



Petaluma General Plan Update

Final Environmental Impact Report State Clearinghouse Number: 2025080378

prepared by

City of Petaluma

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1 Introduction

1.1 Final EIR Contents

This Final Environmental Impact Report (Final EIR) has been prepared for the City of Petaluma to evaluate the potential environmental impacts of the proposed City of Petaluma General Plan Update, referred to herein as the proposed project or General Plan Update ("proposed project" or "project").

As prescribed by the California Environmental Quality Act (CEQA) *Guidelines* Sections 15088 and 15132, the lead agency (the City) is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR (incorporated by reference) comprises the Final EIR for this project. This Final EIR includes individual responses to each letter received during the public review period for the Draft EIR. In accordance with CEQA *Guidelines* Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

The City has provided a good faith effort to respond to all significant environmental issues raised by the comments. The Final EIR also includes amendments to the Draft EIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft EIR. The Final EIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR, which also includes a list of all commenters and public comment letters
- Section 3: Revisions to the Draft EIR
- Section 4: Mitigation Monitoring and Report Program

1.2 Draft EIR Public Review Process

The City of Petaluma distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on August 8, 2025, and ending on September 8, 2025. In addition, the City held an EIR Scoping Meeting on August 21, 2025. The meeting, held at 6:00 PM, was aimed at providing information about the proposed project to members of public agencies, interested stakeholders, and residents/community members. The meeting was held in person at the Petaluma Community Center Activity Room at 320 North McDowell Boulevard. The City received 17 written comments in response to the NOP during the public review period, as well as various verbal comments during the EIR Scoping Meeting. The NOP is presented in Appendix A of the Draft EIR and NOP comments were addressed, as appropriate, in the Draft EIR (refer to Table 1-1, beginning on page 1-4 of the Draft EIR).

The City published a Notice of Availability (NOA) of the Draft EIR on March 27, 2026, and filed a Notice of Completion (NOC) with the Governor's Office of Land Use and Climate Innovation (LCI) to begin the 45-day public review period (Public Resources Code Section 21161), which began on March 27, 2026, and ended on May 18, 2026. The Draft EIR was made available on the City's project website (<https://www.planpetaluma.org/eir>). The NOA was filed with the Sonoma County Clerk, and emailed to individuals who requested written notifications related to the project. As a result of these notification efforts, written and verbal comments on the content of the Draft EIR were received, including comment letters from agencies, community organizations, and individuals, including verbal public comments at the Planning Commission hearing on April 28, 2026, and the City Council hearing on May 18, 2026. Section 2, *Responses to Comments on the Draft EIR*, identifies these commenting parties, their respective comments, and responses to these comments.

1.3 EIR Certification Process and Project Approval

Before acting on the proposed project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency. Following certification of an EIR, the lead agency may make a decision on the project analyzed in the EIR. In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). Per Public Resources Code Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (*CEQA Guidelines* Section 15093).

When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (*CEQA Guidelines* Section 15091[d]).

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify "significant new information." Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR amendments presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

2 List of Commenters

This section includes comments received during public circulation of the Draft Environmental Impact Report (EIR) prepared for the Petaluma General Plan Update (project).

The Draft EIR was circulated for a 52-day public review period that began on March 27, 2026 and ended on May 18, 2026. The City of Petaluma received 54 comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

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2.1 Comments and Responses

The comment letters and responses follow. The comment letters are numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by ~~strikeout font~~ (strikeout font) where text was removed and by underlined font (underlined font) where text was added. These changes in text are also included in Section 3, Revisions to the Draft EIR.

2.2 Master Responses

This subsection includes master responses to recurring written comments made by numerous commenters on the same issue. The master responses are intended to provide a single, comprehensive response to the issues raised. Responses to specific comment letters may refer the commenter to one or more of the master responses presented herein. As a general introduction, it should be noted that the conclusions presented in the Final EIR on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this RTC document. The City acknowledges that some commenters disagree with some conclusions in the EIR. As stated in Section 15151 of the *CEQA Guidelines*, disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. This practice is followed in this RTC document.

Master Response 1: Increased Height Limits

Several commenters expressed concerns that the proposed project would allow for heights of up to eight stories near the SMART Train Station. Specifically, commenters expressed concerns about how this would impact historic structures in this area and the historic downtown district and that this type of development could impact the character of Petaluma.

Several commenters also expressed concerns about the potential for increased traffic associated with high rise development and the potential impact to parking.

Several commenters also expressed concern about the ability for existing infrastructure, such as roads, water, and sewer to withstand additional population associated with high rise development and the impact of an eight-story development on public services.

The EIR analyzes the proposed General Plan and its associated environmental issue areas on a programmatic level. Pursuant to the proposed General Plan land use pattern, the Draft EIR analyzes potential eight-story development as would be allowed by the Station Mixed Use land use designation and as proposed on one parcel near the SMART Train Station, including potential effects on historic structures and downtown character, transportation, and infrastructure and public services; however, these topics are evaluated at a programmatic level consistent with CEQA requirements for General Plan EIRs. It does not include a parcel-by-parcel analysis or analysis of specific development projects. Rather than evaluating individual sites, the EIR evaluates the overall impacts of the development capacity allowed under the proposed General Plan in a comprehensive and holistic manner. A recent case, *Committee for Tiburon LLC v. Town of Tiburon*, (2026) held that an EIR for a general plan did not have to analyze site-specific environmental impacts of potential development for a listed site if the local government was updating its general plan and housing element site inventory, and no specific housing project had been proposed for that site. “When a housing project has not even been proposed, the lack of project-specific details precludes an informed review of environmental impacts and mitigation measures, and deferral of such a review to a site-specific, project-level EIR analysis is appropriate... Accordingly, we hold the trial court erred in granting the Committee's petition based on the failure of the Town's EIR to analyze site-specific impacts of developing housing on Site H.” The Draft EIR does not itself establish or propose specific height limits, but instead evaluates the environmental impacts of the development standards, including height allowances, as proposed in the proposed General Plan. Therefore, no changes to the Draft EIR are required in response to comments which generally express concern with the 8-story height allowance near the SMART train station within the city.

Increased Height Limits Aesthetic Impacts

Impacts to aesthetics, including visual character, is discussed in Section 4.1, *Aesthetics*, of the Draft EIR. As discussed therein under Impact AES-3, new development could affect scenic vistas through obstruction of views, alteration of natural landscapes, and changes to the City's skyline; however, adjusted design standards, such as those that allow for increased building height, would apply to sites

within the city where the location, height and size of the proposed addition is appropriate for the site and existing configuration of the structure, and where the addition is substantially similar in size and height of structures in the immediate vicinity. The areas of the city that would be zoned to have increased height allowances are surrounded by existing development, including multi-story buildings. This would ensure that new development is consistent with its surroundings. Additionally, the land designated for increased height allowances is currently a vacant and is not directly within the downtown core of Petaluma. Potential aesthetic impacts to historic structures would be evaluated at the time a project is proposed and a project-level environmental analysis is prepared. However, due to distance, intervening development, and landscaping of the existing area potential impacts from development in the area to existing historic structures would be reduced. In addition, compliance with proposed land use policies would further reduce impacts to existing historic structures. Specifically, as discussed in Section 4.1, *Aesthetics*, of the Draft EIR, development facilitated by the General Plan would be subject to policies LU-3.1 and LU-10.1 which prioritize infill development and the maintenance of heritage sites to preserve Petaluma's identity. Implementation of these policies would reduce aesthetic impacts associated with increased building height allowances to be less than significant. No revisions to the Draft EIR are required in response to these comments. Moreover, the location of where the eight story height is proposed is on one parcel near the SMART Train Station which is a vacant, infill site within a transit priority area. Public Resources Code Section 21099(d)(1) states that aesthetic impacts shall not be deemed a significant impact for residential, mixed-use residential, or employment centers, which this site is specifically zoned for. No revisions to the Draft EIR regarding aesthetic impacts would be required in response to this comment.

Increased Height Limits Historic Resources Impacts

Impacts to historic resources are discussed in Section 4.5, *Cultural Resources*. As discussed therein under Impact CUL-1, because the project would facilitate new development throughout the Plan Area, the project could potentially impact listed, eligible, or potentially eligible historical resources in the proposed project area. The General Plan includes goals, policies, and actions, such as Goal HR-1, HR-2, and HR-6 Policies HR-1.2, HR-1.3, HR-1.4, HR-2.1, HR-6.1, and HR-6.2, and Actions HR-1.2.1, HR-1.2.2, HR-1.2.3, HR-1.3.1, HR-1.3.4, HR-1.4.1, HR-1.4.2, HR-2.1.2, HR-6.1.1, HR-6.1.2, and HR-6.2.1 which would reduce impacts to historic resources to the extent feasible. Additionally, existing City regulations provide measures for the protection of locally designated individual resources and historic districts and in certain cases historical resources that have yet to be identified. This is accomplished primarily through the certificate of appropriateness process provided in Petaluma Smart Code, Chapter 7 and the requirements of Community and Economic Development Department and Historic and Cultural Preservation Committee project review under Petaluma Implementing Zoning Code, Chapter 15 and City Council Resolution No. 2017 -122 NCS. New development facilitated by the proposed General Plan, including development on parcels where eight stories are allowed, would be subject to the existing regulations which protect historic resources and the proposed General Plan policies, if they are adopted.

As discussed in the Draft EIR, although the existing and proposed regulations provide protection for locally designated known historical resources and procedures to identify and protect historical resources not previously identified, they do not necessarily provide protections for properties that qualify as historical resources pursuant to CEQA that are listed in the NRHP and CRHR, unless they are also on the local register. Nor do the requirements help in all cases to identify and protect potential historical resources that have not been previously identified. While impacts to historical resources would be significant and unavoidable, as discussed in the Draft EIR, this would be due to infill development throughout the city that could be sited near historical resources that have either not been previously identified or which are not on the local register. The significant impact to historical resources would not be due to the height of future development specifically, as height alone is not a negative impact to historical resources. Further, as discussed in the Draft EIR, discretionary projects would undergo separate project-level CEQA review. Therefore, no revisions to the Draft EIR are required.

Increased Height Limits Transportation Impacts

Effective July 1, 2020, state law requires local agencies to analyze vehicle miles traveled (VMT) as the primary metric for evaluating transportation impacts in CEQA documents. (*CEQA Guidelines*, Section 15064.3(c).) Senate Bill 743 amended the CEQA statute to state that roadway congestion generally cannot be considered an environmental impact (Public Resource Code, Section 21099 (b)(2)) and CEQA's implementing Guidelines further direct that "a project's effect on automobile delay shall not constitute a significant environmental effect." (*CEQA Guidelines*, Section 15064.3(a).) Therefore, impacts to traffic congestion associated with increased height limits or more intensive development is not included, and not required to be included, in the EIR analysis. No revisions to the Draft EIR regarding VMT impacts would be required in response to this comment.

As stated above, the Draft EIR is a programmatic document which analyzes the impacts of the proposed General Plan as a whole. Accordingly, the Draft EIR evaluated the project's potential for development of up to eight stories and the resulting effects on roadways within the city. Impacts to roadways within the city are discussed under Impact TRA-1 in Section 4.14, *Transportation*, of the Draft EIR. As discussed therein, the proposed project would result in increased use of roadway facilities within Petaluma. The proposed General Plan includes actions TP-1.1.1, TP-1.1.2, TP 1.1.3, TP 1.1.6, TP 3.3.3, TP 4.1.1, TP4.4.2, TP 5.2.3, and TP 5.5.4 which would guide future development and maintenance of roadways within the city. Additionally, these actions focus on enhancing existing connections and multimodal options rather than expanding roadway capacity. As discussed in the Draft EIR, roadway improvements are funded through the City's TIF program, which allocates up to 100% of eligible project costs for roadway related capital improvements, thereby ensuring that new development would fund roadway improvements proportionate to its impact. This would ensure that new development throughout the city helps fund roadway improvements and that impacts to roadway facilities would be less than significant. No revisions to the Draft EIR regarding roadway impacts would be required in response to this comment.

Lastly, it should be noted that parking impacts, such as whether a project provides adequate parking, are exempt from CEQA review. As stated in *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App. 656 at 697, "The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality is. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. An EIR need only address the secondary physical impacts that could be triggered by a social impact." As such, parking scarcity alone does not constitute a significant impact on the environment. Instead, projects must be looked at on a case-by-case basis to determine whether there are secondary impacts related to scarcity of parking (See, *Save Our Access-San Gabriel Mountains v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8). Similarly, Public Resources Code Section 21099(d)(1) provides that parking impacts of residential, mixed-use residential, and employment center projects on infill sites within a transit priority area shall not be considered significant environmental impacts under CEQA. Increased height locations may qualify under Public Resources Code section 21099(d)(1). Accordingly, the potential parking effects associated with allowing additional height in these transit-oriented infill areas are not treated as significant CEQA impacts. Secondary impacts were considered in Section 4.3, *Air Quality*, and Section 4.14, *Transportation*, of the Draft EIR. No revisions to the Draft EIR regarding parking impacts would be required in response to this comment.

Increased Height Limits Public Services Impacts

As discussed above, the Draft EIR is a programmatic document intended to analyze the proposed General Plan's impacts to public services as a whole. Accordingly, impacts to public services such as police, fire, and schools associated with increased heights are included in Section 4.13, *Public Services and Recreation*, of the Draft EIR. As discussed therein, compliance with proposed policies in the General Plan Update, Petaluma Municipal Code Title 19, and required discretionary review for future projects facilitated by the General Plan Update would minimize adverse environmental effects associated with the provision of new or physically altered fire, police, or library facilities. The Draft EIR determined that impacts to

public services would be less than significant. No revisions to the Draft EIR regarding public services would be required in response to this comment.

Master Response 2: General Opposition

Several commenters expressed general opposition to the proposed General Plan Update but did not raise any significant environmental issues related to the adequacy of the environmental impact analysis; and/or objected generally regarding the adequacy of the environmental impact analysis but did not provide a specific basis to support the asserted inadequacy.

Pursuant to CEQA, all comments received during the public comment period, including personal opinions expressing general support for, or opposition to, the proposed project are noted and included in this Final EIR for consideration by the City, but do not require a specific written response if they do not relate to a significant environmental issue that is addressed within the Draft EIR and/or otherwise within the purview of CEQA. For example, comments objecting to an increase in density, but which do not identify specific adverse impacts to the environment as a result of that density will be shared with the decision-makers, but do not raise environmental issues that require a specific response.

Similarly, comments generally objecting to the proposed General Plan, or questioning the City's planning process, do not raise issues related to the proposed project's impact on the physical environment that require a specific response pursuant to CEQA. Likewise, opinions about the general desirability, merits, and/or purely economic, social, or political considerations of the proposed project are not within the purview of CEQA and do not require a specific written response in this Final EIR.

In cases where the commenter provides an opinion and/or generalized concerns about the merits of the proposed project but does not identify any particular issue concerning the sufficiency of the Draft EIR, the City notes the opinion in this Final EIR for informational purposes and for consideration by the decisionmakers, who will consider all comments. Where a commenter offers unsubstantiated assertions about a significant environmental issue or the adequacy of the Draft EIR, the City notes the assertion in this Final EIR for informational purposes. Therefore, no changes to the Draft EIR are made in response to these comments.

While the City does not provide individual responses to each general opposition comment, each comment is part of the administrative record on the proposed project and will be forwarded to City decision-makers for consideration as part of the public hearing process. In this regard, the City will review, evaluate, and consider, all comments received as part of the decision-making process

Master Response 3: Comments on the Draft General Plan

Several commenters recommended edits to proposed General Plan goals, policies, and actions referenced in the Draft EIR. Several commenters also expressed concerns with the proposed land use plan, designations of certain parcels within the city according to the proposed land use plan, and recommended text edits be made to the Draft General Plan.

The EIR analyzes the proposed General Plan and its associated environmental issue areas on a programmatic level. CEQA requires that comments that raise significant environmental issues on the findings of the Draft EIR be responded to; however, CEQA does not require that the City respond to all comments received. (CEQA Guidelines Sections 15088(c), 15132(d), 15204(a)). Moreover, the City is not required to conduct every test or perform all research, studies, or investigations that commenters suggest (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15204(a)). An EIR need not provide all information reviewers request, as long as the report, when looked at as a whole, reflects a good faith effort at full disclosure (CEQA Guidelines Section 15204(a)). Pursuant to CEQA, all comments received during the public comment period, including comments on the Draft General Plan, are noted and included in this Final EIR for consideration by decision makers, but do not require a specific written response as they do not relate to a significant environmental issue that is addressed within the Draft EIR and/or otherwise within the purview of CEQA. Comments on the draft General Plan document are not relevant to the CEQA

analysis or findings included in the Draft EIR. Therefore, no changes to the Draft EIR are made in response to these comments.

Master Response 4: Recirculation

Several commenters suggest revisions and edits or indicate recirculation of the Draft EIR. As previously noted in Section 1.4 of Chapter 1, *Introduction*, of the Final EIR, under CEQA, recirculation is only required when the lead agency adds “significant new information” to an EIR after the public comment period and prior to certification of the EIR (*Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1128). “Information” can include changes in the project or environmental setting, as well as additional data or other information (CEQA Guidelines Section 15088.5(a)).

CEQA Guidelines Section 15088.5(a) further provides: New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, the California Supreme Court interpreted this “significant new information” standard and rejected the proposition that “any new information” triggers recirculation; recirculation is intended to be an exception, not the general rule. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an otherwise adequate EIR. In response to comments received on the Draft EIR, information was added to the EIR to clarify an issue or expand on a topic. Those revisions are detailed in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR. None of the revisions presented in Chapter 3 require recirculation of the Draft EIR.

Letter 1

CEQA COMMENT LETTER

City of Petaluma General Plan Update
Draft Environmental Impact Report (EIR)

Submitted by:
Ernest Theodore Cabral
Trustee, The Cabral Family Trust

Property:
[REDACTED] Industrial Avenue
Petaluma, California

Subject: Comments on Draft EIR – City of Petaluma General Plan Update (Floodplain Policies)

Dear City of Petaluma Planning Team,

I am the trustee of The Cabral Family Trust, which owns the properties located at 1365 and 1375 Industrial Avenue in Petaluma. These parcels are directly affected by the floodplain-related land use policies currently under consideration as part of the General Plan Update (GPU). I appreciate the opportunity to provide comments on the Draft Environmental Impact Report (EIR).

My comments focus on the adequacy of the environmental analysis related to proposed floodplain development policies and their application to commercially zoned properties such as mine.

1.1

1. Inadequate Project Description and Policy Definition

The Draft EIR references forthcoming flood-related development policies; however, City staff have acknowledged that these policies are still being developed and are not yet fully defined. Without a clear and stable policy framework, the environmental analysis is inherently speculative.

CEQA requires a stable and accurate project description to allow meaningful evaluation of impacts. The absence of clearly defined floodplain policies limits the ability of the public and decision-makers to fully understand the scope and consequences of the proposed changes.

2. Lack of Substantial Evidence Supporting Parcel-Level Restrictions

Publicly available flood modeling, including end-of-century projections, indicates that the subject property is located within an area of minimal inundation, generally less than 0.5 feet in depth. In contrast, nearby areas exhibit significantly greater flood depths.

The Draft EIR does not appear to differentiate between areas of minimal inundation and areas of substantial flood risk when proposing broad floodplain development restrictions. This lack of differentiation raises concerns regarding whether the proposed policies are supported by substantial evidence at the parcel level.

1.2

Given the relatively shallow inundation projected for this site, it is not evident that the property would function as a critical flood storage or conveyance area.

3. Unclear and Potentially Inconsistent Use of Flood Modeling

During discussions with City staff, multiple flood modeling scenarios were referenced, including mid-century and end-of-century projections, with uncertainty as to whether these align with models under review by FEMA.

The Draft EIR does not clearly identify which models form the basis for policy decisions or how these models are being applied to specific parcels. If additional modeling or assumptions are being relied upon, they should be disclosed and evaluated in the EIR.

Without this clarity, it is difficult to determine whether the proposed policies are based on consistent and reliable data.

1.3

4. Failure to Consider Feasible Alternatives

The Draft EIR does not appear to evaluate feasible alternatives that would achieve flood protection objectives while allowing continued productive use of commercially zoned properties.

For parcels such as mine, where modeled inundation is minimal, alternatives could include site-specific mitigation measures, elevation strategies, floodproofing techniques, and engineered solutions.

These approaches may allow development to proceed while still meeting flood management goals. The absence of such analysis suggests that the range of alternatives evaluated in the Draft EIR may be incomplete.

1.4

5. Land Use and Economic Displacement Impacts

The subject property has a long history of supporting productive commercial uses, including a new and used vehicle dealership that generated significant sales tax revenue, employment, and economic activity for the City.

The proposed policies would substantially constrain or eliminate the ability of the property to support similar uses in the future. This reduction in viable use has broader land use implications, including the displacement of development to other locations that may be less appropriate from an environmental and infrastructure standpoint.

The Draft EIR does not appear to adequately evaluate these indirect land use and environmental consequences.

1.5

6. Reduction in Viable Use and Property Devaluation

By restricting commercially zoned land without clear parcel-specific justification, the proposed policies would substantially diminish the economic utility of the property.

This reduction in viable use is not only a private impact but also has broader implications for efficient land use, economic productivity, and the City's long-term fiscal sustainability. The Draft EIR does not appear to assess how these policies affect the functional utility of commercially zoned land or the resulting environmental impacts associated with displaced economic activity.

1.6

7. Policy Consistency and Objective Analysis

Statements made during discussions with City staff suggest that certain types of development may be discouraged based on broader planning preferences.

While long-term planning goals are important, CEQA requires that environmental impacts be evaluated based on substantial evidence and objective analysis.

1.7

8. Timing and Application of Future Policies

City staff have indicated that forthcoming policies may influence how development proposals are evaluated in the near term.

The Draft EIR should clearly describe how and when these policies will be implemented, and whether they may be applied to projects initiated under existing regulations.

1.8

9. Recommended Refinement to Proposed Floodplain Policies

The City should refine the proposed buffer approach to reflect differences in modeled flood depth.

Areas demonstrating minimal inundation (less than 0.5 feet), such as the subject property, should be evaluated for differentiated treatment or exclusion from broad development restrictions.

This approach aligns policy with actual risk and avoids unnecessary economic and land use impacts.

1.9

See Exhibit A.

10. Personal and Practical Impact

This property represents a significant portion of my family's financial stability, including supporting my elderly mother's living situation and my long-term retirement planning.

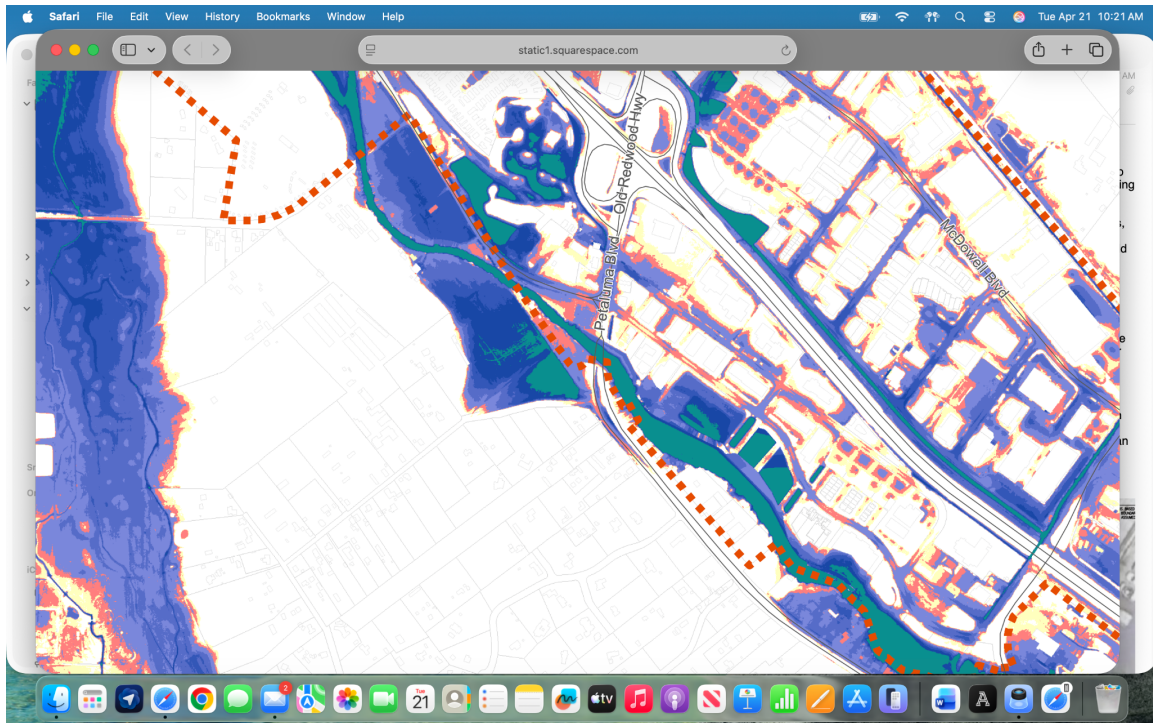
Conclusion

The Draft EIR should be revised and recirculated to address these issues and ensure policies are supported by substantial evidence.

Sincerely,
Ernest Theodore Cabral
Trustee, The Cabral Family Trust

1.9 cont.

Exhibit A – End-of-Century Flood Map



Letter 1

Commenter: Ernest Theodore Cabral, The Cabral Family Trust

Date: April 30, 2026

Response 1.1

The commenter identifies themselves as a trustee of the Cabral Family Trust, which owns the properties located at 1365 and 1375 Industrial Avenue, and states these parcels would be affected by the floodplain-related land use policies in the General Plan Update. The commenter opines that the analysis in the Draft EIR is speculative, as the Draft EIR references flood-related development policies that are not yet fully defined.

It is unclear which specific flood-related development policies the commenter is referring to. The General Plan Update includes several goals and policies related to floods and floodplain development, which are listed under Impact HYD-4 in Section 4.9, *Hydrology and Water Quality*, of the Draft EIR. As discussed therein, implementation of these goals and policies would strengthen the City's existing flood protection and flood resilience policy framework across the Plan Area by tracking flood patterns, modeling climate change, assessing future flood risk, and developing a flood adaptation master plan. Furthermore, as discussed under Impact HYD-4 in Section 4.9, *Hydrology and Water Quality*, of the Draft EIR, the General Plan Update's Flood Resilience Element includes flood regulations and standards such as the requirement to elevate new development at least two feet above the Federal Emergency Management Agency (FEMA) base flood elevation to minimize flood risk; and the requirement for all future development to demonstrate no net increase in flood elevations and no adverse upstream or downstream hydraulic impacts through project-level design and permitting. Compared to the existing General Plan, the General Plan Update includes additional and more protective policies directed at reducing individual and community-wide flood risk, improving flood preparedness, and guiding future development in a manner that accounts for flood hazards and climate-related changes. Accordingly, the General Plan Update would not weaken flood protections or authorize development without regard to flood risk; rather, it would establish a more comprehensive policy framework for addressing those risks over the planning horizon. (See *Krovoza v. City of Davis* (2025) 117 Cal.App.5th 623, relocation of playground equipment did not violate CEQA as it was relocated to a location with less impacts.)

Some of the flood-related policies and actions refer to future and ongoing efforts to establish flood preparedness and resilience; for example, Policy FR-5.1 would involve updating building codes so that new development is required to reduce individual and collective flood risk, and Policy FR-6.2 would involve developing flood protection strategies and mitigation. Implementation of these policies, and others, would result in future changes to the Petaluma Municipal Code and other City documents, and the exact changes are not known at this time. That does not render the Draft EIR speculative or inadequate. As discussed under 2.3.2, *General Plan Buildout*, in Chapter 2, *Project Description*, the General Plan Update is a programmatic-level document and does not authorize specific projects. The Draft EIR analyzes potential environmental effects of the General Plan Update at a programmatic level over approximately the next 20 years. This level of analysis is appropriate because the General Plan Update establishes a policy framework rather than site-specific standards. CEQA recognizes that a program EIR may evaluate a broad planning document, such as a general plan, at a level of detail commensurate with the level of detail in the plan itself, and that later implementing actions may receive subsequent, tiered, or project-level review when more specific information is available. (See CEQA Guidelines, Section 15168; *In re Bay-Delta etc.* (2008) 43 Cal.4th 1143, 1169–1170; *Committee for Tiburon LLC v. Town of Tiburon* (2026) 118 Cal.App.5th 259 [program EIR for general plan/housing element update was not required to conduct site-specific environmental review before a specific project was proposed].)

While implementing measures will be refined through future studies and ordinances, the Draft EIR evaluates the reasonably foreseeable effects of strengthening flood resilience based on available information. CEQA does not require detailed speculation about the exact form of future regulations; instead, it requires a good-faith assessment of potential impacts. Nor does CEQA require an EIR to

analyze hypothetical future code amendments or development standards in a level of detail that is not yet reasonably foreseeable. (See *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 398 [future environmental effects need be analyzed only if they are reasonably foreseeable and likely to be significant]). The Draft EIR discloses the policy direction and evaluates how these measures would generally reduce flood risk. Any future code amendments or implementing actions would undergo additional environmental review, as appropriate. Accordingly, the Draft EIR provides sufficient information to evaluate the potential environmental effects of the General Plan Update. No revisions to the Draft EIR would be required in response to this comment.

Response 1.2

The commenter states that the properties at 1365 and 1375 Industrial Avenue are located within an area of minimal inundation risk, while nearby areas would have significantly greater flood depths. The commenter states the Draft EIR does not differentiate between areas of minimal or substantial flood risk, and questions if the proposed policies are supported by substantial evidence at the parcel level.

As discussed within Section 4.9, *Hydrology and Water Quality*, under subsection 4.9.1.e. *Flood Hazards and Sea Level Rise*, the most frequent flooding occurs along the Petaluma River. Other smaller areas susceptible to flooding occur along Lakeville Highway and Casa Grande Road, and the City has established a floodway district to zone areas within the city consistent with FEMA requirements for areas identified as Floodway as part of adopted Flood Insurance Rate Maps (FIRMs). In addition, the General Plan includes Floodplain designations, distinct from Floodway designations, that would also be consistent with FEMA FIRM mapping. As discussed in Impact HYD-4 Section 4.9, *Hydrology and Water Quality*, development on the flood plain would be required to comply with Section 6.070 of the Petaluma Municipal Code. Future development within a Floodway or Floodplain designation would be required to comply with applicable General Plan Flood Resilient Element policies as listed in the Draft EIR. Further, as discussed in the same section, the City of Petaluma conducted additional flood hazard and sea level rise modeling that project mid-century and end of century flooding and sea level rise scenarios.

As discussed in Response 1.1, the analysis in the Draft EIR is programmatic and does not evaluate flood risk at the parcel level. As the General Plan Update establishes citywide policy direction rather than site-specific standards, the Draft EIR relies on regional data to identify overall flood risk patterns rather than differentiating risk at individual parcels. The Draft EIR considers broader and potentially changing flood risks, including climate change and sea level rise, and evaluates policies intended to address these conditions across the Plan Area. Any future actions affecting specific parcels would be subject to more detailed, site-specific review. (See, *Committee for Tiburon LLC v. Town of Tiburon* (2026) 118 Cal.App.5th 259 program EIR for general plan/housing element update was not required to conduct site-specific environmental review before a specific project was proposed]. No revisions to the Draft EIR would be required in response to this comment.

While the EIR is programmatic and does not analyze on a parcel specific level, the property referenced by the commenter is within the Floodway as currently identified on the adopted FEMA FIRM. The General Plan Update does not include a change to that designation. A change to the designation would only occur as periodically updated through the FEMA review and adoption process.

Response 1.3

The commenter states it is unclear which flood modeling is used to inform the Draft EIR analysis and how modeling is being applied to specific parcels.

As discussed within Section 4.9, *Hydrology and Water Quality*, under subsection 4.9.1.e. *Flood Hazards and Sea Level Rise*, the City of Petaluma conducted flood hazard and sea level rise modeling that project mid-century and end of century flooding and sea level rise scenarios. The sea level rise and flooding maps, which were modeled by Sherwood Engineering and West Consultants using a hydrologic model of the Petaluma River watershed that was developed using HEC-HMS version 4.9 to compute outflow hydrographs for 154 subbasins comprising the Petaluma River watershed. Maps were prepared for mid-

century rain and storm surge and king tides; end of century rain and storm surge and king tides at 3.4 feet and 6.9 feet of sea level rise; and 100-year and 500-year floods and are available via <https://cityofpetaluma.org/flood-management/>. As discussed under Impact HYD-4 in Section 4.9, *Hydrology and Water Quality*, the modeling shows that mid-century flood risk would be similar to existing conditions. No revisions to the Draft EIR would be required in response to this comment.

Response 1.4

The commenter expresses concern that the Draft EIR does not evaluate alternatives that would achieve flood protection objectives while allowing continued productive use of commercial properties and suggests site-specific measures to facilitate development while meeting flood management goals.

The comment does not identify a specific alternative, proposed policy language, mapped area, development standard, or site-specific design measure for the City to evaluate. Accordingly, the City has no concrete alternative to compare against the proposed General Plan Update or the alternatives analyzed in Chapter 6, *Alternatives*, of the Draft EIR. As discussed under Impact HYD-4 in Section 4.9, *Hydrology and Water Quality*, future development in the FEMA 100 year floodplain, floodway, or zero net fill zone, would continue to be guided by the City's existing flood resilience strategies, including the enforcement of heightened regulations designed to minimize flood risk for development as defined in the General Plan Update. The Draft EIR ultimately determined that impacts as a result of the proposed General Plan Update would be less than significant.

Further, the Draft EIR evaluates the program-level impacts of the General Plan Update and, consistent with *CEQA Guidelines* Section 15126.6, considers a reasonable range of alternatives capable of meeting most of the project objectives. Accordingly, under CEQA, the Draft EIR does not require consideration of every conceivable alternative that could achieve flood protection objectives. Rather, CEQA requires analysis of a reasonable range of alternatives that would feasibly attain most of the project's basic objectives while avoiding or substantially lessening significant environmental effects. As discussed in Chapter 6, *Alternatives*, of the Draft EIR, three alternatives are considered. The selection of alternatives included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the proposed project, do not meet basic proposed project objectives, or are not feasible to implement were eliminated from further consideration.

In this context, site-specific measures to facilitate development while meeting applicable flood management goals are more appropriately addressed during future development at the project level, consistent with existing regulatory requirements and General Plan policies. Future development proposals on individual properties will necessarily depend on site-specific conditions, including parcel location, existing and proposed uses, floodplain or floodway status, elevation, grading, access, zero-net-fill requirements, applicable building code requirements, and other regulatory constraints. Those details are not known at this programmatic stage and would be evaluated, as appropriate, when a specific development application or implementing action is proposed. No revisions to the Draft EIR would be required in response to this comment.

Moreover, the level of detail in this response is also appropriate given the general nature of the comment. CEQA requires a good-faith, reasoned response to comments raising significant environmental issues, but the level of detail in the response may correspond to the level of detail in the comment. (CEQA Guidelines, Section 15088, subd. (c).) Because the comment generally suggests that the City should consider ways to balance flood protection with continued commercial use, but does not identify a specific alternative or measure, a more detailed comparative analysis is not required.

Response 1.5

The commenter expresses concern regarding potential economic impacts related to implementation of the proposed flood protection goals, policies, and actions in the General Plan Update. The commenter suggests the proposed policies may result in the displacement of development to other locations, and opines the Draft

EIR does not adequately analyze these land use impacts. Impacts related to land use are analyzed in Section 4.10, *Land Use and Planning*, of the Draft EIR. As discussed therein, implementation of the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required and is not included in the Draft EIR.

As discussed under Impact HYD-4 in Section 4.9, *Hydrology and Water Quality*, the proposed land use changes in the General Plan Update would generally decrease allowable land use intensity for some parcels adjacent to the River, and includes new land use designations for several parcels along the Petaluma River that are within flood and tsunami hazard zones. The overall intent of the proposed policies and land use changes is to prepare Petaluma for current and future flood risks, and to strike a balance between allowing the community to evolve and grow while providing for the future needs of Petaluma by reducing impacts from flood risk. Further, as discussed in Response 1.4, existing uses would be allowed to continue to operate under current conditions as legal conforming or nonconforming uses, consistent with the City's zoning ordinance and floodplain management regulations. No revisions to the Draft EIR would be required in response to this comment.

Response 1.6

The commenter expresses concern that the proposed flood-related policies would diminish the economic utility of property within flood hazard areas.

Refer to Response 1.4. As discussed therein, the General Plan Update would not require the removal or retroactive modification of existing, legally established land uses within flood hazard areas. Existing uses, including commercial and industrial operations within the floodplain, would be allowed to continue to operate under current conditions as legal conforming or nonconforming uses, consistent with the City's zoning ordinance and floodplain management regulations. No revisions to the Draft EIR would be required in response to this comment.

Response 1.7

The commenter states City staff indicated that certain types of development may be discouraged based on broader planning preferences. The commenter states that environmental impacts under CEQA should be evaluated with substantial evidence and objective analysis.

As discussed under 2.3.2, *General Plan Buildout*, in Chapter 2, *Project Description*, the General Plan Update is a programmatic-level document and does not authorize specific projects. The Draft EIR analyzes potential environmental effects of the General Plan Update at a programmatic level. Future development in Petaluma that requires discretionary approval would be subject to CEQA review. No revisions to the Draft EIR would be required in response to this comment.

Response 1.8

The commenter states City staff indicated that the proposed policies in the General Plan Update may influence how development proposals are evaluated in the near term. The commenter suggests the Draft EIR should clearly describe how and when policies would be implemented and applied to development projects.

Refer to Response 1.1. As discussed therein, the General Plan Update is a programmatic-level document and analyzes potential environmental effects of the General Plan Update at a programmatic level. This level of analysis is appropriate because the General Plan Update establishes a policy framework rather than site-specific standards. While implementing measures will be refined through future studies and ordinances, the Draft EIR holistically evaluates the reasonably foreseeable effects of project implementation based on available information. CEQA does not require detailed speculation about the exact form of future regulations; instead, it requires a good-faith assessment of potential impacts. Any

future code amendments or implementing actions would undergo additional environmental review, as appropriate. No revisions to the Draft EIR would be required in response to this comment.

Response 1.9

The commenter suggests the City should refine the proposed buffer approach in modeling flood depth, and areas with minimal inundation risk should be excluded from broad policies. The commenter explains their personal interest in the General Plan Update and concludes their comments.

Refer to Response 1.1. As discussed therein, the General Plan Update is a programmatic-level document and analyzes potential environmental effects of the General Plan Update at a programmatic level. This level of analysis is appropriate because the General Plan Update establishes a policy framework rather than site-specific standards. Future development would be evaluated on a project-by-project basis to determine consistency with General Plan policies and to assess site-specific environmental conditions, including flood risk and potential inundation depths. Where discretionary approvals are required, project-level environmental review under CEQA would occur. No revisions to the Draft EIR would be required in response to this comment.

The commenter references the “proposed buffer approach” in reference to flood modeling. However, there is not a flood related buffer proposed in the General Plan Update. It may be that the commenter is referencing the Buffer and Resilience Areas in the upstream sector (past the weir) as outlined in Table LU-6 of the General Plan. This buffer is established consistent with the City’s existing River Access and Enhancement Plan and for the purposes of protecting water quality, preventing erosion, stabilizing the riverbank, and creating future trails, pathways, and public access along the Petaluma River. This buffer is not based on flood depth or inundation risk. Additionally, specific language for the Buffer Areas specifies that lot specific vested development rights may be transferred elsewhere on the lot to cluster development outside of the Buffer Area. Additionally, vacant parcels that are entirely within the Buffer Area are allowed development pursuant to vested rights and located as far from the river as possible.

The location and extent of the River Buffer and related resilience areas reflect a policy determination in the General Plan Update regarding the appropriate long-term relationship between development, public access, habitat protection, water quality, bank stabilization, and the Petaluma River. The Draft EIR analyzes the reasonably foreseeable environmental effects of that policy framework at a programmatic level. The comment does not identify substantial evidence that use of the River Buffer would result in a new significant environmental impact, a substantially more severe impact than disclosed in the Draft EIR, or a deficiency in the Draft EIR’s analysis. Nor does the comment identify how an alternative buffer location would avoid or substantially lessen a significant environmental impact of the General Plan Update. Accordingly, no revisions to the Draft EIR are required in response to this comment.



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 2, 2026

Olivia Ervin
Principal Environmental Planner
City of Petaluma
11 English Street
Petaluma, CA 94952
planpetaluma@cityofpetaluma.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF PETALUMA
GENERAL PLAN UPDATE DATED MARCH 27, 2026, STATE CLEARINGHOUSE
NUMBER [2025080378](#)

Dear Olivia Ervin,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the City of Petaluma General Plan Update (Project). The proposed Project consists of an update to the City's General Plan which will serve as a long-term framework for future growth and development. The General Plan represents the community's view of its future and contains the goals and policies upon which the City Council, Planning Commission, staff, and the entire community base their land use and resource decisions. To provide a contemporary plan that will guide the community, the General Plan is being updated to reflect changes in the community, new issues and opportunities, changes in State law, and new trends. DTSC recommends and requests consideration of the following comments:

1. There are several areas of which DTSC has regulatory oversight over that are within the City of Petaluma General Plan Update, whether they are listed as having documented contamination, land use restrictions, are subject to a

2.1

Hazardous Waste Facility Permit, or the potential for the Project site to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends further coordination with the Department in the event that the proposed Project may impact any of the areas that may fall under DTSC's oversight. Please review the Project area in [Petaluma, CA EnviroStor](#); DTSC's public-facing database and coordinate with the Department if any suspected decisions may impact these areas of which DTSC oversees.

2.1
cont.

2. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#). Furthermore, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing soil/fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material is suitable for the intended land use. The sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.
3. If any hazardous waste or hazardous materials are discovered during any phase of the Project, DTSC recommends the City of Petaluma enter into a voluntary agreement to address contamination on the property or receive oversight from a [self-certified local agency](#), DTSC or the Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact the relevant [Regional Brownfield Coordinator](#) for your Project.

2.2

2.3

DTSC appreciates the opportunity to comment on the DEIR for the City of Petaluma General Plan Update. Thank you for your assistance in protecting California's people

Olivia Ervin
April 2, 2026
Page 3

and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [the CEQA Review email](#) for additional guidance.

2.3
cont.

Sincerely,



Dave Kereazis
Associate Environmental Planner
HWMMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
[REDACTED]

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Gianna Meschi
Project Manager
Rincon Consultants, Inc. / Consulting Firm
[REDACTED]

Tamara Purvis
Associate Environmental Planner
HWMMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
[REDACTED]

Scott Wiley
Analyst II
HWMMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
[REDACTED]

Letter 2

Commenter: Dave Kereazis, Department of Toxic Substances Control

Date: April 2, 2026

Response 2.1

The commenter provides a summary of the proposed project and introduces their comments. The commenter states there are several areas of the City for which the Department of Toxic Substances Control (DTSC) has regulatory oversight, and recommends further coordination with DTSC in the event that the project impacts any of these areas.

As discussed under 2.3.2, *General Plan Buildout*, in Chapter 2, *Project Description*, the General Plan Update is a programmatic-level document and would not authorize specific projects. The Draft EIR analyzes potential environmental effects of the General Plan Update at a holistic level. If an individual project facilitated by the General Plan Update is located on a hazardous materials site or on a site that DTSC has regulatory oversight over, further environmental review of the project would occur and coordination with DTSC and/or other regulatory agencies would be required, as applicable. No revisions to the Draft EIR would be required in response to this comment.

Response 2.2

The commenter recommends that imported soil/fill material be documented and tested, and provides additional information regarding preliminary assessment and advisories regarding imported fill material.

As discussed in Section 4.8, *Hazards and Hazardous Materials*, of the Draft EIR, the General Plan includes specific actions including SAF-10.1.3 and SAF-10.5.1 that address treatment of soil and fill that would be required at the time a specific project is proposed.

Refer to Response 2.1. The General Plan Update would not authorize specific projects. Individual projects facilitated by the General Plan Update would comply with imported soil/fill material requirements in California Public Health and Safety Code as applicable. No revisions to the Draft EIR would be required in response to this comment.

Response 2.3

The commenter recommends the City of Petaluma enters a voluntary agreement to address contamination if hazardous waste or materials are discovered during project implementation.

Refer to Response 2.1. The General Plan Update would not authorize specific projects. If hazardous waste or materials are discovered during construction of an individual project facilitated by the General Plan Update, site remediation activities and regulatory oversight would occur as required. Further, as discussed in Section 4.8, *Hazards and Hazardous Materials*, of the Draft EIR, discretionary development would be required to implement Mitigation Measure HAZ-1. This mitigation measure would require preparation of a Phase I Environmental Site Assessment prior to the issuance of grading or building permits, and may require additional coordination and/or oversight with an applicable regulatory agency. No revisions to the Draft EIR would be required in response to this comment.

Letter 3

From: David Donnenfield <[REDACTED]>

Sent: Tuesday, April 28, 2026 12:15 PM

To: Petaluma Planning <petalumapanning@cityofpetaluma.org>; [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Barnacle, Brian

<[REDACTED]>; -- City Clerk <[REDACTED]>; John Shribbs

<[REDACTED]>; Janice Cader-Thompson <[REDACTED]>;

Quint, Frank <[REDACTED]>

Subject: Structure Height Framework around Downtown Station

You don't often get email from [REDACTED]. Learn why this is important

Planning Commissioners and CC Members,

It appears that there has been a last-minute change to construction height limitation recommendations by the Petaluma CC and the Planning Commission. This, in reference to the affordable housing complex to occupy space near the Smart Train downtown station. The six-story limit that was agreed upon and recommended previously by the Planning Commission has been expanded to eight stories, resulting in structures 90 feet tall.

At that height, these will not just be prominent structures, they will be domineering ones. They will add bulk, obstruct viewsheds, increase density, and otherwise be an aesthetic

3.1

oddball to the scale of our existing downtown structures. Additionally, as I understand it, the difference in construction costs between six stories and 8 stories is considerable. It seems to me that the additional cost and the impact on infrastructure will likely not be offset by any economies of scale, but quite the opposite. It holds the prospect of making what is advertised as "affordable" housing anything but affordable.

3.1 cont.

Why would the commission and the city council attempt this late-in-the-game alteration to such an important condition as new construction height when we just came out of a highly contentious and acrimonious struggle over another downtown project's bulk and height? I actually supported the new hotel construction project, but also saw merit in wrestling over its specifications. In the end, I'm glad it's going ahead. A reasonable accommodation was reached and the result will be a boost to the downtown's vitality.

That will not be the case if the eight-story height limit is permitted. That will be an abomination to the modesty of our town's skyline and the scale of the downtown's existing structures. Six stories is not only sufficient, it is smart in terms of restraining construction costs and limiting pressures upon our insufficient infrastructure. Do NOT make the mistake of setting this as a precedent we will regret . . . and regret we will.

3.2

Sincerely,

David Donnenfield

Suzan Hahn

David Donnenfield

Petaluma, CA 94954

Letter 3

Commenter: David Donnenfield

Date: April 28, 2026

Response 3.1

The commenter suggests there were changes to the allowable height limits, noting an increase from six to eight stories and referencing the area near the Sonoma-Marín Area Rail Transit (SMART) station. The commenter expresses concern that the taller buildings would be visually out of scale with the surrounding area, obstruct views, and increase density. The commenter also questions if the higher construction costs associated with the added height would offset the project's affordability.

Please refer to Master Response 1. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Response 3.2

The commenter expresses concern that an eight-story building facilitated by the proposed land use designations would be inconsistent with the City's existing skyline and visual character, and could put pressure on existing infrastructure.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Letter 4

From: Veronica Olsen <[REDACTED]>

Sent: Tuesday, April 28, 2026 8:30 AM

To: [REDACTED] <[REDACTED]>; [REDACTED]

<[REDACTED]>; [REDACTED]

<[REDACTED]>; [REDACTED]

<[REDACTED]>;

[REDACTED] <[REDACTED]>; [REDACTED]

<[REDACTED]>; Barnacle, Brian <[REDACTED]>; -- City Clerk

<[REDACTED]>; Petaluma Planning <[REDACTED]>

Subject: Planning Commission: April 28, 2026 - Draft Petaluma General Plan, Public Comment

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

Written Comment: Draft Petaluma General Plan 2026 -

Policy Comments & Response to Draft EIR

Petaluma's Draft General Plan advances important goals, including reinforcing the
Urban Growth Boundary and protecting the city's agricultural edge. The plan reflects
substantial work by staff and the community.

The 90-Foot Station Mixed Use Designation Land Use Element and
Draft EIR

The plan's vision and guiding principles emphasize a neighborhood-scale, human-scale
pattern of development, with careful attention to context, transitions, and views. The
comments below focus on how the proposed ST-MU height standard and related
designations align with that framework.

Public engagement throughout 2024 and early 2025 consistently emphasized walkable
neighborhoods, strong transit connections, and protection of the hills and viewsheds
that define Petaluma's character.

In the fall of 2025, the Council indicated direction aligned with a six-story height framework

4.1

for the Downtown Station. The process then took an unusual turn. Despite community deliberation throughout 2025 and prior Council direction, the item was returned to the Planning Commission on November 20, 2025, at the Commission's suggestion to facilitate further Council consideration. On December 15, 2025, the Council approved Resolution No. 2025-167, establishing the 90-foot designation. The Draft General Plan incorporating this decision was released in March 2026. This hearing represents the first formal public forum at which the 90-foot standard, as included in the plan, can be reviewed and commented upon.

Part A Policy Comment

A.1 ALIGNMENT WITH MARKET CONDITIONS AND AFFORDABLE HOUSING DELIVERY

Economic and Market Analysis Draft GP, p. 5-10

Market-rate higher-density housing products (~4+ stories) are generally not currently financially feasible in Petaluma.

This finding is an important lens for evaluating the ST-MU designation. If four-story construction is currently constrained by market conditions, higher building scales require careful calibration to ensure they produce the intended outcomes particularly with respect to affordable housing delivery.

State density bonus law provides a precise analytical tool for this calibration. California Government Code 65915(d)(2)(D) requires that 100% affordable housing projects within one-half mile of a major transit stop receive an automatic height increase of up to three additional stories or 33 feet above the base entitlement. That bonus is mandatory. The base designation directly determines the development envelope available to affordable developers:

Base

+ Density Bonus*

= Affordable Max

4.1
cont.

4.2

Outcome

6 stories / 65 ft

+ 3 stories

9 stories

Mid-rise scale achievable

within typical affordable

development models

8 stories / 90 ft

+ 3 stories

11 stories

Larger, more complex

building at substantially

higher per-unit cost

* Cal. Gov. Code 65915(d)(2)(D). Mandatory for 100% affordable projects within ½ mile of a major transit stop.

4.2
cont.

A 65-foot base aligns more closely with current financing and construction models for affordable housing, while a 90-foot base introduces additional scale and complexity. A 90-foot base pushes any density bonus project into a building envelope that substantially increases per-unit cost, a threshold that 100% affordable developers, who rely on fixed subsidy levels, typically cannot cross. Clarifying how the proposed height standard supports feasible affordable housing delivery at the SMART station would strengthen alignment with the plan's housing objectives. This argument was raised in community input before adoption and was not addressed in the designation table.

4.3

The claim that 8-story buildings produce affordable housing for teachers, firefighters, nurses, and service workers does not align with California's own housing production record. The Legislature designed its primary streamlined affordable housing law, AB 2011, signed by Governor Newsom in 2022 and amended by AB 2243 in 2024, with a height ceiling of 65 feet near transit. (Cal. Gov. Code 65912.114; AB 2243, Stats. 2024.) Above 85 feet, SB 79 imposes prevailing wage and skilled and trained workforce requirements that raise construction

costs by up to 40 percent, costs that affordable housing financing, which relies on competitive tax credit programs with fixed per-unit subsidy levels, typically cannot absorb. (Cal. Gov. Code 65913.4(a)(8); (AB 2011, citing financial feasibility analysis.) The state's own housing experts have answered this question through statute: 65 feet near transit is where affordable housing production works. 90 feet is where market-rate luxury development works, when markets are strong enough to support it. In Petaluma, the plan's own market analysis finds that even 4-story construction is currently financially marginal (Draft GP, p. 5-10). The claim that 90 feet produces affordable housing in this market is not supported by state law, by the BART production record, or by the plan's own findings.

4.3
cont.

A.2 REGIONAL AND STATE CONTEXT

SB 79, California's most pro-density TOD law, signed October 10, 2025, does not apply to Sonoma County, which does not qualify as an urban transit county under Cal. Gov. Code 65912.156(q). That exclusion itself carries meaning: the Legislature drew a careful line about what transit context warrants urban TOD treatment, and Sonoma County is on the other side of it.

Even within the SB 79 framework, a 90-foot height corresponds only to the most intensive tier and proximity conditions. Petaluma's proposed 90-foot base entitlement exceeds every Tier 2 standard and matches only the maximum Tier 1 adjacent standard—the highest designation in the law. SMART corridor peers operate at significantly lower scales. Where a local approach differs at this scale, articulating the rationale within the plan strengthens its policy foundation.

4.4

Jurisdiction

Max Height at

Station

Note

California State Law SB 79 (eff. July 1, 2026) Cal. Gov. Code 65912.155

Tier 1 (heavy rail), adjacent

95 ft

Highest standard in law. Incl. 20 ft intensifier.

Tier 1, within mile

75 ft

Tier 2 (high-freq. commuter rail), adjacent

85 ft

Incl. 20 ft intensifier. Labor standards apply

above 85 ft.

Tier 2, within mile

65 ft

Tier 2, within mile

55 ft

SMART Corridor Peer

Novato, CA SMART station area

35 ft / 3 stories

City of Novato General Plan 2035

Petaluma Proposed

PETALUMA ST-MU base entitlement

90 ft / 8 stories

Table LU-2, p. 5-26. Exceeds every SB 79

Tier 2 standard. SB 79 does not apply to

Sonoma County.

Sources: Cal. Gov. Code 65912.155 65912.156 (SB 79, eff. July 1, 2026); ABAG SB 79 Summary, April 8, 2026;

Cal. Gov. Code 65912.156(q); City of Novato General Plan 2035.

A.3 RECOMMENDATION

ST-MU designation Table LU-2, p. 5-26

Current: 8 stories / 90 ft base entitlement applicable to SMART-adjacent parcels without a prerequisite Specific Plan.

4.4
cont.

4.5

Recommended refinement: 6 stories / 65 ft while retaining the 60 du/ac

Basis: Plan market findings (pp. 5-3, 5-10); Cal. Gov. Code 65915(d)(2)(D); Policy LU-26.3 (p. 5-85); Goal LU-13 (p. 5-88); SB 79, Cal. Gov. Code 65912.155

4.5
cont.

Part B Response to the Draft EIR

B.1 PROGRAM-LEVEL AESTHETIC ANALYSIS

DEIR, p. 4.1-18 Aesthetics Significance Thresholds

Pursuant to Public Resources Code Section 21099(d)(1) aesthetic and parking impacts of residential, mixed-use residential, or employment center projects on an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, this analysis focuses on areas outside the two TPAs within the Plan Area.

Public Resources Code 21099(d)(1) applies to aesthetic and parking impacts of qualifying infill projects within a transit priority area. The concern here is not that the statute is irrelevant to future projects. The concern is that the DEIR uses that project-level rule to exclude the two Transit Priority Areas from program-level aesthetic analysis of the General Plan's own land use decisions, including the ST-MU 90-foot height designation and its relationship to identified view corridors.

Where the plan introduces a new 90-foot height designation in a station area, (and potentially 120-foot height with an affordable project), the Final EIR should analyze whether that designation may affect visual character, views, scale, and consistency with related General Plan policies. Including this analysis would ensure the plan fully evaluates one of its most consequential designation decisions before adoption.

4.6

B.2 POLICY IMPLEMENTATION CLARITY POLICY LU-20.4

The DEIR concludes that aesthetic impacts are less than significant (DEIR pp. 4.1-19, 4.1-21) based on adherence to General Plan policies. To strengthen this conclusion, it would be helpful to explicitly connect those policies to the designation framework. Policy LU-20.4 is particularly relevant:

Policy LU-20.4 Draft GP, p. 5-78

In the stretch between Mountain View Avenue and D Street, maintain a mix of uses

4.7

similar to those at CPSP, but at a lower height and intensity (to address views, shading, sense of scale, etc.), while preserving historic structures along the corridor.

This policy explicitly identifies views, scale, and height as linked considerations along a defined corridor. It does not appear to be cited in the DEIR aesthetic analysis.

At the same time, the DEIR relies on consistency with General Plan policies to support a less-than-significant finding for aesthetic impacts, without evaluating how those policies are implemented through the designation framework or whether the proposed height standard is consistent with that direction.

Where an EIR relies on policy consistency to support a less-than-significant finding, it must demonstrate how those policies will actually reduce or avoid the identified impact.

Reliance on policy language without corresponding analysis of the plan's own height designations raises an adequacy concern under CEQA. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502.)

In this case, the plan establishes a 90-foot height designation in areas where policy direction calls for lower height to address views, yet the DEIR does not evaluate that relationship at the program level. Deferring this analysis to future project review risks leaving the plan-level decision unexamined.

B.3 GHG-1 AND LAND USE OPTIONS

The DEIR identifies GHG Impact GHG-1 as Significant and Unavoidable (DEIR p. 4.7-16). The staff presentation explains that state and federal regulations limit the City's ability to adopt stricter building standards. That constraint applies to building regulation. However, height designations are land use decisions and remain within local control.

The question is not whether the City can precisely model emissions for all future buildings. The question is whether the EIR evaluates reasonable planning scenarios. CEQA does not require project-level precision at the program level. It does require a good-faith evaluation of feasible alternatives and mitigation approaches.

Building scale and height influence development typology, including structural systems, material use, and construction intensity, all of which are recognized contributors to lifecycle greenhouse gas emissions. These differences can be evaluated at a

4.7
cont.

4.8

comparative level without requiring project-specific modeling.

The DEIR does not evaluate whether alternative height frameworks, such as a mid-rise baseline compared to an 8-11 story baseline, could result in different emissions outcomes. Where a plan establishes a new 90-foot height allowance and identifies a significant and unavoidable GHG impact, evaluating reasonable alternative development envelopes is part of a complete CEQA analysis.

Including a comparative evaluation of height scenarios would strengthen the EIR by clarifying whether the selected height standard represents the lowest-emissions feasible land use approach consistent with the plan's objectives.

The Final EIR is requested to:

1. Clarify the scope of program-level analysis by evaluating the ST-MU designation under General Plan EIR standards, rather than relying on the 21099(d)(1) project-level provision to exclude Transit Priority Areas from aesthetic analysis.
2. Evaluate visual impacts associated with the ST-MU designation, including the view corridors identified in Policies LU-20.2 and LU-20.4, and clarify how the designation framework implements Policy LU-20.4's direction for lower height and intensity.
3. Assess whether the ST-MU height standard has been considered as a land use variable in the GHG analysis, including whether alternative height frameworks could represent a feasible response to the Significant and Unavoidable GHG-1 finding.
4. Clarify the relationship between the ST-MU height standard and feasible housing delivery, in light of the density bonus framework and the plan's own market findings (pp. 5-3, 5-10).

Flex Designation

The Flex designation is applied in corridor and transition areas identified in the plan as

4.8
cont.

4.9

4.10

having high concentrations of age-eligible resources, including the riverfront warehouse area and key corridors such as Petaluma Boulevard, East Washington Street, and Bodega Avenue (Draft GP p. 2-3). These are locations where the plan emphasizes scale, context, and historic compatibility. At the same time, the primary tools needed to guide that evaluation including the Historic Context Statement, Resource Inventory, and coordinated design standards are identified as future actions without a defined sequence relative to the application of Flex designations (Actions HR-2.1.1, HR-2.1.2; LU-12.1.1; HR-1.2.2). As structured, this places additional flexibility in areas of known sensitivity before the framework needed to interpret and apply that flexibility is in place. Clarifying the sequencing and relationship between Flex designations and these implementation measures would help ensure that decisions are guided consistently at the plan level rather than deferred to project-level interpretation.

4.10
cont.

Transportation - Neighborhood Street Designation

Keokuk Street Classification

Keokuk Street is currently classified as a Collector Street. However, its existing function, context, and designation as a Class III bicycle facility indicate that it operates more consistently as a local, low-speed street serving neighborhood access rather than a principal traffic route.

Reclassification as a Neighborhood Greenway would align the street's functional classification with its current use and policy direction. Neighborhood greenways are intended to prioritize pedestrian and bicycle access, support low vehicle speeds and volumes, and create low-stress connections within the active transportation network. These characteristics are consistent with the street's existing conditions and with Policy TP-3.4's direction to establish a low-stress walking and bicycling network.

This approach would also support compatibility with the adjacent historic resource at 301 Keokuk Street by reinforcing a lower-speed, lower-intensity street environment that maintains its setting and context.

Clarifying the functional classification in the General Plan and in any subsequent Active

4.11

Transportation Plan or Complete Streets update would ensure that future design standards, including lane widths and traffic calming measures, are aligned with the intended neighborhood-scale function.

4.11
cont.

Implementation Comments

Comprehensive Standards Strategy

Current: Corridor design guidelines (Action LU-12.1.1) and historic district design guidelines (Action HR-1.2.2)

Recommendation: Prepare a coordinated work plan sequencing Citywide Design Guidelines, Historic District Design Guidelines, City Design Guidelines and Objective Design Standards as a unified implementation package aligned with corridor rezonings.

4.12

Historic Resources Sequencing

A completed Historic Context Statement and Resource Inventory should precede or be concurrent with corridor rezonings to ensure proactive identification and reduce CEQA impacts.

Thank you for your consideration.

Best,

Veronica Olsen

Community Lead for the American Institute of Architects, Sustainable Design

Assessment Team (Petaluma SDAT), member of Climate Action Petaluma

Letter 4

Commenter: Veronica Olsen

Date: April 28, 2026

Response 4.1

The commenter summarizes public engagement on the General Plan and the City Council's decisions on the ST-MU height standard which was increased to 90 feet.

This comment is noted. No further response is required.

Response 4.2

The commenter opines that market rate high density projects over four stories are not financially feasible in the city. The commenter describes the state density bonus law and emphasizes that buildings that provide 100 percent affordable housing within half mile of a transit stop receive an automatic height bonus of 3 stories.

Please refer to Master Response 1 for discussion of the eight-story height allowance within the city. The comment raises issues regarding market feasibility and the policy merits of allowing additional height in certain areas of the City. Those issues are relevant to the City Council's legislative and policy discretion in considering the General Plan Update, but they do not identify a significant environmental impact under CEQA. CEQA focuses on reasonably foreseeable physical changes to the environment. Economic or market-feasibility concerns, standing alone, are not treated as significant environmental effects unless they result in reasonably foreseeable physical environmental changes (*CEQA Guidelines*, Section 15131). The commenter does not identify substantial evidence showing that the challenged height allowance would result in a physical environmental impact not already analyzed in the Draft EIR.

The commenter's reference to the State Density Bonus Law also does not require revisions to the Draft EIR. State law may independently require cities to grant additional height or other relief for qualifying affordable housing projects, including certain 100 percent affordable housing projects near major transit stops. The existence of those state-law allowances does not preclude the City from adopting local land use policies that allow additional height in transit-oriented areas, nor does it establish that the Draft EIR failed to analyze a significant environmental impact. Rather, the General Plan Update's proposed height framework reflects a policy decision regarding where additional housing and mixed-use development capacity should be allowed, including in areas near transit and other infill locations. No revisions to the Draft EIR would be required in response to this comment.

Response 4.3

The commenter states that a 65-foot base height allowance aligns more closely with current financing and construction models. The commenter notes that A 90-foot base pushes any density bonus project into a building envelope that substantially increases per-unit cost, a threshold that 100% affordable developers, who rely on fixed subsidy levels, typically cannot cross. The commenter opines that a 90-foot height allowance would allow for market rate luxury development rather than affordable housing development.

Please refer to Master Response 1 for discussion of the eight-story height allowance within the city and Response 4.2 for a discussion of the state density bonus law. No revisions to the Draft EIR would be required in response to this comment.

Response 4.4

The commenter states that Sonoma County is not an urban transit county under Cal. Gov. Code 65912.156(q) and that SB 79 does not apply to California. The commenter states within the context of SB 79

a 90-foot height allowance exceeds every Tier 2 standard and matches only the maximum Tier 1 adjacent standard and that SMART corridor peers operate at significantly lower scales.

Please refer to Master Response 1 for discussion of the eight-story height allowance within the city and Response 4.2 for a discussion of the state density bonus law. No revisions to the Draft EIR would be required in response to this comment.

Response 4.5

The commenter recommends that SMART-adjacent parcels be revised to allow for a maximum height of 6 stories while retaining the 60 du/ac.

Please refer to Master Response 1 for discussion of the eight-story height allowance within the city and Response 4.2 for a discussion of the state density bonus law. No revisions to the Draft EIR would be required in response to this comment.

Response 4.6

The commenter states that Public Resources Code Section 21099(d)(1) limits consideration of aesthetic and parking impacts for qualifying infill projects within transit priority areas, and the Draft EIR inappropriately applies this project-level standard to exclude the Transit Priority Areas from broader, program-level aesthetic analysis. The commenter expresses concern that new height designations could affect visual character, views, and policy consistency, and recommends that the Final EIR evaluate these impacts to ensure informed decision-making.

As stated under “Visual Character and Quality of Public Reviews” under 4.1.3, *Impact Analysis*, of Section 4.1, *Aesthetics*, of the Draft EIR, the Draft EIR aesthetics analysis focuses on areas outside the two Transit Priority Areas within the Plan Area. The City acknowledges that Public Resources Code Section 21099(d)(1) applies to the determination of significance for aesthetic and parking impacts of individual residential, mixed-use residential, and employment center projects located on infill sites within Transit Priority Areas. As such, this provision would be relevant to future project-level CEQA reviews of development facilitated in these areas. Although the Draft EIR states that the aesthetics analysis would focus on areas outside the Transit Priority Areas, they are not wholly excluded from analysis. The General Plan Update evaluated in the Draft EIR is a program-level action that establishes land use designations and development standards across the Plan Area. Consistent with *CEQA Guidelines* Sections 15168 and 15183, the Draft EIR evaluates the potential environmental effects of these planning decisions at a broader, policy level.

Potential impacts related to visual character are analyzed under Impacts AES-1 and AES-3 in Section 4.1 *Aesthetics*, of the Draft EIR. As discussed therein, development facilitated by the General Plan Update could result in the obstruction of intermittent views of scenic resources, and could affect existing visual character through the obstruction of views, alteration of natural landscapes, and changes to the City’s skyline. This determination includes consideration of the high-density mixed-use development that could be facilitated in the Station Mixed Use area, which could allow development up to 90 feet in height. However, with implementation of goals and policies in the proposed General Plan Update, impacts would be less than significant.

Additionally, please see Master Response 1 regarding increased height limits aesthetic impacts, which addresses this comment.

Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 4.7

The commenter notes the Draft EIR concludes that aesthetic impacts would be less than significant based on consistency with General Plan policies, but suggests that the Draft EIR does not clearly link those policies to the proposed land use designation framework. The commenter refers to Policy LU-20.4 from the General

Plan Update and notes that this policy is not discussed in the aesthetics analysis. The commenter expresses concern that the proposed 90-foot height designation does not align with this policy, and argues that deferring this evaluation to future project-level review may leave an impact of the General Plan Update insufficiently analyzed.

Policy LU-20.4 pertains to Petaluma Boulevard South, and states “in the stretch between Mountain View Avenue and D Street, maintain a mix of uses similar to those at CPSP, but at a lower height and intensity (to address views, shading, sense of scale, etc.), while preserving historic structures along the corridor.” Parcels along this segment of Petaluma Boulevard South are currently designated as Mixed Use, and under the General Plan Update, their designation would be changed to Stepdown Mixed Use. As described under 2.3.1, *Proposed Land Use Change*, in Chapter 2, *Project Description* of the Draft EIR, this designation has a maximum height of four stories or 50 feet, whichever is less. The land use designations that would allow for a maximum height of 90 feet (Station Mixed Use) would not be located in this area. Please refer to Master Response 1 for discussion on the potential impacts of increased height. No revisions to the Draft EIR would be required in response to this comment.

Response 4.8

The commenter notes the Draft EIR concludes that impacts related to greenhouse gas (GHG) emissions would be significant and unavoidable. The commenter opines that the Draft EIR does not evaluate how land use decisions, such as building height and scale, may influence emissions associated with future development. The commenter states height designations remain within local control and can affect construction type, materials, and emissions. The commenter expresses concern that the Draft EIR does not analyze reasonable alternative height limits or compare emissions implications at a programmatic level, and suggests that such analysis would help demonstrate whether the proposed 90-foot height standard represents the most feasible approach with the lowest GHG emissions.

Impacts related to GHG emissions are discussed in Section 4.7, *Greenhouse Gas Emissions*, of the Draft EIR. As discussed under Impact GHG-1, the General Plan Update would be generally consistent with the City’s Blueprint for Climate Action, which outlines a suite of strategies to reduce communitywide emissions, including building electrification, energy efficiency, and transportation demand reduction. However, as also explained in Section 4.7, *Greenhouse Gas Emissions*, the Blueprint for Climate Action is primarily a policy framework and does not, in itself, include fully enforceable regulatory mechanisms. Therefore, it cannot be guaranteed that all identified measures (such as all-electric construction, renewable energy generation, EV infrastructure, and enhanced CALGreen requirements) would be implemented uniformly across all future development. As a result, the Draft EIR conservatively concludes that GHG impacts would be significant and unavoidable.

With respect to the commenter’s concern regarding land use characteristics, the Draft EIR acknowledges that development patterns, including density, building height, and scale, can influence GHG emissions at a programmatic level by affecting construction, operational energy demand, and transportation behavior. Section 4.7, *Greenhouse Gas Emissions*, explains that both operational and embodied emissions contribute to total GHG emissions, and that higher-intensity development can, in some cases, reduce vehicle miles traveled and support more efficient energy use, while potentially increasing embodied emissions depending on construction type. However, at the program level of analysis, the Draft EIR does not assign specific building typologies or construction methods to individual height limits because such details would be determined at the project level and remain subject to subsequent discretionary review and applicable building codes. Consistent with *Committee for Tiburon LLC v. Town of Tiburon* (2026) 118 Cal.App.5th 259, where no specific project has been proposed, CEQA does not require a general plan program EIR to conduct project-level or site-specific analysis that depends on details not yet known.

The City acknowledges that future refinement of development standards, including height limits, could influence GHG outcomes, particularly through the adoption of low-carbon construction practices and building electrification requirements. Such considerations may be addressed through implementing ordinances, updates to the Zoning Code, and project-level review, where project-specific design, materials, and energy systems can be more precisely evaluated and conditioned. Future refinements

would undergo individual environmental review. Nonetheless, at the programmatic level of this Draft EIR, sufficient evidence is not available to conclude that alternative height limits (including the proposed 90-foot standard) would clearly result in lower overall GHG emissions when considering the combined effects of operational efficiency, transportation patterns, and embodied carbon. And although the City has a pathway to meet state GHG reduction targets through the Blueprint for Climate Action, because those measures are not yet fully enforceable or implementable, the project may conflict with applicable GHG reduction policies and could generate substantial emissions, resulting in a potentially significant impact. The commenter does not identify substantial evidence demonstrating that a lower height limit would result in lower overall GHG emissions when considering the combined effects of land use efficiency, housing capacity, vehicle miles traveled, operational energy use, embodied carbon, construction type, and potential displacement of development to other locations. Nor does CEQA require the Draft EIR to prove that the proposed 90-foot height standard is the single lowest-emissions policy choice. CEQA requires an EIR to evaluate a reasonable range of alternatives that could feasibly attain most of the project's basic objectives while avoiding or substantially lessening significant environmental effects (*CEQA Guidelines* Section 15126.6). As discussed in Chapter 6, *Alternatives*, the Draft EIR evaluates a reasonable range of alternatives to the General Plan Update at a programmatic level. The Draft EIR is not required to analyze every conceivable height limit or every possible variation of future development standards.

Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 4.9

The commenter summarizes their comments on the Draft EIR and requests clarification of the Draft EIR's approach to aesthetic analysis in TPAs [Transit Priority Areas], evaluation of visual impacts and policy consistency, and discussion of how the height limits relate to GHG impacts and housing feasibility.

Refer to Responses 4.6 through 4.8.

Response 4.10

The commenter requests that there be clarification as to the timing of proposed actions HR-2.1.1, HR-2.1.2, LU-12.1.1, and HT-1.2.2 as they relate to ensuring historic compatibility in the areas with a flex designation.

The Draft EIR is a programmatic document that evaluates the environmental effects of the proposed General Plan policies, land use designations, and overall development pattern at a citywide level, rather than on a parcel-by-parcel basis or for specific development projects. The EIR analyzes how the framework of proposed policies and actions would collectively influence future development and associated impacts.

The EIR includes and evaluates relevant proposed General Plan policies and actions, such as action HR-2.1.1, HR-2.1.2, LU-12.1.1, and HT-1.2.2, and describes how these measures are intended to reduce or avoid potential environmental impacts at a programmatic level. It does not analyze impacts on a parcel-by-parcel basis or analyze specific development projects. Specifically, as described in Section 4.5, *Cultural Resources*, action HR-1.2.2, and HR-2.1.2 are cited under impact CUL-1 as regulations which would help reduce potential impacts to historical resources: These specific actions would be undertaken by the city and would guide future development facilitated by the General Plan.

The implementation actions identified in the General Plan, including preparation of the Historic Context Statement, updates to the resource inventory, and development of coordinated design standards, are intended to provide more detailed and consistent guidance for interpreting and applying General Plan policies, including within flex areas. While these actions are identified as future work efforts, they are part of the overall policy framework evaluated in the Draft EIR and would be undertaken by the City to inform subsequent planning and project-level decisions. The General Plan also includes policies that apply immediately and require consideration of historic context and compatibility in development review, thereby ensuring that decision-making is guided by adopted policy direction even as these additional tools are developed.

With respect to the commenter's concern regarding flex designations in areas with concentrations of age-eligible resources, future development within flex areas would remain subject to applicable General Plan policies, historic preservation regulations, CEQA review, and discretionary approvals, which provide multiple layers of review to ensure consistency with community character and resource protection.

Therefore, although the Draft EIR does not prescribe a specific sequencing of flex designations relative to each implementation action, it evaluates a comprehensive framework in which flex areas are subject to ongoing policy guidance, future implementing measures, and project-level review. This combined approach is intended to ensure that flexibility in land use is balanced with consistent consideration of historic resources, rather than deferring such considerations solely to project-level interpretation without policy direction.

Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 4.11

The commenter requests that Keokuk Street be reclassified from a collector street to a neighborhood greenway in the proposed General Plan and any subsequent active transportation plan or compete streets update.

Please refer to Master Response 2. No revisions are required on the Draft EIR in response to this comment.

Response 4.12

The commenter recommends that a historic context statement and resource inventory should precede or be concurrent with corridor rezonings to ensure proactive identification and reduce CEQA impacts.

The Historic and Cultural Resources element of the draft General Plan includes a historical analysis, including mapping and discussion of designated historic resources, current age eligible properties, and properties that will be age eligible by 2050 within the city.

The EIR is a programmatic document that analyzes impacts to historic resources in Section 4.5, *Cultural Resources*. As discussed therein, General Plan policies and actions would reduce impacts to historic resources; however, because specific development outcomes and the timing of implementing measures cannot be fully defined at this stage, impacts are conservatively concluded to be significant and unavoidable. The Draft EIR only analyzes the content, including the policies and actions, within the draft General Plan. Any changes to proposed policies, actions, or additions to the General Plan framework would not be within the scope of this EIR.

The City acknowledges that preparation of a Historic Context Statement and Resource Inventory concurrent with, or in advance of, corridor rezonings could enhance the ability to identify resources early and potentially reduce impacts during subsequent project-level CEQA review. The General Plan's implementation actions are intended to support this outcome by establishing the technical and regulatory foundation for informed decision-making. Future work programs and implementation plans developed by the City may further refine the sequencing and coordination of these efforts, including alignment with zoning updates and design guideline preparation.

However, the scope of this EIR is limited to analysis of the policies and actions as presented in the General Plan Update. The Draft EIR does not establish or evaluate detailed implementation schedules or administrative work plans. Any future decisions regarding the sequencing, bundling, or prioritization of implementation actions, such as preparation of unified design guidelines or timing of historic resource studies relative to rezonings, would occur outside the scope of this programmatic environmental review and would be addressed by the City through subsequent planning and policy efforts. No revisions to the Draft EIR would be required in response to this comment.

From: Susan Kirks <[REDACTED]>
Sent: Tuesday, May 12, 2026 2:47 PM
To: General Plan Update <planpetaluma@cityofpetaluma.org>
Cc: -- City Council <citycouncil@cityofpetaluma.org>
Subject: comment on General Plan and DEIR

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

Following are comments focusing on the draft General Plan and Draft EIR.

Comments pertain to Natural Features... and Biological Resources.

Both the General Plan and DEIR reflect inaccurate and omitted information.

5.1

Absent from both documents is evidence of ground truthing. Ground truthing is ground level and local input to verify and refine information to achieve a true whole outcome.

Petaluma is not surrounded by a greenbelt. A greenbelt exists in east Petaluma. Grassland and the West Hills characterize west, SW and NW Petaluma.

Petaluma is not adjacent to the Sonoma Valley Wildlife Corridor and the SVWC does not extend to the Blue Ridge Marin segment of Critical Linkages, a macro vegetation mapping for potential habitat connectivity for wildlife movement by the Bay Area Open Space Council and SC Wildlands, not CDFW.

Petaluma Valley contains SIX wildlife corridors and one of those in east Petaluma intersects with the Sonoma Valley Wildlife Corridor far east of Petaluma. Petaluma wildlife corridors extend to the Blue Ridge Marin Critical Linkages segment, to both the Marin and Sonoma County coasts. Petaluma wildlife corridors are the basis for Wildlife Connectivity - Sonoma & Marin Counties, one of 110+

5.2

30x30 projects in the Together Bay Area (formerly Bay Area Open Space Council) portfolio. Greeninfo Network is my partner in the mapping.

Two needed Wildlife Crossings across Highway 101 in the Petaluma area, extensions of two corridors, are included in the CA Wildlife Crossings Projects list.

Rather than compile a comprehensive description of the environment, conserved open spaces, flora and fauna, the draft General Plan and EIR contain definitions utilizing, e.g., the CNDDDB, and omitting Species

of Special Concern. This is a serious omission with lack of ground truthing. The consultants describe 13 listed Threatened or Endangered Species in Petaluma, omitting Salt Marsh Harvest Mouse, Black Rail and Ridgway's Rail in the Petaluma Wetlands. Nine Species of Special Concern, including the keystone species American Badger, with four Watch List species, are documented at the Paula Lane open space land.

5.3

Disregard of local input and verification, the absence of ground truthing and lack of outreach by consultants result in this draft General Plan and EIR.

5.4

Susan Kirks, Naturalist

Qualifications| (partial list)

Naturalist and Board Chair, Paula Lane Action Network (PLAN)

Board of Directors, Madrone Audubon 2008-2026, President 2012-2014 2016-2025

Member, Statewide Wildlife Corridors Work Group 2015-present

Contributor, CA Sierra Club Coastal Committee

Special Consultant, Farmlore Films LLC NatGeo/Disney Biodiversity Series 2023

Pro Bono Consultant, PBS Rocky Mountains Wildlife Corridor documentary 2019

Nonprofit representative, Environmental Technical Committee, SR 37 reconstruction planning, CalTrans 2022-2024

2nd District representative, Sonoma County Ag and Open Space Advisory Committee 2008-3020

Nonprofit representative to CDFW Meso Predator Work Group

Inaugural Leadership Academy, Center for Ecoliteracy 2014

-- -Partial List --

5.4
cont

Letter 5

Commenter: Susan Kirks

Date: May 12, 2026

Response 5.1

The commenter describes the natural setting surrounding Petaluma, and opines that the Draft EIR omits information since it does not include the results of ground-level and local surveys.

As discussed in Section 4.4, *Biological Resources*, of the Draft EIR under 4.4.3, *Impact Analysis*, the analysis of biological resource impacts is based on existing, reasonably available scientific data sources, including regional and state databases (such as the California Natural Diversity Database), published reports, and other secondary information. This approach is consistent with the CEQA Guidelines, which do not require project-level “ground truthing” or field surveys for programmatic EIRs, and instead allow reliance on existing data to evaluate impacts at a planning level. (See *Committee for Tiburon LLC v. Town of Tiburon* (2026) 118 Cal.App.5th 259.)

Because the Draft EIR is programmatic in nature, it provides a broad, citywide assessment of potential biological resources and habitat conditions rather than parcel-specific verification of on-the-ground conditions. The intent is to identify the types of resources that could be affected and establish a framework for future review, rather than to definitively map all resources through field investigation.

The Draft EIR recognizes that site-specific conditions may differ from mapped or database information. Therefore, consistent with CEQA tiering principles, future development projects implemented under the General Plan would require project-level biological review. As described under Impact BIO-1, Mitigation Measure BIO-1 requires biological resource screening and, where appropriate, focused field surveys conducted by a qualified biologist to verify existing conditions (“ground truthing”) and identify sensitive species or habitats prior to development. This ensures that site-specific information is collected and incorporated into project design and mitigation at the appropriate stage of review.

Accordingly, while the Draft EIR does not include ground-level field verification for all areas evaluated, it follows CEQA requirements for programmatic analysis by relying on available data and incorporating measures to ensure that detailed field investigation occurs prior to any site disturbance, thereby providing a complete and effective framework for biological resource protection.

Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 5.2

The commenter states that Petaluma is not adjacent to the Sonoma Valley Wildlife Corridor and that this corridor does not extend to the Blue Ridge Marin segment of Critical Linkages. The commenter provides other information about wildlife corridors in Petaluma Valley and in the Petaluma area.

As discussed under 4.4.1, *Location and Setting*, in Section 4.4, *Biological Resources* of the Draft EIR, the Plan Area is within the Sonoma Valley Wildlife Corridor. Based on information from the Sonoma Land Trust, the Sonoma Valley Wildlife Corridor passes through the southeastern portion of Petaluma and makes up part of the Marin Coast to Blue Ridge Critical Linkage.

Information from the Sonoma Land Trust was used to describe the biological resources setting of the Plan Area, but the reference was mistakenly omitted from Chapter 7, *References*, of the Draft EIR. The following citation has been added under the *Biological Resources* header:

Sonoma Land Trust. 2025. Protect the Sonoma Valley Wildlife Corridor.
<https://sonomalandtrust.org/wp-content/uploads/2019/09/SLTWildlifeBrochureforlandowners.pdf>. Accessed May 2026.

This addition to the Draft EIR provides clarifying information but does not change the significance findings or impact analysis of the Draft EIR.

Response 5.3

The commenter opines the description of biological resources in the Draft EIR is not comprehensive and that several special-status species are not listed in the Draft EIR.

As discussed under “Special-Status Wildlife Species” in Section 4.4, *Biological Resources*, of the Draft EIR, there are 34 special-status wildlife species known to occur in the region with potential to occur in the Plan Area, and 18 of these species are state or federally listed. These species, provided in Table 4.4-2, includes the salt marsh harvest mouse, California black rail and California Ridgeway’s rail, and other species the commenter refers to. The comment does not identify the specific species that the commenter contends were omitted from the Draft EIR, nor does it provide location-specific information or substantial evidence showing that any such species would occur in the Plan Area or would be affected by implementation of the General Plan Update. The level of detail in this response is therefore appropriate given the general nature of the comment (*CEQA Guidelines*, Section 15088, subd. (c)).

The Draft EIR further acknowledges that additional special-status species, including Species of Special Concern such as the American badger and other locally documented species, may occur in specific areas depending on habitat conditions. To address this, the EIR incorporates Mitigation Measure BIO-1, which requires future development projects to conduct site-specific biological resource screenings and focused field surveys by a qualified biologist where suitable habitat is present. These surveys would verify on-the-ground conditions (i.e., ground truthing), identify any special-status species or habitats present, and ensure that appropriate avoidance, minimization, and mitigation measures are implemented during project-level review. Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 5.4

The commenter summarizes their comments and provides a partial list of qualifications.

This comment is noted and no revisions to the Draft EIR are required in response to this comment.



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Bay Delta Region
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May 13, 2026

Olivia Ervin, Principal Planner
City of Petaluma
11 English Street
Petaluma, CA 94952
planpetaluma@cityofpetaluma.org

Subject: City of Petaluma General Plan Update, Program Environmental Impact Report, SCH No. 2025080378, Sonoma County

Dear Olivia Ervin:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Program Environmental Impact Report (EIR) from the City of Petaluma (City) for the City of Petaluma General Plan Update (project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. CDFW previously submitted a letter dated September 9, 2025, in response to the EIR Notice to Preparation (NOP) for the project.

CDFW is submitting comments on the program EIR to inform the City, as the Lead Agency, of our concerns regarding potentially significant impacts to biological resources associated with the project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Petaluma

Objective: The General Plan Update is a comprehensive update of the City's current General Plan 2025. The General Plan creates and assigns land use designations to facilitate the type and intensity of development that can occur throughout the City through the

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planning horizon year of 2050 (over approximately 24 years). Proposed areas for increased intensity/density of development under this General Plan include along corridors such as Petaluma Boulevard North, East Washington, and Petaluma Boulevard South and strategically in the downtown core. Additional areas have been identified for increased density to facilitate the development of 15-Minute City Centers including Leghorn Plaza Shopping Center. Very few land use changes are proposed in the western hills or at the periphery of the City. Land Use designations along the Petaluma River, where flood risk is high, have reduced development capacity.

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Location: The proposed project applies to all lands within the City of Petaluma city limits and the urban growth boundary, centered at approximately 38.25735°N, 122.6229°W.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the project has the potential to result in “take” of plants or animals listed or candidates under CESA, either during construction or over the life of the project. **The project has the potential to result in take of California tiger salamander (*Ambystoma californiense*), Swainson’s hawk (*Buteo swainsonii*), longfin smelt (*Spirinchus thaleichthys*), and North Coast semaphore grass (*Pleuropogon hooverianus*), which are CESA listed as threatened, and burrowing owl (*Athene cunicularia*) and white sturgeon (*Acipenser transmontanus*), which are CESA candidate species, as further described below.** Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA ITP.

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CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065.). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency’s FOC does not eliminate the project proponent’s obligation to comply with CESA.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream.

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Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to LSA Notification requirements. **Project activities may impact the Petaluma River and other streams, therefore an LSA Notification may be warranted, as further described below.** CDFW would consider the CEQA document for the project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act (MBTA).

California Fully Protected Species

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code § 2081.15). Project proponents should consult with CDFW early in the project planning process. **The project has the potential to impact California Ridgway's rail (*Rallus obsoletus obsoletus*), California black rail (*Laterallus jamaicensis coturniculus*), and salt marsh harvest mouse (*Reithrodontomys raviventris*), which are California fully protected species, as further described below.**

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. **Attachment 1** includes CDFW's recommended mitigation measures in a Draft Mitigation Monitoring and Reporting Program.

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I. Project Description and Related Impact Shortcoming

COMMENT 1: Program EIR Subsequent Project Review

The EIR is a program EIR but does not include a checklist for subsequent project review. As described in CDFW's letter response to the NOP, while program EIRs have a necessarily broad scope, CDFW recommends providing as much information related to anticipated future activities as possible. CDFW recognizes that, pursuant to CEQA Guidelines section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document. This future environmental document would cover a project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate identification of significant effects of the planning approval at hand. The CEQA Guidelines section 15168, subdivision (c)(4) states, **"Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR."** Based on CEQA Guidelines section 15183.3 and associated Appendix N Checklist, and consistent with other program EIRs (e.g., California Vegetation Treatment Program Environmental Impact Report and associated checklist in Appendix PD-3 - Project-Specific Analysis at: <https://bof.fire.ca.gov/projects-and-programs/calvtp-homepage-and%20storymap/#::~:~:text=The%20CalVTP%20Program%20Environmental%20Impact,with%20the%20CalVTP%20Program%20EIR>), **CDFW recommends creating a procedure or checklist for evaluating subsequent project impacts on biological resources to determine if they are within the scope of the program EIR or if an additional environmental document is warranted.** This checklist should be included as an attachment to the EIR. Future analysis should include all special-status species and sensitive habitat including, but not limited to species considered rare, threatened, or endangered species pursuant to CEQA Guidelines, section 15380.

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When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a "within the scope" of the EIR conclusion. For subsequent project activities that may affect sensitive biological resources, a site-specific analysis should be prepared by a Qualified Biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the EIR, including page and section references, containing the analysis of the subsequent project activities' significant effects and indicate whether it incorporates all applicable mitigation measures from the EIR.

II. Environmental Setting and Related Impacts Shortcomings

Mandatory Findings of Significance: Does the Project have the potential to substantially reduce the number or restrict the range of a rare or endangered plant or animal?

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And,

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?

COMMENT 2: Deferred Mitigation

Issue, specific impacts, why they may occur and be potentially significant: If the project may result in physical changes in the environment, such as facilitating development, then the project could: 1) reduce the number or restrict the range of an endangered, rare, or threatened species, or 2) have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. The EIR documents 33 special-status plant species and 34 special-status animal species either within or in the vicinity of the City. The project area has potential to support special-status species including, but not limited to California tiger salamander, Swainson's hawk, longfin smelt, and North Coast semaphore grass, CESA listed as threatened species, and burrowing owl, a CESA candidate species and California Species of Special Concern, in addition to the other species mentioned above, however, the EIR does not include adequate mitigation measures for impacts to CESA-listed species as further described below.

California tiger salamander may be directly or indirectly impacted by the project resulting in mortality of individuals from direct impacts or indirect impacts from degradation of habitat adjacent to ground disturbance and other factors. Additionally, the project may result in the permanent and temporary loss of California tiger salamander habitat.

The EIR indicates that wetlands may be present within project sites. Wetlands in the City may support North Coast semaphore grass, and loss of wetland habitat may result in mortality of individuals and/or indirect impacts from degradation of habitat adjacent to ground disturbance due to altering hydrological conditions or other factors may occur.

The project area covers or is adjacent to riverine habitat within the Petaluma River which supports special-status fishes such as longfin smelt and white sturgeon. Project activities may impact longfin smelt and/or white sturgeon during dewatering or in-water work in the Petaluma River, if these species are present, resulting in injury or mortality. Project activities can also remotely impact special-status fishes (e.g. pollutants introduced upstream from fish habitat, artificial lighting at night).

Swainson's hawk have been documented nesting within two miles of the project area and suitable nesting trees and foraging habitat is present within the project area. The project has the potential to impact nesting Swainson's hawk through nest tree removal or auditory or visual disturbances above ambient levels within 0.5 miles of project activities. Disturbances

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from project activities may result in Swainson's hawk nest abandonment and loss of eggs or reduced health and vigor and loss of young. In addition, urban development as a result of the project may result in the loss of suitable foraging habitat.

The project could result in burrowing owl injury or mortality of adults, and permanent wintering (i.e., non-nesting) habitat loss. Additionally, the project may result in a permanent reduction of burrowing owl foraging habitat in Sonoma County. Burrowing owl is a special-status species and was approved as a candidate species under CESA because the species' population viability and survival are adversely affected by risk factors such as precipitous declines from habitat loss, fragmentation, and degradation; evictions from wintering sites without habitat mitigation; and human disturbance (Shuford and Gardali 2008; Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012); personal communication, CDFW Statewide Burrowing Owl Coordinator Esther Burkett, May 13, 2022, CDFW Petition for Western Burrowing Owl (*Athene cunicularia hypugaea*), 2024). Based on the foregoing, if burrowing owl are wintering on or within 500 meters (1,640 feet) of the project site, or if burrowing owl foraging habitat is removed, project impacts to burrowing owl would be potentially significant.

Salt marsh harvest mouse, California Ridgway's rail, and California black rail have been documented within the project area and suitable salt marsh habitat is present. The project has the potential to impact nesting California black rail and California Ridgway's rail through auditory or visual disturbances above ambient levels. Disturbances from project activities within 700 feet of suitable nesting habitat may result in California black rail and/or California Ridgway's rail nest abandonment and loss of eggs or reduced health and vigor and loss of young. In addition, project activities within salt marsh habitat could result in injury or mortality of salt marsh harvest mouse, California Ridgway's rail, and California black rail individuals from direct impacts.

The EIR states that impacts to biological resources would be less-than-significant in part because of a requirement for the City to "...perform a baseline Biological Resources Screening and Assessment to determine whether projects proposed within undeveloped parcels have any potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat" (see EIR page 4.4-28). However, the proposed biological resource assessments inappropriately defer formulating mitigation measures and may not appropriately identify special-status species that may be impacted and mitigation measures reducing such impacts to less-than-significant. Further, the proposed biological resource assessments would not be subject to public review under CEQA, thereby circumventing key purposes of CEQA including informing the public and governmental decision makers about the potential, significant environmental effects of a proposed project and identifying ways that environmental damage can be avoided or significantly reduced (CEQA Guidelines, § 15002). CEQA Guidelines section 15126.4, subdivision (b) states:

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"Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards."

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No specific mitigation measures relating to take of CESA-listed species are included in the biological resources section of the EIR. The lead agency (the City) has therefore not committed itself to mitigation, nor does the EIR adopt specific performance standards for mitigation goals, nor does it identify types of actions that could meet these standards.

It is conceivable based on the lack of mitigation measures that the above species would: 1) not be appropriately evaluated in subsequent biological surveys, or 2) that future environmental review pursuant to CEQA would not require appropriate mitigation measures to reduce impacts to less-than-significant.

Therefore, if special-status species occur on or adjacent to project sites, impacts to special-status species would be potentially significant, and impacts may substantially reduce the number or restrict the range of threatened, endangered, or rare species which would be considered a mandatory finding of significance (CEQA Guidelines, §§ 15065 & 15380).

Recommended Mitigation Measures: To reduce potential impacts to listed and other special-status species to less-than-significant and comply with CESA, CDFW recommends including mitigation measures in the EIR which evaluate such foreseeable potentially significant impacts. Where future site-specific impacts may not be presently foreseeable based on the project's broad scope, the checklist discussed in Comment 1 above should be used to determine if a future CEQA environmental document is required. CDFW would appreciate the opportunity to review a revised EIR and may have further comments once more specific species information is provided.

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For example, CDFW recommends including the mitigation measures below in this EIR. Note that some mitigation measures may be tailored based on geographical area or other factors.

MM-BIO-1. California tiger salamander. Prior to commencing construction-related activities on grassland or wetland habitat suitable to support California tiger salamander, the project shall obtain a CESA ITP from CDFW for impacts to California

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tiger salamander and comply with the ITP. Copies of the ITP shall be provided to the City prior to the commencement of construction-related activities. The project shall obtain authorization from USFWS for impacts to California tiger salamander and comply with the authorization. The project shall provide habitat compensation for California tiger salamander in accordance with the ITP, which may be informed by the Santa Rosa Plain Conservation Strategy (SRP CS) and Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the U.S. Army Corps of Engineers (USACE) on the Santa Rosa Plain, Sonoma County, California (2020 Programmatic Biological Opinion [PBO]), as applicable. Please note that the CESA ITP habitat compensation requirements are often consistent with the SRP CS and 2020 PBO but may differ based on site-specific conditions.¹

MM-BIO-2. Special-status plants. Prior to ground disturbance, the project shall submit a habitat assessment prepared by a Qualified Biologist for North Coast semaphore grass and other special-status plants and an evaluation of potential direct and indirect impacts to any on-site or adjacent off-site habitat, such as modification of hydrological conditions or construction related sedimentation into potentially occupied habitat, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation.

If suitable habitat for North Coast semaphore grass or other special-status habitat is observed and may be impacted, a Qualified Biologist shall conduct protocol level plant surveys prior to project activities. No later than 30 days prior to initiating project activities, the project shall provide survey reports for protocol surveys for CESA-listed and other special-status plants to CDFW and obtain CDFW's written approval of the reports, unless otherwise approved in writing by CDFW. Surveys shall be conducted according to CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>), during appropriate conditions, and include visiting reference populations, unless otherwise approved in writing by CDFW. Surveys should include the entire extent of any directly or indirectly impacted suitable wetland habitat for special-status wetland plants, including portions of the wetland on adjacent parcels or not directly impacted, as impacts to part of a wetland often affects the entire wetland. Evaluation of indirect impacts to special-status wetland plants may necessitate a thorough hydrological assessment that fully analyzes existing and post-project conditions to seasonal wetland habitat. If CESA-listed plants are documented on-site or off-site where they may be directly or indirectly impacted, or the surveys are not approved in writing by CDFW,

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¹ Federally designated California tiger salamander critical habitat, California tiger salamander range, and CNDDB occurrence data suggest California tiger salamander could occur in the northwest part of the project area.

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the project shall immediately notify CDFW, and no project work may commence until the project obtains a CESA ITP.

If any non-CESA listed special-status plant species are observed, such as California Rare Plant Rank plants, the project shall fully avoid direct and indirect impacts to all individuals and prepare and implement a CDFW-approved avoidance plan prior to project activities. If full avoidance is not possible, project activities may not commence until the project has consulted with CDFW and obtained CDFW's written approval, which may include seed salvage, transplant, or other protective measures appropriate for the species.

MM-BIO-3. Swainson's hawk. If project activities are scheduled during the nesting season for Swainson's hawk (March 1 to September 15), prior to beginning work on the project, a qualified biologist shall conduct surveys according to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&inline>) and prepare a report documenting the survey results, unless otherwise approved in writing by CDFW. The project shall obtain CDFW's written approval of the qualified biologist and survey report prior to starting construction activities between March 1 and September 15. Survey methods shall be closely followed by starting early in the nesting season (late March to early April) to maximize the likelihood of detecting an active nest (nests, adults, and chicks are more difficult to detect later in the growing season because trees become less transparent as vegetation increases). Surveys shall be conducted: 1) within a minimum 0.5-mile radius of the project site or a larger area if needed to identify potentially impacted active nests, unless otherwise approved by CDFW in writing, and 2) for at least the two survey periods immediately prior to initiating project-related construction activities. Surveys shall occur annually for the duration of the project. The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. If active Swainson's hawk nests are detected, the project shall immediately notify CDFW and implement a 0.5-mile construction avoidance buffer around the nest until the nest is no longer active as determined by a qualified biologist, unless otherwise approved by CDFW in writing. Any detected nesting Swainson's hawk shall be monitored by the qualified biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW. If take of Swainson's hawk cannot be avoided, the project shall consult with CDFW pursuant to CESA and obtain an ITP before project activities may commence.²

MM-BIO-4. Swainson's hawk foraging habitat. A Qualified Biologist shall evaluate if the project would result in loss of Swainson's hawk foraging habitat, and if so shall quantify

² A year 2026 CNDDDB nesting Swainson's hawk occurrence is located approximately 1.6 miles southeast of the project area.

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the loss in acres and submit this information to CDFW and obtain CDFW's written approval of it. Prior to project construction, if the project would result in loss of Swainson's hawk foraging habitat, the project shall provide Swainson's hawk foraging habitat mitigation at a minimum 1:1 ratio, which shall include: 1) permanent preservation of the species' foraging habitat through a conservation easement and implementing and funding a long-term management plan in perpetuity, or 2) purchase of Swainson's hawk foraging habitat credits at a CDFW-approved mitigation bank, unless otherwise approved in writing by CDFW. An ITP obtained for Swainson's hawk may require additional habitat compensation to achieve full mitigation.

MM-BIO-5. Special-status fish. In water work shall be avoided where special-status fish such as longfin smelt or white sturgeon may occur, as determined by a Qualified Biologist based on a review of CNDDDB and consultation with CDFW. If take of the above fish species or any CESA listed or candidate aquatic listed species cannot be avoided, the project shall obtain a CESA ITP from CDFW prior to commencing project activities and shall comply with the ITP. The project shall also consult with the USFWS or National Marine Fisheries Service (NMFS) for any impacts to federally listed fish.

MM-BIO-6. Salt marsh fully protected species. Where suitable habitat salt marsh habitat is present, a Qualified Biologist shall be present on-site to survey and monitor for CDFW Fully Protected species, including salt marsh harvest mouse, California Ridgway's rail, and California black rail, during: a) all vegetation removal or disturbance, b) the construction of exclusion fencing, and c) all work within 300 feet of tidal or pickleweed habitats. A Biological Monitor may be required to monitor for CDFW Fully Protected species after surveys and construction of exclusion fencing are completed. The Qualified Biologist or Biological monitor shall have the authority to stop work if deemed necessary for any reason to protect these species, or any other special-status species. Take or possession of these CDFW Fully Protected species is prohibited (Fish & G. Code, §§ 3511 & 4700).

MM-BIO-7. Salt marsh fully protected species – tide. Project activities shall occur within 50 feet of suitable salt marsh harvest mouse, California Ridgway's rail, or California black rail habitat within two hours before and after an extreme high tide event or when adjacent tidal marsh is flooded. Extreme high tide events are defined as a tide forecast of 6.5 feet or higher measured at the Golden Gate Bridge and adjusted to the timing of local high tides. If salt marsh harvest mouse exclusion fencing has been installed and work is conducted outside of California Ridgway's rail and California black rail breeding season (see measures below), or as otherwise approved in writing by CDFW, this restriction is waived.

MM-BIO-8. California black rail and California ridgeway's rail. Project activities on or within 700 feet of tidal marsh or suitable California Ridgway's rail or California black rail

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habitat shall be avoided during the breeding season (January 15 – August 31 for California Ridgway's rail, February 1 – August 31 for California black rail) each year unless appropriately timed, yearly passive and call back protocol level surveys are conducted by a Qualified Biologist and survey methodology and results are submitted to and accepted in writing by CDFW. Surveys shall focus on suitable habitat that may be disturbed by project activities during the breeding season to ensure that these species are not nesting in these locations. The Qualified Biologist shall have appropriate authorizations from CDFW and USFWS to conduct the surveys.

If breeding California Ridgway's rail or California black rail are determined to be present, no activities, visual disturbance (direct line of sight) and/or an increase in the ambient noise level shall occur within a minimum of 700 feet from areas where California Ridgway's rail and/or California black rail have been detected during the breeding season, unless otherwise approved in writing by CDFW. If surveys have not been conducted, all work shall be conducted a minimum of 700 feet from California Ridgway's rail and/or California black rail habitat during breeding season, unless otherwise approved in writing by CDFW.

MM-BIO-9. Salt marsh harvest mouse. Prior to impacting salt marsh habitat, a CDFW approved Qualified Biologist, familiar with salt marsh harvest mouse, shall walk through and inspect suitable habitat prior to vegetation removal and search for signs of harvest mice or other sensitive wildlife and plants. Following inspection, personnel, under the supervision of the Qualified Biologist, shall disturb (e.g., flush) vegetation to cause movement of salt marsh harvest mouse into adjacent marsh areas. Flushing of vegetation shall first occur in the center of the site then progress toward the two sides away from the open water areas or away from impacted habitat. Immediately following vegetation flushing, personnel, under the supervision of the Qualified Biologist, shall remove vegetation with hand tools (e.g., weed-eater, hoe, rake, trowel, shovel, grazing) so that vegetation is no taller than two inches.

MM-BIO-10. Salt marsh harvest mouse barrier. After vegetation removal, a mouse proof barrier shall be placed along the edge of the area removed of vegetation to further reduce the likelihood of salt marsh harvest mouse returning to the area prior to construction, unless otherwise approved in writing by CDFW. The fence shall be made of a heavy plastic sheeting material that does not allow salt marsh harvest mice to pass through or climb, and the bottom shall be buried to a depth of four inches so that salt marsh harvest mouse cannot crawl under the fence. Fence height shall be at least 12 inches higher than the highest adjacent vegetation with a maximum height of 4 feet. All supports for the exclusion fencing shall be placed on the inside of the work area. An approximately 2-foot-wide de-vegetated buffer shall be created along the habitat side of the exclusion fence.

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MM-BIO-11. Salt marsh harvest mouse barrier maintenance. The salt marsh harvest mouse exclusion fencing shall remain in operating condition throughout the duration of the construction phase. The Qualified Biologist or Biological Monitor, or other CDFW approved person, shall daily inspect the integrity of the exclusion fencing to ensure there are no gaps, tears or damage. Maintenance of the fencing shall be conducted as needed. Any necessary repairs to the fencing shall be completed within 24 hours of the initial observance of the damage. Any mice found along or outside the fence shall be closely monitored until they move away from the project area.

MM-BIO-12. Burrowing owl. If the project occurs during the burrowing owl wintering season from September 1 to January 31, prior to project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the project area pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds>), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report habitat assessment and survey methodology. The habitat assessment shall focus on searching the California Natural Diversity Database (CNDDDB) and potentially other sources for any burrowing owl records on or within 1 mile of the project area, vegetation type and height, suitable burrows (with an opening greater than 11 centimeters [cm] in diameter and a depth greater than 150 cm), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to CDFW and the project shall obtain CDFW's written approval of the habitat assessment prior to starting project activities.

If suitable burrowing owl habitat is observed, 4 surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report and shall begin on August 1. The site visits shall be spread evenly throughout August and the non-breeding season, unless otherwise approved in writing by CDFW. The survey results shall be emailed to CDFW and the project shall obtain CDFW's written approval of the survey results prior to starting project activities. In addition, a survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report. Time lapses of more than 14 days between project activities may

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trigger subsequent surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.

If burrowing owl is detected, the project shall immediately notify CDFW. The project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist or Biological Monitor shall monitor any detected owl to ensure it is not disturbed.

If the surveys result in the detection of the burrowing owl that may be impacted by the project, or the presence of this species and impacts to it are assumed, the project shall obtain and comply with an ITP from CDFW.

Habitat compensation for impacts to occupied wintering burrowing owl habitat (habitat known to have been occupied by wintering burrowing owl within the last 3 years) shall also be provided at a minimum 2:1 mitigation to impact ratio prior to project construction, unless otherwise approved by CDFW. Habitat mitigation shall include permanent preservation of high-quality burrowing owl wintering habitat through a conservation easement and implementing and funding a long-term management plan in perpetuity, to be finalized before project construction, unless otherwise approved in writing by CDFW. The burrowing owl mitigation plan shall be submitted to CDFW for approval before project construction and include a review of suitability of mitigation lands for burrowing owl as confirmed by a Qualified Biologist. The project shall obtain CDFW's written approval of the burrowing owl mitigation plan. Please be advised that an ITP obtained for burrowing owl may have additional requirements to achieve full mitigation.

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Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS?

COMMENT 3: Riparian Habitat, Wetlands, Sensitive Natural Communities, and LSA Notification

Issue, specific impacts, why they may occur and be potentially significant: If the project may result in physical changes in the environment, then the project could result in potentially significant impacts to riparian habitat, wetlands, or other sensitive natural communities (<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive>).

6.6

Recommended Mitigation Measure: If impacts to riparian habitat, wetlands, or other sensitive natural communities may occur, to reduce potential impacts to less-than-significant and comply with Fish and Game Code section 1600 et seq., CDFW recommends including the mitigation measure below.

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MM-BIO-13: Lake and Stream Alteration. For project activities that may substantially alter the bed, bank, or channel of any streams (including ephemeral or intermittent streams) or lake, an LSA Notification shall be submitted to CDFW pursuant to Fish and Game Code section 1602 prior to project construction. If CDFW determines that an LSA Agreement is warranted, the project shall comply with all required measures in the LSA Agreement, including, but not limited to requirements to mitigate impacts to the streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a 3:1 mitigation to impact ratio based on acreage and linear distance as close to the project area as possible and within the same watershed and year as the impact, unless otherwise approved in writing by CDFW. Temporary impacts shall be restored on-site in the same year as the impact. The project shall also consult with the Regional Water Quality Control Board (RWQCB) and USACE on impacts to waters such as streams, lakes, and wetlands, and obtain permits if necessary pursuant to the Clean Water Act and Porter Cologne Water Quality Control Act.

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MM-BIO-14: Sensitive natural communities. The project shall implement restoration on-site or off-site to mitigate temporary or permanent impacts to sensitive natural communities at a minimum 1:1 (restore on-site temporary impacts) or 3:1 (permanent impacts) mitigation to impact ratio for acres and linear feet of impacts, and trees, if applicable, shall be replaced at an appropriate ratio based on size and species, and temporal habitat loss, or provide habitat compensation including permanent protection of habitat at the same ratio through a conservation easement and preparing and funding implementation of a long-term management plan, unless otherwise approved in writing by CDFW.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

6.7

FILING FEES

The project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for

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the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

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CONCLUSION

CDFW appreciates the opportunity to comment on the EIR to assist the City in identifying and mitigating project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nick Wagner, Senior Environmental Scientist (Specialist), at [REDACTED] or [REDACTED]; or Melanie Day, Senior Environmental Scientist (Supervisory), at [REDACTED] or [REDACTED]

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...
Erin Chappell
Regional Manager
Bay Delta Region

Attachment: Draft Mitigation Monitoring and Reporting Program

ec: Office of Land Use and Climate Innovation SCH No. 2026040726
Vincent Griego, USFWS - [REDACTED]
James Hansen, CDFW Bay Delta Region - [REDACTED]
Craig Weightman, CDFW Bay Delta Region - [REDACTED]

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REFERENCES

California Department of Fish and Wildlife (CDFW, formerly California Department of Fish and Game). 2012. Staff Report on Burrowing Owl Mitigation. Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>.

CDFW. 2024. Petition Evaluation for Western Burrowing Owl (*Athene cunicularia hypugaea*). Report to the Fish and Game Commission. California Department of Fish and Wildlife, P.O. Box 944209, Sacramento, CA.

Klute, D. S., L. W. Ayers, M. T. Green, W. H. Howe, S. L. Jones, J. A. Shaffer, S. R. Sheffield, and T. S. Zimmerman. 2003. Status Assessment and Conservation Plan for the Western Burrowing Owl in the United States. U.S. Department of Interior, Fish and Wildlife Service, Biological Technical Publication FWS/BTPR6001-2003, Washington, D.C.

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Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

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ATTACHMENT 1

Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM)	Description	Timing	Responsible Party
MM-BIO-1	<u>California tiger salamander.</u> Prior to commencing construction-related activities on grassland or wetland Prior to commencing construction-related activities on grassland or wetland habitat suitable to support California tiger salamander, the project shall obtain a CESA ITP from CDFW for impacts to California tiger salamander and comply with the ITP. Copies of the ITP shall be provided to the City prior to the commencement of construction-related activities. The project shall obtain authorization from USFWS for impacts to California tiger salamander and comply with the authorization. The project shall also provide habitat compensation for California tiger salamander in accordance with the ITP, which may be informed by the SRP CS, and the Reinitiation of Formal Consultation on Issuance of Clean Water Act, Section 404 Permits by the USACE on the Santa Rosa Plain, Sonoma County, California (2020 PBO), as applicable. Please note that the CESA ITP habitat compensation requirements are often consistent with the SRP CS and 2020 PBO but may differ based on site-specific conditions.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
MM-BIO-2	<u>Special-status plants.</u> Prior to ground disturbance, the project shall submit a habitat assessment prepared by a Qualified Biologist for North Coast semaphore grass and other special-status plants and an evaluation of potential direct and indirect impacts to any on-site or adjacent off-site habitat, such as modification of hydrological conditions or construction related sedimentation into potentially occupied habitat, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation. If suitable habitat for North Coast semaphore grass or other special-status habitat is observed and may be impacted, a Qualified Biologist shall conduct protocol level plant surveys prior to project activities. No later than 30 days prior to initiating project activities, the project shall provide survey reports for protocol surveys for CESA-	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

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	listed and other special-status plants to CDFW and obtain CDFW's written approval of the reports, unless otherwise approved in writing by CDFW. Surveys shall be conducted according to CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants), during appropriate conditions, and include visiting reference populations, unless otherwise approved in writing by CDFW. Surveys should include the entire extent of any directly or indirectly impacted suitable wetland habitat for special-status wetland plants, including portions of the wetland on adjacent parcels or not directly impacted, as impacts to part of a wetland often affects the entire wetland. Evaluation of indirect impacts to special-status wetland plants may necessitate a thorough hydrological assessment that fully analyzes existing and post-project conditions to seasonal wetland habitat. If CESA-listed plants are documented on-site or off-site where they may be directly or indirectly impacted, or the surveys are not approved in writing by CDFW, the project shall immediately notify CDFW, and no project work may commence until the project obtains a CESA ITP. If any non-CESA listed special-status plant species are observed, such as California Rare Plant Rank plants, the project shall fully avoid direct and indirect impacts to all individuals and prepare and implement a CDFW-approved avoidance plan prior to project activities. If full avoidance is not possible, project activities may not commence until the project has consulted with CDFW and obtained CDFW's written approval, which may include seed salvage, transplant, or other protective measures appropriate for the species.		
MM-BIO-3	<u>Swainson's hawk</u>. If project activities are scheduled during the nesting season for Swainson's hawk (March 1 to September 15), prior to beginning work on the project, a qualified biologist shall conduct surveys according to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&inline) and prepare a report documenting the survey results, unless otherwise approved in writing by CDFW. The project shall obtain CDFW's written approval of the qualified biologist and survey report prior to starting construction activities between March 1 and September 15. Survey methods shall be closely followed	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

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	by starting early in the nesting season (late March to early April) to maximize the likelihood of detecting an active nest (nests, adults, and chicks are more difficult to detect later in the growing season because trees become less transparent as vegetation increases). Surveys shall be conducted: 1) within a minimum 0.5-mile radius of the project site or a larger area if needed to identify potentially impacted active nests, unless otherwise approved by CDFW in writing, and 2) for at least the two survey periods immediately prior to initiating project-related construction activities. <u>Surveys shall occur annually for the duration of the project.</u> The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. If active Swainson's hawk nests are detected, the project shall immediately notify CDFW and implement a 0.5-mile construction avoidance buffer around the nest until the nest is no longer active as determined by a qualified biologist, unless otherwise approved by CDFW in writing. Any detected nesting Swainson's hawk shall be monitored by the qualified biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW. If take of Swainson's hawk cannot be avoided, the project shall consult with CDFW pursuant to CESA and obtain an ITP before project activities may commence.		
MM-BIO-4	<u>Swainson's hawk foraging habitat.</u> A Qualified Biologist shall evaluate if the project would result in loss of Swainson's hawk foraging habitat, and if so shall quantify the loss in acres and submit this information to CDFW and obtain CDFW's written approval of it. Prior to project construction, if the project would result in loss of Swainson's hawk foraging habitat, the project shall provide Swainson's hawk foraging habitat mitigation at a minimum 1:1 ratio, which shall include: 1) permanent preservation of the species' foraging habitat through a conservation easement and implementing and funding a long-term management plan in perpetuity, or 2) purchase of Swainson's hawk foraging habitat credits at a CDFW-approved mitigation bank, unless otherwise approved in writing by CDFW. An ITP obtained for Swainson's hawk may require additional habitat compensation to achieve full mitigation.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
MM-BIO-5	<u>Special-status fish.</u> In water work shall be avoided where special-status fish such as longfin smelt or white sturgeon may occur, as determined by a Qualified Biologist based on a review of CNDDDB and consultation with CDFW. If take of the above fish species or any CESA listed or	Prior to Ground Disturbance and for Duration of	Project Applicant

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	candidate aquatic listed species cannot be avoided, the project shall obtain a CESA ITP from CDFW prior to commencing project activities and shall comply with the ITP. The project shall also consult with the U.S. Fish and Wildlife Service or NMFS for any impacts to federally listed fish.	Construction	
MM-BIO-6	<u>Salt marsh fully protected species.</u> Where suitable habitat salt marsh habitat is present, a Qualified Biologist shall be present on-site to survey and monitor for CDFW Fully Protected species, including salt marsh harvest mouse, California Ridgway's rail, and California black rail, during: a) all vegetation removal or disturbance, b) the construction of exclusion fencing, and c) all work within 300 feet of tidal or pickleweed habitats. A Biological Monitor may be required to monitor for CDFW Fully Protected species after surveys and construction of exclusion fencing are completed. The Qualified Biologist or Biological monitor shall have the authority to stop work if deemed necessary for any reason to protect these species, or any other special-status species. Take or possession of these CDFW Fully Protected species is prohibited (Fish & G. Code, §§ 3511 & 4700).	Duration of Construction	Project Applicant
MM-BIO-7	<u>Salt marsh fully protected species – tide.</u> Project activities shall occur within 50 feet of suitable salt marsh harvest mouse, California Ridgway's rail, or California black rail habitat within two hours before and after an extreme high tide event or when adjacent tidal marsh is flooded. Extreme high tide events are defined as a tide forecast of 6.5 feet or higher measured at the Golden Gate Bridge and adjusted to the timing of local high tides. If salt marsh harvest mouse exclusion fencing has been installed and work is conducted outside of California Ridgway's rail and California black rail breeding season (see measures below), or as otherwise approved in writing by CDFW, this restriction is waived.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
MM-BIO-8	<u>California black rail and California ridgeway's rail.</u> Project activities on or within 700 feet of tidal marsh or suitable California Ridgway's rail or California black rail habitat shall be avoided during the breeding season (January 15 – August 31 for California Ridgway's rail, February 1 – August 31 for California black rail) each year unless appropriately timed, yearly passive and call back protocol level surveys are conducted by a Qualified Biologist and survey methodology and results are submitted to and accepted in writing by CDFW. Surveys shall focus on suitable habitat that may be disturbed by project activities during the breeding season to ensure	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

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	that these species are not nesting in these locations. The Qualified Biologist shall have appropriate authorizations from CDFW and USFWS to conduct the surveys. If breeding California Ridgway's rail or California black rail are determined to be present, no activities, visual disturbance (direct line of sight) and/or an increase in the ambient noise level shall occur within a minimum of 700 feet from areas where California Ridgway's rail and/or California black rail have been detected during the breeding season, unless otherwise approved in writing by CDFW. If surveys have not been conducted, all work shall be conducted a minimum of 700 feet from California Ridgway's rail and/or California black rail habitat during breeding season, unless otherwise approved in writing by CDFW.		
MM-BIO-9	<u>Salt marsh harvest mouse.</u> Prior to impacting salt marsh habitat, a CDFW approved Qualified Biologist, familiar with salt marsh harvest mouse, shall walk through and inspect suitable habitat prior to vegetation removal and search for signs of harvest mice or other sensitive wildlife and plants. Following inspection, personnel, under the supervision of the Qualified Biologist, shall disturb (e.g., flush) vegetation to cause movement of salt marsh harvest mouse into adjacent marsh areas. Flushing of vegetation shall first occur in the center of the site then progress toward the two sides away from the open water areas or away from impacted habitat. Immediately following vegetation flushing, personnel, under the supervision of the Qualified Biologist, shall remove vegetation with hand tools (e.g., weed-eater, hoe, rake, trowel, shovel, grazing) so that vegetation is no taller than 2 inches.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
MM-BIO-10	<u>Salt marsh harvest mouse barrier.</u> After vegetation removal, a mouse proof barrier shall be placed along the edge of the area removed of vegetation to further reduce the likelihood of salt marsh harvest mouse returning to the area prior to construction, unless otherwise approved in writing by CDFW. The fence shall be made of a heavy plastic sheeting material that does not allow salt marsh harvest mice to pass through or climb, and the bottom shall be buried to a depth of 4 inches so that salt marsh harvest mouse cannot crawl under the fence. Fence height shall be at least 12 inches higher than the highest adjacent vegetation with a maximum height of 4 feet. All supports for the exclusion fencing shall be placed on the inside of the work area. An approximately 2-foot-wide de-vegetated buffer shall	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

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	be created along the habitat side of the exclusion fence.		
MM-BIO-11	<u>Salt marsh harvest mouse barrier maintenance.</u> The salt marsh harvest mouse exclusion fencing shall remain in operating condition throughout the duration of the construction phase. The Qualified Biologist or Biological Monitor, or other CDFW approved person, shall daily inspect the integrity of the exclusion fencing to ensure there are no gaps, tears or damage. Maintenance of the fencing shall be conducted as needed. Any necessary repairs to the fencing shall be completed within 24 hours of the initial observance of the damage. Any mice found along or outside the fence shall be closely monitored until they move away from the project area.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
MM-BIO-12	<u>Burrowing owl.</u> If the project occurs during the burrowing owl wintering season from September 1 to January 31, prior to project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the project area pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report habitat assessment and survey methodology. The habitat assessment shall focus on searching the CNDDDB and potentially other sources for any burrowing owl records on or within one mile of the project area, vegetation type and height, suitable burrows (with an opening of >11 cm in diameter and a depth of >150 cm), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to CDFW and the project shall obtain CDFW's written approval of the	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

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	habitat assessment prior to starting project activities. If suitable burrowing owl habitat is observed, four surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report, and shall begin on August 1. The site visits shall be spread evenly throughout August and the non-breeding season, unless otherwise approved in writing by CDFW. The survey results shall be emailed to CDFW and the project shall obtain CDFW's written approval of the survey results prior to starting project activities. In addition, a survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report. Time lapses of more than 14 days between project activities may trigger subsequent surveys including, but not limited to a final survey conducted within 24 hours prior to ground disturbance. If burrowing owl is detected, the project shall immediately notify CDFW. The project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist or Biological Monitor shall monitor any detected owl to ensure it is not disturbed. If the surveys result in the detection of the burrowing owl that may be impacted by the project, or the presence of this species and impacts to it are assumed, the project shall obtain and comply with an ITP from CDFW. Habitat compensation for impacts to occupied wintering burrowing owl habitat (habitat known to have been occupied by wintering burrowing owl within the last 3 years) shall also be provided at a minimum 2:1 mitigation to impact ratio prior to project construction, unless otherwise approved by CDFW. Habitat mitigation shall include permanent preservation of high-quality burrowing owl wintering habitat through a conservation easement and implementing and funding a long-term management plan in perpetuity, to be finalized before project construction, unless otherwise approved in writing by CDFW. The burrowing owl mitigation plan shall be submitted to CDFW for approval before project construction and include a review of suitability of mitigation lands for burrowing owl as confirmed by a Qualified Biologist. The project shall obtain CDFW's written approval of the burrowing owl mitigation plan. Please be advised that an ITP obtained for burrowing owl may have additional requirements to achieve full mitigation.		
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MM-BIO-13	<u>Lake and stream alteration.</u> For project activities that may substantially alter the bed, bank, or channel of any streams (including ephemeral or intermittent streams) or lake, an LSA Notification shall be submitted to CDFW pursuant to Fish and Game Code section 1602 prior to project construction. If CDFW determines that an LSA Agreement is warranted, the project shall comply with all required measures in the LSA Agreement, including, but not limited to requirements to mitigate impacts to the streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a 3:1 mitigation to impact ratio based on acreage and linear distance as close to the project area as possible and within the same watershed and year as the impact, unless otherwise approved in writing by CDFW. Temporary impacts shall be restored on-site in the same year as the impact. The project shall also consult with the RWQCB and USACE to impacts to waters such as streams, lakes, and wetlands, and obtain permits if necessary pursuant to the Clean Water Act and Porter Cologne Water Quality Control Act.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
MM-BIO-14	<u>Sensitive natural communities.</u> The project shall implement restoration on-site or off-site to mitigate temporary or permanent impacts to sensitive natural communities at a minimum 1:1 (restore on-site temporary impacts) or 3:1 (permanent impacts) mitigation to impact ratio for acres and linear feet of impacts, and trees, if applicable, shall be replaced at an appropriate ratio based on size and species, and temporal habitat loss, or provide habitat compensation including permanent protection of habitat at the same ratio through a conservation easement and preparing and funding implementation of a long-term management plan, unless otherwise approved in writing by CDFW.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant

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Letter 6

Commenter: Erin Chappell Regional Manager, California Department of Fish and Wildlife (CDFW)

Date: May 13, 2026

Response 6.1

The commenter describes CDFW's role as a Trustee and Responsible Agency for fish and wildlife resources in accordance with California state law and CEQA. The commenter provides a summary of the proposed project.

This comment provides informational comments. No revisions to the Draft EIR are required in response to this comment.

Response 6.2

The commenter summarizes the regulatory process governing take of protected species and encourages early consultation with CDFW in the project planning process for projects that may require incidental take permits for state-listed species. The commenter describes CEQA's requirement for mandatory findings of significance for projects that are likely to substantially impact threatened or endangered species. The commenter summarizes the regulatory process governing lake and streambed alterations, raptors and other nesting birds, and California fully protected species.

This comment does not contain a substantive comment on the Draft EIR. Responses to specific comments on the Draft EIR are provided below.

Response 6.3

The commenter recommends that the City prepare a procedure or checklist, pursuant to CEQA Guidelines Section 15168, to evaluate potential impacts of future projects facilitated by the General Plan Update, and further recommends that site-specific biological analyses be prepared by a qualified biologist.

The City acknowledges the commenter's reference to CEQA Guidelines Section 15168 regarding programmatic EIRs. As discussed under 2.3.2, *General Plan Buildout*, in Chapter 2, *Project Description* of the Draft EIR, this EIR was prepared as a program-level analysis that evaluates the potential environmental effects of implementation of the General Plan Update and establishes the framework for subsequent project-level review. Consistent with CEQA Guidelines Section 15168, future discretionary projects facilitated by the General Plan Update will be subject to project-specific environmental review, as appropriate, to determine whether additional analysis is required based on the details of each proposal and the environmental setting at the time of application. This is an adequate mechanism to evaluate site-specific impacts without the need for a separate checklist or procedural document.

Impacts to biological resources are evaluated in Section 4.4, *Biological Resources*, of the Draft EIR. As discussed under Impact BIO-1, the Draft EIR would require implementation of Mitigation Measure BIO-1, "Biological Resources Screening and Assessment." This mitigation measure requires that for projects on undeveloped parcels, or where site conditions do not clearly indicate prior development, the City shall require a qualified biologist to conduct a baseline biological resources screening and assessment. The purpose of this assessment is to identify the potential presence of special-status species, sensitive vegetation communities, wetlands, and critical habitat that could be affected by the proposed project.

Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 6.4

The commenter states the project could facilitate development that may significantly impact special-status species by reducing populations, restricting ranges, or adversely modifying habitat. The commenter notes

that the Draft EIR identifies numerous special-status plant and animal species in or near the City and specifically references California tiger salamander, Swainson's hawk, longfin smelt, North Coast semaphore grass (listed as threatened under CESA), and burrowing owl (a CESA candidate species and California Species of Special Concern). The commenter opines the Draft EIR does not include adequate mitigation measures to address potential impacts to these CESA-listed and special-status species and provides species-specific discussion of potential impacts associated with future development facilitated by the project.

As discussed under 2.3.2, *General Plan Buildout*, in Chapter 2, *Project Description* of the Draft EIR, this EIR was prepared as a program-level analysis that evaluates the potential environmental effects of implementation of the General Plan Update. It does not authorize specific projects, and future development facilitated by the project would require additional project-level review. As discussed under Impact BIO-1 in Section 4.4, *Biological Resources*, implementation of Mitigation Measures BIO-1 through BIO-7 would reduce potential impacts to special-status species and nesting birds to a less than significant level by requiring Biological Resources Screening and Assessments, protocol surveys, avoidance and minimization, habitat restoration, and preconstruction surveys. Specifically, Mitigation Measure BIO-1 requires that for projects on undeveloped parcels, or where site conditions do not clearly indicate prior development, the City shall require a qualified biologist to conduct a baseline biological resources screening and assessment. If any special-status species are identified on an individual site as part of this screening, Mitigation Measures BIO-2 through BIO-7 shall be required as applicable, and design alterations, further technical studies (e.g., protocol surveys) and consultations with the United States Fish and Wildlife Service, CDFW, and/or other local, state, and federal agencies may be required. Accordingly, potential impacts to special-status species listed by the commenter and other species would be identified at the individual project level and addressed in accordance with CEQA, the California Fish and Game Code, and other applicable regulations. No revisions to the Draft EIR would be required in response to this comment.

Response 6.5

The commenter recommends incorporation of species-specific mitigation measures addressing California tiger salamander, special-status plants, Swainson's hawk, special-status fish, salt marsh habitat and related species, California Ridgway's rail and California black rail, and burrowing owl.

As discussed under 2.3.2, *General Plan Buildout*, in Chapter 2, *Project Description* of the Draft EIR, this EIR was prepared as a program-level analysis that evaluates the potential environmental effects of implementation of the General Plan Update. The General Plan Update establishes a framework for future land use and development but does not approve or authorize specific projects. Accordingly, the level of mitigation included in the Draft EIR is appropriately programmatic and establishes standards and processes that ensure site-specific impacts are identified and addressed during subsequent project-level review.

As discussed under Impact BIO-1 in Section 4.4, *Biological Resources*, of the Draft EIR, implementation of Mitigation Measures BIO-1 through BIO-7 would reduce potential impacts to special-status species and sensitive habitats to a less than significant level. These measures require, among other things, site-specific Biological Resources Screening and Assessments, protocol-level surveys where appropriate, consultation with applicable resource agencies, and implementation of avoidance, minimization, and habitat restoration measures based on the conditions present at each project site. The additional measures recommended by the commenter are generally species- and site-specific in nature and would prescribe detailed requirements that may not be applicable to all future projects or locations within the Plan Area. Incorporating prescriptive measures at the program level could limit the City's ability to require tailored mitigation for specific biological resources and regulatory requirements present at the time individual projects occur.

Consistent with CEQA and applicable state and federal regulations, including the California Endangered Species Act and Fish and Game Code, the need for species-specific avoidance, minimization, and mitigation measures will be evaluated on a case-by-case basis during subsequent environmental review.

Where special-status species or sensitive habitats, including those identified by the commenter, are present or have the potential to occur, appropriate measures, including focused surveys, agency consultation, and species-specific protections, will be required. Therefore, the Draft EIR's mitigation measures are sufficient for a program-level document and ensures that impacts to biological resources will be appropriately addressed at the project level.

Overall, no revisions to the Draft EIR would be required in response to this comment.

Response 6.6

The commenter states development facilitated by the General Plan Update could result in potentially significant impacts to riparian habitat, wetlands, or other sensitive natural communities. The commenter recommends incorporation of additional mitigation measures that require a lake and streambed alteration agreement for projects that may alter streams or lakes, and that require restoration of sensitive natural communities.

Potential impacts to riparian habitat, wetlands, or other sensitive natural communities are analyzed under Impact BIO-2 in Section 4.4, *Biological Resources* of the Draft EIR. As discussed therein, compliance with local, state and federal regulations pertaining to these resources, as well as the proposed policies of the General Plan Update and Mitigation Measures BIO-1 through BIO-4, would reduce impacts to these resources to a less than significant level. Compliance with Fish and Game Code Section 1602, including submission of a lake and streambed alteration notification and adherence to any resulting Lake and Streambed Alteration Agreement, is a mandatory requirement of state law for projects that may affect streambeds or riparian habitat.

In addition, impacts to regulated sensitive natural communities such as riparian, including requirements for avoidance, minimization, and compensatory mitigation are subject to review and approval by CDFW and other regulatory agencies with jurisdiction. These agencies impose site-specific mitigation requirements, including ratios and performance standards, through their permitting processes based on the particular resources affected. Because these requirements are already enforceable under applicable state and federal law, they do not constitute mitigation measures under CEQA. Accordingly, incorporation of the proposed mitigation measures is not necessary, as the protections identified by the commenter are already ensured through existing regulatory requirements and agency oversight.

However, to further reduce potential impacts to sensitive natural communities and further clarify restoration mitigation, the following revisions were made to page 4.4-29 of the Draft EIR:

BIO-4 Habitat Restoration Plan

If federally or state-listed plants or non-listed special-status CRPR 1 and 2 plant populations identified during special status plant surveys pursuant to Mitigation Measure BIO-2, cannot be avoided pursuant to Mitigation Measure BIO-3, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 per acre of impact (and 1:1 per individual plant), and to be determined by the City in coordination with CDFW and USFWS for each species as a component of habitat restoration. If sensitive natural communities are identified pursuant to Mitigation Measure BIO-1, and the project would substantially reduce the community's extent, fragment remaining regional habitat, or threaten the community's continued existence, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 per acre of impact.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 6.7

The commenter requests that special status species and natural communities detected during surveys be submitted to the California Natural Diversity Database.

Due to the programmatic nature of the Draft EIR, biological surveys were not conducted and therefore no submittals to the California Natural Diversity Database are warranted at this time. However, mitigation measures identified in Section 4.4, *Biological Resources*, of the Draft EIR require special-status plant surveys and pre-construction wildlife surveys for individual development projects facilitated by the proposed project to confirm the presence of special-status species. The project proponent must implement Mitigation Measures BIO-1 through BIO-7; reporting occurrences to the CNDDDB may be done for documentation purposes, but such reporting is not a mitigation measure, and does not substitute for the required mitigation. No revisions to the Draft EIR would be required in response to this comment.

Response 6.8

The commenter states that payment of CDFW fees is required.

The City thanks the commenter for their reminder of recording obligations and filing fees. Once the project is approved, the City will pay the required CDFW fees at the time the Notice of Determination for the Final EIR is filed. No revisions to the Draft EIR would be required in response to this comment.

Response 6.9

The commenter concludes their comments and provides references.

This comment does not contain a substantive comment on the Draft EIR. No further response is required.

Response 6.10

The commenter provides the recommended mitigation measures in a draft Mitigation Monitoring and Reporting Plan table.

Refer to Responses 6.5 and 6.6 for responses related to the recommended mitigation measures.

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



May 18, 2026

SCH #: 2025080378
GTS #: 04-SON-2025-01078
GTS ID: 37562
Co/Rt/Pm: SON/VAR/VAR

Olivia Ervin
City of Petaluma, Principal Environmental Planner
11 English Street
Petaluma, CA 94952

Re: City of Petaluma General Plan Update – 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 City of Petaluma General Plan Update. 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 March 2026 DEIR.

7.1

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

Project Understanding

The proposed project consists of an update to the City's General Plan which will serve as a long-term framework for future growth and development in the City of Petaluma.

Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City's adopted VMT thresholds. Per the DEIR, this project is found to have significant and unavoidable VMT impact.

7.2

To mitigate VMT impacts, please consider fair share contributions to off-site VMT reduction projects. Such contributions could include but are not limited to: funding regional transit service enhancements (e.g., SMART, Petaluma Transit, Sonoma County Transit); contributing to regional active transportation infrastructure (e.g., SMART Pathway, Petaluma River Trail, regional bike networks); supporting regional TDM programs, mobility wallets, or e-bike incentives. The City should coordinate with

7.3

Sonoma County Transportation and Climate Authorities (SCTCA), the Metropolitan Transportation Commission (MTC), and Caltrans to identify appropriate fair share formulas and eligible projects and document these contributions in its Mitigation Monitoring and Reporting Program (MMRP).

7.3 cont.

Please also consider exploring the following options to help further reduce the VMT impact if the implementation of applicable Transportation Demand Management (TDM) measures is insufficient to mitigate the project VMT impact to a less-than-significant level: VMT based Transportation Impact Fee program, VMT Mitigation Exchange, and VMT Mitigation Bank. Please note that Caltrans has funded several local/regional agencies to study the feasibility of a variety of VMT mitigation programs through the Sustainable Transportation Planning Grant program ([link](#)). Caltrans welcomes the potential opportunities to work with the City.

7.4

Multimodal Transportation Planning

Please review and include reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans Bay Area Bike Plan Update* (2025) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

7.5

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

7.6

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

7.7

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the General Plan development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Olivia Ervin, Principal Environmental Planner
May 18, 2026
Page 3

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Lisel Ayon, Associate Transportation Planner, via 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.

7.7 cont.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luo Yunsheng'.

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

c: State Clearinghouse

Letter 7

Commenter: Yunshen Luo, Branch Chief, Local Development Review, California Department of Transportation

Date: May 18, 2026

Response 7.1

The commenter summarizes the local development review program and indicates their comments do not indicate an official position or approval by Caltrans on the project. The commenter also summarizes the project.

This comment provides informational comments. No revisions to the Draft EIR are required in response to this comment.

Response 7.2

The commenter states the VMT analysis was conducted in a manner consistent with the City's adopted VMT thresholds and that the project has a significant and unavoidable VMT impact.

No revisions to the Draft EIR are required in response to this comment.

Response 7.3

The commenter recommends that fair share contributions to off-site VMT reduction projects be considered and documented in the mitigation monitoring and reporting program (MMRP) for this project.

The City values the opportunity to collaborate with Caltrans, SCTCA, and MTC on future fair share contribution opportunities. No revisions to the Draft EIR are required in response to this comment.

Response 7.4

The commenter recommends that the city explore the implementation of VMT based Transportation Impact Fee program, VMT Mitigation Exchange, and VMT Mitigation Banks to further reduce VMT impacts.

As discussed in Section 4.14 of the EIR, mitigation measure TRA-1 includes implementation of VMT reduction and banking measures to reduce VMT impacts. Even with implementation of this measure, VMT impacts would remain significant and unavoidable. No revisions to the Draft EIR would be required in response to this comment.

Response 7.5

The commenter recommends that the EIR include reference to the Caltrans District 4 Pedestrian Plan (2021) and the Caltrans Bay Area Bike Plan Update (2025).

The following revisions were made to page 4.14-10 of the Draft EIR:

Caltrans District 4 Pedestrian Plan

The Caltrans District 4 Pedestrian Plan, released in 2021, is a comprehensive guide aimed at improving pedestrian infrastructure across the nine-county Bay Area. This plan identifies existing conditions and prioritizes location-based needs to enhance pedestrian safety and accessibility. Developed in collaboration with local agencies, advocates, and the public, the plan serves as a crucial reference for planners and project designers. It promotes alternatives to driving, aiming to reduce congestion, lower greenhouse gas emissions, and encourage healthier lifestyles. The plan is part of

the broader Bay Area Active Transportation Plan, which integrates pedestrian and bicycle needs into a cohesive strategy.

Caltrans District 4 Bike Plan

The Caltrans District 4 Bike Plan, finalized in 2018, evaluates the bicycling needs across the Bay Area's state transportation network. This plan identifies and prioritizes infrastructure improvements to enhance bicycle safety, mobility, and accessibility. It builds on the 2017 California State Bicycle and Pedestrian Plan and aims to create an integrated bicycle network that supports safe and convenient cycling for all ages and abilities. The plan was developed with input from the public and collaboration with local and regional partners, ensuring that proposed improvements align with local networks and address barriers to cycling.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 7.6

The commenter recommends that the EIR include reference to the Caltrans Director's Policy 37 in relation to the Complete Streets policies included from the proposed General Plan.

The following revisions were made to page 4.14-10 of the Draft EIR:

Complete Streets Act

The California Complete Streets Act (AB 1358) adopted in 2008, requires that cities and other public agencies incorporate "Complete Street" policies when updating their General Plan Circulation Element. The term "Complete Streets" refers to a balanced, multimodal transportation network that meets the needs of all users of streets, including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, public transportation, and seniors. A "Complete Street" is one that provides safe and convenient travel in a manner that is suitable to the local context. Complete Streets make travel safe for all users, including bicyclists, pedestrians, motorists, transit vehicles, and people of all ages and abilities. Each street does not need to provide dedicated space to all users, but the network must accommodate the needs of all users.

In 2021, Caltrans adopted Director's Policy 37, a policy directive related to non-motorized travel throughout the State. Director's Policy 37 states:

The California Department of Transportation (Caltrans) recognizes that walking, biking, transit, and passenger rail are integral to our vision of delivering a brighter future for all through a world-class transportation network. Additionally, Caltrans recognizes that streets are not only used for transportation but are also valuable community spaces. Accordingly, in locations with current and/or future pedestrian, bicycle, or transit needs, all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. When decisions are made not to include complete streets elements in capital and maintenance projects, the justification will be documented with final approval by the responsible District Director. Opportunities for complete streets exist in all phases of project development from planning and design to construction, operations, and maintenance. Complete streets projects should prioritize underserved communities that have been historically harmed and segmented by the transportation network and should serve people of all ages and abilities. Furthermore, Caltrans commits to removing unnecessary policy and procedural barriers and partnering with communities and agencies to ensure projects on local and state transportation systems improve the connectivity to existing and planned pedestrian, bicycle, and transit facilities, and accessibility to existing and planned destinations, where possible.

These revisions to the Draft EIR do not change the significance findings or impact analysis of the Draft EIR.

Response 7.7

The commenter emphasizes the importance of equity and public engagement and encourages the city to foster equitable public engagement to ensure future transportation decisions and investments reflect community interests and values.

This comment does not contain a substantive comment on the Draft EIR; however the City acknowledges this comment and commits to continuing their public engagement work for future transportation projects within the city. No revisions to the Draft EIR would be required in response to this comment.



May 18, 2026

Heather Gurewitz, AICP
City of Petaluma Community Development Department
11 English Street
Petaluma CA 94952

RE: City of Petaluma Draft General Plan Update and Environmental Impact Report

Thank you for the opportunity to review the City of Petaluma Draft General Plan Update and Environmental Impact Report (EIR), in accordance with the Sustainable Groundwater Management Act (SGMA) and the California Environmental Quality Act (CEQA).

8.1

The Petaluma Valley basin is a medium priority basin and is regulated by the State of California under SGMA. The Petaluma Valley Groundwater Sustainability Agency (PVGSA) was established in 2017, and the City is a member agency of the GSA through a Joint Powers Agreement. The Department of Water Resources has approved a Groundwater Sustainability Plan (GSP) for the Petaluma Valley basin.

SGMA requires coordination between land-use planning and groundwater management, and specifically that General Plans be updated to align with GSPs, particularly regarding the identification of water sources, conjunctive use, and recharge areas. Cities and counties must consider the GSP when updating General Plans and ensure that zoning and land-use decisions do not hinder the ability to achieve sustainable groundwater management.

8.2

The PVGSA staff have reviewed the Draft General Plan and have the following comments regarding groundwater management.

- The Land Use map and policies, which focus on in-fill development and incentives for increased residential use density, are consistent with assumptions in the Urban Water Management Plan and therefore

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consistent with the GSP 50-year growth projections (GSP Appendix 3-D). The General Plan Update policies are compatible with the DWR adopted GSP and future growth under these policies are not expected to result in, or contribute to, undesirable results or to exceed other sustainability indicators identified in the GSP.

- The PVGSA supports other General Plan goals and policies regarding water resource management and climate adaptation. Many policies and actions in the Natural Features, Systems, and Resources Element, as well as the Land Use Element, support protection of riparian areas, wetlands, and water quality and highlight practices that also protect groundwater resources. Other General Plan policies that the PVGSA supports are specific to groundwater management activities directly linked to GSA initiatives and jurisdiction. These include the following goals and policies of the Infrastructure and Utilities, and Safety Elements:

Goal IU-7 Groundwater Sustainability: *The City is a member agency of the Petaluma Valley Groundwater Sustainability Agency (GSA) and other regional agencies to improve the long-term resilience and natural function of groundwater resources.*

Policy IU-7.1 Manage groundwater resources: *Manage groundwater as a valuable and limited shared resource by protecting groundwater recharge areas and stream sides from urban encroachment, enacting stormwater standards to reduce runoff inside the city, and enacting watershed restoration efforts within the greater Petaluma watershed.*

Action IU-7.1.1: *Develop additional wells to supply the average minimum water demand for emergency use or as proposed in the IWMP without impacting other groundwater users or groundwater dependent ecosystems.*

Action IU-7.1.2: *Design stormwater infrastructure to utilize flood waters to recharge basins.*

Action IU-7.1.3: *Coordinate with the Petaluma Valley GSA to monitor groundwater sustainability indicators, review and monitor new development impacts on groundwater use, and coordinate implementation of water use enforcement measures, if determined necessary to support sustainable groundwater.*

8.3
cont.

Action IU-7.1.4: *Require new development and redevelopment that add impervious surface to match the previous volume of groundwater recharge.*

Action IU-7.1.5: *Support projects and policies that increase groundwater recharge and absorption of water in high-recharge areas and in the upper watershed, including outside City limits.*

Action IU-7.1.6: *Collaborate with the County when reviewing development applications to examine the combined impacts of new septic tanks and other potentially contaminating activities, and the ability to adequately protect groundwater resources. Collaborate with the County on implementing the updated 2022 Well Ordinance.*

Policy IU-7.2: Preserve groundwater resources for emergencies and drought: *Preserve groundwater resources to meet emergency needs and multiyear drought supply reductions.*

Action IU-7.2.1: *Continue to use groundwater to meet emergency water supply needs.*

Policy IU-5.3 Increase use of recycled water: *Reduce potable water demands by converting existing potable water uses to tertiary recycled water, promoting private onsite reuse where feasible, and implementing related actions in the Blueprint for Climate Action.*

Policy SAF-7.3 Address drought risks in water management planning: *Mitigate the risks of drought in water management plans.*

Action SAF-7.3.1: *Update the Urban Water Management Plan (UWMP) to address drought risks, considering projects that will have impacts on the water supply.*

The PVGSA staff have reviewed the Draft EIR on the proposed General Plan Update and has the following comments:

8.4

- The PVGSA requests the following minor addition be made to the Draft EIR:

On page 4.9-3 please include the following text:

The Petaluma Valley groundwater basin (Figure 4.9-2) is designated by the State as a medium priority basin and is regulated by the Sustainable Groundwater Management Act (SGMA). Groundwater management is locally implemented by the Petaluma Valley Groundwater Sustainability Agency (PVGSA), of which the City is a member agency. The California Department of Water Resources (DWR) approved a Groundwater Sustainability Plan (GSP) for the Petaluma Valley basin in 2023.

- The PVGSA supports the Hydrology impact analysis and conclusions of the Draft EIR that possible future development under the General Plan Update would not be in conflict with the adopted GSP for the Petaluma Valley groundwater basin, as identified in Impact HYD-2:

***Impact HYD-2.** Development facilitated by the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management of the basin would be impeded. Proposed project development would adhere to General Plan Update goals and policies and comply with NPDES requirements. This impact would be less than significant.*

We appreciate the City's close collaboration on planning and implementing groundwater sustainability programs. Continued coordination helps ensure that local land-use planning decisions support groundwater sustainability goals and minimizes potential conflicts. Thank you for the opportunity to provide input on the Draft General Plan Update and Draft EIR.

Sincerely,



Sandi Potter, Administrator
Petaluma Valley Groundwater Sustainability Agency

Letter 8

Commenter: Sandi Potter, Administrator, Petaluma Valley Groundwater Sustainability Agency

Date: May 18, 2026

Response 8.1

The commenter summarizes the state of the Petaluma Valley basin and the requirements of SGMA.

This comment does not contain a substantive comment on the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 8.2

The commenter states that the land use map and policies are consistent with assumptions in the Urban Water Management Plan. The commenter states that future growth under the General Plan is therefore not expected to result in or contribute to undesirable results or exceed sustainability indicators identified in the GSP.

This comment is in agreeance with the land use map and policies and no revisions to the Draft EIR are required in response to this comment.

Response 8.3

The commenter expresses support for General Plan goals, policies, and actions regarding water resource management, climate adaptation, and groundwater sustainability including policies IU-7.1, IU-7.2, IU-5.3, and SAF-7.3.

This comment is in agreeance with the General Plan goals, policies, and actions. No revisions to the Draft EIR are required in response to this comment.

Response 8.4

The commenter requests that the following text be added on page 4.9-3 of the EIR: “The Petaluma Valley groundwater basin (Figure 4.9-2) is designated by the State as a medium priority basin and is regulated by the Sustainable Groundwater Management Act (SGMA). Groundwater management is locally implemented by the Petaluma Valley Groundwater Sustainability Agency (PVGSA), of which the City is a member agency. The California Department of Water Resources (DWR) approved a Groundwater Sustainability Plan (GSP) for the Petaluma Valley basin in 2023.”

The following text on page 4.9-3 of the Draft EIR was revised in response to this comment:

The Petaluma Valley groundwater basin (the basin) underlies a majority of the Plan Area as shown in Figure 4.9-2. The basin is designated by the State as a medium priority basin and is regulated by the Sustainable Groundwater Management Act (SGMA). Groundwater management is locally implemented by the Petaluma Valley Groundwater Sustainability Agency (PVGSA), of which the City is a member agency. The California Department of Water Resources (DWR) approved a Groundwater Sustainability Plan (GSP) for the Petaluma Valley basin in 2023.

Groundwater levels near Petaluma began to drop in the 1950s until the 1960s when seawater intrusion occurred along the Petaluma River due to increased groundwater pumping. In 1962, the city began importing water from the Russian River to restore groundwater levels. At this time the Russian River system became the City’s primary source of water via Sonoma Water. Since then, groundwater has remained steady with seasonal fluctuations of approximately 10 feet. Long-term hydrological monitoring and planning is conducted by the Petaluma Valley GSA. ~~In 2022, the~~

~~Groundwater Sustainability Plan for the Petaluma Valley Basin was drafted and in 2023 is was approved by the California Department of Water Resources (DWR).~~

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 8.5

The commenter expresses support for the analysis and conclusions included in the Hydrology section of the Draft EIR, including the less than significant impact findings for impact HYD-2 regarding groundwater supplies and groundwater recharge.

This comment is in agreeance with the analysis within the Draft EIR. No further response is required.

Response 8.5

The commenter expresses appreciation for the collaboration with the City on planning and implementing groundwater sustainability programs and the opportunity to provide input on the Draft EIR.

This comment does not contain a substantive comment on the Draft EIR. No further response is required.



**Sonoma
Water**

May 18, 2026

Olivia Ervin
Principal Environmental Planner
City of Petaluma
11 English St.
Petaluma, CA 95452

RE: Comments on the City of Petaluma's Draft Environmental Impact Report for the General Plan Update

Dear Ms. Ervin,

Thank you for the opportunity to review the City of Petaluma's (City) Draft Environmental Impact Report for the General Plan Update (Draft EIR). Sonoma County Water Agency (Sonoma Water) staff submits the following comments on the Draft EIR for the City's consideration.

COMMENTS

SECTION 4.9 HYDROLOGY WATER QUALITY

4.9.1 Setting

Page 4.9-1, second paragraph, last sentence: While the description notes that February is typically the wettest month, Sonoma Water recommends including the average total seasonal rainfall as well. The seasonal precipitation total provides a more comprehensive and meaningful representation of the region's hydrologic setting than the average rainfall of a single month and would support the accuracy of the environmental setting section.

Second paragraph, last sentence citation: The citation provided; WeatherSpark (<https://weatherspark.com/y/619/Average-Weather-in-Petaluma-California-United-States-Year-Round>) appears not to rely on data from actual weather stations in Petaluma. When attempting to view historical data, the site instead displays information from the San Francisco International Airport station, which is not representative of local conditions in Petaluma.

Additionally, Petaluma Airport has data back to 1893 (<https://www.ncei.noaa.gov/access/past-weather/38.695212,-122.995766,38.195212,-122.495766>)

a. Surface Water

Page 4.9-1 through 4.9-2, first paragraph: This description appears to be consistent with descriptions from Bulletin 118 for groundwater, which explains the inaccuracies noted here. At the state level, the SWRCB divides the state into nine hydrologic regions based on watershed boundaries.

9.4

Since 2017, however, the Department of Water Resources (DWR) has recognized the watershed boundaries published by the U.S. Geological Survey (USGS) as the official standard. For surface water, the USGS maintains the Watershed Boundary Dataset, which uses the Hydrologic Unit Code (HUC) system to classify watersheds and subwatersheds.

Second Paragraph, second sentence: The Petaluma River watershed (HUC 12: 180500020601) is shown in Figure 4.9-1, but description in this paragraph does not align with this watershed. The HUC 10 watershed Petaluma River-Frontal San Pablo Bay Estuaries (1805000206) is likely the watershed intended to be shown in the figure and referenced in the first sentence of the paragraph.

9.5

Second Paragraph, third sentence: Please note that the city also spans into the HUC 10 watershed San Pablo Bay (1805000208).

9.6

Second Paragraph, last sentence: Please note that not all runoff is conveyed through piped systems. Flood control channels manage surface runoff as well.

9.7

Third Paragraph, second sentence: Please note that the Petaluma River in the downtown area is subject to tidal influence.

9.8

Figure 4.9-1. Please consider a figure that identifies all the watersheds in the City.

9.9

c. Water Supply

Page 4.9-3, first paragraph, third sentence: Please note that as of 2025, the 10-year average groundwater contribution was approximately two percent, spanning three drought years (water years 2016, 2021, 2022). The maximum contribution was five percent in water year 2022.

9.10

First paragraph, last sentence: It would be helpful to include a discussion of the percent of potable demand that is offset by recycled water to provide context for understanding overall water supply reliability.

9.11

Page 4.9-4, Figure 4.9-2: Please clarify if the figure includes the 2018 basin modification.

9.12

Drinking Water

Page 4.9-5, first paragraph, first sentence: Please note that Petaluma primarily sources its potable water through wholesale purchases from Sonoma Water, which delivers water from the Russian River to the City through its transmission system.

9.13

Recycled Water

Page 4.9-6, first paragraph: The discussion of recycled water contains inaccuracies and could be interpreted as direct potable reuse. Updating the text is needed to provide a more complete and accurate description.

9.14

E. Flood hazards and sea level rise

Page 4.9-6, first paragraph, fifth sentence: Please note in reference to Figure 4.9-1, which shows the Petaluma watershed, that not all of the Plan Area is within this watershed. Consider revising to include the missing details to provide a more accurate description.

9.15

Dam and levee inundation

Page 4.9-8, first paragraph, first sentence: It appears this section is focused specifically on flooding hazards associated with dam and levee failures. Given that focus, it is unclear whether referencing lakes in the adjacent Russian River watershed is necessary or relevant. Please consider clarification whether these upstream lakes and their regulating dams have any potential for direct flooding impacts for the Plan Area.

9.16

Additionally, according to the reference provided, the Pinheiro Dam is listed as satisfactory with a low hazard. La Crema Winery Reservoir is referred to as Browns Lane and listed as fair with a high hazard. <https://nid.sec.usace.army.mil/nid/#/>

9.17

Policy 8-P-32

Page 4.9-14: This policy statement needs clarification. As written, it is unclear whether it prohibits all fill within areas subject to periodic inundation or if it is intended to allow fill as long as there is no net loss of storage capacity. Clarifying whether the intent is a complete prohibition or a zero-net-storage-loss standard would improve interpretation and implementation.

9.18

Policy 8-P-34

Page 4.9-14: Please note that while XP-SWMM is still an officially accepted model by FEMA, it is being phased out in favor of other software.

9.19

Sonoma Water Supply Strategic Action Plan

Page 4.9-15: Consider removing the Sonoma Water Supply Strategic Action Plan as a reference, as this plan is no longer being maintained or updated.

9.20

Impact Hyd-2

Page 4.9-19, second paragraph: The statement concludes that the proposed development would not increase groundwater pumping; however, if the overall water demand increases, the groundwater component, though only about 1 percent of supply, would also increase proportionally. This increase may be small, but the significance is not addressed here. Clarification is needed regarding whether the project could result in any measurable increase in groundwater extraction associated with higher total water use.

9.21

Impact HYD-3

Page 4.9-21, last paragraph: While Low Impact Development (LID) and regulatory frameworks such as NPDES, SWPPP, and BASMAA focus heavily on water quality and ensure drainage and excess stormwater are not released from a given project site for low recurrence interval storms, these features may be overwhelmed under larger storms like 10- to 100-year storm events. Consider alternatives designed specifically to provide high-capacity storage and conveyance for flood mitigation for new development.

9.22

HYD-4 impact analysis:

Page 4.9-22, second paragraph: The statement “the area of concern is minimal” is unclear. It is not evident whether this means that the geographic area subject to potential inundation is minimal, or that the potential impact area (i.e., severity or extent of consequences) is minimal. Clarifying whether the statement refers to the size of the inundation zone or the magnitude of potential impacts would improve accuracy and reader understanding.

9.23

Page 4.9-22, last paragraph continued onto page 23: Please provide reference to the studies that were undertaken to investigate future rainfall and incorporate into the analysis to strengthen the conclusion.

9.24

Page 4.9-23, first paragraph, last sentence: The statement is unclear as to whether the requirement of no net increase applies to all future development within the City, regardless of location, or only to development occurring within FEMA-regulated floodplains. If it is intended to apply Citywide, it is not clear how a project outside the floodplain could demonstrate no net increase in flood elevations

9.25

without being required to provide on-site detention sufficient to offset increased runoff from pre-to post-development conditions for a defined storm event (e.g., 100-year). Clarification is needed regarding the geographic scope of this requirement and the technical basis for demonstrating compliance.

9.25
cont.

SECTION 4.16 UTILITIES

4.16.1 Setting

Page 4 16.1, first paragraph: The reference “DWR 2025;2024.” appears to pertain solely to the groundwater basin designation, which has limited relevance to the discussion of water supply, wastewater, and stormwater conditions in the Plan Area. From a hydrologic setting standpoint, the watershed context is more meaningful and provides a more accurate basis for understanding surface water processes in Petaluma.¹ Consider adding relevant information to describe the broader hydrologic setting.

9.26

a. Water and Recycled Water Supply & Distribution

Page 4.16-1, first paragraph: The statement of the City of Petaluma receives 95 percent of its potable water from the Sonoma Water does not align with earlier statements indicating that only about one percent of potable supply comes from local groundwater. Please note that over the past decade, the maximum contribution was approximately five percent during severe drought conditions and average use under typical conditions are much less. Out of the eight non-drought years over the last 10 years, four years were at 0%.

9.27

Page 4.16-1, first paragraph, fourth sentence: Please note that in the last 10 years, three to four percent of the total demand has been offset.

9.28

Sonoma Water Supply

Page 4.16-1, first paragraph: Please note that the cited “contract rights” of 13,400 AFY is and “entitlement limit” as stated in the 2006 Restructured Agreement. The “entitlement limit”, however, is based on the assumption of a planned water right project that would have increased the system capacity to 101,000 AFY from the current capacity of 75,000 AFY. The water project was abandoned officially in 2016 when Sonoma Water requested the cancellation of the pending water right application for 26,000 AFY.

9.29

¹ entitlement limit: *The maximum amounts of water Sonoma Water is obligated to deliver to any regular customer from the transmission system as specified in Section 3.1(a), 3.2 (a), 3.2 (c) and 3.5 of the Restructured Agreement for Water Supply*

Groundwater

Page 4.16-2, last sentence: Please note that over the last 10 years, groundwater production has been zero in four years, averaged approximately 339 acre-feet per year during the three years of drought, and averaged about 64 acre-feet per year in the remaining years. The stated average of 37 AF per year doesn't capture the range of how this supply is used for 'supplemental and emergency purposes'.

9.30

Water Shortage Contingency

Page 4.16-2, first sentence: Sonoma Water suggests clarifying the statement that "total water demands through 2045 ... can be met by the available supplies under all hydrological conditions ...". In Petaluma's 2020 UWMP, a supply deficit under the single-dry year hydrologic condition from 2030 through 2045 (Table 7-3) is identified. Additionally, please note that this single dry-year supply constraint is no longer present in Sonoma Water's 2025 UWMP water supply analysis.

9.31

Climate Change Impacts to Water Supply

Page 4.16-2, first paragraph: Considering that 98% of the potable water supply is received from Sonoma Water, we believe that the assessment of water supply vulnerability should reference work conducted by Sonoma Water. Consider referencing and including a discussion based on Sonoma Water's Vulnerability Assessment conducted in October 2021 and included as Appendix B in Sonoma Water's Climate Adaptation Plan, 2021.

9.32

City of Petaluma 2020 Urban Water Management Plan

Page 4.16-16, first paragraph, first sentence: Please note that although the minimum planning horizon is 20-years based on water code, Petaluma's 2020 UWMP covered a 25-year planning horizon.

9.33

Policy 8-P-6

Page 4.16-16: Please consider updating this report date to reflect the December 2020 report or most recent water supply and demand analysis report completed in January 2026.

9.34

Policy IU-2.1

Page 4.16-26: Sonoma Water suggests adding a requirement to use IAPMO's Water Demand Calculator (California Plumbing Code Appendix M) for pipe sizing, in place of the outdated use of Hunter's Curve methodology. The Water Demand Calculator is now the industry-recognized standard in California and provides more accurate and efficient sizing. (<https://iapmo.org/we-stand/water-demand-calculator/water-demand-calculator-ca>)

9.35

Policy IU-3.1

Page 4.16-26: Same comment as above. Sonoma Water recommends building standards to include use of IAPMO's Water Demand Calculator for pipe sizing.

9.36

Wastewater

Page 4.16-30, second paragraph, second sentence: Please clarify if this statement is regarding sufficient wastewater treatment capacity or wastewater infrastructure.

9.37

Appendix E

Page 5, Table 1: Please clarify if Urban Non-potable demand is considered the same as Recycled Water Urban-offset. The 10-year average for Recycled Water Urban offset is 322 acre-feet per year. For the year 2025, it was 200 acre-feet.

9.38

Please contact Donald Seymour, Deputy Director of Engineering at Donald.Seymour@scwa.ca.gov for water right questions and for all other questions, please contact Connie Barton, Senior Environmental Specialist at connie.barton@scwa.ca.gov.

Sincerely,



Grant Davis
General Manager

c: Don Seymour, Todd Schram, Paul Piazza

Letter 9

Commenter: Grant Davis, General Manager, Sonoma Water

Date: May 18, 2026

Response 9.1

The commenter expresses appreciation or the opportunity to comment on the Draft EIR.

This comment is noted and no further response is required.

Response 9.2

The commenter recommends adding text to describe the average total seasonal rainfall for the city on page 4.9-1 of the Draft EIR.

Page 4.9-1 of the Draft EIR has been revised in response to this comment:

The Plan Area is characterized by a typical Mediterranean climate, generally dry in the summer with mild, wet winters. The average monthly seasonal rainfall is 2.1 inches (NOAA 2026). Average summer temperatures in degrees Fahrenheit are in the high 70s to low 80s and average winter temperatures are in the mid-50s. The warmest month of the year is July with an average maximum temperature of 83, while the coldest month is January, with an average minimum temperature of 39 (Weather Spark 2025). ~~Most rainfall occurs between October and April, with an average rainfall of 5.1 inches during February, the wettest month (Weather Spark 2025).~~

Additionally, the reference "(NOAA 2026)" was added to the references section on page 7-11:

National Oceanic and Atmospheric Administration [NOAA]. 2026. Global Summary of the Month Data Petaluma Airport. <https://www.ncei.noaa.gov/access/search/data-search/global-summary-of-the-month?bbox=38.440,-122.845,38.024,-122.429&pageNum=1>. (Accessed June 2026).

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.3

The commenter recommends replacing the WeatherSpark weather data reference with reference data from the Petaluma Airport.

Please refer to Response 9.2.

Response 9.4

The commenter states that DWR recognizes the watershed boundaries published by USGS as the official standard which uses the Hydrologic Unit Code (HUC) system to classify watersheds and subwatersheds.

Hydrologic Unit Codes are used to describe watersheds throughout Section 4.9, *Hydrology and Water Quality*, of the Draft EIR. No revisions are necessary in response to this comment.

Response 9.5

The commenter recommends that the HUC 10 watershed be added to Figure 4.9-1 and the description of the watersheds be updated to reflect both HUC 12 and HUC 10.

Figure 4.9-1, on page 4.9-2 of the Draft EIR has been revised in response to this comment. See Section 3.1 for more details. Additionally, the following text on page 4.9-1 of the Draft EIR has been revised in response to this comment:

The ~~San Pablo Bay Petaluma River~~ watershed (HUC 10) is in southern Sonoma and northern Marin Counties, as shown in Figure 4.9-1. Tributaries to the Petaluma River include Petaluma Creek, Willow Brook Creek, Lichau Creek, Liberty Creek, Marin Creek, Wiggins Creek, Wilson Creek, Corona Creek, Capri Creek, Lynch Creek, Washington Creek, East Washington Creek, Thompson Creek, Kelly Creek, and Adobe Creek. The lower 11 miles of the Petaluma River flow through the Petaluma Marsh. The river ultimately empties into the northwest portion of San Pablo Bay and the Plan Area also sits within the Petaluma River San Pablo Bay Watershed.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.6

The commenter recommends that the Draft EIR acknowledge that the city spans into the HUC 10 watershed.
Refer to Response 9.5.

Response 9.7

The commenter recommends that the Draft EIR acknowledge that runoff is managed through flood control channels in addition to piped systems.

The following text on page 4.9-1 of the Draft EIR was revised in response to this comment:

Surface water runoff in the Plan Area is managed by a piped storm drain system and flood control channels.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.8

The commenter recommends that the Draft EIR acknowledge that the Petaluma River in the downtown area is subject to tidal influence.

The following text on page 4.9-1 of the Draft EIR was revised in response to this comment:

The Petaluma River is subject to tidal influence. The historical hydrological function of the Petaluma River watershed has been degraded by channelization, reduced meanders, urban growth, and extensive losses of wetland and floodplain connectivity in the watershed.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.9

The commenter recommends that the Draft EIR include a figure that shows all watersheds in the city.

In response to Comment 9.5, Figure 4.9-1 of the Draft EIR was revised to show both the Petaluma River Watershed and San Pablo Bay Watershed which are within the city on one figure. The new figure is shown on page 3-4 of Section 3, *Revisions to the Draft EIR*.

Response 9.10

The commenter recommends that the Draft EIR be revised to include the 10 year average groundwater contribution (2 percent) and the maximum groundwater contribution (five percent in 2022).

The following text on page 4.9-3 of the Draft EIR was revised in response to this comment:

As of 2020, less than one percent of the City's annual water supply was from groundwater. The 10 year average water supply from groundwater for the City of Petaluma is two percent per year. The maximum percentage groundwater is five percent which was supplied to the city in 2022.

The City's potable water supply is supplemented with recycled water supply used primarily for irrigation. This recycled water is used primarily for irrigation and historically has accounted for three to four percent of potable water demand over the last ten years.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.11

The commenter recommends that the Draft EIR be revised to include a discussion of the amount of potable demand that is offset by recycled water.

The following text on page 4.9-3 of the Draft EIR was revised in response to this comment:

The City's potable water supply is supplemented with recycled water supply used primarily for irrigation. This recycled water is used primarily for irrigation and historically has accounted for three to four percent of potable water demand over the last ten years.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.12

The commenter requests clarification as to whether or not Figure 4.9-2 includes the 2018 basin modification.

The data used to create Figure 4.9-2 was last updated in 2022, which is after the 2018 basin modification. Therefore, this figure does include the basin modification and no revisions to the Draft EIR are required in response to this comment.

Response 9.13

The commenter recommends that the Draft EIR be revised to indicate that Petaluma primarily sources its potable water through wholesale purchases from Sonoma Water, which delivers water from the Russian River to the City through its transmission system.

The following text on page 4.9-5 of the Draft EIR was revised in response to this comment:

As described under Section 4.9.1(c), Water Supply, Petaluma sources its potable drinking water primarily through wholesale purchases from Sonoma Water which delivers water to the city from the Russian River. from Lake Mendocino and Lake Sonoma which are fed by the Russian River water through an agreement with Sonoma Water.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.14

The commenter recommends that the description of recycled water included in the Draft EIR be revised.

The following text on page 4.9-6 of the Draft EIR was revised in response to this comment:

As described under Section 4.9.1(c), *Water Supply*, Petaluma supplements its potable water supply with tertiary treated recycled water treated at the Ellis Creek Water Recycling Facility. This recycled water is used primarily for irrigation and historically has accounted for three to four percent of potable water demand over the last ten years. The quality of the City's recycled water deliveries is regulated by the State Water Resources Control Board (SWRCB) Division of Drinking Water, which requires regular collection and testing of water samples to ensure that the quality meets regulatory standards.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.15

The commenter recommends that the Draft EIR be revised to include discussion of both watersheds the city falls within.

The following text on page 4.9-6 of the Draft EIR has been revised in response to this comment:

Two 100-year floods could occur in the same year or even in the same month, but the likelihood that two 100-year flood events would occur consecutively is very small. The Plan Area is within the Petaluma River and San Pablo Bay watersheds, as described above. Flooding caused by heavy rainfall, primarily associated with seasonal storms, can occur in the region during winter and spring months.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.16

The commenter recommends that upstream lakes and regulating dams within the Russian river watershed be removed from discussion if they have the potential for direct flooding in the Plan Area.

Section 4.9 of the Draft EIR discusses both the Pinheiro Dam and La Crema Winery Dam as these are identified in the Petaluma Local Hazard Mitigation Plan as posing a small risk to the Plan Area if they fail. As such no changes to the Draft EIR are necessary in response to this comment.

Response 9.17

The commenter references the National Inventory of Dams and indicates that it rates the Pinheiro Dam and La Crema Winery Reservoir as having different hazard levels than the Petaluma Local Hazard Mitigation Plan.

The Petaluma Local Hazard Mitigation Plan based their findings on 2018 data from the National Inventory of Dams. As of 2026, data has been updated, and the National Inventory of Dams no longer classifies Pinheiro Dam as having a high hazard rating. Accordingly, the following text on page 4.9-8 and 4.9-22 of the Draft EIR has been revised:

There are several dams that regulate the flow of water from the lakes in the region to the and Russian River which provides drinking water for the Plan Area. One ~~Two~~ privately owned dams near the southeastern corner of the City ~~is~~ are at high risk of failure according to Army Corps of Engineers: ~~the Pinheiro Reservoir and the La Crema Winery Reservoir.~~

Additionally, ~~two one~~ dams in the area is at risk of failure according to Army Corps of Engineers: ~~the Pinheiro Dam and the~~ La Crema Winery Dam.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.18

The commenter recommends that the Draft EIR be revised to clarify whether Policy 8-P-32, cited on page 4.9-14, prohibits all fill within areas subject to periodic inundation or if it is intended to allow fill as long as there is no net loss of storage capacity.

Policy 8-P-32, as included on page 4.9-14 is the existing General Plan policy, adopted as part of the 2008 General Plan, which would be replaced by the proposed General Plan when adopted by the City Council. However, for informational purposes, Action FR-5.2.5 replaces this policy and says, "To protect existing flood water storage, implement a Net-Zero Fill policy for all uses within the extent of the Current 100- Year and Current 500-Year Flood Hazard Maps to retain at least the full volume of current flood storage." No changes or further response are required.

Response 9.19

The commenter notes that the XP-SWMM software cited in Policy 8-P-34 on page 4.9-14 of the Draft EIR is a software that is being phased out by FEMA.

This comment is noted. Policy 8-P-34, as included on page 4.9-14 is the existing General Plan policy, adopted as part of the 2008 General Plan, which would be replaced by the proposed General Plan when adopted by the City Council. However, for informational purposes, the City's hydrologic model of the Petaluma River watershed was developed using HEC-HMS version 4.9. No changes or further response are required.

Response 9.20

The commenter recommends that the Sonoma Water Supply Strategic Action Plan be removed from the regulatory setting because it is no longer being maintained or updated.

Page 4.9-16 of the Draft EIR was revised in response to this comment. See Section 3.1 for details.

Response 9.21

The commenter requests clarification as to whether groundwater demand would increase due to the higher total water use associated with the proposed project.

The commenter is correct that increased water usage could lead to increased groundwater demand during times of peak water demand; however, this increase would be minimal and would not lead to a substantial decrease in groundwater supplies. The following text on Page 4.9-19 of the Draft EIR was revised in response to this comment:

Development facilitated by the proposed project would not decrease groundwater supplies. As described in Section 4.9.1c, above, groundwater is only used as a water supply source for peak water demand needs and emergency purposes, and as of 2020, accounts for two less than one percent of the City's annual water supply. While development associated with the proposed project could result in higher water usage, and therefore an increased usage of groundwater for peak water demand needs, groundwater usage would not substantially increase and would likely remain below the 10 year peak usage of five percent.

While Additionally, development facilitated by the proposed project ~~does not have the potential to increase groundwater pumping and decrease groundwater supply,~~ it does have the potential to increase the amount of total impervious surface throughout the Plan Area, which could potentially

interfere with groundwater recharge. Development under the Plan would incrementally increase the amount of impervious surface area overlying the basin within Petaluma which could reduce the potential for groundwater recharge from surface water infiltration.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.22

The commenter recommends alternatives to NPDES, SWPPP, and BASMAA regulations be cited to reduce impacts associated with drainage and stormwater systems.

The draft EIR is a programmatic document that does not analyze impacts on specific parcels or specific development projects. As described under impact HYD-4 of the Draft EIR, flood impacts would be less than significant with implementation of existing regulations and proposed General Plan policies. This analysis was based in part on flood modeling completed by the city to map future flood risk and sea level rise. These models are cited as “Petaluma 2025” in the Draft EIR and are available online at: <https://www.planpetaluma.org/slr-flood-map>. No revisions to the Draft EIR are necessary in response to this comment.

Response 9.23

The commenter requests clarification as to whether the statement “the area is of minimal concern” on page 4.9-22 of the draft EIR refers to the size of the inundation zone or the magnitude of potential inundation impacts.

This statement refers to the magnitude of potential impacts. As discussed in the Petaluma Local Hazard Mitigation Plan, due to the dam capacity of the Pinheiro and La Crema dams, it is unlikely that much risk would be imposed on those areas near Petaluma. The following text on Page 4.9-22 of the Draft EIR was revised in response to this comment:

Additionally, ~~two~~ one dams in the area ~~are~~ is at risk of failure according to Army Corps of Engineers: ~~the Pinheiro Dam and the La Crema Winery Dam~~. The LHMP indicates that five critical utility facilities (two electrical substations and three water facilities) are at risk of flooding. The LHMP includes strategies to address the challenges of recurring flooding during heavy rains. It should be noted that at the time of this report, the LHMP is undergoing an update as part of a regional LHMP (Petaluma 2025). However, this update is still in progress and not available for public review. The most recent Petaluma LHMP analyzes the risk of inundation from dam failure and finds that the risk of inundation is very low ~~as the area of concern is minimal likelihood of~~ due to the capacity of these dams (City of Petaluma 2020). Therefore, impacts associated with dam failure are not discussed further in this section.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.24

The commenter recommends reference to the studies that were undertaken to investigate future rainfall be cited under Impact HYD-4 of the Draft EIR.

Future flood risk within the city, which is discussed under impact HYD-4 of the Draft EIR, was based on sea level rise and flood modeling done by the City in 2025. These models are cited as “Petaluma 2025” in the Draft EIR and are available online at: <https://www.planpetaluma.org/slr-flood-map>. No revisions to the Draft EIR would be required in response to this comment.

Response 9.25

The commenter requested clarification on which development no net increase requirements apply to as referenced under Impact HYD-4 in the Draft EIR.

No net increase requirements apply to all future development within floodplains and flood zones. The following text on page 4.9-23 of the Draft EIR was revised to make this clarification:

All future development sited within floodplains and flood zones would be required to demonstrate no net increase in flood elevations and no adverse upstream or downstream hydraulic impacts through project-level design and permitting.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.26

The commenter recommends additional details be added to the discussion of the hydrologic setting in Section 4.16, Utilities and Service Systems, of the Draft EIR.

The following text on page 4.16-1 of the Draft EIR was revised to include discussion of the watersheds that the city is within:

Petaluma is in the San Francisco Bay Hydrologic Region and overlies the Petaluma Valley Groundwater Basin, as defined by the California Department of Water Resources (DWR) in its hydrologic region atlas (DWR 2025; 2024). The city is also within the HUC 10 (San Pablo Bay Watershed) and HUC 12 (Petaluma River Watershed) watersheds as discussed further in Section 4.9, Hydrology and Water Quality.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.27

The commenter states that the statement that the City of Petaluma receives 95 percent of its potable water from Sonoma Water does not align with earlier statements indicating that only about one percent of potable supply comes from local groundwater and cites historic groundwater usage.

On page 4.16-1 of the Draft EIR, the following statements are made “The City of Petaluma manages its own public water system and receives almost all (95 percent) of its potable water supply from the Sonoma County Water Agency (Sonoma Water). Sonoma Water provides water principally from the Russian River to several retail water providers in Sonoma County and some providers in Marin County. The City also produces approximately five percent of its potable water supply from groundwater wells.” This is consistent with the statements the commenter is making, therefore no changes were made to the Draft EIR in response to this comment.

Response 9.28

The commenter recommends that the percentage of potable water offset by recycled water be revised in the Draft EIR to three to four percent.

The following text on page 4.16-1 of the Draft EIR was revised to reflect this updated percentage:

The City of Petaluma manages its own public water system and receives almost all (95 percent) of its potable water supply from the Sonoma County Water Agency (Sonoma Water). Sonoma Water provides water principally from the Russian River to several retail water providers in Sonoma County and some providers in Marin County. The City also produces approximately five percent of its potable water supply from groundwater wells. The City offsets ~~two to three~~ three to four percent

of its total demand for potable water in the urban system with recycled water. The total supply available to the City through these three sources is approximately 9,500 acre-feet per year (AFY) (City of Petaluma 2021). Each of these water supply sources is discussed in further detail below.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.29

The commenter states that the contract rights of the restructure agreement cited in Section 4.16 of the Draft EIR are actually entitlement limits. The commenter also clarifies that this limit was based on an assumption that a water project would be completed to increase system capacity, however this project was abandoned in 2016. The commenter affirms that the current water supply capacity is 75,000 AFY.

This comment is noted. As described on page 4.16-1 of the Draft EIR, 75,000 AFY is the water supply capacity of Sonoma Water and this number was used throughout the analysis. To improve clarity, the following text on page 4.16-1 of the Draft EIR has been revised in response to this comment:

~~The City has access to water supply from the Sonoma Water through the Restructure Agreement for Water Supply (Restructured Agreement). Under the Restructured Agreement, the City has contract rights to 13,400 AFY.~~ The City's estimates of reliable supply are based on Sonoma Water's current water rights of 75,000 AFY, Sonoma Water's Russian River System Model and the "Water Shortage Allocation Methodology" adopted by Sonoma Water's Board of Directors. As described in more detail in the City of Petaluma 2020 Urban Water Management Plan (City of Petaluma 2021), incorporated herein by reference, Sonoma Water anticipates being able to meet the City's water allocation through 2045 under normal water conditions.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.30

The commenter describes groundwater production over the last ten years and recommends that the average stated in the Draft EIR be updated to reflect the range of production over the last ten years.

Page 4.16-2 of the draft EIR does not state the average groundwater production, but rather the production in 2020, as described in the 2020 Urban Water Management Plan. No changes were made to the Draft EIR in response to this comment.

Response 9.31

The commenter states that Petaluma's 2020 Urban Water Management Plan (UWMP) identifies a supply deficit in single dry years from 2030-2045 and recommends that be discussed in the Draft EIR. Additionally, the commenter recommends that the Draft EIR discuss that this single dry year constraint is no longer identified as part of Sonoma Water's 2025 UWMP.

The following text on page 4.16-2 of the Draft EIR was revised in response to this comment:

In its 2020 Urban Water Management Plan (UWMP), the City anticipated that its total water demands through 2045 will be 12,117 AFY, which can be met by the available supplies under all hydrologic conditions except single dry years (City of Petaluma 2021). However, pursuant to Section 10632 of the California Water Code, the City adopted a Water Shortage Contingency Plan (WSCP) that addresses short-term and long-term water supply shortages that may result from droughts, climate change, disasters, reduced deliveries from Sonoma Water, and other conditions (City of Petaluma 2021). In the event of a water supply shortfall, the City may decide to implement additional water conservation measures to reduce demand and to increase its groundwater supply to ensure that demand does not exceed supply in a single dry year (City of Petaluma 2022).

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Reference to the 2025 Sonoma Water UWMP was not added as this Draft EIR focuses only on the City of Petaluma and therefore relies on Petaluma's UWMP. No further revisions were made to the Draft EIR in response to this comment.

Response 9.32

The commenter recommends reference to Sonoma Water's Vulnerability Assessment be added to the discussion of climate change impacts to water supply included on page 4.16-2 of the Draft EIR.

The following text on page 4.16-3 of the Draft EIR was revised in response to this comment:

Sonoma Water Supply. Sonoma Water's Vulnerability Assessment (Sonoma Water 2021) describes how water supply will likely be affected by climate change in the future. Specifically, the Russian River water supply, which is where Petaluma sources their water, is projected to be impacted by increasing climate variability and severity of drought. Additionally, future increases in wildfire intensity and frequency could contribute to high sediment and organic carbon loading in the Russian River which could impact water quality. At this time climate change impacts to Sonoma Water's water supply is unknown, although Sonoma Water is working with the US Geological Survey to analyze potential long-term impacts. However, because Sonoma Water's supply is rainfall-driven, climate change is expected to affect supply in that timing of runoff is expected to become more variable. This will affect reservoir storage, especially in spring and summer months. Annual precipitation is expected to vary with vulnerability to droughts and dry periods.

Additionally, the reference to the Sonoma Water Vulnerability Assessment was added to Section 7, References:

Sonoma Water. 2021. Vulnerability Assessment. Appendix B. Vulnerability Assessment: Climate Adaptation Plan. (accessed June 2026).

These revisions to the Draft EIR do not change the significance findings or impact analysis of the Draft EIR.

Response 9.33

The commenter notes that Petaluma's 2020 UWMP covered a 25 year planning horizon.

The following text on page 4.16-13 of the Draft EIR was revised to reflect the 25 year planning horizon of the City's UWMP:

The City of Petaluma's 2020 UWMP, adopted by the City Council on June 21, 2021, fulfills the requirements of the California Urban Water Management Planning Act and provides a 25 ~~20~~-year planning horizon for the City's water supply, demand projections, conservation programs, and drought preparedness.

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.34

The commenter recommends the report date cited as part of policy 8-P-6 on page 4.16-16 of the Draft EIR be updated.

Policy 8-6-P, as included on page 4.16-16 is an existing General Plan policy, adopted as part of the 2008 General Plan, which would be replaced by the proposed General Plan when adopted by the City Council.

Further, Policy IU-4.1 listed on page 4.16-26 of the Draft EIR, would support Policy 8-6-P. No changes or further response are required.

Response 9.35

The commenter recommends proposed General Plan policy IU-2.1 be revised to include a requirement to use IAPMO's water demand calculator for pipe sizing in place of the outdated use of Hunter's Curve methodology.

Policy IU-2.1 is a proposed General Plan policy. Please see Master Response 3. The Draft EIR analyzed water usage in Section 4.16, *Utilities and Service Systems*. As discussed therein, impacts to water supply would be less than significant. No revisions to the EIR are necessary in response to this comment.

Response 9.36

The commenter recommends proposed General Plan policy IU-3.1 be revised to include a requirement to use IAPMO's water demand calculator for pipe sizing in place of the outdated use of Hunter's Curve methodology.

Policy IU-3.1 is a proposed General Plan policy. Please see Master Response 3. The Draft EIR analyzed water usage in Section 4.16, *Utilities and Service Systems*. As discussed therein, impacts to water supply would be less than significant. No revisions to the EIR are necessary in response to this comment.

Response 9.37

The commenter requests clarification as to whether the statement "Cumulative development in the wastewater service area will continue to increase wastewater generation. As described under Impact UTIL-1, there is generally sufficient existing wastewater capacity to accommodate anticipated cumulative development, although five locations may need to be improved or upsized (Appendix G)." included in Section 4.16 of the Draft EIR is referencing wastewater capacity of wastewater infrastructure.

This statement is in reference to both wastewater infrastructure and capacity. The following text on page 4.16-30 of the Draft EIR has been revised for clarity:

Cumulative development in the wastewater service area will continue to increase wastewater generation. As described under Impact UTIL-1, there is generally sufficient existing wastewater capacity to accommodate anticipated cumulative development and generally there is also sufficient wastewater infrastructure, although five locations may need to be improved or upsized (Appendix G).

This revision to the Draft EIR does not change the significance findings or impact analysis of the Draft EIR.

Response 9.38

The commenter requests clarification on table 1 of Appendix E. Specifically they ask if Urban Non-potable demand is considered the same as Recycled Water Urban-offset.

Urban non-potable demand is not the same thing as recycled water urban offset in Appendix E to the draft EIR, because the golf course's water use is included in the urban recycled water demand and that is not potable offset. The number provided for urban non-potable demand is all urban recycled water use but not all direct potable offset. Additionally, the potable offset numbers are correct. The 10-year average cited is from 2014-2024 using urban recycled water totals (not including golf courses or Ag). The 2025 number is also accurate and does not include golf course water use or agriculture. No revisions to Appendix E or the Draft EIR are required in response to this comment.

Holland & Knight

560 Mission Street, Suite 1900 | San Francisco, California 94105 | T +1.415.743.6900 | F +1.415.743.6910
Holland & Knight LLP | www.hklaw.com

Tamsen Plume

Deborah Brundy

Genna Yarkin

May 18, 2026

Petaluma City Council
11 English Street
Petaluma, CA 94952

Re: Stakeholder Comments on the General Plan Update and Environmental Impact Report

Dear Mayor and Councilmembers:

We represent Regis Homes Bay Area, LLC (“Regis”) in connection with its housing development project applications for (1) the construction of 41 single family homes in the “Riverfield Commons North” (formerly Deer Creek Apartments II) project; and (2) the construction of 205 single family homes in the “Riverfield Commons South” project. We appreciate the opportunity to provide the following stakeholder comments addressing the General Plan Update and its associated Environmental Impact Report (“EIR”) which are before you for consideration this evening, particularly as they relate to the Riverfield Commons North project and property.

10.1

The Riverfield Commons North project is located on approximately 6.7 acres of undeveloped land with APN 007-391-005 (the “Property”). The owners of the Property and Regis have consistently, frequently, and clearly communicated for several years that the Property will be developed with a housing development project and have requested that both the General Plan Update and its EIR take appropriate account of that reality. Notable events include:

- February 2023 - The Property’s owners (J. Cyril Johnson Investment Corp.) submitted a qualifying SB 330 preliminary application for development, vesting the previous Deer Creek Apartments II project to then-existing regulatory requirements. The application was submitted as a “Builder’s Remedy” project when the City did not have a compliant Housing Element, allowing it to proceed with residential development despite the existing General Plan not allowing such use
- February 2025 – After several rounds of City comments on the owners’ formal application for Deer Creek Apartments II, the City determined the application complete for processing
- September 2025 – Stakeholder comment provided by the Property’s owners on the EIR scope, requesting that it take appropriate account of the vested housing proposal

10.2

- December 2025 – Stakeholder comment provided by the Property’s owners on the “Preferred Citywide Land Use Map and Associated Land Use Designation Standards,” requesting that it take appropriate account of the vested housing proposal
- April 2026 – In partnership with the Property’s owners, Regis submitted supplemental materials transitioning the Deer Creek Apartments II project to the “Riverfield Commons North” project under AB 1893 (“Builder’s Remedy 2.0”), revising the proposal to include 41 single family homes

10.2 cont.

As highlighted in the above timeline, the *Riverfield Commons North project remains an active, vested, in-process housing development project*. However, at this time neither the General Plan Update nor its EIR takes appropriate account of that fact. Rather, the General Plan Update designates the Property as “Neighborhood Commercial” or “NC”, as shown in Figure LU-4 (in the excerpt below the Property is red, outlined in yellow):



 Neighborhood Commercial (NC)

10.3

The development standards applicable to the NC designation are as follows:

Designation	Intent/Description	Examples of Allowed Uses	Max Density (du/ac)	Max Intensity (FAR)	Max Height (Stories) ¹	Max Height (Feet) ¹
Neighborhood Commercial (NC)*	Small-scale clusters of local shopping and service uses, preferably with walkable street-fronts, which serve the surrounding neighborhood	• Retail & Services • Office	-	0.8	2	30

1

Noticeably absent is any allowance for residential use, despite the years-long, vested housing development proposal affecting the Property. While the Riverfield Commons North project has a vested right to proceed *regardless* of the General Plan Update, we note that it behooves the

¹ General Plan Update, Table LU-4.

community for the General Plan to take appropriate and accurate account of anticipated development, and the General Plan Update fails as an informational document where there is no realistic opportunity to develop the Property with commercial use in the lifetime of this General Plan Update.

In addition to the realistic and vested nature of the existing housing proposal, we note that the assumption that this Property could be developed in the near future with “local shopping and service uses” is decidedly unrealistic from a practical perspective. There is no highway access to the Property (either actual or planned) and the Rainier Crosstown Connector project has been all but abandoned. The surrounding area is already well served by local shopping and service uses along N. McDowell Blvd, and there is likely to be poor demand for new such uses. It would be much more realistic and consistent with surrounding development patterns to designate the site for residential use, especially given the residential project planned for the adjacent parcel to the south (Riverfield Commons South).

For all of the reasons expressed herein and in the Property owners’ previous communication (see enclosed for more details), we renew our request for the Property to be designated for residential use. It appears to us that the Diverse Low Density Residential (RDIV) designation would be appropriate and consistent with designations for surrounding properties.

Thank you for your attention to this matter.

Sincerely,

HOLLAND & KNIGHT LLP



Tamsen Plume
Deborah Brundy
Genna Yarkin

CC: Todd Regonini – Regis Homes Bay Area
Greg Powell – Principal Planner
Heather Hines – Staff Project Manager

10.3
cont.

December 15, 2025

City Council - City of Petaluma
11 English Street
Petaluma, CA 94952

Re: **Stakeholder Public Comment –“Preferred Citywide Land Use Map and Associated Land Use Designation Standards” for the General Plan Update**

Dear Mayor and Councilmembers:

On behalf of J. Cyril Johnson Investment Corp., the owners (“Owners”) of the property with APNs 136-100-025 (the Deer Creek 1 Site) and 007-391-005 (the Deer Creek 2 Site) in Petaluma, we submit the following stakeholder public comments on Agenda Item 9 before you this evening. The APNs we list above are the subject of two separate, in-process planning applications for housing development, which the General Plan Update and therefore the environmental review, will affect.

The Deer Creek 1 Site is subject to a vested SB 330 preliminary application for 217 single family residences on approximately 21.686 net acres of undeveloped land. The Deer Creek 2 Site is subject to a vested SPAR application for 80 apartments on approximately 6.7 acres of undeveloped land. As discussed in our previous communication dated September 8, 2025 (enclosed as Attachment A to this letter), we reiterate that both projects have obtained vested rights to proceed under existing regulatory requirements (inclusive of the existing General Plan and Zoning) pursuant to the Housing Crisis Act of 2019 (SB 330) and are further protected by the requirements of the Housing Accountability Act (the HAA).

However in the materials before you this evening, the land use plan continues to contemplate a large increase in the buffer from the Petaluma River for both the Deer Creek 1 Site and the Deer Creek 2 Site, causing a significant loss of developable area that is incompatible with the submitted project proposals and the projects’ vested right to proceed under the existing buffer requirements.¹ While the projects’ vested right to proceed under the now-existing buffer will be maintained even if the City does adopt a larger buffer, we urge the City to instead consider a buffer for the Deer Creek 1 Site and Deer Creek 2 Site that takes account of the vested developments, so that the General Plan Update’s environmental review is as accurate as possible, and the City and Owners’ expectations and understanding about the buffer, remain consistent.

Second, we appreciate that the preferred land use plan now appears to take appropriate account of the anticipated development on the Deer Creek 1 Site with regard to the proposed land use designation. The proposed project proposes an approximate density of 10 du/acre and is composed

¹ See hearing materials for Item 9, Attachment 2.

of single-family homes, which matches the proposed “Diverse Low Density Residential” designation that permits 6.1-15 du/acre and allows single-family homes.²

However, the preferred land use plan does not in any way take account of the vested project proposal for the Deer Creek 2 Site. The anticipated designation for the Deer Creek 2 Site is “Neighborhood Commercial,” which designation does not permit residential use. This is clearly inconsistent with the vested project proposal. While the project’s vested rights will be maintained even if the City *does* adopt the Neighborhood Commercial designation, we urge the City to instead consider a designation that is more appropriate to, and compatible with, the vested proposal. As noted above with regard to the buffer, this again will ensure that the environmental review conducted for the General Plan is as accurate as possible, and that the City and the Owners’ expectations and understanding regarding the Deer Creek 2 Site maintains consistent.

Both projects are realistic, reasonably foreseeable, and in process with vested rights to proceed. Both projects also play an important role in the City reaching its Regional Housing Needs Assessment (RHNA) targets for the 6th Cycle Housing Element.

We sincerely appreciate the opportunity to provide feedback to the City Council ahead of the City’s preparation of the General Plan Update, and we plan to remain active participants throughout this vital public process. The Owners remain excited about the future of both Deer Creek 1 and Deer Creek 2.

Sincerely,

HOLLAND & KNIGHT LLP

A handwritten signature in dark ink, appearing to read "Genna Yarkin", is written over a light blue horizontal line.

Genna Yarkin
Tamsen Plume

² See hearing materials for Item 9 at Attachments 2, 3, and 4.

Holland & Knight

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Genna Yarkin
+1 415-743-6990
Genna.Yarkin@hklaw.com

Tamsen Plume
+1 415-743-6941
tamsen.plume@hklaw.com

September 8, 2025

City of Petaluma – Community Development
Dept.
ATTN: Heather Gurewitz, Senior Planner
11 English Street
Petaluma, CA 94952

Re: **Stakeholder Public Comment – Scope of Environmental Review for the General Plan Update, Specifically Regarding APNs 136-100-025 and 007-391-005**

Dear All:

On behalf of J. Cyril Johnson Investment Corp., the owners (“Owners”) of the property with APNs 136-100-025 and 007-391-005 in Petaluma, we submit the following stakeholder public comments on the scope of the Environmental Impact Report (EIR) that is being prepared to comply with the California Environmental Quality Act (CEQA) for the City of Petaluma (the City)’s General Plan Update.

The APNs we list above are the subject of two separate, in-process planning applications for housing development, which the General Plan Update and therefore the EIR, will affect. Both projects have obtained vested rights to proceed under existing regulatory requirements pursuant to the Housing Crisis Act of 2019 (SB 330) and are further protected by the requirements of the Housing Accountability Act (the HAA).

The Owners’ Affected Properties and Projects Protected by State Housing Law

The following provides a brief overview of the Owners’ affected projects and the state housing laws that are at play in their processing and approval, including as related to the pending General Plan Update.

Deer Creek 1

- The Deer Creek 1 Residential Subdivision project (Deer Creek 1) would include 217 single family residences on approximately 21.686 net acres of undeveloped land with APN 136-100-025 (the Deer Creek 1 Site)

- On July 24, 2025, applicant Regis Homes Bay Area (Regis Homes) submitted a qualifying SB 330 preliminary application for development, vesting the Deer Creek 1 project to then-existing regulatory requirements including those of the City’s existing General Plan, which contemplates residential development on the Deer Creek 1 Site
- Regis Homes is working on a formal application for development, which it will be submitting within 180 days of its preliminary application in compliance with SB 330
- Importantly, the Deer Creek 1 project’s right to proceed with this development is vested by SB 330 and the HAA, regardless of any changes to permitted uses or development standards for the Deer Creek 1 Site in the City’s pending General Plan Update

Deer Creek 2

- The Deer Creek 2 Apartments project (Deer Creek 2) would include 80 apartments on approximately 6.7 acres of undeveloped land with APN 007-391-005 (the Deer Creek 2 Site)
- In February, 2023 the Owners submitted a qualifying SB 330 preliminary application for development, vesting the Deer Creek 2 project to then-existing regulatory requirements. The application is also subject to the Builder’s Remedy provision of the HAA because the Deer Creek 2 project includes 20% low income units and we submitted the preliminary application when the City did not have a compliant Housing Element – for this reason, the Project is able to proceed with residential development despite the existing General Plan not allowing such use
- On February 20, 2025, the City determined the application complete for processing
- On March 24, 2025, the City provided “consistency” comments pursuant to the Housing Accountability Act (the HAA)
- On July 1, 2025, the Owners submitted responses addressing the “consistency” comments
- This application is still in process, pending CEQA review and further work with City staff to prepare it for hearings
- Importantly, the Deer Creek 2 project’s right to proceed with this development is vested by SB 330 and the HAA including the Builder’s Remedy provision, regardless of any changes to permitted uses or development standards for the Deer Creek 2 Site in the City’s pending General Plan Update

Both projects are realistic, reasonably foreseeable, and in process with vested rights to proceed. Both projects also play an important role in the City reaching its Regional Housing Needs Assessment (RHNA) targets for the 6th Cycle Housing Element, bringing 38 low income units, 11

moderate income units, and 248 above moderate income units. Data through 2024 indicates that in this cycle, Petaluma has entitled only 69 new housing units, consisting of 31 low income units and 38 above moderate income units.¹ This represents only 3.6% progress in overall required units, 10.8% progress in the low income category, 4.7% progress in the above moderate income category.²

Stakeholder Comments on the Scope of Environmental Review Relative to the Deer Creek 1 and Deer Creek 2 Projects and Sites

Given that the above-listed Deer Creek 1 and Deer Creek 2 projects are currently in process and subject to housing law protections including those of SB 330, the HAA, and the State Density Bonus Law, we request that the City take the following into account in preparation of the General Plan Update and the accompanying EIR:

- CEQA requires the General Plan Update EIR to take account of all “reasonably foreseeable” development in the City’s pipeline – this *must* include both Deer Creek 1 and Deer Creek 2 due to their vested status, and we request that the EIR assume the full scope of both projects in all relevant analysis
- While we understand that the current request is for commenters to provide input only on the scope of environmental review for the General Plan Update, it is worth noting here that we are confused by the downzoning of the Deer Creek 1 and Deer Creek 2 Sites that the General Plan Update appears to contemplate, by designating both Sites as areas “proposed for de-intensification and/or fewer uses”³ and in Alternative 2 of the Land Use Policy Framework, as sites that would be designated for Open Space (Deer Creek 2 Site) and Parks (Deer Creek 1 Site) – we request that the General Plan Update (and therefore its EIR) take appropriate account of the in-process, realistic, and vested Deer Creek 1 and Deer Creek 2 projects and study the full scope of their development (further noting that downzoning the Sites in a way that would prohibit development without proper compensation may violate the law and that the Owners may separately pursue remedies under the law if the City does so)
- We request that the City carefully consider, in particular, the impacts of all pending projects including Deer Creek 1 and Deer Creek 2 in the section of the EIR that addresses Housing and Population, and that the projects must also be accurately accounted for in the Growth Inducement analysis (since studying parks or open space on the Sites would not be realistic and would therefore skew both analyses)
- In 1995, the City adopted the precise plan line for the Rainier Cross Town Connector and Interchange (Ordinance No.1992 N.C.S). The City’s Zoning Code Section 4.050 purports

¹ See <https://www.hcd.ca.gov/housing-open-data-tools/apr-dashboard>, data selected for Petaluma in 2023 and 2024.

² See Petaluma 2023-2031 Housing Element, Table 1.

³ Land Use Policy Framework, Figure 5.

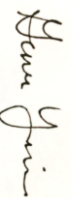
to require dedication of all future right-of-way plan for plan line areas, and Municipal Code Section 13.20.170 prohibits any structures from being built in these areas. In both cases, the projects have asserted that they cannot be legally required to dedicate these areas and/or keep structures out of them. Please see our previous communication related to the Deer Creek 1 and Deer Creek 2 projects for further discussion. In the context of the EIR and the General Plan Update, we note that the General Plan Update should accurately reflect that this infrastructure project has long been *abandoned*, that the discussion in Existing Conditions Report⁴ about the unrealistic nature of it proceeding be carried forward, and that an ordinance be adopted to remove the dedication requirement and development prohibition related to the Rainier Cross Town Connector and Interchange. We see no mention of the Rainier Cross Town Connector and Interchange in the Transportation Policy Framework dated January 2024, but note that the General Plan Update and the EIR should accurately reflect that:

- 1) The Deer Creek 1 and Deer Creek 2 projects will be proceeding without dedicating or avoiding the plan line area; and
- 2) The Rainier Cross Town Connector and Interchange is not proceeding (Caltrans considered the potential ramp component of the Rainier Extension as suspended indefinitely in their written comments on the EIR for that project, and we are unaware of any planned, imminent transportation project that includes the ramps)

We sincerely appreciate the opportunity to provide feedback to the City ahead of its preparation of the General Plan Update EIR, and we plan to remain active participants throughout this vital public process. The Owners remain excited about the future of both Deer Creek 1 and Deer Creek 2. If helpful to discuss, please let us know.

Sincerely,

HOLLAND & KNIGHT LLP



Genna Yarkin
Tamsen Plume

⁴ See Existing Conditions Report – Transportation, September 2022.

Letter 10

Commenter: Genna Yarkin and Tamsen Plume, Holland and Knight, LLP.

Date: May 18, 2026

Response 10.1

The commenter indicates that they represent Regis Homes Bay Area, LLC. In connection with their proposed developments Riverfield Commons North and Riverfield Commons South, respectively. The commenter expresses appreciation for the opportunity to comment on the General Plan Update and Draft EIR.

This comment is noted and no revisions are required on the Draft EIR in response to this comment.

Response 10.2

The commenter provides background context illustrating that Regis Homes Bay Area, LLC. Has communicated to the city that the properties would be developed with Riverfield Commons North and Riverfield Commons South

This comment is noted and no revisions are required on the Draft EIR in response to this comment.

Response 10.2

The commenter summarizes the General Plan land use designation for the Riverfield Commons North project site and the development standards associated with the site. The commenter opines that the proposed General Plan and land use map do not take into account the planned development on this site. The commenter also includes previous letters on this matter sent to the City as an attachment to their comment letter.

The Draft EIR is a programmatic document that analyzes the proposed General Plan and land use pattern as a whole for the city. It does not include parcel-by-parcel analysis nor does it analyze any specific development projects. Please refer to Master Response 3. No revisions are required on the Draft EIR in response to this comment.

From: [Julia Ryu](#)
To: [Petaluma Planning](#)
Cc: [-- City Clerk](#)
Subject: May 18 meeting and proposal !!
Date: Saturday, May 16, 2026 12:13:32 PM

Hello!

I am writing as the owner of [REDACTED] Lakeville Highway.
I believe there is a meeting May 18 to discuss expansion that will detrimentally affect those of us who continue to live and tend to our land and ranches ..

I want to express my deep concern and disagreement with a plan to continue urban sprawl and development into wildlife habitat and precious ranch lands. We live here and we wish to speak up as neighbors and ranch owners to protect rural Petaluma.

Are we able to attend the meeting in person?

If not please tell us the best place to direct our concerns.

Appreciatively,

Julia & Marcus Ryu
[REDACTED]

11.1

11.2

Letter 11

Commenter: Julia Ryu

Date: May 16, 2026

Response 11.1

The commenter expresses concern and disagreement with plans that further urban sprawl and develop in wildlife habitat and ranch lands.

The Plan Area is defined as encompassing the City limits, Urban Growth Boundary, and Urban Service Area in Chapter 2, *Project Description*. The Plan Area, specifically the Urban Growth Boundary, was previously approved by voters and is designated as land for urban development. The Urban Growth Boundary, as currently approved, would not change as part of the proposed project. Therefore, development into the Urban Growth Boundary would not be considered urban sprawl or sprawling outside of the existing approved Urban Growth Boundary.

Impacts to wildlife are discussed in Section 4.4, *Biological Resources*, of the Draft EIR. As discussed therein, impacts to special status species, sensitive natural communities, and protected wetlands would be less than significant with implementation of mitigation measures BIO-1 through BIO-7. Additionally, impacts to the movement of wildlife species would be less than significant and the project would not conflict with any adopted local policies protecting wildlife species nor would it conflict with any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Overall, there would be no significant and unavoidable biological resource impacts.

Additionally, the proposed General Plan land use map that is analyzed in the Draft EIR includes designations for open space and parks, particularly concentrated along the edges of the Plan Area. Impacts to agricultural resources are discussed in Section 4.2, *Agriculture and Forestry Resources*. As discussed therein, impacts to agricultural resources would be less than significant. No revisions to the Draft EIR are required in response to this comment.

Response 11.2

The commenter asks if they can attend the City Council meeting in person and if not where they should direct their concerns.

The official public review period for the Draft EIR concluded on May 18, 2026. During that public review period, the City received comments from the public as well as feedback from the Planning Commission on April 28, 2026 and from the City Council on May 18, 2026. At their meeting on May 18th, the City Council directed staff to prepare a Final Environmental Impact Report and the associated final General Plan for adoption. The City Council will hold a public hearing and accept public comments when the Final EIR is considered for certification and the General Plan is considered for adoption. Notice of the public hearing will be provided 10 days in advance in a newspaper of general circulation and details posted to the City's website.

From: Peggy Flynn <PFlynn@cityofpetaluma.org>
Sent: Monday, May 18, 2026 4:30 PM
To: Brian Oh <boh@cityofpetaluma.org>; Hines, Heather <hhines@cityofpetaluma.org>
Cc: Eric Danly <EDanly@cityofpetaluma.org>
Subject: FW: City Council Meeting May 18, 2026: Agenda Item #8 General Plan Adoption

Peggy Flynn
City Manager
City of Petaluma | City Manager's Office
Phone. (707) 778-4345 |
PFlynn@cityofpetaluma.org
11 English St, Petaluma, CA 94952

Report issues through our new
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From: Maureen Gottschall <mmgottschall4@gmail.com>
Sent: Monday, May 18, 2026 4:26 PM
To: -- City Council <citycouncil@cityofpetaluma.org>; -- City Clerk
<cityclerk@cityofpetaluma.org>
Subject: City Council Meeting May 18, 2026: Agenda Item #8 General Plan Adoption

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

Mayor McDonnell and Members of the City Council:

I am writing to ask the Council to reduce the maximum building height in the Station
Mixed-

Use designation from eight stories to six stories before the Draft General Plan
moves to

final adoption. This is the only parcel in the entire General Plan with this
designation, and the

eight-story standard does not reflect what the community asked for, what the
location can

support, or what our infrastructure can absorb.

1. Eight stories is not what the community asked for.

The City's own General Plan website summarizes five years of community engagement on

building height as follows: Most of the community was comfortable with keeping
parts of the

current General Plan and zoning that includes four and five stories in most
locations, but also a

12.1

12.2

desire to increase housing density nearest the downtown SMART station. A desire to increase density near transit is not the same as a desire for eight stories. The City staff recommendation that emerged from that feedback was six stories a meaningful increase over the existing four-to-five-story norm, consistent with transit-oriented development, and supported by community input. Six stories goes up to the limit of what the public process produced. Eight stories goes beyond it. The shift from six to eight at the dais at

12.2 cont.

Councilmember Barnacle's urging did not come from the community engagement record; it was added on top of it.

The Draft General Plan itself acknowledges that the new Mixed-Use designations largely preserve the existing height limits in Downtown and the Central Petaluma Specific Plan Area.

The Station Mixed-Use designation at eight stories is the single outlier in an otherwise consistent framework. That outlier was not requested through the public process. 2. The location cannot support eight-story density.

The parcel in question sits at the Downtown SMART station (220 Lakeville Street), inside

Petaluma's most sensitive built environment:

Historic district context. The downtown is the cultural and economic heart of

Petaluma and one of the best-preserved Victorian-era downtowns in the state. The General Plan otherwise commits to honor the historic downtown and to high-quality

12.3

design that preserves community character. An eight-story building immediately adjacent to a one- and two-story historic core is inconsistent with that direction. The

General Plan's own Historic & Cultural Resources Element and the community's repeatedly expressed values cannot be reconciled with that scale on that parcel.

Flood-vulnerable river corridor. The Downtown SMART station is in the lower river

corridor the same area for which the General Plan establishes expanded river buffers,

retention areas, and policies that exceed FEMA standards. Concentrating the city's single tallest allowable building on a flood-adjacent parcel runs against the plan's own

12.4

Flood Resilience Element.

Site constraints. This is a narrow parcel with limited setbacks, limited frontage, and direct adjacency to active rail. The development envelope at eight stories produces a

12.5

building mass that the immediate streetscape was never designed to accommodate.

3. Our infrastructure cannot support it.

The General Plan correctly states that the City must ensure necessary

12.6

infrastructure to support

these changes. We are not in a position to make that assurance today:

Wastewater (Ellis Creek). The plant was designed for 6.7 MGD and currently runs at approximately 60% of capacity. The Housing Element alone adds over 1,900 units to

12.6 cont.

that demand. Concentrated high-density development accelerates a timeline the plant was designed to absorb over 50 years.

Sewer collection system. Petaluma is currently under a Regional Water Board regulatory order over bacteria contamination in the Petaluma River, with an Improvement Action Plan in progress. The downtown sewer lines are among the oldest in the system. Adding the highest-intensity parcel in the city to that aging downstream collection network is the wrong location for that load.

12.7

Water supply. Sonoma Water deliveries from the Russian River system remain under ongoing drought pressure. The Housing Element relies on conservation and recycled water neither of which has been quantified against an eight-story Station

12.8

Mixed-Use buildout.

Roads. The City's own November 2024 staff report shows 62% of Petaluma streets in fair, poor, or failed condition, with over \$100 million in deferred maintenance. The five-year paving plan, by staff's own admission, only holds the current PCI score of 52. The system has no margin to absorb the trip-generation impact of an eight-story building at the downtown core.

12.9

Capital project deferrals. At the March 2026 mid-year budget update, the Council deferred more than \$30 million in capital projects including \$1.019 million for the Petaluma North SMART Station Access project itself. We are deferring station-area infrastructure right now. This is not the moment to entitle the single most intensive parcel in the General Plan.

12.10

4. The request.

The Council should:

1. Direct staff, prior to certification of the Final EIR, to modify the Station Mixed-Use designation to a six-story maximum, consistent with staff's recommendation and with the community engagement record summarized on the City's own General Plan website.

This General Plan will guide Petaluma for the next 25 years. The decision on the Station Mixed-Use designation will outlast every person in this room. Please align the maximum height with the community input that built this plan, with the location it is being applied to, and with the infrastructure we actually have.

12.11

Thank you for your time and your service.

Respectfully,

Maureen Gottschall
Petaluma Resident

12.11 cont.

Letter 12

Commenter: Maureen Gottschall

Date: May 18, 2026

Response 12.1

The commenter expresses disagreement with the eight-story height allowance in the station-mixed use designation and states this is the only parcel in the city with this proposed designation.

Please refer to Master Response 1 for a discussion of maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 12.2

The commenter states that the community and city council previously agreed on 6 stories for the station mixed use designation and that the public did not ask for this to be increased to eight stories.

Please refer to Master Response 1 for a discussion of maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Response 12.3

The commenter expresses concern that historical resources in the downtown area could be affected by an eight-story building.

Please refer to Master Response 1 for a discussion of aesthetic and historical resource impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 12.4

The commenter expresses concern that the parcel designated as station mixed-use is within the lower river corridor and is adjacent to parcels prone to flooding and subject to expanded river buffers, retention areas, and policies that exceed FEMA standards.

As described under impact HYD-4 of the Draft EIR, flood impacts would be less than significant with implementation of existing regulations and proposed General Plan policies. This analysis was based in part on flood modeling completed by the City to map future flood risk and sea level rise. These models are cited as "Petaluma 2025" in the Draft EIR and are available online at:
<https://www.planpetaluma.org/slr-flood-map>.

No revisions to the Draft EIR are necessary in response to this comment.

Response 12.5

The commenter expresses concern that the parcel designated as station mixed-use is a narrow parcel and that a building of this size would negatively affect the immediate streetscape.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 12.6

The commenter expresses concern that the wastewater infrastructure, particularly Ellis Creek Wastewater Treatment facility cannot adequately serve concentrated high density development proposed by the project.

The Draft EIR analyzed impacts to infrastructure, including wastewater infrastructure, in Section 4.16, *Utilities and Service Systems*. As discussed therein and in the Water Supply and Wastewater System Evaluation Technical Memorandum included as Appendix E to the EIR, the Ellis Creek Wastewater Treatment Plant would have sufficient capacity to accommodate wastewater generated by cumulative development through 2050 and the Plan Area would be adequately served by existing wastewater treatment facilities. No revisions to the Draft EIR are required in response to this comment.

Response 12.7

The commenter states that Petaluma is under a Regional Water Board regulatory order over bacteria contamination in the Petaluma River and expresses concern about allowing high density development near the downtown which has old sewer lines.

The Draft EIR is a programmatic document that analyzed utility infrastructure, including wastewater infrastructure, as a whole for the Plan Area. As discussed in in Section 4.16, *Utilities and Service Systems*, there are areas of the city that would require new or expanded sewer lines including McDowell Boulevard, D Street and Vallejo Street, Washington Street, Petaluma Boulevard, and a portion of pipeline along the railroad corridor and the Petaluma River. Development in the Plan Area that results in the need for new or upsized wastewater infrastructure would be required to pay wastewater impact fees to offset costs associated with expansion of the City's sewer system. New or expanded wastewater infrastructure would also be required to comply with other applicable regulations of the Petaluma Municipal Code. Additionally, the California Plumbing Code contains provisions requiring the installation of low flow fixtures and toilets in new developments and the retrofitting of existing structures with water efficient fixtures. Development facilitated by the proposed project would be required to comply with Part 5, Chapter 4 of the California Plumbing Code which would reduce wastewater generation within the city. Overall, impacts to sewer infrastructure within the city would be less than significant. No revisions to the Draft EIR are required in response to this comment.

Response 12.8

The commenter expresses concern that there would not be adequate water supply to support development of an eight-story station mixed use development.

The Draft EIR is a programmatic document that analyzed utility infrastructure, including water supply, as a whole for the Plan Area in Section 4.16, *Utilities and Service Systems*. As discussed therein and in the Water Supply and Wastewater System Evaluation Technical Memorandum included as Appendix E to the EIR, there would be sufficient water supply for cumulative growth in the Plan Area in normal years and across multiple dry years. However, a shortfall would occur in a single-dry year, and there would be approximately a 12 percent difference between supply and demand in a single-dry year starting in 2030. When a water supply shortfall occurs, the City would implement its WSCP, which addresses short-term and long-term water supply shortages that may result from droughts, climate change, disasters, reduced deliveries from Sonoma Water, and other conditions. In addition to implementation of the WSCP, proposed General Plan polices would be implemented which would further reduce impacts to water supply. Overall impacts to water supply would be less than significant. No revisions to the Draft EIR are required in response to this comment.

Response 12.9

The commenter expresses concern that roadways would be negatively impacted by an eight-story development within the City.

Please refer to Master Response 1 for a discussion of roadway impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 12.10

The commenter expresses concern that there have been capital improvement projects in the station area that have been deferred recently. The commenter opines that now is not the right time to entitle the most intensive parcel in the General Plan.

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 12.11

The commenter states that the General Plan will guide development in Petaluma for the next 25 years and requests that the maximum height for the station mixed use designation be changed to align with community input.

Please refer to Master Response 1 for a discussion of maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: Paula Granucci <paulagranucci@comcast.net>
Sent: Saturday, May 16, 2026 11:28 AM
To: General Plan Update; -- City Clerk
Subject: Enforce Protections for Open Space

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Some people who received this message don't often get email from paulagranucci@comcast.net. Learn why this is important

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

Greetings planners,

We live on 66 acres of grazing land on Lakeville Hwy in unincorporated Petaluma. Our land

supports a cow-calf operation year round. Our property is under the decades-old Williams

Act which affords benefits to land owners whose land is used for production of food or

fiber. We bought this property years ago with the intent of protecting open space and

increasing biodiversity there. We are in the Petaluma River watershed and are deliberate in

keeping our (land) management free from producing contaminants into the watersheds.

We strongly urge you to enforce protections for open spaces and to keep development inside the city core. Infill development in unincorporated Petaluma would work directly

against the measures that many many landowners take daily to protect the rivershed and

biodiversity that is crucial to farming.

Thank you for directing development away from Ag lands in Petaluma.

Sincerely,
Paula Granucci
6537 Lakeville Hwy
Petaluma CA

13.1

Letter 13

Commenter: Paul Granucci

Date: May 16, 2026

Response 13.1

The commenter states that they live on land protected by the Williamson Act and supports protecting open space, increasing biodiversity, and keeping their land management free from producing contaminants into the watershed. The commenter requests that protections for open space are enforced and infill development should be concentrated in the city core and not expanded into unincorporated Petaluma because this would negatively affect the river shed and biodiversity.

Refer to Response 11.1. No revisions to the Draft EIR are required in response to this comment.

From: [Christie Achor](#)
To: -- City Clerk
Subject: Keeping Petaluma PETALUMA!
Date: Sunday, May 17, 2026 4:00:11 PM

Christie Achor

[REDACTED]
Petaluma, CA 94952
[REDACTED]
[REDACTED]

May 17, 2026

City Council of Petaluma
11 English Street
Petaluma, CA 94952

Subject: Strong Opposition to Proposed Zoning Changes for Eight-Story Buildings

Dear Mayor and Members of the City Council,

I am writing to formally voice my strong opposition to the proposed zoning changes that would permit the construction of eight-story buildings in our downtown area. While I understand the ongoing pressure to develop, sacrificing the unique character and livability of Petaluma for high-rise developments is a short-sighted approach that our infrastructure simply cannot handle.

14.1

People live in and visit Petaluma precisely because of its deeply preserved historic downtown. Our low-rise skyline and small-town charm provide an authentic vibe that is nearly impossible to find anywhere else in the Bay Area. This historic integrity is the cultural engine of our city, and introducing eight-story structures will permanently overpower and destroy it.

14.2

Furthermore, our existing infrastructure is already at a breaking point. Gridlock is a daily reality, and driving around town has become increasingly difficult due to the sheer volume of vehicles. Our historic streets and intersections were never designed to handle this level of congestion. Adding dense, high-rise developments will severely worsen traffic, strain public services, and compromise the quality of life for current residents. We simply do not have the infrastructure capacity to support this influx of people.

14.3

I urge the City Council to reject these zoning changes. Please focus instead on smart, sustainable development that respects our existing height limits, upgrades our infrastructure first, and preserves Petaluma's historic character.

14.4

Sincerely,
Christie Achor

Get [Outlook for iOS](#)

Letter 14

Commenter: Christine Achor

Date: May 17, 2026

Response 14.1

The commenter expresses disagreement with the allowance of up to eight-story development in the downtown area. The commenter opines this will sacrifice the unique character and livability of the city.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 14.2

The commenter expresses concern that an eight-story development would negatively impact the character and historic nature of Petaluma's downtown.

Please refer to Master Response 1 for a discussion of aesthetic and historical resource impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 14.3

The commenter expresses concern that an eight-story development would worsen traffic and strain public services.

Please refer to Master Response 1 for a discussion of traffic, roadway impacts, and public service impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 14.4

The commenter urges the city council to reject the proposed zoning changes and asks them to focus on sustainable development that respects existing height limits, upgrades infrastructure, and preserves Petaluma's historic character.

Please refer to Master Response 1 for a discussion of maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: [Rodger Bridwell](#)
To: [-- City Clerk](#)
Subject: URGENT: Reject Destructive Downtown Zoning Changes – Say NO to 8-Story Buildings
Date: Sunday, May 17, 2026 5:36:14 PM

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

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

Dear Mayor and Members of the City Council,

I am writing to express my vehement opposition to the reckless proposed zoning changes that would allow eight-story high-rises to destroy our downtown. This proposal is a blatant betrayal of Petaluma's community identity, driven by development pressures at the direct expense of the people who actually live here.

Our historic downtown is not a blank slate for developers to exploit. Its low-rise skyline and unique charm are irreplaceable assets. Jamming massive, eight-story concrete blocks into our historic core will permanently ruin the character, authenticity, and visual appeal of our town. Once that historic integrity is destroyed, it is gone forever.

Furthermore, our local infrastructure is already failing. Gridlock is a daily nightmare, and our historic grid is completely overwhelmed. It is entirely irresponsible to even consider adding massive high-rise density when our roads are crumbling, traffic is at a standstill, and public services are already strained to their limits. The city lacks the infrastructure capacity for this influx, and forcing it through is a recipe for civic disaster.

I demand that the City Council reject these zoning changes outright. Your duty is to protect Petaluma's residents and preserve our historic heritage, not to rubber-stamp short-sighted, destructive development projects.

Sincerely,

Rodger Bridwell

401 Fair Street

Petaluma CA. 94952

15.1

15.2

Letter 15

Commenter: R Bridwell

Date: May 17, 2026

Response 15.1

The commenter expresses disagreement with the allowance of up to eight-story development in the downtown area. The commenter expresses concern that this will negatively impact the historic character of Petaluma's downtown.

Please refer to Master Response 1 for a discussion of aesthetic and historical resource impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 15.2

The commenter expresses concern that an eight-story building would negatively impact existing infrastructure, such as roads, worsen traffic, and strain public services.

Please refer to Master Response 1 for a discussion of traffic, roadway impacts, and public service impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: [Constance Bay](#)
To: [-- City Clerk](#)
Subject: Fwd: For public record for May 18 public hearing
Date: Monday, May 11, 2026 3:24:47 PM

----- Forwarded message -----

From: Constance Bay [REDACTED] >
Date: Mon, May 11, 2026 at 3:18 PM
Subject: For public record for May 18 public hearing
To: <cityclerk@cityofpetaluma.orgsubject>

To whom it may concern:

Please put me down as not agreeing with the change in height from six stories to eight stories for the area adjacent to the Petaluma train station. At the last meeting it was agreed by City Council and workshop members that six stories was the best way to proceed. I'm not sure why it was decided to change this to eight stories but I'm assuming there was some sort of financial advantage.

Please do not disregard all of the work, time and effort that was put into the decision to stay with six stories! I'm very concerned about the view shed and the impact on our special downtown Petaluma ambience. We need to protect this!

Thanks and advance, and I am hoping the City Council will go back to their previous agreement for six stories.

Constance Bay

16.1

Letter 16

Commenter: Constance Bay

Date: May 11, 2026

Response 16.1

The commenter expresses disagreement with the allowance of up to eight story development in the downtown area. The commenter expresses concern that this will negatively impact the character of Petaluma's downtown.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Dave](#)
To: [-- City Clerk](#)
Subject: Downtown/Fairgrounds Plans
Date: Monday, May 18, 2026 10:06:29 AM

Hello,

My name is David Kahn, I live at [REDACTED] Drive in Petaluma. I am a retire Battalion Chief from the Petaluma Fire Department.

17.1

I am in full support of the plan to build a City Services HQ at the Fair Grounds, combining the Police HQ, a new Fire Station Location and a combined updated EOC when needed. This is a must for the future of this city.

I am in full support of of the eight or at least 6 story combined use building proposed by the downtown train depot. It is time to make use of this vacant lot and have it bring in more revenue.

17.2

Third, We NEEEEED the Rainier under-crossing to be built! It is so hypocritical to ban drive throughs, but then to not allow for the infrastructure to be built for the proper flow of traffic. So people sit with their motor running. JCT on the council needs to stop being so selfish and let this go through!

17.3

Thank you for your work and your time!

David Kahn

Letter 17

Commenter: David Kahn

Date: May 18, 2026

Response 17.1

The commenter states they are a retired Battalion Chief from the Petaluma Fire Department and that they fully support the plan to build a City Service Headquarters at the fairgrounds.

This comment is noted, no further response is required.

Response 17.2

The commenter expresses support for a mixed-use development that is at least six stories in height by the SMART train station.

This comment is noted, no further response is required.

Response 17.3

The commenter opines that a Rainier under crossing needs to be built to allow for the proper flow of traffic.

This comment does not pertain to the Draft EIR. No further response is required.

From: [DJ Gaker](#)
To: [-- City Clerk](#)
Subject: Height limit support
Date: Sunday, May 17, 2026 9:11:38 PM

I saw a post on Nextdoor about increasing the building height limit near the SMART station to 90 feet, and I wanted to express my support for the change. I would be happy to see those areas developed fully, allowing more people to walk/bike downtown easily.

18.1

Thanks,
DJ Gaker, Petaluma resident

Letter 18

Commenter: DJ Gaker

Date: May 18, 2026

Response 18.1

The commenter expresses support for increasing the allowable height of development near the SMART station to 90 feet.

This comment is noted, no further response is required.

From: [Gary McKinnon](#)
To: [-- City Clerk](#)
Subject: Public Record May 18th Public Hearing Draft General Plan
Date: Tuesday, May 12, 2026 6:18:21 PM

Apparently the Petaluma City Council thinks it knows better than the citizens they represent. The initiative against the overlay and the height limits downtown clearly demonstrated that the wide majority of the residents don't want 8 story buildings downtown or anywhere that block the views and light from our streets. They can have those in Miami and Vegas but we want to see the beautiful hills and valleys that surround our special town.

What has the council got to gain by this high density approach? There are acres of development going on now with housing going up all around and that is good but most of us want a low profile presence and that should be obvious. Thousands of signatures prove that the appetite for urban structures is not what people who live here or want to live here favor.

I urge the council to remember who they represent, not their own or those of special interests who influence them. Six stories is high enough.

Gerald McKinnon
Petaluma, CA

--

19.1

Letter 19

Commenter: Gary McKinnon

Date: May 12, 2026

Response 19.1

The commenter states that a wide majority of residents in Petaluma do not want eight- story buildings downtown. The commenter urges the city council to agree to a height allowance of six stories.

Please refer to Master Response 1 for a discussion of maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: [Howard Belove](#)
To: [-- City Clerk](#)
Subject: NO to eight story buildings
Date: Monday, May 18, 2026 6:59:30 AM

in downtown Petaluma.

Howard Belove
[REDACTED]

20.1

Letter 20

Commenter: Howard Belove

Date: May 12, 2026

Response 20.1

The commenter expresses disagreement with the allowance of eight- story buildings in downtown Petaluma.

Please refer to Master Response 1 for a discussion of maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: [Isabelle M Beardsworth](#)
To: [-- City Clerk](#)
Subject: Public Comment to City Council Meeting May 18 2026 Draft General Plan
Date: Saturday, May 16, 2026 11:13:35 PM

I strongly disagree with the adoption of the Draft General Plan in its current form. The assertion that “your voices made the plan” is inaccurate. The plan does not even conform to the “Policy Frameworks” outlined with respect to “Historical Preservation, “Resources”, “Land Use”, “Complete Streets”, “Transportation” and” Water Resources”. The “Plan” appears primarily to fulfill the “Reimagining Petaluma” by City employees to grow the size of government and fill the coffers anticipating the City Council will again approve “The Plan”.

21.1

21.2

The GPAC may be a group of well-intentioned volunteers, but they do not speak for all citizens. They are an unelected group and the concept of “community engagement” historically has been a check box approach. The City Council, the elected representatives, have NOT been listening to citizens. PHA and the very successful Citizen Petition to demand a public vote to eliminate a 6-story downtown hotel is evidence of that.

21.3

The most egregious violation is the proposed rezoning in the downtown which would allow up to a 90 foot building adjacent to SMART train and high rise buildings in other downtown areas. This conflicts directly with the “density and intensity”, ‘except in certain areas’. These areas are the most conspicuous in the city and subject to the most congestion. This is a key approach to Petaluma by car, train, bus, bicycle or walking and it says downtown inner city not the quaint Sonoma County town citizens and visitors alike love.

21.4

A building of this size is incompatible with the surrounding area however designed. It would completely overlook the Historic Districts and Historic Buildings. The challenge to the City Council for preservation of the existing zoning laws in the “A Street Historic District” reflected the sentiment of the community. The prior representation by the City Council to approve only 6 stories is a violation of community trust. This would block the view of the Sonoma County Hills the City has always vowed to protect.

21.5

21.6

This is not an appropriate “Land Use” for this downtown area. The high-density housing is incompatible with the surrounding area. The area consists of primarily one story buildings with the exception of the 2-story grocery store and 4-story housing on Washington Street. A structure of this magnitude would best be situated adjacent to

21.7

21.8

the east side SMART station on the perimeter of the town in a new neighborhood. The M-Group had instead selected a 4-story building only.

21.8 cont.

The “Complete Streets” are NOT. The city has elected not to maintain public roads and spend taxpayer funds on alternative transportation. Washington Street, the main thoroughfare through Petaluma, is a complete disaster. Citizens have been demanding the City of Petaluma to fix the potholes on city streets for the past 40+ years I have lived here. Every city council member has promised to work on this issue but it does not come to pass. Citizens have paid taxes for this purpose and they pay the price in damage to their vehicles as a result of the lack of maintenance. The proposed Project List for the “Road Repair and Accountability Act” is pitiful and a band-aid to the work that needs to be completed. It is kicking the can down the proverbial road. The amount of money utilized for bicycle lanes, cross walks, bulb outs could have been better spent on maintaining existing roads which ultimately cannot be repaired with these long delays. It is shameful to allow these conditions.

21.9

The high density/high rise development is primarily predicated on the (not so) SMART train. The long-term viability of SMART is highly questionable. It is primarily funded by taxpayers via the sales tax and does not receive the revenue taxpayers were led to believe was forthcoming from state and federal funds. There was a 5% revenue attributed to ridership. This is decreasing with the “free” (to riders) old and young people which has been extended to garner support for the upcoming vote to extend the taxes for another 30 years. There is no guarantee this will happen and without it SMART will be in further dire financial straits. The revenue and expenses have not accurately been reported and expenses for operations are extremely high. Trains are a wonderful mode of transportation, however, they have very limited opportunities and a lengthy time issue for 21st century public use.

21.10

Other public transportation options have significant financial issues in Petaluma. The City Council is undergoing significant review of the Petaluma transit operation because of anticipated losses. Golden Gate Transit and Sonoma County Transit are amending their schedules to push forward the train. “Luma Go” is not a well utilized and long-term viable transportation system nor the “Redwood Bike-Share” and once grants are discontinued the City would need to fund.

21.11

The City of Petaluma does not have the ability to add 16,000+ citizens in the next plan and add 6,500+- new residents. Petalumen’s are absorbing a 5% water rate increase for the next 5 years approved by City Council with a proviso in the event of drought conditions we have unlimited rates for additional water we need to purchase on the open market. The City Council had a presentation by Sonoma County Supervisor which reflected a total lack of water management. We do not have water

21.12

storage capacity and conservationists legal action results in millions of acre feet of water being released to the ocean. There is no capacity in the community for additional water and tax payers are already paying exorbitant costs for sewer rates to build future capacity. California mandated new housing has not taken into consideration the facts of life.

21.12 cont.

The City of Petaluma is in a financial crisis. It was designated with a “D” financial rating by an independent entity. It is currently utilizing Measure U funds to borrow against future revenue and not utilized in the manner citizens voted to approve the measure. The proposed new Police and Fire Station is a project that we do not need and we cannot afford.

21.13

21.14

The Staff Report acknowledges the fact that Petaluma has minimal growth just as the County of Sonoma from 2010 to 2025. In fact, the population has slightly decreased. The prior “General Plan” significantly overestimated increased population and new housing needs. The proposed plan does exactly the same thing; has no basis in reality. Clearly, there is no independent assessment of the current economic climate, the significant reduction in the wine industry and other service sectors. The City has no viable plan to attract businesses which provide high paying jobs. This is merely “wishful thinking” under the guise of a “Plan”.

21.15

I would comment on the DEIR, however, citizens have contributed significant comments on the past on various reports. Suffice it to say, I have never met an EIR with other than a “No Impact/Less than Significant” that check all the boxes and slide by.

21.16

On a last note, the City needs to evaluate whether citizens may want to be limited to a “15 minute neighborhood”. Many people do not want to have their lives revolve around government mandates but would like to have the freedom to make their own decisions on how to live. These “plans” are all predicated on this basis but it will not work if people do not wish to live on that basis.

21.17

I urge the City Council to listen to the feedback of citizens and not make decisions without real input from all interested parties.

Isabelle Beardsworth

From: [Isabelle M Beardsworth](#)
To: [-- City Clerk](#)
Subject: Addendum to public comment to City Council May 18 2026 Draft General Plan
Date: Saturday, May 16, 2026 11:29:02 PM

I do note the significance of disallowing any public comment remotely on Zoom for the City Council Meeting for the most significant issue in decades: the new General Plan. Many people have protested the elimination of citizen participation online for years when abruptly eliminated. Effectively, this has discriminated against citizens for participating in this democratic process. Despite promises to reconsider within a “few weeks” (that is on the public record) by city employees, the (not) “first” and forward looking leadership, even when many other cities in Sonoma county allowed. Petaluma has finally had to comply with SB 707 when compelled by the state but is still holding out until July 6 2026, past the July 1 deadline.

21.18

Letter 21

Commenter: Isabelle Beardsworth

Date: May 12, 2026

Response 21.1

The commenter expresses concern that public comment is not allowed remotely on Zoom for the city council meeting on the General Plan.

This is not a substantive comment on the Draft EIR. No further response is required.

From: [Judith Allewelt](#)
To: [-- City Clerk](#)
Subject: FOR PUBLIC RECORD MAY 18 GENERAL MEETING
Date: Monday, May 11, 2026 2:04:04 AM

Smart Train Station Building Height!

>

> 8 stories No! Sure, you're allowed legally since the area is considered a transportation hub but it will ruin the landscape of our dear town. And what about the traffic impact. In one small area-train, river drawbridge, roadway leading to a highway. Are you trying to destroy Petaluma? Here comes the lawsuit! Judi Allewelt

> Sent from my iPhone

| 22.1

| 22.2

Letter 22

Commenter: Judith Allewelt

Date: May 11, 2026

Response 22.1

The commenter expresses concern that an eight-story development would ruin the landscape of downtown Petaluma.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Response 22.2

The commenter expresses concern that an eight-story development would greatly increase traffic in the downtown area.

Please refer to Master Response 1 for a discussion of traffic impacts as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: [Julia Cort](#)
To: [-- City Clerk](#)
Subject: General plan
Date: Sunday, May 17, 2026 3:38:09 PM

Dear City Council, please do not alter the general plan just because you can. Petaluma is not Santa Rosa or San Rafael. That's why we all live here. The historic charm, the style of the buildings, the character of the buildings. We have the ability to Enjoy our downtown, to through town from east side to west side without too much congestion. This is why we love it here. Our town is not blighted. Our town is extremely vibrant. People come and visit because there are things going on all the time and people are busy downtown shopping and being entertained and dining. I hope you will retain the current standards for the general plan and not increase the height allowed. Sincerely,
Julia Cort
Sent from my iPhone

23.1

Letter 23

Commenter: Julia Cort

Date: May 11, 2026

Response 23.1

The commenter expresses concern that an 8-story development would negatively affect the historic charm and character of the downtown area. The commenter opines that the character of downtown is what makes people want to come and visit.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, and historic resources as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Kim Bruno](#)
To: [-- City Clerk](#)
Cc: [Wendy ICE](#)
Subject: Comments on General Plan - May 18, 2026
Date: Sunday, May 17, 2026 9:07:23 PM

As I understand the proposed general plan, the height restrictions on new buildings have been eviscerated such that buildings may now reach 90 feet near the train station as opposed to the current limit of 65 feet (six stories). This is an obvious conflict with the previous and new general plan (HR1.2) that promises to "Maintain existing historic districts with a high degree of historic integrity and significance, while encouraging adaptive reuse of historic buildings ...".

24.1

Moreover, while the current and proposed general plan is laden with good intentions, it is not balanced with a commitment to maintain the city's historical and cultural character. If the professed good intentions articulated in the general plan may be easily avoided by an overlay, why have a general plan?

24.2

I urge the city council to reconsider its commitment to maintain existing historic districts by declining to radically increase the size of buildings "near" the train station.

Thank you

Kim Bruno

██████████ Dr, Petaluma, CA 94952

Letter 24

Commenter: Kim Bruno

Date: May 17, 2026

Response 24.1

The commenter expresses concern that an eight-story development would negatively affect the historic districts which are protected under proposed General Plan Policy HR 1.2.

Please refer to Master Response 1 for a discussion of impacts to historic resources as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

Response 24.2

The commenter expresses concern that an eight-story development would negatively affect the character of the city and urges the city council to decline an increase in the allowable height of development near the SMART station.

Please refer to Master Response 1 for a discussion of aesthetic resource impacts, including visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. No revisions to the Draft EIR would be required in response to this comment.

From: [REDACTED]
To: -- City Clerk; [General Plan Update](#)
Subject: For Public Record May 18th Public Hearing Draft General Plan
Date: Saturday, May 16, 2026 1:59:45 PM

I am opposed to building 8-story structures adjacent to the Petaluma SMART train station. This would not be in keeping with the height or the character of most buildings near the station nor in nearby downtown.

Right now the area includes two lovely buildings that reflect the historic character of Petaluma: the excellent Petaluma Art Center and the Visitor's Center. Across Lakeville is the beautifully restored Burdell Building and nearby is the refurbished structure that houses the Hampton Inn. These buildings demonstrate that Petaluma honors rather than abolishes its industrial past.

This SMART stop is currently the gateway to Petaluma for both day trippers and tourists who come here to appreciate our historic downtown. When this site is properly developed, it can become a destination itself that will promote local shopping and restaurants and boost the usage of the SMART train on weekends.

Creating a neighborhood of 8 story buildings does not reflect the character of Petaluma that residents enjoy and tourists come to visit. Please preserve the 6 story height limit for this site!

Laurie Treleven

25.1

Letter 25

Commenter: Laurie Treleven

Date: May 16, 2026

Response 25.1

The commenter expresses opposition to building eight-story structures near the SMART station. The commenter expresses concern that an eight-story development would negatively affect the historic downtown area and character of Petaluma.

Please refer to Master Response 1 for a discussion of aesthetic impacts, including impacts to visual character, and impacts to historic resources as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [LINDA HARTRICH](#)
To: [-- City Clerk](#)
Subject: Re: Tall Buildings in Petaluma
Date: Sunday, May 17, 2026 7:04:49 PM

Sent from my iPhone

Dear Mayor and City Council,

I am writing to state that we are in opposition to any new buildings over four stories high. Please don't ruin our lovely Petaluma downtown area.

Thank you for your consideration.

Sincerely,

Linda Hartrich and family



26.1

Letter 26

Commenter: Linda Hartrich

Date: May 17, 2026

Response 26.1

The commenter expresses opposition to building eight-story structures near the SMART station. The commenter expresses concern that an eight-story development would negatively affect the downtown area.

Please refer to Master Response 1 for a discussion of aesthetic impacts, including impacts to visual character, and impacts to historic resources as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [mary michelucci](#)
To: [-- City Clerk](#)
Subject: Smart train station
Date: Thursday, May 14, 2026 5:52:03 AM

What is the reason for making the smart train station 8 stories tall.?

Really you must be clear to the general public your reasoning for needing the training station so tall. Then there are questions about accessibility and parking which has become an increasingly absent commodity. Please be transparent. Mary Michelucci
Sent from my iPhone

27.1

Letter 27

Commenter: Mary Michelucci

Date: May 14, 2026

Response 27.1

The commenter expresses concern over the eight- story height allowance near the SMART station and requests that the reasoning for the height increase be made known to the public. The commenter expresses concern with accessibility and parking associated with an eight-story building.

Please refer to Master Response 1 for a discussion of traffic, roadway impacts, and parking as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Nan Winters](#)
To: [-- City Clerk](#)
Subject: Height limit
Date: Saturday, May 16, 2026 9:43:17 PM

City Council,

I live in Petaluma, and also have a business here. Please respect the height limit that was carefully crafted and voted on. Everyone that I know that lives here, and loves our fabulous historic and charming town, wants height limits. So many people that visit my shop every year, always remark how lucky we are to have kept the special and unique flavor alive. They always say, "don't screw it up like my town has!" So, don't screw it up by marring it with high rises that steal the views and light. Traffic is bad enough, as is parking. Listen to the citizens, please. Thank you. Hope you do the right thing, or you'll probably be on your way out.

Best,

Nan Winters

Sent from my iPhone

28.1

Letter 28

Commenter: Nan Winters

Date: May 16, 2026

Response 28.1

The commenter expresses opposition to the eight- story height allowance near the SMART station. The commenter expresses concern with impacts to the historic downtown, traffic, and parking associated with an eight-story building.

Please refer to Master Response 1 for a discussion of aesthetic impacts and impacts to historic resources and traffic as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Nancy Rogers](#)
To: [-- City Clerk](#)
Subject: For Public Record May 18th Public Hearing Draft General Plan
Date: Monday, May 11, 2026 5:28:39 PM

> On May 11, 2026, at 5:26 PM, Nancy Rogers <[REDACTED]> wrote:

>

> To Petaluma City Council

>

> I am writing to express my opposition to the proposed General Plan amendment that allows building heights to exceed six stories. I support additional housing on vacant properties, but would like retain the general character of neighborhoods, especially those within and adjacent to the Historic Downtown Petaluma area.

>

> Thank you for this opportunity to express my views.

>

> Nancy Rogers

> [REDACTED]

> Petaluma, CA 94954

> [REDACTED]

29.1

Letter 29

Commenter: Nancy Rodgers

Date: May 11, 2026

Response 29.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. The commenter expresses concern with impacts to the character of the neighborhoods in this area associated with an eight-story building.

Please refer to Master Response 1 for a discussion of aesthetic impacts, including impacts to visual character, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Ocie Bridwell](#)
To: [-- City Clerk](#)
Subject: Regarding proposed zoning changes for eight story buildings
Date: Sunday, May 17, 2026 11:06:01 PM

To Whom It May Concern,

I am writing to formally voice my strong opposition to the proposed zoning changes that would permit the construction of eight-story buildings in our downtown area.

One of the main attractions for tourists when visiting Petaluma is it's preserved historic downtown. Our historic skyline and small-town charm provide an authentic vibe that is a relief from bustling cities and drab sprawling suburban landscapes found elsewhere in the Bay Area. This historic integrity is the cultural engine of our city, and introducing eight-story structures will permanently overpower and destroy it.

30.1

Furthermore, our existing infrastructure is already at a breaking point. Driving through town has become not a headache but an actual obstacle due to the congestion. Adding dense developments and increasing traffic will severely worsen our infrastructure, strain public services, and compromise the quality of life for current residents. We simply do not have the infrastructure capacity to support this influx of people.

I urge the City Council to reject these zoning changes. Please focus instead on smart, sustainable development that respects our existing height limits, upgrades our infrastructure first, and preserves Petaluma's historic character.

Sincerely,

Ocie Bridwell

Letter 30

Commenter: Ocie Bridwell

Date: May 17, 2026

Response 30.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. The commenter expresses concern with potential aesthetic impacts and impacts to Petaluma's historic downtown associated with an eight-story development. The commenter also expresses concern about potential impacts to existing infrastructure, including roads in addition to increased traffic and strain on public services. The commenter urges the City Council to reject the eight-story height allowance.

Please refer to Master Response 1 for a discussion of aesthetic impacts, historic impacts, transportation impacts, and public services impacts, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Ramona Ingrassia](#)
To: [-- City Clerk](#)
Subject:
Date: Monday, May 18, 2026 11:51:08 AM

To allow 28 story buildings in downtown Petaluma would be the most drastic mistake. You can make to a historic very quaint little town like ours. Please use your head and not think about money. Traffic alone would be horrendous. We don't need something like this in our downtown. What is this all about with you deciding what would affect so many and people who do not want this. We don't need something like this.

31.1

Letter 31

Commenter: Ramona Ingrassia

Date: May 18, 2026

Response 31.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. The commenter expresses concern with potential impacts to Petaluma's historic downtown associated with an eight-story development. The commenter also expresses concern about potential increased traffic associated with an eight-story development.

Please refer to Master Response 1 for a discussion of historic and transportation impacts, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Rick Brown](#)
To: [-- City Clerk](#)
Subject: I support 8 stories
Date: Monday, May 18, 2026 7:53:23 AM

32.1

Rick Brown

[REDACTED]

Petaluma z, ca

Letter 32

Commenter: Rick Brown

Date: May 18, 2026

Response 32.1

The commenter expresses support for the eight-story height allowance near the SMART station.

This comment is noted. No further response is required.

From: [Rodger Bridwell](#)
To: [-- City Clerk](#)
Subject: URGENT: Reject Destructive Downtown Zoning Changes – Say NO to 8-Story Buildings
Date: Sunday, May 17, 2026 5:36:14 PM

Dear Mayor and Members of the City Council,

I am writing to express my vehement opposition to the reckless proposed zoning changes that would allow eight-story high-rises to destroy our downtown. This proposal is a blatant betrayal of Petaluma's community identity, driven by development pressures at the direct expense of the people who actually live here.

Our historic downtown is not a blank slate for developers to exploit. Its low-rise skyline and unique charm are irreplaceable assets. Jamming massive, eight-story concrete blocks into our historic core will permanently ruin the character, authenticity, and visual appeal of our town. Once that historic integrity is destroyed, it is gone forever.

Furthermore, our local infrastructure is already failing. Gridlock is a daily nightmare, and our historic grid is completely overwhelmed. It is entirely irresponsible to even consider adding massive high-rise density when our roads are crumbling, traffic is at a standstill, and public services are already strained to their limits. The city lacks the infrastructure capacity for this influx, and forcing it through is a recipe for civic disaster.

I demand that the City Council reject these zoning changes outright. Your duty is to protect Petaluma's residents and preserve our historic heritage, not to rubber-stamp short-sighted, destructive development projects.

Sincerely,

Rodger Bridwell

██████ Street

Petaluma CA. 94952

33.1

Letter 33

Commenter: Rodger Bridwell

Date: May 17, 2026

Response 33.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. The commenter expresses concern with potential impacts to Petaluma's historic downtown associated with an eight-story development. The commenter also expresses concern about potential increased traffic associated with an eight-story development.

Please refer to Master Response 1 for a discussion of historic and transportation impacts, as they relate to the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Sergio Bravo](#)
To: [-- City Clerk](#)
Subject: Opposed Downtown building
Date: Monday, May 18, 2026 6:25:27 AM

City clerk,

I am in full opposition of the draft for a 8 story building in Downtown Petaluma.
Sent from my iPhone

34.1

Letter 34

Commenter: Sergio Bravo

Date: May 18, 2026

Response 34.1

The commenter expresses opposition to the eight-story height allowance near the SMART station.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: t.mcmains@comcast.net
To: -- City Clerk
Subject: Building Height
Date: Sunday, May 17, 2026 10:04:31 PM

As along time residence of the city I wish to register my opposition to the General Plan allowing 8 story buildings. If someone wants to build an 8 story building for what ever purpose let them go to Santa Rosa

35.1

Letter 35

Commenter: T. McMains

Date: May 17, 2026

Response 35.1

The commenter expresses opposition to the eight-story height allowance near the SMART station.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Cherry Palacios](#)
To: [-- City Clerk](#)
Subject: The Streets of Petaluma Belong to the Citizen's ...
Date: Sunday, May 17, 2026 11:33:15 PM

Please do the job you wanted when you applied to be on the City Council, and listen to your citizens.

We DON'T want an 8 or 6 story hotel building in the heart of town.

This intended hotel being right on the corner of B Street, which is one of the main arteries to downtown, will look like a tall monstrosity next to Rex Hardware.

The traffic lights already on this corner, plus guests checking in-and-out of the hotel and putting luggage into their "stationery" vehicles, will be extremely detrimental to the regular traffic flow and guest safety.

Thelma Cherry Rowe-Palacios
Petaluma, Ca. 94952

36.1

Letter 36

Commenter: Thelma Cherry Rowe-Palacios

Date: May 17, 2026

Response 36.1

The commenter expresses opposition to an 8 or 6 story hotel in the heart of Petaluma. The commenter expresses concern with potential visual character impacts and traffic associated with an 8 or 6 story development.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Tom Gaffey](#)
To: [-- City Clerk](#)
Subject: General plan, 8 story buildings
Date: Monday, May 18, 2026 9:21:04 AM

I want to go on the record as a Petaluma voter, that I am against zoning for eight story building heights in the area of the Smart train station or anywhere in Petaluma for that matter. I am afraid that eight story buildings that qualify as a low income builds would be allowed to have an additional 30% added to what local zoning regs would allow. This could conceivably lead to high rise buildings reaching 120 feet high.

Petaluma is currently on track to reach the California housing build requirement numbers the state expects us to build and we can reach those numbers without zoning up to eight story projects.

Please keep heights in Petaluma capped at six stories.

Tom Gaffey
Petaluma

37.1

Letter 37

Commenter: Tom Gaffey

Date: May 17, 2026

Response 37.1

The commenter expresses opposition to the eight- story height allowance near the SMART station. The commenter expresses concern that with a density bonus development on this site could be 120 feet high. The commenter states that Petaluma is on track to meet the State’s housing requirements without zoning up to eight-story developments.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Patricia Tuttle Brown, PhD, MFT, LAc Acupuncture, Classical Chinese Medicine, Counselling
 513 Petaluma Blvd. South, Petaluma, Ca. 94952 ph 707-762-2240 fax 707-762-9290
and Citizen Activist since 1993
working with compatriots & staff to protect & enhance Petaluma's civic, political & land-use decisions
for the health and well-being of all

Testimony Submitted 5-18-2026 for Final Council Public Hearing
for Petaluma's "General Plan Draft 2026"

I am just a regular citizen. Like most people.

I am one who has felt over the years that I have a responsibility to help my city which I love. Someone has to help. Who??Sigh.... My basic perspective is: it is not really fun; it is a big time-steal; it is exhausting; one can feel ridiculous standing up there talking to Council et al; and it can be uncomfortably controversial; And yet...how can pay lip service to "caring about the greater whole" and...just wait for someone else to always "do it?"

So today, I persevere, feeling rather uncomfortable as usual, to give this feedback hoping to shape the Current 20 year General Plan Draft for the City of Petaluma 2026 with feedback for the 5-18-2026 final General Plan Council hearing..

The primary feedback is:

ENFORCE THE CITY PLANS/. USE CITIZEN/. TIGHTEN UP WEKNESSES. PROTECT HISTORy

WHY LISTEN TO ME?? BECAUSE "I'VE BEEN 'THERE' " ... for years...

I

[I was here] **WORKING FOR ACCESS TO LAFFERTY RANCH 1993-1995... all the way to ACCESS in 2023**

In 1993 my initial toe-in-the water involvement was serendipitously with a few of the first meetings to try to get the City to give tours on both Lafferty Ranch (city-owned/desired by neighbor) and Moon Ranch (an alternative [inferior??] property he wished to swap for the City's "gem on the Mountain". It was I, the engineer with the inspiration, and my neighbor Joe.. and lo and behold: after a lot of nothing, we succeeded (mostly him!)in having the City commit to providing city-sponsored bus tours, fairly, to both locations, which turned out to be a smash hit.... And the public in the end (with lots of opposition on" the other side") succeeded in 1975 in watching the City Council vote to neither sell nor trade the property. Two years. 1993 to 1995. This was only my own small contribution. There were many many heroes greater then me in this victory! But I am the one writing here, having had experience then and since then of attaching "action" to "caring". So this latter is action, which I wish Council to commit to, amidst this General Plan 2026 update.



Waiting from 1993 to this day in 2023,
 as docent, amazedly, 20-years-in, opening the Lafferty gate:
 at our mountain top park!

[& I was here]

WHY LISTEN TO ME??

II

“HEALTHY DEMOCRACY” CAME TO TOWN, TASKED WITH PROVIDING CITIZEN INPUT TO THE CITY REGARDING DISPOSITION OF THE “SONOMA-MARIN FAIRGROUNDS” (an issue very close to my agricultural roots/Petaluma heart) AND I CHOSE TO SIT THROUGH ALL (BUT 6 OF THE) 72 HOURS (= 66 HOURS!) OF THAT “LOTTERY-CHOSEN GROUP” TASKED TO DECIDE THE FATE OF PETALUMA’S SONOMA MARIN FAIRGROUNDS.

I was the ONLY person who did this. There were at base no other observers except a random few who would pop in and out. So: this is my other “why listen to me” example. It is an example of the fact of what a citizen can be willing to DO to help a cause greater than themselves in our own City. It was an odd disquieting 66 hours, but it was worth it.

*And, to my amazement, this extremely randomly- chosen diverse group of Petalumans chose as their #1 goal for the land “Agriculture.” There is it is, right on the summary. It gave me(and no other observe)r one important other takeaway from that 66 hours—which helped me understand why Citizen observers are so important : for, after the Committee had disbanded , printed their conclusion, presented it to Council (of the #ONE priority being “**Agriculture**” for that land) I observed ata later Council meeting some ex-members feeling inspired to continue to expand the ideas, unfortunately implying--rightly or not from my perception--that they were speaking for “the group,” presenting maps for Fairgrounds usage (some or one of which wen up on the Council chamber wall) that were never part of Healthy Democracy’s conclusion, and ... thereby attempt to morph the simple conclusion (**Agriculture, #1 conclusion, for use of that land**) to their own ends.. For anyone who had not been there all those hours, it was confusion. But I knew “That was cheating!” I knew that. and I knew the real conclusion: I knew, because: I was there. We citizen are a valuable unpaid commodity when we turn “caring” into “being willing to show.” The citizens are an underutilized force for staff here, too often seen as antagonists both ways.*

38.1
cont.



*The only time and on the final day of the 66- hour saga of watching the Lottery group, that I was allowed to mingle inside the fence!
The only time I ever spoke to one of the Lottery -chosen, which was to say, “Please could you take this picture.”*

WHY LISTEN TO ME??

III

THIS LAST SECTION II

IS A

**PARTICULAR MESSAGE FOR THIS GENERAL PLAN 2026 REVISION
& IS BORNE OUT OF MY INTIMATE EXPERIENCE WITH THE THREE PLANS IN PARTICULAR,
WHICH I WHY I USE THEM TO DETAIL MY THOUGHTS AND SUGGESTIONS BELOW.
THE THOUGHTS ARE APPLICABLE TO OTHER PLANS IN THE CITY, OF COURSE.**

38.1
cont.

THE 3 KEYS



ACKNOWLEDGE

Acknowledge that many aspects of the City Plans are not being enforced or honored as written.
Understand there is some confusion in some of the plans
which need to be examined/clarified and possibly altered
for greater clarity and consistency, though not
“torn apart” or entirely re-written to ‘update’ them
which was a suggestion I heard at the Planning Commission
4-28-2026 when I mentioned this need I detail in my testimony here.
That rather habitual jump to EXTREME can easily “throw the baby out with the bathwater”.
e.g. one of these plans took 7 years to finish!

ENFORCE

Truly ENFORCE the plans the City has already adopted.

38.2

INTERMINGLE...

Intermingle staff with citizen more often.
More citizen participation regularly for each plan is needed,
with Staff giving citizens the power to do so: fully, regularly, appropriately, bravely when necessary
on an on-going basis-- to assist staff and Council in this momentous task of enforcement!
If we as a City learned an important lesson in the recent Downtown Hotel Proposal debacle
it was that greater Citizen Input regularly, intermingled together with staff’s pondering of important decisions,
and doing so before a lot of money is spent by doing this “intermingling” at the outset of the decision-making,
is vital and should wisely be integrated in.

**BELOW, I DETAIL COMMENTS ABOUT ENFORCEMENT CHALLENGES/IDEAS
FOR THREE OF OUR CITIZEN-GENERATED AND ADOPTED CITY PLANS,
BECAUSE THOSE ARE THE ONES OF WHICH I HAVE HAD CLOSE INVOLVEMENT.
THEY ARE EXAMPLES WHICH COULD BE APPLIED MORE BROADLY
TO PROVIDE BETTER, MORE FOCUSED “ENFORCEMENT MECHANISMS.”**

*1) I was Chair of the first PBAC (Pedestrian Bicycle Committee)
for its first 10 years in existence from 1993 to 2003, at which time I stepped down.*

2) I was a member/signer on the CPSP Committee

*3) I attended almost all of the River Access and Enhancement Plan meeting, and provided
input from the PBAC when needed.*

38.
3

Each of these 3 Plans, have different issues and problems with enforcement that have cropped up. At the Planning Commission final GP mtg of 4/28/2026, I mentioned the problem with enforcement. The response, interestingly enough was along the lines of, “yes they need to be updated.” That is not what I am saying. What I am saying is: don’t waste time re-

making them: FIND MECHANISMS NOW TO ENFORCE THEM. This is already in place with the Pedestrian Bicycle Plan due to how it was originally structured as a requirement of the ISTEA funding which provided money for bike and ped issue, coming from the federal gov't in 1993's desire to begin to even the playing field within transportation to not just motor vehicles. AND Still, I mention here aspects of the PBAC Committee's current organization which may hinder true "Citizen Voice" as originally mandated by ISTEA and the money distribution rules.

1. RE: the Petaluma River Access and Enhancement Plan

- One can think, "Wow, this plan took ~7 years to finish. A lot of volunteer blood sweat and tears! And one can think: "Well, from the outset of any development nibble most of us/most developers will want to claim the bank for ourselves/themselves and NOT have it 'belong to all of us.' We're all human.
- But then one must think: the creation of this Plan took muscle. 7 years? Volunteer time muscularly-gruelingly creating this Plan, including landowner, people with a lot of stake in the product. . It took "muscle." But: we have not created the muscle of enforcement.
- The most recent example being the "Wine Bar/Wedding Venue/Antique Auto Building" [*sorry I don't know it's actual title!*] across the River from Grand Central [café] on Weller Street. The developer asked for "no path for the public on bank" apparently. Or perhaps no public access even on it's generous river overhang? I am not sure. And even though, as I was told by staff, Planning had written the staff report to support the access-for-the public, staff told me, it was a last-minute Council decision to overturn that recommendation. One cannot blame one person for pushing this. BUT THE COUNCIL MAJORITY VOTED OK, seemingly and why? Is our Plan just a toothless piece of feel-good window dressing? *Could a Citizen group tasked with dogging the River Plan have helped them make a better decision?*
- My proposal here is that: we need a body of citizens mandated to follow river-related issues and dog this plan whenever issues come up in the city. **I'd request that this General Plan 2026 include the creation of such a group, for this and other citizen-driven plans.** The Planners will benefit in the end, although at the outset it will feel ...annoying.
- We need to be honest about the recent DOWNTOWN overlay/hotel debacle: one important thing it showed us (well, it showed ME anyway) is that public involvement at the outset of projects has been lacking. So the poor staff has been pilloried because—guess what? the citizens weren't and didn't feel included, and it was all on staff's back to take the blame, along with Council.
- There are other examples. But I can't be so long-winded
- ***BUT: WE CAN'T LIVE LIFE BACKWARDS: But we FACE what we have let happen. We MUST plan better forwards. I ask that the current General Plan 2026 do this and create a Citizen group of some form with ACCESS TO EARLY PLANNING DOCUMENTS to dog the River plan, as mentioned above***

38.3
cont.

2. RE: the Central Petaluma Specific Plan:

- the CPSP is a wonderful document that contains language throughout about preservation.
 - e.g. p. 100 of chapter 9 historic preservation: Gpal 1: Protect, enhance, perpetuate and adaptively reuse properties of historic and cultural significance." [*ptb: a tricky designation that leaves a lot out, in my view*]
 - the boundary of the district is clear when policy 3.2. recognized properties on: Second Street, E St G St and Petaluma Blvd South as having historic significance..
 - p. 106 Objective 3 calls out the boundaries of the District: and calls for preservation boundaries, saying the areas is "bounded by D St to the north, McNear Hill to the south and the Petaluma River and Petaluma Boulevard South on the East and West
- **but back to my own experience here, as a person living and working at 513 Petaluma Blvd So:**
 - I have my notes from 2005: Basin St was proposing its Theatre District buildings which included plans for the tearing down of the warehouses on 1st St, from D St. to the Ellis creek. Trusting in the CPSP priorities to stop this portion of their plan, the neighborhood happily formed a group the "1st, 2nd, & 3rd St Neighborhood Group" to remind the city how this was not OK. But we lost! Goodbye warehouses. It was just a majority vote the wrong way, for the historical preservation asked for in the plan. We were too pitiful of little group to have much influence.
 - The same thing happened to Homeowners Lumber, despite our efforts.
 - NOTE: THERE IS A MAP IN THE CPSP, COLORING THE AREA MENTIONED ABOVE, IN PINK ON ITS "Central Petaluma Specific Plan Zoning p. 29, Central Specific Plan Land use Map, with a label saying "Riverfront Warehouse District" with a boundary (unclear) that at least extends from D St to McNear hill. [needs clarity..in cpsp]

- This above story about our neighborhood here in the Riverfront Warehouse district of the Central Petaluma Specific Plan area is a good example of a Plan being “nice” but who cares about the Plan, if its not enforced. The warehouses are gone AND of course, the riverbank has a building on it.
- ***BUT: AGAIN WE CAN'T LIVE LIFE BACKWARDS: But we FACE what we have let happen. We MUST plan better forwards. I ask that the current General Plan 2026 do this and create a Citizen group of some form with ACCESS TO EARLY PLANNING DOCUMENTS to dog the CPSP plan, as mentioned above.***

3. the Petaluma Pedestrian Bicycle Plan

- The City's adopted Pedestrian Bicycle Plan [copy I have is May 2008] is the exception here because there IS a City Council-appointed Committee which works with the issues, with staff involvement. Why is there this PBAC? Because and only because: the original ISTEAF funding in 1993 stipulated there needed to be an enforcement committee and that its member would themselves be only cyclists and pedestrians, so the power would like in THEIR hands, not the hands of others .
- In the current Plan specifically : (on p. 99) under “implementation process” it says that the PBAC is to be part of the “**conditions of approval process: .../ which goes on to say, j/.. ”When a development or a redevelopment plan is submitted to the City, the PBAC is allowed to comment of bicycle and pedestrian facilities and amenities.”** :
- a point of information about what I call “Plan enforcement slippage” is that: between 1993 when the PBAC began and 2003 when I left, what the PBAC actually did THEN in those ten years regarding “enforcement”, was to write a formal document entitled “Recommended Conditions of Approval” and submit it to the staff for their inclusion for their final planning requirements. Many times staff left things out of their final conditions of approval BUT the PBAC document was always attached at the end of the staff report. in other words there was a RECORD of what the PBAC had asked for. That was a respectful process.
- **In this letter to the General Plan 2020 update I request that the PBAC again be able to submit such a formal document, with “ legs,” to staff/or Council, depending on the situation.**
- Other observations I had when looking at the City website for the PBAC is that:
 - at this time the Committee appears to be diluted down by too many extraneous people even though the original mandate was that the people who should be entrusted with prioritizing the needs/potential solutions for pedestrians and bicyclists were dedicated pedestrians and bicyclist citizens, because of their own experience. The diluting down is that now: beyond the “6 Council-appointed ‘ bike/ped’ members: there are and additional 4 members listed on the Petaluma Website, at least 3 of whom appear to be voting members:
 1. Planning Commissioner “liaisons”
 2. Park and Rec “liaison”
 3. Council member) “liaison”
 4. plus someone listed as “Liaison” whose role is not laid out but whom I assume is a paid staff member.
- *personal note from ptb:* Having been on the PBAC Committee and also being Chair for most of the ten years, I experienced a lot of blowback from staff. We at the start were under Park and Rec, and someone there “in charge of us” became so incensed that we were talking about the need for “cut-throughs between neighborhoods for easier pedestrian or even bike access” that he actually sent us a memo saying we were going [*this is not an exact quote but it is my memory*] “way beyond our purview, these are not Parks issues” [or something like that] and that we could now only **meet once a year**. (As you can imagine that was a shock. And...kind of illegal? or something?) We said, “we are not creating parks. This is transportation.” We (actually I) reached out [*at 9 months pregnant if you can believe it*] to a listening Council member, the issue went to Council, we were taken out from under Park and Rec, and continued to work to improve access for walking and biking in our City. But—it was intimidating.
- So, thinking of intimidating things and top-down things: I wonder about this structure that the PBAC has been laden with, having so many “other voices thrown in” including a staff “bike expert” perhaps with many strong opinions who knows, and I can easily surmise that the 6 Bicycle/Pedestrian appointees chosen for their expertise on this issue, may feel intimidated. Being intimidated is something I recognize. It does not make for healthy democracy

38.3
cont.

4. This last page is a personal request pertaining the CPSP in your update:

- THE REQUEST is: that “within the boundaries of the Riverfront Warehouse District there be, in this General Plan 2020 update, consistent height zoning with ALL of the Riverfront Warehouse area made “ T4,” not the separation into “T5” for Blvd South part of the District. This definitely feels like a false distinction especially between G & H Streets, although that may be selfish/self-serving of me to say, because this block is our home and place of work. But an important aspect of the heights of our block is that: our neighbors immediately behind this block are the home to the small bungalows home on 2nd St which is part of what the Riverfront Warehouse District wants to honor. To block

38.4

more or less ALL of their sunlight through a wall of building, or even MY building, is something that is not right to do, and I would not do. So why T5?

38.4
cont.

- IN ADDITION: Our building at 513 Petaluma Blvd south ours was mislabeled as “built in 1920” in the CPSP tho’ it was actually “built in 1904. In fact the stonemason who built the Carnegie also lived here and the same stone from the same quarry is on both building. *[Exciting, isn’t it!? It is to me, & we found one of his stonemason tools left on a ledge here about 20 years ago.]*
- IN ADDITION: It is important to note that the beautiful book The Petaluma River by Butler and Rinehart has erroneous map lines showing that the Riverfront Warehouse District as not including the Blvd S East side. It is wrong so please don’t use it or recommend it without amending its map on p 100. . We cannot let beauty trump accuracy.
- The history of this area is still alive and interesting. One anecdote I was told by my mother: her father Joe used to walk from his house (now our house) to his pharmacy downtown and back again at lunch (a sane life??). Apparently, according to her, Safeway came in and succeeded in buying up [or having promises for?] all the building in rest of this entire block (Between G & H and Blvd so and 1st St). Except his. They were wanting to tear them all down and build a store. My grandfather, she said, was the stubborn holdout. So... here we have just one story in a pretty intact part of old Petaluma!: “Riverfront Warehouse District”
- And we cannot forget: even though this CPSP/Riverfront Warehouse District plan’s historic designations were existing we LOST the warehouses. After a good fight we lost! ...even though the adopted plan said to preserve them!

38.5

So...what does that tell us? To those who help to create and then fight to enforce City Plans: “thank you?” To thank those who sometimes say “No! I won’t sell?” “bless you?” For me, it’s “No, I wouldn’t want to build higher and mess things up for those who live in small houses behind.” But--it’s complicated, isn’t it. Or is it?



. my formal request below

I request that in the new 2026 General Plan, that the buildings along the Riverfront Warehouse District “the East side of Petaluma Blvd’s blocks” be zoned identically as the rest of the River Warehouse District: which would thereby be maximum T 4 NOT T 5. Our building, built in 1904 (with stone from the same quarry as that which the same stonemason put on the Carnegie Library, (and who in fact built this building I’ve been told), should have the same zoning as the rest of the District. The “District” is at base an attempt to preserve history. There are other historic houses especially on this block of the Blvd So. There is no reason to have these different heights within one District, except “it was already there....?” To permit/encourage a “wall of buildings” on our side of the Blvd here, would produce negative consequences for the neighborhood behind, a neighborhood we have been trying to preserve since the Riverfront Warehouse District was created around 2005. It isn’t just warehouses here, [in fact we failed heartbreakingly to prevent several from destruction AFTER this plan was made. They were torn down for redevelopment anyway, on First St] These blocks are a vibrant mix. And apparently the atmosphere is being lauded in the local press an “adorable” “exciting” “BoHo-” something -or-other. Funny. And OK—let’s let it be.

signed, Patricia Tuttle Brown; 513 Petaluma Blvd So.

38.6

Letter 38

Commenter: Patricia Tuttle Brown

Date: May 17, 2026

Response 38.1

The commenter summarizes their past public involvement on issues within Petaluma.

This comment does not pertain to the Draft EIR. No further response is required.

Response 38.2

The commenter requests that the City acknowledge that some City plans need more clarity and to be enforced. The commenter also requests that the city intermingle their staff with citizens more often to encourage citizen participation.

Please refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Response 38.3

The commenter summarizes their involvement in City matters as they relate to the Pedestrian Bicycle Plan, the Petaluma River Access Enhancement Plan, and the Central Petaluma Specific Plan.

This comment does not pertain to the Draft EIR. No further response is required.

Response 38.4

The commenter requests that there be consistent height allowances for all of the riverfront warehouse area.

Please refer to Master Response 3 for a general response to comments on the content of the General Plan. No revisions to the Draft EIR would be required in response to this comment.

Response 38.5

*The commenter states that there are errors in the book *The Petaluma River* by Butler and Rhinehart as they relate to mapping of the riverfront warehouse district and emphasizes the historical nature of this district.*

This comment does not pertain to the Draft EIR. No further response is required.

Response 38.6

The commenter requests that there be consistent height allowances for all of the riverfront warehouse area.

Please refer to Master Response 3 for a general response to comments on the content of the General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Tom Bornheimer](#)
To: [-- City Council](#); [-- City Clerk](#)
Subject: General Plan, Agenda Item 8
Date: Monday, May 18, 2026 3:14:51 PM

Hello City Council Members,

I urge you to limit the height of future buildings at the downtown SMART Station and environs to 4-5 stories. Any structure above this size is too big for Petaluma and out of character for our town.

I know some want to “Build Baby Build” but now is the time to be realistic. Taller buildings cost more to build and outfit. Plus there would be a need for new fire equipment if built too tall.

I am in favor of more housing downtown but it must blend naturally into and beside our historic downtown and not overwhelm it. We do not want Petaluma to look like San Rafael with massive buildings over shadowing the downtown.

Let’s also be realistic that no development will be moving forward in this financial environment with higher inflation and borrowing costs plus a potential recession too.

Thank you,

Tom Bornheimer
Petaluma Resident

39.1

Letter 39

Commenter: Tom Bornheimer

Date: May 18, 2026

Response 39.1

The commenter urges the City Council to limit the height allowance near the SMART station to 4 or 5 stories. The commenter states that taller buildings are more expensive to build and would require new fire equipment to serve them. The commenter expresses their support for housing that blends naturally into the historic downtown and opines that no development will be moving forward in this economy.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Please refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [REDACTED]
To: -- City Clerk
Subject: For Public Record May 18 Public Hearing Draft General Plan
Date: Monday, May 18, 2026 4:52:39 PM

City Council Members

I'm strongly opposed to a general plan that would allow the development of high-rise construction between D and Washington Streets in front of the Smart Train station. The 1914 railway station is an important part of Petaluma's history and a link to our historic downtown.

High rise development would separate this important landmark (and the historic structures across Lakeville) from the downtown district. Such construction would do irreparable harm to the aesthetic of Petaluma.

The impact on traffic and parking would be significant. Traffic can be frustratingly heavy on D Street and Washington Streets. This is before we see the impact of Adobe Creek, the Appellation Hotel, and the Oyster Cove development. It is naive to think residents of housing adjacent to the train station will do without cars. Transit oriented studies in California show that roughly 75-80% of transit-oriented households maintain vehicles for non-work trips.

Mary Anne Pedroni

40.1

Letter 40

Commenter: Mary Anne Pedroni

Date: May 18, 2026

Response 40.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. They express concern with potential impacts to historic resources such as the 1914 railway station. Additionally, they express concern with potential aesthetic, traffic, and parking impacts associated with an eight-story development.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation, including impacts to aesthetics, historic resources, and transportation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

Letter 41

From: [Larry O'Shea](#)
To: [-- City Clerk](#)
Subject: No to 8 story building in downtown Petaluma!!!!'n
Date: Monday, May 18, 2026 10:01:38 PM

41.1

Sent from my iPhone

Letter 41

Commenter: Larry -O'Shea

Date: May 18, 2026

Response 41.1

The commenter expresses opposition to the eight-story height allowance near the SMART station.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Claudia Aron Ross](#)
To: [-- City Clerk](#)
Subject: Plan to allow 8 story buildings in GP
Date: Sunday, May 17, 2026 7:13:09 PM

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

I would like to respectfully submit to the record objection to a plan to add 8 story buildings in Petaluma. So many reasons: our infrastructure would not support this; views would be impeded; wind tunnels and light blocks; etc.

Claudia Aron Ross

42.1

Letter 42

Commenter: Claudia Aron Ross

Date: May 17, 2026

Response 42.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. They express concerns over potential impacts to visual resources and existing infrastructure.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Margie Elgin](#)
To: [-- City Clerk](#)
Subject: 8 stories is just too high!
Date: Monday, May 18, 2026 4:04:42 PM

I am extremely opposed to 8 stories at our train station. Stick to 6 stories, as everyone agreed to in 2025, after lots of workshops.

43.1

M.Elgin

Letter 43

Commenter: Margie Elgin

Date: May 18, 2026

Response 43.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. The commenter requests that the City Council approve only up to 6 stories on this site.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: Veronica Olsen

Sent: Sunday, May 17, 2026 3:13 PM

To: Quint, Frank; DeCarli, Alex; Kevin McDonnell; John Shribbs ; Karen Nau; City Clerk; Petaluma Planning; Barnacle, Brian; Janice Cader-Thompson

Subject: Re: CC, 05-18-26, General Plan: 90-Foot Station Mixed Use Designation-Public Comment

Dear Mayor McDonnell and Petaluma City Council Members,

I respectfully recommend amending the ST-MU designation from 90 feet to the current 65-foot standard for the following reasons:

Land Value Escalation

Land markets respond immediately to entitlement potential, while housing production and construction feasibility evolve much more slowly.

Research on transit-oriented upzoning demonstrates this pattern:

- Chicago transit-oriented districts: research found that property values increased significantly following transit-oriented upzoning, while housing construction lagged in the early years after adoption (Freemark 2019)
- Los Angeles transit-oriented corridors: UCLA Lewis Center research notes that concentrated upzoning strategies can increase redevelopment land values and speculative land expectations by concentrating development potential into a limited geography (Phillips 2025)

When zoning allows 90 feet, land values begin reflecting high-rise development expectations. Affordable housing developers must then compete for the same parcels while operating within fixed subsidy and financing structures.

Over the General Plan's 20-year horizon, this creates a risk that parcels will carry land values tied to development economics that Petaluma's current market may not realistically support.

Construction Economics

UC Berkeley Turner Center research documents significant cost escalation as building

44.1

height increases:

- 6 stories: approximately 103% of base construction costs
- 7–8 stories: approximately 125% of base construction costs

Once projects move beyond mid-rise wood-frame construction into more complex structural systems, costs increase substantially.

Above 85 feet, prevailing wage requirements can further increase project costs. This is one reason why California’s affordable housing streamlining frameworks have historically aligned around the 65-foot threshold, where affordable financing structures are generally more feasible.

Importantly, the General Plan’s own market analysis (page 5-10) states:

“Market-rate higher-density housing products (~4+ stories) are generally not currently financially feasible in Petaluma.”

44.1, cont.

This is a significant finding. If even mid-rise construction faces feasibility challenges today, then 90-foot zoning may not result in additional housing delivery. Instead, it risks creating theoretical capacity that does not translate into economically viable projects.

State Density Bonus Law Already Provides Height Flexibility

California State Density Bonus Law (Cal. Gov. Code §65915) already allows substantial additional height for qualifying affordable housing projects.

- A 65-foot base can already support projects approaching approximately 9 stories through existing density bonus provisions.

This means meaningful height flexibility for affordable housing already exists without establishing a universal 90-foot entitlement.

What California Cities Are Actually Building

Recent affordable housing projects in comparable transit-oriented California communities have predominantly been delivered at approximately 6–7 stories, often with substantial public financing or public land participation.

Culver City

- Jubilo Village: 95 units, 6 stories, 100% affordable, church-donated land, substantial public financing
 - Washington Palms: 67 units, 7 stories, 100% affordable, city-supported land acquisition
- Santa Cruz
- 100% affordable projects: predominantly 6–7 stories on public or donated land
 - 8-story projects: primarily market-rate with smaller affordable components

Berkeley / El Cerrito

- North Berkeley BART-area development: predominantly mid-rise construction typologies
- El Cerrito Plaza affordable housing: 6-story affordable housing development

The pattern is consistent: most fully affordable transit-oriented housing in California is being delivered through mid-rise construction typologies supported by public partnerships and subsidy structures, not through 8+ story market-driven zoning.

44.1, cont

What 65 Feet Enables

A 65-foot framework still supports meaningful density while better aligning with:

- State Density Bonus Law flexibility
- Emerging single-stair reform opportunities
- Federal and state affordable housing financing programs
- Public land partnership opportunities
- More climate-efficient mid-rise building typologies
- Construction economics that are more achievable in Petaluma's market

Six stories provides substantial housing capacity while remaining better aligned with the kinds of projects that can realistically be financed and built in Petaluma.

Respectfully,

Veronica Olsen

Letter 44

Commenter: Veronica Olsen

Date: May 17, 2026

Response 44.1

The commenter expresses opposition to the eight-story height allowance. The commenter requests that the City Council approve only mid-rise construction.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Cindie Raab](#)
To: [-- City Clerk](#)
Subject: 8 story building
Date: Monday, May 18, 2026 3:56:28 PM

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Please do not allow 8 story buildings in downtown Petaluma.
Sent from my iPhone

45.1

Letter 45

Commenter: Cindie Rabb

Date: May 17, 2026

Response 45.1

The commenter expresses opposition to the eight-story height allowance.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [DAWN-DYANNA Dhyanna](#)
To: [-- City Clerk](#)
Subject: Oppose 8-story buildings
Date: Monday, May 18, 2026 12:22:48 PM

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

To whom it may concern:

I am writing to express my strong opposition to the inclusion of eight-story building height allowances in the draft General Plan Update. While residents acknowledge the need for housing, this proposal is a gross overreach that completely disregards the community's identity and sacrifices Petaluma's character for the financial gain of high-density developers.

The residents of Petaluma DO NOT WANT, and will not tolerate, a City Council that operates in the pockets of special interests and corporate developers. This council was elected to represent us: the citizens who live, work, and pay taxes here—not to greenlight extreme zoning changes that maximize developer profits at our expense. Allowing eight-story towers in and around our downtown core is an unacceptable assault on the historic charm that defines our town. It will irreparably destroy the human/nature-scaled aesthetic of our streets, block out natural sunlight, obstruct river views, and reduce our beloved historic downtown into a generic, concrete corridor. Furthermore, pushing through high-rises without a viable plan to fix our already failing infrastructure—our congested streets, broken parking system, and strained public utilities—is not a responsible step forward. Our community expects the City Council to reject this extreme proposal and instead demand: strict height limits -- reject any plan that allows developments to exceed current, reasonable downtown [limits](#). Focus on responsible, low-to-medium rise infill housing (2 to 4 stories) that actually fits our neighborhood infrastructure.

Further: to halt high-density approvals until traffic, parking, and utility capacities are explicitly upgraded to handle [them](#).

[Public](#) Transparency = showing the public that the Council answers to Petaluma residents, not outside real estate [interests](#). **The draft General Plan must be heavily revised to completely eliminate these high-rise provisions.** We are watching how you vote on this issue, and we expect our elected officials to listen to the residents who live here. I urge you to stand with your constituents, reject the eight-story height limits, and preserve the integrity of Petaluma.

Thank you,
Dawn-Dyanna Dhyanna
[REDACTED]

Petaluma

46.1

Letter 46

Commenter: Dawn Dhyanna

Date: May 18, 2026

Response 46.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. They express concerns over potential impacts to traffic, parking, and utility capacities.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [Eric Leland](#)
To: [-- City Clerk](#)
Subject: Comment on Agenda Item #8 (General Plan)
Date: Monday, May 18, 2026 12:44:15 PM

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

Dear Mayor & City Council,

I urge you to adopt the resolution directing staff to prepare the final General Plan for adoption.

Please support the Station Mixed Use designation as defined in the Land Use Element in the draft General Plan. Working together with Petaluma's inclusionary zoning, proposals can consider a variety of multifamily home construction that support the increase in affordable homes that we require, built on the same sized parcel.

The 90-foot height is still well under the height of the grain elevator nearby, so this designation sets an incremental precedent upwards, not a radical one. It would allow for more varieties of proposals and possibly some that increase the amount of housing in a location, particularly convenient and sustainable to live.

47.1

Providing more affordable homes near major public transit systems and downtown shopping & services is very attractive to many people. It also helps reduce traffic as people choose to travel more affordably for many of their trips (particularly during this current gasoline price spike).

The General Plan has been years in the making with a huge number of public meetings to get input on this designation and all the others. I appreciate the detailed focus of the public, GPAC and staff and council's consideration along the way.

-Eric

--

Eric Leland (he/him)
Petaluma Resident

Letter 47

Commenter: Eric Leland

Date: May 18, 2026

Response 47.1

The commenter expresses support for the increase in height near the SMART train station.

This comment is noted, no further response is required.

From: [Eva](#)
To: [-- City Clerk](#)
Subject: General Plan Public Comment – Downtown Height Limits
Date: Monday, May 18, 2026 11:29:21 PM

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

Dear County Clerk,

I am writing to formally express my opposition to the provision in the draft General Plan that would allow 8-story buildings in our downtown area and near Smart Stations.

Such a height is out of scale with the character, charm, and existing fabric of our community. I am concerned about the impacts this would have on neighborhood aesthetics, traffic, parking, light, and overall quality of life for residents and local businesses.

I respectfully ask that this provision be reconsidered and revised to better reflect the scale and character of our town.

Thank you for your time and consideration.

Sincerely,

Eva Rhea
Petaluma resident
Sent from my iPhone

48.1

Letter 48

Commenter: Eva Rhea

Date: May 18, 2026

Response 48.1

The commenter expresses opposition to the eight-story height allowance near the SMART station. They express concerns over potential impacts to traffic, parking, and light.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: [faye dorman](#)
To: [-- City Clerk](#)
Subject: 8 stories!!
Date: Monday, May 18, 2026 2:30:51 PM

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No thank you.
Faye dorman
Sent from my iphone

49.1

Letter 49

Commenter: Faye Dorman

Date: May 18, 2026

Response 49.1

The commenter expresses opposition to the eight-story height allowance near the SMART station.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

From: Susan Colb <[REDACTED]>

Sent: Monday, May 18, 2026 4:53 PM

To: General Plan Update

Cc: cityclerk@cityofpetaluma.org

Subject: Rural Petaluma

My son's family and I live at [REDACTED], Petaluma 94954 because we love the peace, the open space and the wildlife.

Please enforce strict protections of our open spaces and refuse to expand past the Urban Growth Boundary. Additionally, Lakeville Road is already a dangerous road and we do not need more traffic.

Thank you,

Susan Colb

[REDACTED]

50.1

Letter 50

Commenter: Susan Colb

Date: May 18, 2026

Response 50.1

The commenter requests strict protections of open spaces and that the city not expand past the Urban Growth Boundary.

Refer to Response 11.1 for a discussion of the Urban Growth Boundary. No revisions to the Draft EIR are required in response to this comment.

From: Jake Hassid

Sent: Wednesday, April 1, 2026 9:48 AM

To: General Plan Update

Cc: Ashton Hethcote

Subject: Public Comment on Draft General Plan — Residential Solar Adoption Program

Dear Planning Commission and City Council,

Thank you for the opportunity to comment on the Draft General Plan and for the extraordinary work that has gone into Petaluma's climate leadership over the past several years. The Blueprint for Climate Action and the city's commitment to carbon neutrality by 2030 set a standard that other cities across the country look to — and the All-America City finalist recognition is well-deserved proof of that. I'm writing to suggest that the General Plan include a specific implementation action for accelerating residential solar adoption through a community group-buy program, commonly known as a "Solarize" campaign. The gap: Petaluma's Blueprint for Climate Action identifies greenhouse gas reduction as a central goal, and the city has made impressive progress on municipal solar installations, fleet electrification, LED streetlight conversion, and the Ellis Creek floating solar project. However, there is currently no structured city-supported program to help Petaluma residents adopt rooftop solar and battery storage on their own homes. This is a significant untapped opportunity — residential energy use represents a major share of community-wide emissions, and distributed solar paired with battery storage also strengthens grid resilience during the PSPS events and wildfire seasons that directly affect our community. The challenge: The federal 30% residential solar tax credit (Section 25D) ended on December 31, 2025, creating widespread confusion among homeowners who now believe solar is no longer financially viable. In reality, PG&E rate increases, available state and local incentives (including 3CE battery rebates and SGIP), and third-party ownership structures that still qualify for the federal commercial credit through 2027 continue to make solar a strong investment. But without trusted, city-endorsed education and outreach, many residents will sit on the sidelines during the very years when Petaluma most needs to accelerate adoption to meet its 2030 goal. The recommendation: I respectfully request that the General Plan include language supporting the establishment of a Solarize Petaluma program — a time-limited community group-buy campaign in which the city endorses a competitively vetted local solar installer, community partners like Daily Acts, Cool Petaluma, and Climate Action Petaluma conduct outreach and co-host

51.1

educational sessions, and residents access group-discounted pricing with tiered rates that decrease as more neighbors participate. This model has been used successfully in hundreds of communities nationwide. Notably, Ann Arbor, Michigan saw residential solar installations increase from 17 per year to an average of 180 annually after launching their Solarize program. Similar programs are active right now in communities across Washington, Michigan, New York, and other states. A Solarize program would require no city funding — only a formal endorsement, communications support, and coordination with community partners. It would deliver measurable, reportable reductions in residential greenhouse gas emissions and provide a tangible implementation mechanism for the Blueprint's mitigation goals. Specifically, I suggest the following addition to the General Plan's climate and energy implementation actions: "Explore and support the establishment of a community solar group-buy program (Solarize) to reduce barriers to residential solar and battery storage adoption through vetted installer partnerships, group-discounted pricing, community education, and targeted outreach to Equity Priority Areas." This language is consistent with the Blueprint's emphasis on community partnerships, equity, and actionable implementation. It also aligns with the General Plan's goals around sustainable development, energy independence, and climate adaptation. Simply Solar has been headquartered in Petaluma since 2014 and has over 20 years of experience installing solar throughout the Bay Area. We would welcome the opportunity to work with the city and its community partners to develop and launch such a program. We are happy to present to the Climate Action Commission or provide additional information at any time. Thank you for your continued leadership on climate action and for considering this comment.

51.1, cont.

Respectfully,

Jake Hassid
Simply Solar | COO

Letter 51

Commenter: Jake Hassid

Date: April 1, 2026

Response 51.1

The commenter suggests the City support a residential solar adoption program in the General Plan.

Please refer to Master Response 3 for a general response to comments on the content of the General Plan. No further response is required.

From: Jan Jirout

Sent: Monday, March 30, 2026 10:16 PM

To: General Plan Update

Subject: Public Comment: Draft General Plan — Climate Implementation

To the Petaluma General Plan Team,

Thank you for the opportunity to comment on the Draft General Plan. I'm a Petaluma resident and I support the plan's ambitious climate commitments. I'm curious about the public facing performance metrics dashboard stated in GOV-1.2.1. It uses the word "Maintain" instead of "Create" but I don't think this dashboard exists yet, right? Have the tracked metrics been defined yet? If so, have any of the targets been defined? And if so can we get those added to this Plan? What happens if the city finds we're not hitting targets? Are there any binding consequences for threshold misses that make the dashboard an accountability mechanism instead of a transparency tool?

Thank you for considering this comment.

I am a Petaluma resident who regularly bikes for transportation. I appreciate the Transportation Element's commitment to building protected infrastructure and its candid acknowledgment that today's network serves only cyclists who are "brave and fearless." One thing I think is missing from this ambitious plan is addressing occurrences of bad behavior from drivers directed towards cyclists. Multiple times I've experienced aggressive, threatening drivers including "rolling coal" and yelling obscene threats. I'm not one of those kids doing wheelies on a throttled bike, I'm a 40's father of two girls (who are often with me on the bike) with a pedal assist following most of the rules. I've had cyclist friends tell me similar stories of their own personal experience. Specifically, I ask that the final General Plan address the following: 1. Establish a cyclist incident reporting mechanism. Many cities use a simple online form allowing cyclists to report near-misses and harassment. This data would directly support the plan's stated goal of using empirical data to focus resources on safety improvements (Action TP-4.1.2). 2. Acknowledge driver harassment as a barrier to cycling adoption in the Transportation Element's existing conditions narrative, alongside infrastructure gaps. Behavioral safety and physical safety are both required for a cycling mode shift.

Thank you for all of the great work!

52.1

Sincerely,

Jan Jirout

Letter 52

Commenter: Jan Jirout

Date: March 30, 2026

Response 52.1

The commenter requests clarification on the status of the performance metrics dashboard for climate commitments. The commenter also requests for a cyclist incident reporting mechanism.

Please refer to Master Response 3 for a general response to comments on the content of the General Plan. No further response is required.

From: Lydia Asselin

Sent: Sunday, April 26, 2026 5:06 PM

To: General Plan Update

Subject: Community Input / Public Comment on the Draft General Plan

Thank you for the opportunity to comment on the Draft General Plan. I was pleased to see a level of detail across all sections that reflects the amount of time and community discussion that has taken place over the past several years. The document seems very comprehensive as well as aspirational.

My comments are centered on the Land Use section, having closely followed the evolution of this component of the General Plan Update.

1. The densest/tallest of the new Land Use designations, “Station Mixed Use” was the subject of significant and vocal public comment, and quite a bit of back-and-forth discussion in multiple City Council study sessions. What had appeared to be consensus at six stories and a height limit of 70 feet suddenly became up-zoned, at a late hour of a City Council meeting, to 8 stories and 90 feet at what seemed to be the urging of two council members.
2. This Draft GP Land Use Map (Figure LU-4) shows the Station-MU designation (8 stories/90 feet) occurring on ONE BLOCK ONLY, bounded by Lakeville, Copeland, East Washington, and D Streets. This block would allow buildings twice as tall as any of the Historic District’s Downtown-MU designation (up to 45 feet taller), and two to five stories taller than any of the proposed land use designations that ring the downtown SMART Station.
3. The single-block Station-MU is surrounded by multiple Land Use designations, all of significantly less allowable height: Neighborhood Center-MU (3 stories/40 feet); Town Center-MU (4 stories/50 feet); Urban Corridor-MU (5 stories 60 feet); and Urban Core-MU (6 stories/70 feet).
4. This City Council decision to increase the height of the Station Mixed Use designation up to 8 stories for one single downtown block seems completely arbitrary. The North SMART Station does not appear as “Station-MU” on the Draft Land Use Map. In fact, Figure LU-4 shows the North SMART Station as “Neighborhood Center-MU”, which allows 3 stories and 40 feet maximum height.
5. I see no clear justification for the capricious, unsystematic single-block zoning designation for the downtown SMART station to allow for the only 8-story development in Petaluma. I urge you to continue discussion on this specific Land Use designation.

53.1

Letter 53

Commenter: Lydia Asselin

Date: April 26, 2026

Response 53.1

The commenter expresses opposition to the eight-story height allowance near the SMART station.

Please refer to Master Response 1 for a discussion of the maximum height allowance associated with the station mixed-use designation. Additionally, refer to Master Response 2 for a general response to opposition to the proposed General Plan. No revisions to the Draft EIR would be required in response to this comment.

WRITTEN PUBLIC COMMENT

Petaluma Planning Commission

General Plan & Draft Environmental Impact Report Public Hearing
April 28, 2026 — 6:00 PM

Submitted by: James Wirth

Address: [REDACTED]

Contact: [REDACTED]

Subject: ADU Oversight, Grandfathered Status Verification, and Neighboring Property Owner Rights — Recommendations for the New General Plan

I. PURPOSE OF THIS COMMENT

I am a Petaluma homeowner and resident submitting this written comment to share a firsthand perspective on how California's ADU approval framework is currently operating in our community — and to offer constructive recommendations for how the new General Plan can address the gaps that this experience has revealed.

I want to be clear from the outset: I support housing production. I understand and respect Petaluma's obligation to plan for 1,910 new housing units before 2031, and I recognize that Accessory Dwelling Units are an important tool for meeting that goal in established neighborhoods. This comment is not opposition to ADUs. It is a request that the General Plan ensure the ADU approval process works fairly and transparently for everyone — not only for those seeking to build, but for the neighbors who live alongside new development and who currently have no meaningful voice in that process.

I offer this comment not as a grievance but as an informed perspective. Over the past six months I have developed a detailed working knowledge of California's ADU statutes, Petaluma's Implementing Zoning Ordinance, the ministerial approval process, and how they interact in practice. That knowledge was gained through direct experience with an ongoing ADU project adjacent to my property — experience I believe gives me a perspective that may be useful to this Commission as it shapes policy for the next generation of Petaluma residents.

II. WHAT I HAVE OBSERVED FIRSTHAND

I am the adjoining property owner to an ADU currently under construction at [REDACTED] under Permit No. BLDR-[REDACTED]. The project has raised a number of questions that I have pursued diligently through the City's own processes over the past six months. I raise them here not to relitigate a permit decision, but because they illustrate specific gaps in the current oversight framework that I believe the General Plan has an opportunity to address.

1. Grandfathered Status Was Not Independently Verified

The zero-setback approval for this project rests on the structure qualifying as a conversion or in-kind reconstruction of a legally established nonconforming structure under Petaluma IZO Section 7.030. The permit application asserts a construction date for the prior structure that I have reason to believe is inaccurate based on photographic evidence. I raised this concern in formal written letters to the Planning Division. The City's written response of April 23, 2026 did not identify what documentation was used to verify the prior structure's age or legal nonconforming status before the permit was issued. This is not an isolated concern. If the City cannot identify what verification it performed before relying on an applicant's unverified date claim to justify zero-setback construction, then the oversight mechanism is not functioning as intended. The General Plan has an opportunity to require that verification be documented before grandfathered status is used as the basis for a zero-setback approval.

2. In-Kind Reconstruction Standards Are Not Being Consistently Applied

Petaluma's IZO defines in-kind reconstruction as the same location, building footprint, and height. The applicant's own submitted plans — Sheet A3.01, Exterior Elevations (Existing) — show the prior structure had a roof level of approximately 9'4". The proposed structure has a roof level of 20'6" and a parapet of 23'0". A structure more than twice the height of the prior one raises a legitimate question about whether the in-kind reconstruction standard has been correctly applied. I raised this question in writing. It has not been substantively addressed.

I understand that the City has provided its legal interpretation of how the height standard applies under IZO Chapter 28(B). I am not asking the Commission to relitigate that determination. I am asking that the General Plan establish clear, written, publicly available criteria for what constitutes in-kind reconstruction — so that both applicants and neighboring residents understand the standard being applied before construction begins.

54.1

3. The Ministerial Approval Process Leaves No Room for Neighbor Input

Under state ADU law, my neighbor was under no obligation to notify me before applying for this permit. I had no right to comment, no opportunity to raise concerns during review, and no meaningful appeal process once the permit was issued. I learned the project was happening only because my neighbor voluntarily told me — a courtesy the law does not require.

I recognize that the City's hands are largely tied by state law on this point. California Government Code Section 66317 requires ministerial approval without discretionary review or a public hearing. I am not asking the Commission to violate state law. I am asking that the General Plan advocate, through appropriate policy language, for the restoration of at minimum a basic neighbor notification right for zero-setback ADU projects — and that Petaluma formally communicate that position to its state legislators.

4. Formal Written Inquiries Went Unanswered for Six Months

Beginning in October 2025, I submitted a formal California Public Records Act request and two detailed written letters to the Planning Division raising specific questions about this permit. I attended a scheduled meeting with the entire Planning Department in November 2025 and made multiple additional visits to the department in person. I sent follow-up correspondence to six city departments. The City's Planning Manager provided the first substantive written response on April 23, 2026 — six months after my initial inquiry. I am grateful for that response and for Mr. Trippel's personal engagement. However, the pattern of non-response that preceded it is itself a policy concern. Neighboring property owners who raise documented compliance questions deserve timely written responses. The absence of a clear process for handling such inquiries is a gap the General Plan can address.

5. Fire Safety and Drainage Near Property Lines

The structure is being built at effectively zero clearance from our shared property line. In a county with documented wildfire exposure, zero clearance between structures eliminates the access corridor that firefighters need to work between buildings and removes the buffer that fire-resistance standards are designed to provide. Construction has also altered drainage patterns in ways that have directed stormwater toward my property.

I am not suggesting these issues were ignored in the plan review process — the City's April 23rd response indicates that fire and drainage standards were reviewed. I am suggesting that the General Plan explicitly address how those standards apply to zero-setback and near-property-line ADU construction, so that both applicants and neighbors understand what protections apply and how they are verified in the field.

III. CONSTRUCTIVE RECOMMENDATIONS FOR THE GENERAL PLAN

Based on my direct experience and my study of the applicable statutes and ordinances, I respectfully offer the following recommendations for the Commission's consideration in developing the new General Plan:

- **1.** Require documented verification of grandfathered or nonconforming status. Before a zero-setback ADU permit is approved on the basis of a claimed grandfathered structure, the permit file should contain independently verifiable documentation of the prior structure's original construction date, permit history, and continuous legal nonconforming status. This protects applicants, neighbors, and the City alike.
- **2.** Establish and publish a clear written policy on complete demolition. The General Plan should direct staff to develop and publish a clear written standard addressing when complete demolition of a prior structure affects the availability of the zero-setback nonconforming exemption. Clarity on this point benefits everyone navigating the ADU approval process.
- **3.** Require a formal written response process for neighboring property owner inquiries. When an adjoining property owner raises a documented compliance concern about an active ADU permit in writing, the General Plan should direct staff to provide a timely written response. The current absence of any such process leaves neighbors without recourse and creates legal exposure for the City.
- **4.** Include explicit fire safety and drainage standards for zero-setback construction. The General Plan should include policy language specifically addressing fire department access, ember resistance, and stormwater management for ADU projects proposed at or within three feet of a shared property line. These standards exist in code — the General Plan should make clear how they are applied and verified for this specific category of construction.
- **5.** Advocate at the state level for restoration of basic neighbor notification rights. The General Plan should include a policy direction for the City to formally communicate to its state legislators support for

54.1,
cont.

amending California ADU law to restore at minimum a basic notification right for adjoining property owners when a zero-setback ADU permit application is submitted. This does not require the City to oppose ADUs — it simply asks that neighbors be informed.

IV. A NOTE ON MY BROADER INTEREST IN THIS PROCESS

I want to be transparent about something. I have recently submitted an application for the open Planning Commission seat. I share this not to suggest any conflict, but because I believe it reflects the spirit in which this comment is offered.

My experience over the past six months has deepened my commitment to Petaluma's planning process and my respect for the difficult balance this Commission navigates between state mandates, community needs, and the rights of existing residents. I am not here to obstruct development. I am here because I believe that balance matters and that all voices — including those of the neighbors who live alongside new development — deserve to be heard and considered.

If I am fortunate enough to serve on this Commission, I would bring to it the same commitment to balance, accountability, and transparency that I hope this comment reflects. I would approach every application with the same objective standards I would want applied to any project affecting my own property — and I would work to ensure that the oversight mechanisms this General Plan establishes are clear, fair, and consistently applied.

V. CONCLUSION

Petaluma is a city that values its neighborhoods, its history, and its community character. The new General Plan is an opportunity to affirm that those values extend to every resident — including those who did not choose to build something new, but who live with the consequences of what their neighbors build.

I am grateful for the opportunity to share this perspective and for the Commission's commitment to a thorough, inclusive General Plan process. I am available to provide any additional documentation, information, or context that would be helpful.

Respectfully submitted,

James Wirth

[Redacted signature block]

April 28, 2026

54.1,
cont.

Letter 54

Commenter: James Wirth

Date: April 28, 2026

Response 54.1

The commenter expresses concern with the current ADU approval framework and standards and suggests recommendations to the General Plan for the ADU approval process.

Please refer to Master Response 2 for a general response to opposition to the proposed General Plan.

Planning Commission and City Council Hearings

During the public review period for the Draft EIR, the City held public hearings on April 28, 2026 before the Planning Commission and on May 18, 2026 before the City Council, both in person with remote participation via Zoom. These hearings provided opportunities for public comment and for decision-makers to review and provide direction on the Draft EIR. The following tables summarize key comments and concerns raised at each meeting to inform preparation of the Final EIR and document consideration of environmental issues under CEQA.

April 28 Planning Commission Meeting

On April 28, 2026, the Planning Commission held a public meeting on the Draft General Plan and associated Draft EIR in the Planning Commission Chambers, with participation available both in person and via Zoom. This meeting occurred during the formal public review period of the EIR and provided an opportunity for members of the public to offer comments, as well as for the Commission to ask questions, raise concerns, and provide direction to staff on the adequacy and content of the EIR. Table 2-1, below, summarizes the Commission's comments by theme, with the purpose of organizing technical and policy feedback related specifically to the EIR order of receipt to document key areas of concern raised during the meeting.

Table 2-1 April 28 Planning Commission Meeting

Area of Concern	Specific Issues / Concerns / Comments
Methodology	- Clarification requested on which buildout assumptions were used (full cumulative growth vs. incremental growth from General Plan changes). - Concern about how cumulative impacts are defined and analyzed, especially given differing unit totals. - Concern that a program EIR may be too generalized to capture site-specific impacts, especially for hydrology, historic resources, and infrastructure. - Questions about how the EIR will remain valid if actual development patterns differ from assumptions. - Discussion of need for future supplemental or subsequent EIRs if land use patterns change.
EIR Framing / Procedural Issues	Question about statement that the EIR identified "no controversy"—commissioners noted that community controversy (e.g., density) exists and questioned how CEQA defines "controversy."
Cultural and Historic Resources	- Concern about impact to historic resources under infill development, especially given uncertainty over future historic designation (45–50-year threshold). - Discussion of whether a historic resource inventory should serve as mitigation; concern raised that lack of a comprehensive, up-to-date inventory limits impact avoidance.
Hazards and Hazardous Materials	- Question regarding DTSC comment and whether coordination requirements are sufficiently explicit. - Concern about ensuring proper identification of contaminated sites (e.g., former agricultural lands) before development.
Hydrology and Water Quality	- Concern about whether the EIR adequately uses available flood modeling tools. - Suggestion that projected buildout (impervious surfaces, development intensity) should be directly tested in flood models to evaluate impacts more rigorously.
Transportation	- Concern about timing mismatch between EIR assumptions and real-world conditions, especially recent transit funding cuts. - Question about how new information emerging during the EIR process (e.g., reduced transit service) is incorporated.

Area of Concern	Specific Issues / Concerns / Comments
Significant Impacts	- General discussion acknowledging, but implicitly questioning, validity and implications of significant and unavoidable findings, particularly for: - Greenhouse gases - Transportation (VMT) - Noise - Cultural resources
Greenhouse Gas Emissions	Implicit concern that GHG reductions rely on the Blueprint for Climate Action which may not be enforceable due to legal or regulatory constraints, raising uncertainty about effectiveness.
Alternatives	- Questions about how land use alternatives interact with environmental impacts and whether the EIR analysis is flexible enough to reflect changing development patterns. - Interest in whether analyzing more detailed alternatives could reduce future CEQA burdens.

The April 28th Planning Commission meeting was recorded and is available for playback at the link here: <https://petalumaca.new.swagit.com/videos/384329>. Issues and comments raised by commenters were discussed and adequately responded to during the Planning Commission meeting. No additional follow-up questions were raised, and these comments are considered to be responded to.

May 18 City Council Hearing

In addition to the April 28, 2026 Planning Commission meeting, the Petaluma City Council held a public hearing on the Draft General Plan and Draft EIR in the City Council Chambers on May 18, 2026, with options for both in-person attendance and remote participation via Zoom. This meeting marked the close of the EIR public review period and provided an opportunity for Council to deliberate on the environmental analysis and provide direction prior to certification of the Final EIR. Table 2-2 summarizes, order of receipt, the concerns and comments raised, focusing on higher-level issues related to the EIR's findings, tradeoffs, and implications for decision-making. Its purpose is to capture how EIR conclusions were evaluated at the policy level and to identify key concerns that may need to be addressed or acknowledged in the Final EIR and accompanying findings.

Table 2-2 May 18 City Council Hearing

Area of Concern	Specific Issues / Concerns / Comments
Cultural and Historic Resources	- Concern that the EIR identifies significant and unavoidable impacts to historic resources, reflecting risk from infill and redevelopment. - Public concern that growth patterns (especially downtown and along the river) could erode historic character and skyline.
Greenhouse Gas Emissions	- Acknowledgement that the EIR finds GHG impacts significant and unavoidable, raising questions about whether policies (e.g., Blueprint for Climate Action) are sufficient. - Implicit concern that regulatory/legal constraints limit enforceability, reducing mitigation effectiveness.
Transportation	- Concern about significant and unavoidable VMT impacts, especially given Petaluma's role as a commuter city (large inbound/outbound commuting patterns). - Questions about whether land use changes near transit will meaningfully reduce regional travel behavior.
Noise	Recognition that construction-related noise remains significant and unavoidable, with limited mitigation available for temporary but intense impacts.

Area of Concern	Specific Issues / Concerns / Comments
Biological Resources	- Questions raised regarding how biological resources are analyzed (e.g., reliance on CNDDDB database, program-level assumptions). - Emphasis that future site-specific studies will still be required, reflecting limits of EIR detail.
Land Use and Planning	- Strong public concern about 8-story development at SMART station, including: - Impacts to skyline and community character - Scale relative to historic downtown - Concern about notification and understanding of land use changes, which affects ability to meaningfully engage with the EIR. - Some confusion over zoning types (e.g., Maker Micro, Flex), suggesting difficulty interpreting environmental implications
Alternatives	- EIR alternatives (no project, core-focused, corridor-focused) acknowledged. - Implicit concern that none fully resolve environmental tradeoffs, reinforcing reliance on a policy balance rather than impact avoidance.
Industrial Land Uses	- Concern from Council members about loss of industrial land, especially near river/rail corridors. - Implication that EIR may not fully address long-term economic/environmental tradeoffs of conversion to housing.
Affordable Housing	- Concern whether increased density will actually produce affordable housing benefits. - Concern that environmental impacts are being accepted without guaranteed community benefit.
Urban Design	- Concerns about scale and massing of future development (e.g., hotels, high-density housing). - Concern that of out-of-character development intensity.
Significant and Unavoidable Impacts	- Council discussed tradeoffs between environmental impacts and policy goals (housing, transit, climate). - Acknowledgement that significant unavoidable impacts require a statement of overriding considerations.

The May 18th City Council meeting was recorded and is available for playback at the link here: <https://petalumaca.new.swagit.com/videos/388303>. Issues and comments raised by commenters were discussed and adequately responded to during the City Council meeting. No additional follow-up questions were raised, and these comments are considered to be responded to.

3 Errata to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred but before the EIR is certified (Public Resources Code Section 21092.1; *CEQA Guidelines* Section 15088.5). Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (*CEQA Guidelines* Section 15088.5(b)).

The relevant portions of *CEQA Guidelines* Section 15088.5 (items a, b and e) read as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record

The information added to this Final EIR noted in this section supplements, clarifies, amplifies, and corrects information in the Draft EIR. The City has reviewed the information in the Revisions to the Draft EIR and has determined that it does not change any of the basic findings or conclusions of the EIR, does not constitute “significant new information” pursuant to *CEQA Guidelines* Section 15088.5, and does not require recirculation of the Draft EIR. This decision is supported by substantial evidence provided in this EIR.

3.1 Revisions to the Draft EIR

Air Quality

Page 4.3-32 (Impact AQ-4):

AQ-2 Construction Health Risk Assessment

For all individual discretionary projects where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize a fleet comprised only of EPA rated Tier 4 engines and/or alternative fuel construction equipment or equivalent, a construction health risk assessment (HRA) shall be performed.¹ The construction HRA shall be performed by a qualified air quality consultant coordinated through the City. The HRA shall be conducted following the Office of Environmental Health Hazards ~~Assessment's Association's~~ (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Bay Area Air District (Air District) guidelines to determine potential risk and compare the risk to the following Air District thresholds:

- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or

If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment or equivalent shall be implemented to reduce the risk to below Air District thresholds.

Page 4.3-32 (Impact AQ-4):

AQ-3 Reduce Operational Toxic Air Contaminants Near Sensitive Receptors

For individual projects that would site sensitive receptors within 500 feet of a freeway, high-volume roadway (urban road with 100,000 vehicles/day or rural road with 50,000 vehicles/day), railyard, or rail line using diesel locomotives, the project applicant shall retain a qualified air quality consultant to prepare an HRA to determine the exposure of new sensitive receptors resulting from the project to existing emission sources. The HRA shall be conducted following the Office of Environmental Health Hazards ~~Assessment's Association's~~ (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Air District guidelines to determine potential risk and compare the risk to the following Air District thresholds:

- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute)

If risk exceeds the thresholds, measures shall be implemented to reduce the risk to below thresholds. Measures may include, but are not limited to:

- Install, operate, and maintain in good working order a central heating and ventilation system or other air take system in the building of a sensitive receptor that would be impacted by the project, or in each individual residential unit, that meets the efficiency standard of the minimum efficiency reporting value (MERV) of 16. The heating and ventilation system should include the following features: installation of a high-efficiency filter and/or carbon filter to minimize particulate and other airborne chemical matter from entering the building. Either high-efficiency particulate absorption filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers 85 percent supply filters should be used.
- Ensure that positive pressure occurs in the building.

¹ Sensitive receptors are that segment of the public most susceptible to respiratory distress as a result of poor air quality, such as children under 14, persons over 65, persons engaged in strenuous work or exercise, and people with pre-existing cardiovascular and chronic respiratory diseases. Locations of sensitive receptors include schools, parks and playgrounds, hospitals, day cares, assisted living facilities, and residential communities (CARB 2005)

- Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
- Achieve a performance standard of at least four air exchanges per hour of recirculation.
- Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.

Page 4.3-33 (Impact AQ-4):

AQ-4 *Operational Health Risk Assessment*

Prior to permit approval for industrial or commercial land uses that would generate at least 100 diesel trucks per day or 40 or more trucks with diesel-powered transport refrigeration units per day, the applicant shall submit an operational health risk assessment (HRA) or submit proof that an HRA is not required in accordance with Air District thresholds to the City for review and approval. If required by the City, the operational HRA shall be prepared in accordance with the Office of Environmental Health Hazard Assessment and Air District requirements, and mitigated to an acceptable level below applicable Air District thresholds. If risk exceeds the thresholds, measures shall be implemented to reduce the risk to below thresholds. Measures may include, but are not limited to:

- Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.
- Electrifying warehousing docks.
- Truck Electric Vehicle (EV) Capable trailer spaces.
- Requiring use of newer equipment and/or vehicles.
- Restricting off-site truck travel through the creation of truck routes.

Biological Resources

Page 4.4-28:

BIO-2 *Special-Status Plant Species Surveys*

Where the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for significant impacts to federally or state-listed plants or regional population level impacts to species with a California Rare Plant Rank of 1 or 2 from project development, a qualified biologist shall complete protocol-level surveys for special-status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). The surveys shall be floristic in nature, shall be seasonally timed to coincide with the bloom period of the target species, and shall include evaluation of a reference site. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to development permit approval. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the City, and the CDFW and/or USFWS, as appropriate, for review and/or approval.

If special-status plants are not found during protocol-level special-status plant surveys, no further action is required. If federally- and/or state-listed individuals and/or California Rare Plant Rank 1B or 2B plant populations are found during special-status plant surveys, ~~the~~ Mitigation Measures BIO-3 and BIO-4 shall be implemented.

Page 4.4-29:

BIO-3 Special-status Plant Species Avoidance, Minimization, and Mitigation

If federally-listed and/or state-listed individuals, and/or CRPR 1B or 2B plant populations are found during special-status plant surveys (pursuant to Mitigation Measure BIO-2) and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be redesigned to avoid impacting those plant species, where feasible. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. Prior to initiation of construction activities the project proponent shall submit a site plan depicting the location(s) of special-status plants and avoidance buffers to the City and regulatory agencies for review and approval.

If special-status plants can be avoided, no further action is required. If federally- and/or state-listed individuals and/or California Rare Plant Rank 1B or 2B plant populations cannot be avoided, then Mitigation Measure BIO-4 shall be implemented.

BIO-4 Habitat Restoration Plan

If federally or state-listed plants or non-listed special-status CRPR 1 and 2 plant populations identified during special status plant surveys pursuant to Mitigation Measure BIO-2, cannot be avoided pursuant to Mitigation Measure BIO-3, and will be impacted by development, all impacts shall be mitigated by the applicant to be determined by the City in coordination with CDFW and USFWS for each species as a component of habitat restoration and at a ratio not lower than 1:1 per acre of impact (and 1:1 per individual plant), and to be determined by the City in coordination with CDFW and USFWS for each species as a component of habitat restoration. If sensitive natural communities are identified pursuant to Mitigation Measure BIO-1, and the project would substantially reduce the community's extent, fragment remaining regional habitat, or threaten the community's continued existence, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 per acre of impact.

Page 4.4-31:

BIO-6 Special Status Animal Species Avoidance and Minimization

For development facilitated by the plan where potential impacts to aquatic and/or terrestrial animal species are identified by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1, the following measures shall be applied.:

1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.
2. All projects occurring within or /adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed outside of the breeding season of sensitive aquatic species. If a project cannot avoid work during this period due to technical or safety constraints, the applicant shall obtain approval from the City based on a project-level biological assessment demonstrating that impacts can be avoided or minimized through specific measures, and any required permits or authorizations from applicable resource agencies shall be secured prior to initiating work..
3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the

CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.

4. No endangered/threatened species shall be captured and relocated without express permission within a permit from the CDFW and/or USFWS.
5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it is safe for project activities to resume.
6. For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet, or at a distance as determined by a qualified biologist, from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
8. No equipment shall be permitted to enter wetted portions of any affected drainage channel or wetland.
9. At the end of each workday, excavations shall be secured with a cover or a ramp provided to prevent wildlife entrapment.
10. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.
11. Considering the potential for the project to impact federally and state-listed species and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits.
12. Prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey as determined necessary during the biological analysis (Mitigation Measure BIO-1). The survey ~~shall~~ should include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of suitable habitat features, such as burrows, that are potentially suitable for listed species. If any listed species are detected, no work shall be conducted until the individual(s) leaves the site of their own accord, unless federal and/or state "take" authorization has been issued for relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of listed species are found within the survey area, the City and/or applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.

BIO-7 *Pre-Construction Bird Surveys, Implement Avoidance Measures, and Provide Notification*

For all future development facilitated by the General Plan, construction activities initiated during the bird nesting season (February 1 – September 15), involving removal of vegetation (e.g., trees and shrubs), abandoned structures, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 5 days prior to initiation of ground disturbance and vegetation removal. The

nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist, including staging and storage areas. The minimum survey radii surrounding the work area shall be the following: 250 feet for non-raptors and 1,000 feet for raptors, but shall be adjusted as necessary by a qualified biologist. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the region. If construction lapses for seven days or longer, the qualified biologist shall conduct another focused survey before project activities are reinitiated. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. The qualified biologist shall observe the active nest to establish a behavioral baseline of the adults and nestlings, if present. The qualified biologist shall continuously monitor the active nests to detect signs of disturbance and behavioral change as a result of construction impacts, such as noise, vibration, odors, or worker/equipment motion. If signs of disturbance and behavioral changes are observed, the qualified biologist shall require that construction causing those changes cease and may contact CDFW or USFWS for guidance. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone as an "Ecologically Sensitive Area" and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.

Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

Cultural Resources

Page 4.5-23:

Action HR-6.1.1: Create a program and standards for the installation of ~~exhibits, signs, kiosks, plaques, and/or interpretive art~~ commemorating past events or sites of historical or cultural interest.

Action HR-6.1.2: Work with local groups, public schools, tribes, and organizations to provide tours, educational opportunities and other public information programs geared toward increased knowledge and understanding of Petaluma's historic and cultural resources. ~~The historic downtown walking tours provided by the Petaluma Historical Library & Museum may be promoted and enhanced, as well as their Heritage Homes of Petaluma program. Programs may be developed through the Petaluma Regional Library and/or local public schools to educate people of all ages.~~

Action HR-6.2.1: Include intangible aspects of Petaluma's history in programs and standards for the installation of ~~exhibits, signs, kiosks, plaques,~~ interpretive art, and/or the development of an online story map commemorating past events or sites of historical or cultural interest. These events and sites may not all be designated historic resources.

Page 4.5-25:

CUL-1 *Historical Resource Protection*

Consistent with Policy HR-1.4 and Action HR-1.4.1, a historical resources evaluation (HRE) shall be prepared for any discretionary project carried out under the proposed project involving the demolition or physical alteration of any building, structure, object, or other built environment feature that is 45 years of

age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) in architectural history or history (National Park Service 1983). The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the California OHP to identify historical resources within the proposed development site. All properties within and, if appropriate as determined by a qualified architectural historian, immediately adjacent to the proposed development site that are 45 years of age or older and have the potential to be directly or indirectly affected shall be evaluated within their historic context and documented in a report meeting California OHP guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. HREs shall be submitted to the City for review and concurrence. If the property is already listed in the NRHP or CRHR or designated locally in Petaluma, the HRE described above shall not be required.

If through an HRE a property is found to not qualify as a historical resource, no additional work relating to historical resources shall be required. If historical resources are identified within or adjacent to a proposed development site, efforts shall be made to the greatest extent feasible to ensure that impacts are mitigated. As applicable, alteration of the resource shall be undertaken in a manner consistent with the SOI Standards. In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historical architect meeting the SOI PQS in architectural history or architecture. In conjunction with any development application that may affect a historical resource, an SOI consistency report identifying and specifying the treatment of character-defining features and construction activities shall be prepared by a historian or architectural historian meeting the SOI PQS in history or architectural history and provided to the City for review and concurrence. As applicable, the report shall demonstrate how the project complies with the Standards and be submitted to the City for review and approval prior to the issuance of any permits.

If significant historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a HABS-like report. If required, the report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall minimally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historical research. Other types of mitigation that may be considered in addition to HABS-like documentation include, but are not limited to, publicly accessible interpretive signage, commemorative informative web sites, salvage and reincorporation of historical architectural materials and features into new buildings or interpretive displays. The HABS-like documentation or, if applicable, a salvage plan shall be completed by a qualified architectural historian or historian who meets the SOI PQS and submitted to the City of Petaluma Planning Department prior to issuance of any permits for demolition or alteration of the historical resource. Additional documentation shall be prepared by qualified personnel and submitted for review by the City prior to the issuance of a Certificate of Occupancy.

Page 4.5-28:

CUL-2 Archaeological Resources Protection

Prior to approval of a project that involves ground disturbance activities, the project proponent shall provide an archaeological resources assessment prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology (qualified archaeologist) as defined in Code of Federal Regulations, Title 36, Part 61).

- Archaeological Resources Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) with a minimum 0.5-mile radius and a Sacred Lands File search maintained by the Native American Heritage Commission. The

records searches will characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around a project site. A Phase I pedestrian survey shall be undertaken at a project site to locate any surface cultural materials. A geoarchaeological review (examination of CHRIS and ethnographic data, historical, geological, and soil maps, aerial imagery, geotechnical reports) shall be conducted to assess the potential for the project to encounter unknown archaeological resources during construction. A qualified archaeologist shall identify known archaeological resources and classify the project site as having high, medium, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary, such as monitoring during construction-related ground disturbance. Construction monitoring shall be recommended when archaeological resources are present and/or the assessment identifies a high likelihood of archaeological resources being present.

- If the CHRIS search or Phase I archaeological survey identifies resources that may be affected by a project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant (i.e., eligible for the CRHR and/or NRHP) or unique the City shall first consider whether avoidance and preservation in place is feasible, and If resource avoidance and preservation in place is not ~~feasible~~ possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation.
- For archaeological resources found eligible under CRHR Criterion 4/NRHP Criterion D (data potential) that cannot be avoided and will be impacted by the project, mitigation shall include, but would not be limited to, a Phase III data recovery program. The data recovery program shall make provisions for adequately recovering the scientifically consequential information from and about the resource. For archaeological resources that are found eligible under ~~CRHR Criterion 1/NRHP Criterion Criteria~~ A (events), ~~CRHR Criterion 2/NRHP Criterion B~~ (persons), and/or ~~CRHR Criterion 3/NRHP Criterion C~~ (design/craftsmanship) that cannot be avoided and will be impacted by the project, other appropriate mitigation shall be determined by a qualified archaeologist in consultation with the implementing agency and, if the resource is also a tribal cultural resource, Federated Indians of Graton Rancheria Tribal Heritage Preservation Office. Mitigation may include but would not be limited to development of interpretive or educational materials or preservation of all or portions of the archaeological site.
- Final disposition of any recovered artifacts or samples, which could include but would not be limited to curation or onsite reburial, shall occur as specified by the qualified archaeologist in consultation with the City and, if the resource is a tribal cultural resource, Federated Indians of Graton Rancheria Tribal Heritage Preservation Office. Artifacts and samples include material recovered from all phases of work, including the Phase I survey, Phase II testing, Phase III data recovery, and construction monitoring.

Transportation

Page 4.14-10 (Regulatory Setting):

Caltrans District 4 Pedestrian Plan

The Caltrans District 4 Pedestrian Plan, released in 2021, is a comprehensive guide aimed at improving pedestrian infrastructure across the nine-county Bay Area. This plan identifies existing conditions and prioritizes location-based needs to enhance pedestrian safety and accessibility. Developed in collaboration with local agencies, advocates, and the public, the plan serves as a crucial reference for planners and project designers. It promotes alternatives to driving, aiming to reduce congestion, lower greenhouse gas emissions, and encourage healthier lifestyles. The plan is part of the broader Bay Area Active Transportation Plan, which integrates pedestrian and bicycle needs into a cohesive strategy.

Caltrans District 4 Bike Plan

The Caltrans District 4 Bike Plan, finalized in 2018, evaluates the bicycling needs across the Bay Area's state transportation network. This plan identifies and prioritizes infrastructure improvements to enhance bicycle safety, mobility, and accessibility. It builds on the 2017 California State Bicycle and Pedestrian Plan and aims to create an integrated bicycle network that supports safe and convenient cycling for all ages and abilities. The plan was developed with input from the public and collaboration with local and regional partners, ensuring that proposed improvements align with local networks and address barriers to cycling.

Complete Streets Act

The California Complete Streets Act (AB 1358) adopted in 2008, requires that cities and other public agencies incorporate "Complete Street" policies when updating their General Plan Circulation Element. The term "Complete Streets" refers to a balanced, multimodal transportation network that meets the needs of all users of streets, including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, public transportation, and seniors. A "Complete Street" is one that provides safe and convenient travel in a manner that is suitable to the local context. Complete Streets make travel safe for all users, including bicyclists, pedestrians, motorists, transit vehicles, and people of all ages and abilities. Each street does not need to provide dedicated space to all users, but the network must accommodate the needs of all users.

In 2021, Caltrans adopted Director's Policy 37, a policy directive related to non-motorized travel throughout the State. Director's Policy 37 states:

The California Department of Transportation (Caltrans) recognizes that walking, biking, transit, and passenger rail are integral to our vision of delivering a brighter future for all through a world-class transportation network. Additionally, Caltrans recognizes that streets are not only used for transportation but are also valuable community spaces. Accordingly, in locations with current and/or future pedestrian, bicycle, or transit needs, all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. When decisions are made not to include complete streets elements in capital and maintenance projects, the justification will be documented with final approval by the responsible District Director. Opportunities for complete streets exist in all phases of project development from planning and design to construction, operations, and maintenance. Complete streets projects should prioritize underserved communities that have been historically harmed and segmented by the transportation network and should serve people of all ages and abilities. Furthermore, Caltrans commits to removing unnecessary policy and procedural barriers and partnering with communities and agencies to ensure projects on local and state transportation systems improve the connectivity to existing and planned pedestrian, bicycle, and transit facilities, and accessibility to existing and planned destinations, where possible.

Page 4.14-6 (Section 4.14-1 Setting, *Pedestrian Facilities*):

Pedestrian facilities in Petaluma include sidewalks, trails, crosswalks, curb ramps, and signals. The City generally requires sidewalks along public roadways, and most streets have sidewalks on both sides. Pedestrian-oriented land uses, street widths, lighting, and landscaping contribute to the quality of the pedestrian environment, particularly in downtown Petaluma and the West Side neighborhood, where a grid street pattern and a well-developed sidewalk network support walkability. Most signalized intersections in Petaluma include pedestrian signals and marked crossings, but sidewalk gaps remain in several areas. Notable examples include Hopper Street between East D Street and Caulfield Lane in Central Petaluma, and streets such as D Street and Western Avenue that connect outlying western neighborhoods to downtown. Portions of Highway 116 and several freeway crossings over highway 101 within the city were identified in the Caltrans District 4 Pedestrian Plan for the Bay Area as being priority locations for future Caltrans improvement projects (Caltrans 2021).

Page 4.14-26:

Mitigation Measure TRA-1 Community-Based VMT Reduction Program

To achieve measurable reductions in per capita VMT consistent with the City's adopted SB 743 VMT thresholds (Resolution No. 2021-112) and to inform long-range planning alignment with the 2022 CARB Scoping Plan (30% reduction by 2045), the proposed project would be required to implement the following actions:

- **15-Minute Neighborhoods:** Implement actions that integrate transportation and land use that allows everyone, in every neighborhood, to meet most of their daily needs within close proximity to their home. This means creating a human-scale city composed of vibrant, people-friendly, and complete neighborhoods, connected by quality public transport and pedestrian and bicycle infrastructure and amenities that residents want or need to access commercial, recreational, and community opportunities and resources. Success requires achieving safe, comfortable connections that facilitate travel by people of all ages and abilities in a manner that garners near-term physical and mental health benefits and longer-term public health and economic benefits via reduced carbon emissions.
- **VMT reduction and banking:** Per action TDM-3 of the Blueprint for Climate Action, adopt a VMT-based development impact fee program in coordination with SCTCA.
- **Universal Basic Mobility Program:** Per action TDM-4 of the Blueprint for Climate Action, evaluate the feasibility of funding a transportation benefits program, e.g. Universal Basic Mobility Program, for existing low-income residents in disadvantaged neighborhoods. Conduct a survey of low-income residents in disadvantaged communities to understand financial, logistical, and informational barriers to transportation to inform a Universal Basic Mobility program.
- **Parking Reform:** Per actions PM-1 through PM-3 of the Blueprint for Climate Action, establish parking management policies and standards to balance supply and demand, to reduce demand for parking and single-occupancy vehicle use, and to meet target utilization rates at key destinations through the use of dynamic pricing.
- **Active Transportation Network Completion:** Per action AT-1 of the Blueprint for Climate Action, implement a citywide low-stress bicycle and pedestrian network, including connections to SMART stations, schools, and neighborhood hubs.
- **Mobility Hubs:** Per actions TLUC-4: General Plan implementation of the Blueprint for Climate Action, construct multimodal hubs at transit nodes integrating bike share, scooter share, EV car share, EV and e-bike charging, and real-time transit information.
- **Transit Enhancements:** Per ~~a~~Actions TS-1 through TS-6 of the Blueprint for Climate Action, expand Petaluma Transit service frequency and coverage and provide enhanced connections to transit stops.
- **Neighborhood-Level Incentives:** Provide e-bike rebates, subsidized regional transit passes, and car-share credits to residents.

Page 4.14-27:

Mitigation Measure TRA-2 Employer-Based VMT Reduction Program

To reduce commute-related VMT the proposed project shall require employers to demonstrate reductions in home-based work VMT per employee consistent with City thresholds through the following actions:

- **City employee Transportation Demand Management Program.** Per actions ~~u~~ETDM 1 through ETDM 3 of the Blueprint for Climate Action, establish a plan to reduce employee single-occupancy vehicle trips, engage with employees, and adapt the program based on surveys.
- **Employer TDM Policy.** Per action TDM-1 of the Blueprint for Climate Action, adopt a modern TDM policy for employers that requires employers to submit an emission reduction plan to the City to meet the City's greenhouse gas reduction targets as outlined in the Blueprint for Climate Action. This should

include a range of strategies listed in the Blueprint such as transit and micromobility subsidies, and on-site secure bicycle parking and parking management strategies.

Hydrology and Water Quality

Page 4.9-1 (Section 4.9-1a Setting):

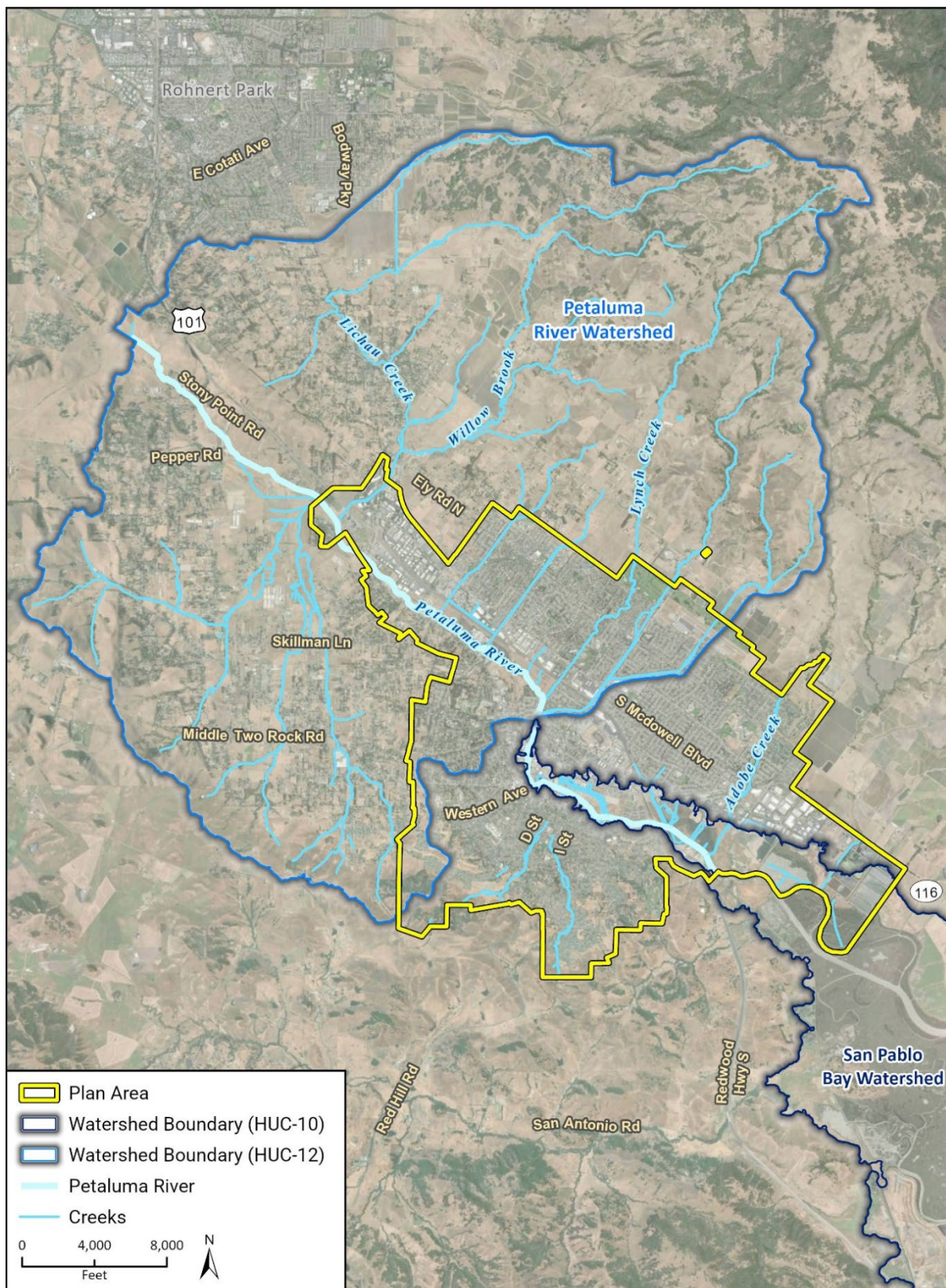
The Plan Area is characterized by a typical Mediterranean climate, generally dry in the summer with mild, wet winters. The average monthly seasonal rainfall is 2.1 inches (NOAA 2026). Average summer temperatures in degrees Fahrenheit are in the high 70s to low 80s and average winter temperatures are in the mid-50s. The warmest month of the year is July with an average maximum temperature of 83, while the coldest month is January, with an average minimum temperature of 39 (Weather Spark 2025). ~~Most rainfall occurs between October and April, with an average rainfall of 5.1 inches during February, the wettest month (Weather Spark 2025).~~

Page 4.9-1 (Section 4.9-1a Setting, Surface Water):

The ~~San Pablo Bay~~ Petaluma River watershed (HUC 10) is in southern Sonoma and northern Marin Counties, as shown in Figure 4.9-1. Tributaries to the Petaluma River include Petaluma Creek, Willow Brook Creek, Lichau Creek, Liberty Creek, Marin Creek, Wiggins Creek, Wilson Creek, Corona Creek, Capri Creek, Lynch Creek, Washington Creek, East Washington Creek, Thompson Creek, Kelly Creek, and Adobe Creek. The lower 11 miles of the Petaluma River flow through the Petaluma Marsh. The river ultimately empties into the northwest portion of San Pablo Bay and the Plan Area also sits within the Petaluma River ~~San Pablo Bay~~ Watershed. Surface water runoff in the Plan Area is managed by a piped storm drain system and flood control channels.

The Petaluma River is subject to tidal influence. The historical hydrological function of the Petaluma River watershed has been degraded by channelization, reduced meanders, urban growth, and extensive losses of wetland and floodplain connectivity in the watershed.

Page 4.9-2, Figure 4.9-1:



Page 4.9-3 (Section 4.9-1b Setting, *Groundwater*) (revised paragraphs only):

The Petaluma Valley groundwater basin (the basin) underlies a majority of the Plan Area as shown in Figure 4.9-2. The basin is designated by the State as a medium priority basin and is regulated by the Sustainable Groundwater Management Act (SGMA). Groundwater management is locally implemented by the Petaluma Valley Groundwater Sustainability Agency (PVGSA), of which the City is a member agency. The California Department of Water Resources (DWR) approved a Groundwater Sustainability Plan (GSP) for the Petaluma Valley basin in 2023.

Groundwater levels near Petaluma began to drop in the 1950s until the 1960s when seawater intrusion occurred along the Petaluma River due to increased groundwater pumping. In 1962, the city began importing water from the Russian River to restore groundwater levels. At this time the Russian River system became the City's primary source of water via Sonoma Water. Since then, groundwater has remained steady with seasonal fluctuations of approximately 10 feet. Long-term hydrological monitoring and planning is conducted by the Petaluma Valley GSA. ~~In 2022, the Groundwater Sustainability Plan for the Petaluma Valley Basin was drafted and in 2023 is was approved by the California Department of Water Resources (DWR).~~

Page 4.9-3 (Section 4.9-1c Setting, *Water Supply*):

~~As of 2020, less than one percent of the City's annual water supply was from groundwater. The 10 year average water supply from groundwater for the City of Petaluma is two percent per year. The maximum percentage groundwater is five percent which was supplied to the city in 2022.~~

~~The City's potable water supply is supplemented with recycled water supply used primarily for irrigation. This recycled water is used primarily for irrigation and historically has accounted for three to four percent of potable water demand over the last ten years.~~

Page 4.9-5 (Section 4.9-1d Setting, *Drinking Water Quality*):

~~As described under Section 4.9.1(c), *Water Supply*, Petaluma sources its potable drinking water primarily through wholesale purchases from Sonoma Water which delivers water to the city from the Russian River, from Lake Mendocino and Lake Sonoma which are fed by the Russian River water through an agreement with Sonoma Water.~~

Page 4.9-6 (Section 4.9-1d Setting, *Recycled Water Quality*):

As described under Section 4.9.1(c), *Water Supply*, Petaluma supplements its potable water supply with tertiary treated recycled water treated at the Ellis Creek Water Recycling Facility. This recycled water is used primarily for irrigation and historically has accounted for three to four percent of potable water demand over the last ten years. The quality of the City's recycled water deliveries is regulated by the State Water Resources Control Board (SWRCB) Division of Drinking Water, which requires regular collection and testing of water samples to ensure that the quality meets regulatory standards.

Page 4.9-6 (Section 4.9-1e Setting, *Flood Hazards and Sea Level Rise*):

Two 100-year floods could occur in the same year or even in the same month, but the likelihood that two 100-year flood events would occur consecutively is very small. The Plan Area is within the Petaluma River and San Pablo Bay watersheds, as described above. Flooding caused by heavy rainfall, primarily associated with seasonal storms, can occur in the region during winter and spring months.

Page 4.9-6 (Section 4.9-1e Setting, *Flood Hazards and Sea Level Rise*):

Additionally, as part of the General Plan Update, the City of Petaluma conducted additional flood hazard and sea level rise modeling using a hydrologic model of the Petaluma River watershed that was developed using HEC-HMS version 4.9 to compute outflow hydrographs for 154 subbasins comprising the Petaluma River watershed. The flood hazard and sea level rise modeling projects mid-century and

end of century flooding and sea level rise scenarios. These models show that mid-century (around 2050) flood hazard conditions will be similar to existing conditions (City of Petaluma 2025).

Page 4.9-8 (Section 4.9-1 Setting ,Dam and Levee Inundation):

There are several dams that regulate the flow of water from the lakes in the region to the Russian River which provides drinking water for the Plan Area. ~~One~~ Two privately owned dams near the southeastern corner of the City ~~is~~ are at high risk of failure according to Army Corps of Engineers: ~~the Pinheiro Reservoir and the La Crema Winery Reservoir.~~

Page 4.9-15 (Section 4.9.2c Regulatory Setting, Local Regulations):

~~Sonoma Water Supply Strategic Action Plan~~

~~This plan outlines the development of new water supply projects, plans, and strategies to meet the reasonable expected future water demands. The 2010 Action Plan emphasizes a regional approach to protect the water supply and make it more resilient to a changing climate. The Action Plan was updated in 2011 and 2013 and again in 2018.~~

Page 4.9-19 (Impact HYD-2):

Development facilitated by the proposed project would not decrease groundwater supplies. As described in Section 4.9.1c, above, groundwater is only used as a water supply source for peak water demand needs and emergency purposes, and as of 2020, accounts for ~~two less than one~~ percent of the City's annual water supply. While development associated with the proposed project could result in higher water usage , and therefore an increased usage of groundwater for peak water demand needs, groundwater usage would not substantially increase and would likely remain below the 10 year peak usage of five percent.

~~While Additionally,~~ development facilitated by the proposed project ~~does not have the potential to increase groundwater pumping and decrease groundwater supply,~~ it does have the potential to increase the amount of total impervious surface throughout the Plan Area, which could potentially interfere with groundwater recharge. Development under the Plan would incrementally increase the amount of impervious surface area overlying the basin within Petaluma which could reduce the potential for groundwater recharge from surface water infiltration.

Page 4.9-22 (Impact HYD-4):

Additionally, ~~two one~~ dams in the area ~~are~~ is at risk of failure according to Army Corps of Engineers: ~~the Pinheiro Dam and the La Crema Winery Dam.~~ The LHMP indicates that five critical utility facilities (two electrical substations and three water facilities) are at risk of flooding. The LHMP includes strategies to address the challenges of recurring flooding during heavy rains. It should be noted that at the time of this report, the LHMP is undergoing an update as part of a regional LHMP (Petaluma 2025). However, this update is still in progress and not available for public review. The most recent Petaluma LHMP analyzes the risk of inundation from dam failure and finds that the risk of inundation is very low ~~as the area of concern is minimal likelihood of~~ due to the capacity of these dams (City of Petaluma 2020). Therefore, impacts associated with dam failure are not discussed further in this section.

Page 4.9-23 (Impact HYD-4):

All future development sited within floodplains and flood zones would be required to demonstrate no net increase in flood elevations and no adverse upstream or downstream hydraulic impacts through project-level design and permitting.

Tribal Cultural Resources

Page 4.15-1 of the Draft EIR:

Petaluma lies within the ancestral territory of an area traditionally occupied by the Coast Miwok. The Coast Miwok are members of the larger Miwokan subgroup of the Utian language family. They inhabited areas within Marin and Sonoma counties, ~~including a northern extent of Duncan's Point and a southern extent at the Golden Gate, and inland to the current area of the city of Sonoma (Kroeber 1925; Levy 1978).~~ Coast Miwok territory is bordered by the Pomo, to the north, Wappo to the northeast, and Patwin to the east. One Coast Miwok village, *Péta Lúma*, was located east of Petaluma and the Petaluma River (City of Petaluma 2022).

The pre-contact Coast Miwok inhabited villages made up of conical dwellings, semi-subterranean sweathouses, and dance houses (Kelly 1978:417). Each village had a leader chief to oversee village affairs and social and ceremonial life was organized around moieties, or dichotomous groups, classed as either Land or Water (Kelly 1978:419).

The Coast Miwok were exploited for labor for the construction of several missions, including by Mission Dolores, established in 1800 in San Francisco, and later by the Mexican land grant holders. As a direct result of the establishment of the mission system, the Coast Miwok population dramatically declined.

Page 4.15-5:

Projects ~~that may cause a substantial adverse change to a tribal cultural resource~~ under CEQA are subject to AB 52. Under AB 52, the City is required to notify California Native American tribes that are traditionally and culturally affiliated with the Plan Area and who have requested such notification.

The FIGR submitted a formal written request to consult on the proposed project under AB 52 on April 5, 2024. The city responded to the request and offered availability to initiate consultation. A

consultation meeting was scheduled for June 17, 2024, but was rescheduled. The City and FIGR held a consultation meeting engaged in consultation on October 14, 2024. Consultation with the FIGR related to the proposed project is ongoing. As a result of consultation with FIGR, input on the General Plan and Draft EIR was received and incorporated into both the General Plan and the Final EIR. The City of Petaluma sent a letter on July 10, 2026 to FIGR to conclude consultation and as such, consultation efforts are determined to be complete.

Page 4.15-6:

The City received a response from the FIGR on April 5, 2024, requesting formal consultation under SB 18 for the proposed project. The city responded to the request and offered availability to initiate consultation. A consultation meeting was scheduled for June 17, 2024, but was rescheduled. The City and FIGR held a consultation meeting ~~engaged in consultation~~ on October 14, 2024. Consultation with the FIGR related to the proposed project is on-going. As a result of consultation with FIGR, input on the General Plan and Draft EIR was received and incorporated into both the General Plan and the Final EIR. The City of Petaluma sent a letter on July 10, 2026 to FIGR to conclude consultation and as such, consultation efforts are determined to be complete.

Page 4.15-7:

As described in PRC Section 21084.2, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is considered to have a significant impact on the environment. What constitutes a "substantial adverse change" to a tribal cultural resource is informed by Section 21068, CEQA Guidelines Section 15382, and the tribal consultation process under Sections 21080.3.1 and 21080.3.2 defined in CEQA Statutes or Guidelines, however, guidance can be garnered from CEQA Guidelines Section 15064.5(b)(1). Therefore, in this section a substantial adverse change to a tribal cultural resource is considered to include the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings that results in the material impairment of the tribal cultural

~~resource. Material impairment is defined as the demolition or alteration in an adverse manner those characteristics that convey the significance of the resource~~

Page 4.15-8:

Threshold 2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant 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.

~~Direct~~ Effects on tribal cultural resources are typically known once a specific project has been proposed because the effects are highly dependent on the individual project site conditions, the characteristics of the proposed activity, including but not limited to the level of ground disturbance associated with construction activities and the feasibility of mitigation.

Goal HR-4: Tribal Cultural Resources Protection. The preservation of tribal cultural resources shall be prioritized honored, avoided, and protected, in consultation with FIGR.

Page 4.15-9:

Action HR-4.1.3: In consultation with FIGR, determine if Tribal monitoring, tribal cultural resource surveys, or other management strategies are required for development review projects. If Tribal Cultural Resources are identified, ~~require the applicant~~ consult with FIGR to determine next steps. Require implementation of any mitigation determined to be necessary by the City, and FIGR.

Action HR-4.2.1: Develop a local tribal consultation policy ~~or~~ and memorandum of agreement (MOA) between the Tribe and the City.

Action HR-4.2.2: Consult and collaborate with Federated Indians of Graton Rancheria to establish treatment protocols for tribal cultural resources

Policy HR-4.3: Celebrate Tribal Heritage. Collaborate with Federated Indians of Graton Rancheria to recognize and celebrate its cultural heritage and contributions to the region. ~~Petaluma.~~

Action HR-4.3.2: Host workshops in which FIGR tribal representatives educate City staff about tribal cultural resources, history and cultural heritage and work collaboratively with City staff ~~ways~~ to incorporate this education into their work.

Page 4.15-11:

Goal HR-4 would reduce potential impacts to tribal cultural resources by requiring collaboration and consultation with FIGR, and the identification and evaluation of such resources in consultation with FIGR early in the environmental planning process.

Mitigation Measures

The following mitigation measures are measures that could be applied to future development facilitated by the proposed project, where applicable. Additional mitigation measures, including those described in law and identified by FIGR during consultation for specific project review, may also apply to future development.

TCR-1 Avoidance of Tribal Cultural Resources

When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. The feasibility of avoiding tribal cultural resources shall be determined by the City in consultation with FIGR, and as required by State law.

TCR-2 Tribal Cultural Resource Plan

A Tribal Cultural Resources (TCR) Plan shall be developed in consultation with FIGR and required for development occurring in areas identified as potentially sensitive for tribal cultural resources during consultation with FIGR.

Page 4.15-12:

TCR-3 Native American Monitoring

For development activities occurring in areas identified as potentially sensitive for tribal cultural resources through consultation with FIGR, the City shall require the project applicant/proponent to shall retain a FIGR Tribal monitor to observe ground disturbance as requested by FIGR through the consultation process. If a FIGR Tribal monitor is not available, a qualified archaeologist from FIGR's preferred list of archaeologists will be contacted instead for monitoring purposes. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared as described above under Mitigation Measure TCR-2. In the event of a discovery of tribal cultural resources, the steps identified in the TCR treatment plan prepared under Mitigation Measure TCR-2 shall be implemented.

TCR-4 Sensitive Location of Human Remains

For any development facilitated by the project where human remains are expected to be present based on the results of tribal consultation and/or as identified by a qualified archaeologist, the City shall consult with FIGR on the decision to employ a canine forensics team. If a canine forensics team is employed, the City shall require the team to attempt to identify human remains in a noninvasive way (e.g., non-excavation). Any requirements for the use of a canine forensics team shall be documented in the TCR treatment plan prepared under Mitigation Measure TCR-2. The tribal cultural resources treatment plan may require revisions to the design of development facilitated by the project or an addendum to the treatment plan in the event that human remains are identified, with avoidance as the preferred recommendation, as set forth in Mitigation Measure TCR-1.

Utilities and Service Systems

Page 4.16-1 (Section 4.16-1 Setting):

Petaluma is in the San Francisco Bay Hydrologic Region and overlies the Petaluma Valley Groundwater Basin, as defined by the California Department of Water Resources (DWR) in its hydrologic region atlas (DWR 2025; 2024). The city is also within the HUC 10 (San Pablo Bay Watershed) and HUC 12 (Petaluma River Watershed) watersheds as discussed further in Section 4.9, Hydrology and Water Quality.

Page 4.16-1 (Section 4.16-1a Setting, Water and Recycled Water Supply & Distribution):

The City of Petaluma manages its own public water system and receives almost all (95 percent) of its potable water supply from the Sonoma County Water Agency (Sonoma Water). Sonoma Water provides water principally from the Russian River to several retail water providers in Sonoma County and some providers in Marin County. The City also produces approximately five percent of its potable water supply from groundwater wells. The City offsets ~~two to three~~ three to four percent of its total demand for potable water in the urban system with recycled water. The total supply available to the City through these three sources is approximately 9,500 acre-feet per year (AFY) (City of Petaluma 2021). Each of these water supply sources is discussed in further detail below.

Page 4.16-1 (Section 4.16-1b Setting, Sonoma Water Supply):

~~The City has access to water supply from the Sonoma Water through the Restructure Agreement for Water Supply (Restructured Agreement). Under the Restructured Agreement, the City has contract rights to 13,400 AFY. The City's estimates of reliable supply are based on Sonoma Water's current water rights of 75,000 AFY, Sonoma Water's Russian River System Model and the "Water Shortage Allocation Methodology" adopted by Sonoma Water's Board of Directors. As described in more detail in the City of Petaluma 2020 Urban Water Management Plan (City of Petaluma 2021), incorporated herein by reference, Sonoma Water anticipates being able to meet the City's water allocation through 2045 under normal water conditions.~~

Page 4.16-2 (Section 4.16-1a Setting, Water Shortage Contingency):

In its 2020 Urban Water Management Plan (UWMP), the City anticipated that its total water demands through 2045 will be 12,117 AFY, which can be met by the available supplies under all hydrologic conditions except single dry years (City of Petaluma 2021). However, pursuant to Section 10632 of the California Water Code, the City adopted a Water Shortage Contingency Plan (WSCP) that addresses short-term and long-term water supply shortages that may result from droughts, climate change, disasters, reduced deliveries from Sonoma Water, and other conditions (City of Petaluma 2021). In the event of a water supply shortfall, the City may decide to implement additional water conservation measures to reduce demand and to increase its groundwater supply to ensure that demand does not exceed supply in a single dry year (City of Petaluma 2022).

Page 4.16-3 (Section 4.16-1a Setting, Climate Change Impacts to Water Supply):

Sonoma Water Supply. Sonoma Water's Vulnerability Assessment (Sonoma Water 2021) describes how water supply will likely be affected by climate change in the future. Specifically, the Russian River water supply, which is where Petaluma sources their water, is projected to be impacted by increasing climate variability and severity of drought. Additionally, future increases in wildfire intensity and frequency could contribute to high sediment and organic carbon loading in the Russian River which could impact water quality. At this time climate change impacts to Sonoma Water's water supply is unknown, although Sonoma Water is working with the US Geological Survey to analyze potential long-term impacts. However, because Sonoma Water's supply is rainfall-driven, climate change is expected to affect supply in that timing of runoff is expected to become more variable. This will affect reservoir storage, especially in spring and summer months. Annual precipitation is expected to vary with vulnerability to droughts and dry periods.

Page 4.16-13 (Section 4.16-2 Regulatory Setting, Petaluma Urban Water Management Plan):

The City of Petaluma's 2020 UWMP, adopted by the City Council on June 21, 2021, fulfills the requirements of the California Urban Water Management Planning Act and provides a 25 20-year planning horizon for the City's water supply, demand projections, conservation programs, and drought preparedness.

Page 4.16-30 (4.16-4 Cumulative Impacts):

Cumulative development in the wastewater service area will continue to increase wastewater generation. As described under Impact UTIL-1, there is generally sufficient existing wastewater capacity to accommodate anticipated cumulative development and generally there is also sufficient wastewater infrastructure, although five locations may need to be improved or upsized (Appendix G).

References

Page 7-11 (Hydrology and Water Quality):

National Oceanic and Atmospheric Administration [NOAA]. 2026. Global Sumamry of the Month Data Petaluma Airport. <https://www.ncei.noaa.gov/access/search/data-search/global-summary-of-the-month?bbox=38.440,-122.845,38.024,-122.429&pageNum=1>. (Accessed June 2026).

Page 7-17 (Utilities and Service Systems):

Sonoma Water. 2021. Vulnerability Assessment. Appendix B. Vulnerability Assessment: Climate Adaptation Plan. (Accessed June 2026).

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4 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

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Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Air Quality							
AQ-1 Construction Emissions Screening							
For future development facilitated by the General Plan that does not meet the Bay Area Air Quality Management District (Air District) construction screening criteria provided in the 2022 Air District CEQA Guidelines (or the guidelines in place at the time of development), individual air quality analysis shall be conducted to determine project significance. Where individual projects exceed Air District significance thresholds, emission-reduction measures shall be incorporated to reduce emissions to below thresholds. Construction emission reduction measures may include, but are not limited to, incorporation of Tier 4 and/or alternative fueled equipment, use of onsite power sources instead of generators, and use of low/no-VOC content architectural coatings. Individual project analysis and accompanying emission-reduction measures shall be approved by the City prior to issuance of a grading or building permit.	Require the project proponents to conduct an individual air quality analysis to determine the project's significance. Require project proponents to develop and implement emissions reduction measures. Review and approve emission-reduction measures.	When required, prior to the issuance of a grading or building permit	Once per project	City of Petaluma Department of Community Development, Planning Division			
AQ-2 Construction Health Risk Assessment							
For all individual discretionary projects where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize a fleet comprised only of EPA rated Tier 4 engines and/or alternative fuel construction equipment or equivalent, a construction health risk assessment (HRA) shall be performed. ¹ The construction HRA shall be performed by a qualified air quality consultant coordinated through the City. The	Require the project proponent to obtain a qualified air quality consultant. Require the qualified air quality consultant to prepare a construction HRA in compliance with the OEHHA 2015 Health Risk Guidelines and	When required, prior to construction	Once per project	City of Petaluma Department of Community Development, Planning Division			

¹ Sensitive receptors are that segment of the public most susceptible to respiratory distress as a result of poor air quality, such as children under 14, persons over 65, persons engaged in strenuous work or exercise, and people with pre-existing cardiovascular and chronic respiratory diseases. Locations of sensitive receptors include schools, parks and playgrounds, hospitals, day cares, assisted living facilities, and residential communities (CARB 2005).

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
HRA shall be conducted following the Office of Environmental Health Hazards Assessment's (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Bay Area Air District (Air District) guidelines to determine potential risk and compare the risk to the following Air District thresholds: Increased cancer risk of > 10.0 in a million; Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment or equivalent shall be implemented to reduce the risk to below Air District thresholds.	Air District guidelines and in coordination with the City. Determine the health-risk potential and implement mitigation measures that reduce health related risks to below thresholds. Review and approve a construction HRA and appropriate mitigation measures.						
AQ-3 Reduce Operational Toxic Air Contaminants Near Sensitive Receptors							
For individual projects that would site sensitive receptors within 500 feet of a freeway, high-volume roadway (urban road with 100,000 vehicles/day or rural road with 50,000 vehicles/day), railyard, or rail line using diesel locomotives, the project applicant shall retain a qualified air quality consultant to prepare an HRA to determine the exposure of new sensitive receptors resulting from the project to existing emission sources. The HRA shall be conducted following the Office of Environmental Health Hazards Assessment's (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Air District guidelines to determine potential risk and compare the risk to the following Air District thresholds: - Increased cancer risk of > 10.0 in a million; - Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) If risk exceeds the thresholds, measures shall be implemented to reduce the risk to	Require the project proponent to obtain a qualified air quality consultant. Require the qualified air quality consultant to prepare an operational HRA in compliance with the OEHHA 2015 Health Risk Guidelines and Air District guidelines. Require the qualified air quality consultant to determine the health-related risks utilizing Air District thresholds. Require the project proponent to implement mitigation measures that reduce	When required, prior to permit approval	Once per project	City of Petaluma Department of Community Development, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
below thresholds. Measures may include, but are not limited to: • Install, operate, and maintain in good working order a central heating and ventilation system or other air take system in the building of a sensitive receptor that would be impacted by the project, or in each individual residential unit, that meets the efficiency standard of the minimum efficiency reporting value (MERV) of 15. The heating and ventilation system should include the following features: installation of a high-efficiency filter and/or carbon filter to minimize particulate and other airborne chemical matter from entering the building. Either high-efficiency particulate absorption filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers 85 percent supply filters should be used. • Ensure that positive pressure occurs in the building. • Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air. • Achieve a performance standard of at least four air exchanges per hour of recirculation. • Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.	health related risks to below thresholds. Review and approve an operational HRA and appropriate mitigation measures.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
AQ-4 Operational Health Risk Assessment							
Prior to permit approval for industrial or commercial land uses that would generate at least 100 diesel trucks per day or 40 or more trucks with diesel-powered transport refrigeration units per day, the applicant shall submit an operational health risk assessment (HRA) or submit proof that an HRA is not required in accordance with Air District thresholds to the City for review and approval. If required by the City, the operational HRA shall be prepared in accordance with the Office of Environmental Health Hazard Assessment and Air District requirements and mitigated to an acceptable level below applicable Air District thresholds. If risk exceeds the thresholds, measures shall be implemented to reduce the risk to below thresholds. Measures may include, but are not limited to: • Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. • Electrifying warehousing docks. • Truck Electric Vehicle (EV) Capable trailer spaces. • Requiring use of newer equipment and/or vehicles. • Restricting off-site truck travel through the creation of truck routes.	Require the project proponent to conduct an operational health risk assessment in compliance with the Office of Environmental Health Hazards Assessment and Air District requirements including appropriate mitigations reducing risk below thresholds. Require the project proponent to obtain proof that an HRA is not required, if applicable to the project in accordance to Air District thresholds. Review and approve an operational HRA or proof that an HRA is not required.	When required, prior to permit approval	Once per project	City of Petaluma Department of Community Development, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Biological Resources							
BIO-1 Biological Resources Screening and Assessment							
For projects proposed within undeveloped parcels, or when site conditions do not clearly demonstrate that the parcel is fully developed, the City shall require project applicants to engage a qualified biologist (having the appropriate education and experience level) to perform a baseline Biological Resources Screening and Assessment to determine whether projects proposed within undeveloped parcels have any potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, as is feasible, to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special-status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources Mitigation Measures BIO-2 through BIO-7 shall be required as applicable. Pending the results of the	Require the project proponent to obtain a qualified biologist to perform baseline Biological Resources Screening and Assessment. Require the project proponent to perform no further actions if the Biological Resources Screening and Assessment determines no project-related impacts on biological resources. Require a qualified biologist to conduct a project-specific biological analysis and document biological resources within the project site if biological resources screening assessment results determine potential impacts on resources. Require the project proponent to conduct design alterations, further technical studies and consult with USFWS, CDFW,	When required, prior to development permitting approval and prior to vegetation removal, grubbing, or construction activities	Once per project, then as needed if additional surveys, studies, consultations, or construction-period measures are required.	City of Petaluma Department of Community Development, Planning Division; California Department of Fish and Wildlife			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.	and other applicable local agencies.						
BIO-2 Special-Status Plant Species Surveys							
Where the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for significant impacts to federally or state-listed plants or regional population level impacts to species with a California Rare Plant Rank of 1 or 2 from project development, a qualified biologist shall complete protocol-level surveys for special-status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). The surveys shall be floristic in nature, shall be seasonally timed to coincide with the bloom period of the target species, and shall include evaluation of a reference site. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to development permit approval. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the City, and the CDFW and/or USFWS, as appropriate, for review and/or approval.	Require the project proponent to obtain a qualified biologist to complete protocol-level survey for special-status plants, survey report, and map findings onto a site-specific aerial photograph in compliance with current and applicable protocols by CDFW, USFWS, and local agencies. Review and approve a special-status plant species survey report.	When required, prior to development permitting approval as feasible and prior to vegetation removal, grubbing, or construction activities.	Once per project.	City of Petaluma Department of Community Development, Planning Division; California Department of Fish and Wildlife			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
If special status plants are not found during special-status plant surveys no further action is required. If federally-and/or state-listed individuals and/or California Rare Plant Rank 1B or 2B populations are found during special status plant surveys, Mitigation Measures BIO-3 and BIO-4 shall be implemented.							
BIO-3 Special-Status Plant Species Avoidance, Minimization, and Mitigation							
If federally-listed and/or state-listed individuals, and/or CRPR 1B or 2B plant populations are found during special-status plant surveys (pursuant to Mitigation Measure BIO-2) and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be redesigned to avoid impacting those plant species, where feasible. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. Prior to initiation of construction activities, the project proponent shall submit a site plan depicting the location(s) of special-status plants and avoidance buffers to the City for review and approval. If special-status plants can be avoided, no further action is required. If federally- and/or state-listed individuals and/or California Rare Plant Rank 1B or 2B plant populations cannot be avoided, then Mitigation Measure BIO-4 shall be implemented.	Require the project proponents to redesign project plans to avoid impacts on federally listed and/or state-listed individuals or plant populations where feasible. Require the project proponent to obtain a qualified biologist to establish avoidance buffers for rare and listed-plant occurrences. Review and approve site plans including the location(s) of special-status plants and avoidance buffers.	When required, prior to permit approval	Once per project	City of Petaluma Department of Community Development, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-4 Habitat Restoration Plan.							
If federally or state-listed plants or non-listed special-status CRPR 1 and 2 plant populations identified during special status plant surveys pursuant to Mitigation Measure BIO-2, cannot be avoided pursuant to Mitigation Measure BIO-3, and will be impacted by development, all impacts shall be mitigated by the applicant to be determined by the City in coordination with CDFW and USFWS for each species as a component of habitat restoration and at a ratio not lower than 1:1 per acre of impact (and 1:1 per individual plant). <u>If sensitive natural communities are identified pursuant to Mitigation Measure BIO-1, and the project would substantially reduce the community's extent, fragment remaining regional habitat, or threaten the community's continued existence, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 per acre of impact.</u> A qualified biologist shall prepare and submit a restoration plan to the City for review and approval prior to City approval of project plans. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization may be required by these agencies.) The restoration plan shall include, at a minimum, the following components: 1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type). 2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be	Require the project proponent to implement mitigation measure(s) that provide a 1:1 per acre of impact or individual plant ratio. Require the project proponent to consult with the CDFW and USFWS for each species as a component of habitat restoration. Require a qualified biologist to prepare and submit a restoration plan consistent with all the required components. Review and approve a restoration plan. Require the project proponent to request a federal and/or state take-authorization. Review and approve a Habitat Mitigation Plan. Review and approve final monitoring report including compliance documentation with HMP and criteria.	When required, prior to the approval of final site plans; monitoring and reporting during restoration period; final monitoring report within 30 days of completion of monitoring.	Quarterly during first year; annually thereafter/as specified in approved restoration plan.	City of Petaluma Department of Community Development, Planning Division; California Department of Fish and Wildlife; United States Fish and Wildlife Service			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
established, restored, enhanced, and/or preserved).							
3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values).							
4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan).							
5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule).							
6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports).							
7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, 1:1 replacement by number of plants and habitat acreage impacted or other industry standards as determined by a qualified restoration specialist.							
8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria.							
9. Notification of completion of compensatory mitigation and agency confirmation.							
10. Contingency measures (initiating procedures, alternative locations for							

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
contingency compensatory mitigation, funding mechanism). 11. All nursery plants used in restoration shall be inspected for sudden oak death and other pathogens or insects/disease of concern. If a federally and/or state-listed plant species has the potential to be impacted, a Habitat Mitigation Plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization may be required by these agencies. Within 30 days of completion of monitoring, a final monitoring report shall be submitted to the City for review and approval, documenting compliance with the Habitat Mitigation Plan and achievement of success criteria.							
BIO-5 Endangered/Threatened Special-status Species Habitat Assessments and Protocols Surveys.							
Where the project-specific biological analysis (Mitigation Measure BIO-1) determines that suitable habitat may be present for federal- or state-listed, candidates, or proposed species, the City shall require protocol habitat assessments/surveys be completed in accordance with current CDFW and/or USFWS protocols prior to issuance of any construction permits. If, through consultation with the CDFW and/or USFWS, it is determined that protocol habitat assessments/surveys are not required, the project applicant shall be required to complete and document this consultation and submit it to the City prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified	Require the project proponent to conduct required protocol habitat assessments and surveys in accordance to up to date CDFW and/or USFWS standards. Require the project proponent to consult with CDFW and/or USFWS to determine protocols for habitat assessments/surveys that are not required. Review the required documentation submitted by the project proponent documentation of	When required, prior to the issuance of construction permits	Once per project	City of Petaluma Department of Community Development, Planning Division; California Department of Fish and Wildlife; United States Fish and Wildlife Service			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
biologist to conduct protocol surveys. (Note: if a federally and/or state-listed wildlife species will be impacted, federal and/or state take authorization may be required by USFWS and CDFW.)	agency consultation and submit proof to the City. Require the project proponent to obtain a qualified biologist to conduct protocol surveys in adherence to survey and timing requirements. Require the project proponent to obtain take-authorization from USFWS and CDFW if federally and/or state listed wildlife species is impacted by the project.						
BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization.							
For development facilitated by the plan where potential impacts to aquatic and/or terrestrial animal species are identified by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1, the following measures shall be applied:	Require the project proponent to conduct a Biological Resources Screening and Assessment and including all applicable measures.	When required, prior to and during ground disturbance/vegetation clearing; prior to construction in suitable habitat; during construction if listed species enter the site; prior to burying, capping, moving, or	Daily during applicable construction activities; weekly/as needed if approved by CDFW/USFWS	City of Petaluma Department of Community Development, Planning Division; California Department of Fish and Wildlife; United States Fish and Wildlife Service			
1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.	Require the project proponent to retain a qualified biologist to establish an avoidance buffer, if warranted.						
2. All projects occurring within or adjacent to aquatic habitats (including riparian habitats and wetlands) shall be	Approve a project-level biological assessment including avoidance and minimization mitigation measures,						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
completed outside of the breeding season of sensitive aquatic species, If a project cannot avoid work during this period due to technical or safety constraints, the applicant shall obtain approval from the City based on a project-level biological assessment demonstrating that impacts can be avoided or minimized through specific measures, and any required permits or authorizations from applicable resource agencies shall be secured prior to initiating work.	and any required permits and authorizations applicable. Require a CDFW and/or USFWS approved biologist to be present during initial ground disturbing/vegetation clearing activities.	filling trenches, pipes, culverts, or similar structures.					
3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.	Require the approved biologist to conduct pre-activity clearance surveys for endangered/threatened species. Require the project proponent to obtain approval from CDFW or USFWS to conduct biologist-lead site inspections ensuring all-prescribed avoidance and minimization measures are implemented.						
4. No endangered/threatened species shall be captured and relocated without express permission within a permit from the CDFW and/or USFWS.	Require the project proponent to obtain a permit from CDFW and/or USFWS for the capture and relocation of endangered and threatened species.						
5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease.	Require the project proponent to consult with CDFW or USFWS						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
	A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it is safe for project activities to resume.						
6.	For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.						
	Require construction activities be stopped if an endangered and/or threatened species enters the construction site.						
	Require the CDFW/USFWS approved biologist to document the presence of any endangered/threatened species on the project site.						
	Require the project proponent to consult with CDFW and USFWS to determine the start of project activities and appropriate course of action to comply with FESA and CESA.						
7.	All vehicle maintenance/fueling/staging shall occur not less than 100 feet, or at a distance as determined by a qualified biologist, from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.						
	Establish project boundaries including the installation of exclusion fencing.						
	Review the fence weekly and following rain or wind events.						
8.	No equipment shall be permitted to enter wetted portions of any affected drainage channel or wetland.						
	Implement appropriate containment						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
9. At the end of each workday, excavations shall be secured with a cover or a ramp provided to prevent wildlife entrapment.	procedures for potential spills.						
10. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.	Require the minimum of one-spill kit per work location.						
11. Considering the potential for the project to impact federally and state-listed species and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits.	Restrict equipment within drain channels or wetlands.						
	Install a secure cover or ramp to prevent wildlife entrapment.						
	Inspect structures for the presence of animals prior to earth disturbing activities.						
	Require the project proponent to consult with CDFW and USFWS to identify mitigation banks within the County.						
12. Prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey as determined necessary during the biological analysis (Mitigation Measure BIO-1). The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of suitable habitat features, such as burrows, that are potentially suitable for listed species. If any listed species are detected, no work shall be conducted until the individual(s) leaves the site of their own accord, unless federal and/or state "take" authorization has been issued for relocation. Typical	Require the project proponent to obtain required permits and a qualified biologist to conduct a preconstruction survey.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of listed species are found within the survey area, the City and/or applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.							
BIO-7 Pre-Construction Bird Surveys, Implementation Avoidance Measures, and Provide Notification.							
Construction activities initiated during the bird nesting season (February 1 – September 15), involving removal of vegetation (e.g., trees and shrubs), abandoned structures, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 5 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist, including staging and storage areas. The minimum survey radii surrounding the work area shall be the following: 250 feet for non-raptors and 500 feet for raptors, but shall be adjusted as necessary by a qualified biologist. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the region. If construction lapses for seven days or longer, the qualified biologist shall conduct another focused survey before project activities are reinitiated. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the proposed work activity, and existing	Require project proponents to retain a qualified biologist familiar with avian species in the northern California Bay Area to conduct required surveys, prepare a survey report, and establish an avoidance buffer, if warranted. Require qualified biologists to observe and continuously monitor adult and nestlings in active nests. Require the project proponent to consult with CDFW or USFWS if signs of significant disturbance changes are observed as a result of construction.	When required, prior to site plan approval; no more than 5 days prior to ground disturbance or vegetation removal during nesting season; during ground disturbance and vegetation removal construction activities.	Once per project, then as-needed during construction activities.	City of Petaluma Department of Community Development, Planning Division; California Department of Fish and Wildlife; United States Fish and Wildlife Service			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
disturbances associated with land uses outside of the site. The qualified biologist shall observe the active nest to establish a behavioral baseline of the adults and nestlings, if present. The qualified biologist shall continuously monitor the active nests to detect signs of disturbance and behavioral change as a result of construction impacts, such as noise, vibration, odors, or worker/equipment motion. If signs of disturbance and behavioral changes are observed, the qualified biologist shall require that construction causing those changes cease and may contact CDFW or USFWS for guidance. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone as an "Ecologically Sensitive Area" and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities. Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to	Review and approve the survey report prepared by the qualified biologist. Confirm that individual project site plans include a statement acknowledging compliance with the MBTA and CFGC including the Best Management Practices for avoidance of active bird nests.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.							
Cultural Resources							
CUL-1 Historical Resource Protection							
Consistent with Policy HR-1.4 and Action HR-1.4.1, a historical resources evaluation (HRE) shall be prepared for any discretionary project carried out under the proposed project involving the demolition or physical alteration of any building, structure, object, or other built environment feature that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) in architectural history or history (National Park Service 1983). The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the California OHP to identify historical resources within the proposed development site. All properties within and, if appropriate as determined by a qualified architectural historian, immediately adjacent to the proposed development site that are 45 years of age or older and have the potential to be directly or indirectly affected shall be evaluated within their historic context and documented in a report meeting California OHP guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. HREs shall be submitted to the City for review and concurrence. If the property is already listed in the NRHP or CRHR or designated locally in	Require project proponents to conduct a historical resources evaluation (HRE) on projects involving the demolition of or physical alteration of infrastructure that is 45 years or older in accordance with California OHP guidelines and best practices for properties that are not listed by the NRHP, CRHR, or locally designated by the City. Require the project proponent to obtain a qualified architectural historian or historian to prepare the HRE, SOI consistency report, and salvage plan in compliance with SOI and PQS standards and review the application of Standards. Review and approve documentations,	When required, prior to the issuance of permits, certificate of occupancy, and demolition or alteration of a historical resource(s).	Once per project.	City of Petaluma Department of Community Development, Planning Division; California Department of Parks and Recreation			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Petaluma, the HRE described above shall not be required. If through an HRE a property is found to not qualify as a historical resource, no additional work relating to historical resources shall be required. If historical resources are identified within or adjacent to a proposed development site, efforts shall be made to the greatest extent feasible to ensure that impacts are mitigated. As applicable, alteration of the resource shall be undertaken in a manner consistent with the SOI Standards. In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historical architect meeting the SOI PQS in architectural history or architecture. In conjunction with any development application that may affect a historical resource, an SOI consistency report identifying and specifying the treatment of character-defining features and construction activities shall be prepared by a historian or architectural historian meeting the SOI PQS in history or architectural history and provided to the City for review and concurrence. As applicable, the report shall demonstrate how the project complies with the Standards and be submitted to the City for review and approval prior to the issuance of any permits. If significant historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the	evaluations, and California Department of Parks and Recreation Series 523 Forms of all applicable properties determined to be 45 years or older or adjacent to proposed project site in compliance with California OHP standards. Review for consistency and approve the HRE, SOI consistency report and salvage plan submitted by the project proponents. Require the project proponent to conduct no further work if an HRE is determined not to qualify as a historical resource. Require the project proponent to develop and provide mitigation measures if the HRE determines the historical resources are adjacent to the proposed development site. Require the project proponent to develop and establish appropriate project-						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
historical resource in the form of a HABS-like report. If required, the report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall minimally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historical research. Other types of mitigation that may be considered in addition to HABS-like documentation include, but are not limited to, publicly accessible interpretive signage, commemorative informative web sites, salvage and reincorporation of historical architectural materials and features into new buildings or interpretive displays. The HABS-like documentation or, if applicable, a salvage plan shall be completed by a qualified architectural historian or historian who meets the SOI PQS and submitted to the City of Petaluma Planning Department prior to issuance of any permits for demolition or alteration of the historical resource. Additional documentation shall be prepared by qualified personnel and submitted for review by the City prior to the issuance of a Certificate of Occupancy.	specific mitigation measures to minimize unavoidable impacts on significant historical resources in compliance with the SOI standards and HABS Level III requirements. Develop and review additional documentation needed for the project.						
CUL-2 Archaeological Resources Protection							
Prior to approval of a project that involves ground disturbance activities, the project proponent shall provide an archaeological resources assessment prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology (qualified archaeologist) as defined in Code of Federal Regulations, Title 36, Part 61). Archaeological Resources Assessments shall include a California Historical	Require the project proponent to obtain a qualified archaeologist to conduct an archaeological resource assessment in compliance with Professional Qualification Standards.	Prior to project approval for projects involving ground disturbance	Once per project, then as-needed based on results.	City of Petaluma Department of Community Development, Planning Division; Federated Indians of Graton			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) with a minimum 0.5-mile radius and a Sacred Lands File search maintained by the Native American Heritage Commission. The records searches will characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around a project site. A Phase I pedestrian survey shall be undertaken at a project site to locate any surface cultural materials. A geoarchaeological review (examination of CHRIS and ethnographic data, historical, geological, and soil maps, aerial imagery, geotechnical reports) shall be conducted to assess the potential for the project to encounter unknown archaeological resources during construction. A qualified archaeologist shall identify known archaeological resources and classify the project site as having high, medium, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary, such as monitoring during construction-related ground disturbance. Construction monitoring shall be recommended when archaeological resources are present and/or the assessment identifies a high likelihood of archaeological resources being present. If the CHRIS search or Phase I archaeological survey identifies resources that may be affected by a project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are	Confirm the archaeological resource assessments contain all required components such as. - CHRIS records search - Sacred Lands File search - Phase I pedestrian survey - Geoarchaeological review - Include necessary recommendations, additional studies, and or mitigation measures. Require a qualified archaeologist to identify and classify archaeological resources. Conduct a Phase II testing and evaluation determine the following: - Determine the significance of the resource(s) under CRHR and/or NRHP - Consult with city on avoidance or preservation of resource(s), if feasible.			Rancheria (FIGR)			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
determined significant (i.e., eligible for the CRHR and/or NRHP) or unique the City shall first consider whether avoidance and preservation in place is feasible, and If resource avoidance and preservation in place is not feasible , appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. - For archaeological resources found eligible under CRHR Criterion 4/NRHP Criterion D (data potential) that cannot be avoided and will be impacted by the project, mitigation shall include, but would not be limited to, a Phase III data recovery program. The data recovery program shall make provisions for adequately recovering the scientifically consequential information from and about the resource. For archaeological resources that are found eligible under CRHR Criterion 1/NRHP Criterion A (events), CRHR Criterion 2/ NRHP Criterion B (persons), and/or CRHR Criterion 3/NRHP Criterion C (design/craftsmanship) that cannot be avoided and will be impacted by the project, other appropriate mitigation shall be determined by a qualified archaeologist in consultation with the implementing agency and, if the resource is also a tribal cultural resource, Federated Indians of Graton Rancheria Tribal Heritage Preservation Office. Mitigation may include but would not be limited to development of interpretive or educational materials or preservation of all or portions of the archaeological site. - Final disposition of any recovered artifacts or samples, which could include but would not be limited to curation or onsite reburial, shall occur as specified by	- If unfeasible, develop and include appropriate project-specific mitigation measures. Conduct a Phase III data recovery program, if archaeological resources are found eligible under CRHR or NRHP criteria and would result in unavoidable impacts due to the project. The Phase III must include: - Mitigation measures to reduce unavoidable impacts. - Provisions for scientific information recovery from and about the resource(s). Conclude the eligibility of an archaeological resource(s) under CRHR/NRHP criteria that would result in unavoidable impacts due to the proposed project.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
the qualified archaeologist in consultation with the City and, if the resource is a tribal cultural resource, Federated Indians of Graton Rancheria Tribal Heritage Preservation Office. Artifacts and samples include material recovered from all phases of work, including the Phase I survey, Phase II testing, Phase III data recovery, and construction monitoring.	Require the qualified archaeologist to develop appropriate mitigation measures in consultation with the implementing agency or the FIGR Tribal Heritage Preservation Office if the resource or resources are a tribal cultural. Conduct a final disposition of any materials recovered in all phases of the project as specified by the qualified archaeologist in consultation with the City and if the resource or resources are considered tribal cultural with FIGR.						
Geology and Soils							
GEO-1 Paleontological Resources Protection							
Projects involving excavations in sediments with undetermined and/or high paleontological sensitivity as delineated in Figure 4.6-6 and Table 4.6-1 shall be required to prepare a Paleontological Resources Mitigation Plan drafted by a Qualified Paleontologist (pursuant to Society of Vertebrate Paleontology guidelines). The Paleontological Resources Mitigation Plan shall be approved by the City prior to commencement of ground disturbing activities. The Paleontological Resources Mitigation Plan shall be written according to Society of Vertebrate Paleontology	Require the project proponent to obtain a qualified paleontologist in adherence to the Society of Vertebrates Paleontology (SVP) guidelines. Require a qualified paleontologist to prepare a paleontological	When required, prior to excavation activities	Once per project	City of Petaluma Department of Community Development, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
standards and shall outline actions that will be followed during excavation activities to ensure the preservation of any discovered paleontological resources. These actions may include, but are not limited to: paleontological sensitivity training, construction monitoring, protocols for paleontological discoveries (i.e., salvage, laboratory preparation, and permanent curation), and final reporting.	resources mitigation plan. in compliance with applicable SVP standards. Review and approve the paleontological resources mitigation plan.						
GEO-2 Unanticipated Discovery of Paleontological Resources							
Projects involving ground disturbance shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Paleontologist. If the find is determined to be significant, the Qualified Paleontologist shall direct all mitigation efforts related to paleontological resources consistent with the Society of Vertebrate Paleontology standards, which may include, but are not limited to: paleontological monitoring; fossil salvage, preparation, and curation; and reporting to summarize the paleontological mitigation efforts.	Require a standard-inadvertent discovery clause in every construction contract for projects involving ground disturbing activities. Stop construction activities within 50 feet of a find until consultation with a qualified paleontologist as indicated in MM GEO-1 is complete. Confirm the significance of the findings in consistency with SVPs standards.	Prior to execution of construction contracts and during construction if a potential fossil is discovered.	Once per project; as need if a discovery occurs	City of Petaluma Department of Community Development, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Hazards and Hazardous Materials							
HAZ-1 Phase I Environmental Site Assessment							
Prior to approval of any discretionary development within the City of Petaluma, the project applicant shall retain a qualified environmental professional (as defined by ASTM Standard E1527-21 or its successor) to prepare a Phase I Environmental Site Assessment (ESA) for the project site in accordance with applicable ASTM standards. The Phase I ESA shall be submitted to the City for review prior to issuance of any grading or building permits. If the Phase I ESA identifies Recognized Environmental Conditions (RECs) that indicate a reasonable possibility of contamination, the applicant shall prepare a Phase II ESA, including soil, soil vapor, and/or groundwater sampling and analysis as warranted. If the Phase II ESA confirms the presence of contamination at levels that could pose a risk to human health or the environment, the applicant shall implement a site-specific remediation plan approved by the applicable regulatory agency (e.g., DTSC, Regional Water Quality Control Board) prior to, or concurrent with, project construction, and in accordance with all applicable regulatory requirements.	Require the project applicant to prepare a Phase I ESA in accordance with ASTM standards and submit it to the City. If hazardous conditions are identified, require preparation of a Phase II ESA with sampling as needed. If contamination is confirmed, require preparation and implementation of a regulatory agency–approved remediation plan. Verify completion of remediation prior to or concurrent with construction.	Prior to project approval, then as needed	Once per project	City of Petaluma Department of Community Development, Planning Division Department of Toxic Substances Control Department of Water Resources Regional Water Quality Control Board			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Noise							
NOI-1(a) Project-Specific Construction Noise Study							
A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for development projects located within 500 feet of noise-sensitive land uses identified in the City's General Plan Noise Element (i.e., residential uses, schools, community buildings, and parks/open space, and hospitals), and that have one or more of the following characteristics: • Construction durations of 18 months or more (excluding interior finishing); • Use of large, heavy-duty equipment rated at 300 horsepower (hp) or greater; • The potential for pile driving; or • Located within 1,000 feet of other construction projects with overlapping construction schedules. The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residential uses, schools, community buildings, parks/open space, and hospitals) and identify measures to reduce noise exposure during the construction period. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant Federal, State, or local standards or guidelines or accepted industry practices. Noise reduction devices or techniques may include but not be limited to silencers, enclosures, sound barriers, and/or placement of restrictions on equipment or construction techniques (e.g., alternative installation methods to pile	Verify if a development project is within 500 feet of noise sensitive land use as defined by the City's General Plan Noise Element. Obtain a qualified noise expert to conduct a noise study, as deemed necessary. Develop, review, and approve the Construction Noise Study to include available noise reduction devices and techniques, noise reduction measures, characterize construction noise sources, quantify noise levels, and identify anticipated noise reduction within noise-sensitive land uses.	When required, prior to issuance of demolition, grading, and/or building permits, or prior to construction permit approval	Once per project	City of Petaluma Department of Community Development, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
driving such as cast-in-place systems or pile cushioning). Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.							
NOI-1(b) Measure to Reduce Construction Noise							
If the results of the Project-Specific Construction Noise Study described in Mitigation Measure NOI-1(a) show that noise levels associated with an individual project are expected to exceed applicable thresholds, the City of Petaluma shall require construction contractors to implement as many of the following measures as feasible prior to issuance of a demolition, grading, and/or building permit: • Shielding and Silencing. Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the project applicant or owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. • Enclosures and Screening. All outdoor fixed mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (e.g., solid material with minimum weight of 2 pounds per square foot) and break the line-of-sight from the equipment and off-site noise-sensitive uses.	Require construction contractors to implement construction noise reduction measures as feasible. Require the construction contractor to maintain and document on-site earthwork or construction activities in compliance with equipment manufacturer specifications. Ensure enclosure of outdoor fixed mechanical equipment from off-site noise-sensitive uses utilizing impermeable materials. Establish construction staging areas as far as reasonably possible from noise-sensitive issues. Ensure mobile construction	When required, prior to the issuance of a demolition, grading, and/or building permit	Once per project.	City of Petaluma Department of Community Development, Planning Division.			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
• Construction Staging Areas. Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. • Smart Back-Up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction. • Equipment Idling. Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use. • Workers' Radios. All noise from workers' radios, including any on-site music, shall be controlled such that they are not audible at off-site noise-sensitive uses. • Use of Driven Pile Systems. Driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. • Temporary Noise Barriers. Temporary sound barriers, such as walls or sound blankets, shall be positioned between construction activities and noise-sensitive uses when modeled noise levels from construction equipment exceed applicable standards and have a direct line of sight with noise sensitive receivers. Placement, orientation, size,	equipment has smart back-up alarms and human spotters as alternative. Limit construction vehicles and equipment to idle for no longer than five minutes when not used. Limit all workers' radios are at a controlled volume, inaudible to off-site noise sensitive land uses. Obtain a geotechnical engineer to conduct a soils report. Prohibit driven sonic or pile vibratory drivers, except in project-site locations deemed necessary by the geotechnical engineer and soils report. Obtain a qualified acoustical consultant to provide directions on the installation of temporary sound barriers between construction activities and noise sensitive land uses. Require the project proponents to obtain						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
and density of acoustical barriers shall be specified by a qualified acoustical consultant. • Noise Complaint Response. Project applicants shall designate an on-site construction project manager who shall be responsible for responding to any complaints about construction noise. This person shall be responsible for responding to concerns of neighboring properties about construction noise disturbance and shall be available for responding to any construction noise complaints during the hours that construction is to take place. They shall also be responsible for determining the cause of the noise complaint (e.g., bad silencer) and shall require that reasonable measures be implemented to correct the problem. A toll-free telephone number and email address shall be posted in a highly visible manner on the construction site at all times and provided in all notices (mailed, online website, and construction site postings) for receiving questions or complaints during construction and shall also include procedures requiring that the on-site construction manager respond to callers and email messages. The on-site construction project manager shall be required to track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction and shall notify the City's Community Development Director of each complaint occurrence. Project applicants shall be required to comply with all requirements of Mitigation Measures NOI-1(a) and NOI-1(b) in addition to any additional requirements identified and recommended by the Construction Noise	a designate an on-site construction project manager responsible for construction noise related complaints and tasks. Provide proof of a notice of and compliance with identified measures.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.							
NOI-2 Construction Vibration Control Plan							
Prior to issuance of a building permit for an individual project involving the use of the following construction equipment within the specified distances of nearby building structures, the project applicant shall prepare a groundborne vibration analysis to assess and mitigate potential vibration impacts associated with construction activities: • Use of a pile driver within: ○ 135 feet of fragile/historic structures ○ 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings) ○ 75 feet of engineered concrete and masonry (no plaster) • Use of a vibratory roller within: ○ 40 feet of fragile/historic structures ○ 25 feet of any other structure (residential, commercial, or industrial) • Use of a dozer or other large earthmoving equipment within: ○ 20 feet of fragile/historic structures ○ 15 feet of any other structure (residential, commercial, or industrial) The vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels generated by construction equipment shall not exceed City vibration thresholds for architectural damage (i.e., 0.12 in/sec PPV at fragile/historic structures, 0.2 in/sec PPV at non-engineered timber and masonry	Require the project proponent to prepare a groundborne vibration analysis to assess and mitigate potential vibration impacts associated with construction equipment use and activities. Require the project proponent to obtain a qualified acoustical consultant or engineer to conduct the vibration analysis. Enforce city vibration thresholds for architectural damage that could potentially occur. Utilize alternative methods and equipment if vibration levels exceed city thresholds. Conduct construction-vibration monitoring during the usage of high-vibration activities to ensure compliance with the city's vibration thresholds.	Prior to issuance of a building permit then during construction activities	Once per project, then as-needed.	City of Petaluma Department of Development Services, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
buildings, and 0.3 in/sec PPV for engineered concrete and masonry structures). If vibration levels would exceed these thresholds, alternative methods and equipment, such as drilling piles as opposed to pile driving, use of static rollers as opposed to vibratory rollers, and use of lower horsepower equipment as applicable, shall be employed. If necessary, such as when high-vibration equipment may be used within close proximity to a fragile/historic structure, construction vibration monitoring shall be conducted to ensure the City's vibration thresholds are not exceeded at nearby structures.							
Transportation							
TRA-1 Community Based VMT Reduction Program							
To achieve measurable reductions in per capita VMT consistent with the City's adopted SB 743 VMT thresholds (Resolution No. 2021-112) and to inform long-range planning alignment with the 2022 CARB Scoping Plan (30% reduction), the proposed project would be required to implement the following actions: • 15-Minute Neighborhoods: Implement actions that integrate transportation and land use that allows everyone, in every neighborhood, to meet most of their daily needs within close proximity to their home. This means creating a human-scale city composed of vibrant, people-friendly, and complete neighborhoods, connected by quality public transport and pedestrian and bicycle infrastructure and amenities that residents want or need to access commercial, recreational, and community opportunities and resources. Success requires achieving safe, comfortable connections that facilitate travel by people of all ages and abilities in	Require implementation of project actions in compliance with SB 743 and the 2022 CARB Scoping Plan. Develop, review, and adopt a VMT-based development impact fee program in coordination with SCTA. Conduct a survey on low-income residents in disadvantaged communities. Create and establish parking management policies and standards.	Prior to project approval	Once per project	City of Petaluma Department of Public Works, Safe Streets and Mobility Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
a manner that garners near-term physical and mental health benefits and longer-term public health and economic benefits via reduced carbon emissions. • VMT reduction and banking: Per action TDM-3 of the Blueprint for Climate Action, adopt a VMT-based development impact fee program in coordination with SCTA. • Universal Basic Mobility Program: Per action TDM-4 of the Blueprint for Climate Action, evaluate the feasibility of funding a transportation benefits program, e.g. Universal Basic Mobility Program, for existing low-income residents in disadvantaged neighborhoods. Conduct a survey of low-income residents in disadvantaged communities to understand financial, logistical, and informational barriers to transportation to inform a Universal Basic Mobility program. • Parking Reform: Per actions PM-1 through PM-3 of the Blueprint for Climate Action, establish parking management policies and standards to balance supply and demand, to reduce demand for parking and single-occupancy vehicle use, and to meet target utilization rates at key destinations through the use of dynamic pricing. • Active Transportation Network Completion: Per action AT-1 of the Blueprint for Climate Action, implement a citywide low-stress bicycle and pedestrian network, including connections to SMART stations, schools, and neighborhood hubs. • Mobility Hubs: Per action TLUC-4: General Plan implementation of the Blueprint for Climate Action, construct multimodal hubs at transit nodes	Develop and implement a city-wide low-stress bicycle and pedestrian network. Construct a multimodal hub within transit nodes. Expand the Petaluma Transit service frequency, coverage, and enhance connections to transit stops. Develop VMT reduction neighborhood-level incentives for residents.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
integrating bike share, scooter share, EV car share, EV and e-bike charging, and real-time transit information. • Transit Enhancements: Per actions TS-1 through TS-6 of the Blueprint for Climate Action, expand Petaluma Transit service frequency and coverage and provide enhanced connections to transit stops. • Neighborhood-Level Incentives: Provide e-bike rebates, subsidized regional transit passes, and car-share credits to residents.							
TRA-2 Employer Based VMT Reduction Program							
To reduce commute-related VMT the proposed project shall require employers to demonstrate reductions in home-based work VMT per employee consistent with City thresholds through the following actions: • City employee Transportation Demand Management Program. Per actions ETDM 1 through ETDM 3 of the Blueprint for Climate Action, establish a plan to reduce employee single-occupancy vehicle trips, engage with employees, and adapt the program based on surveys. • Employer TDM Policy. Per action TDM-1 of the Blueprint for Climate Action, adopt a modern TDM policy for employers that requires employers to submit an emission reduction plan to the City to meet the City's greenhouse gas reduction targets as outlined in the Blueprint for Climate Action. This should include a range of strategies listed in the Blueprint such as transit and micromobility subsidies, and on-site secure bicycle parking and parking management strategies.	Require employers to demonstrate reductions in-home based work VMT per employee. Establish a plan to reduce-employee single-occupancy vehicle trips, engagement and adapt employees to the survey-based program. Review and approve an emissions reduction plan.	Prior to project approval	Once per project	City of Petaluma Department of Public Works, Safe Streets and Mobility Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
TRA-3 Safe Routes to School Program and Monitoring							
To increase walking and bicycling for school-related trips, reduce school-related VMT, and align programs with the buildout of the ATP network, the proposed project shall implement the following actions consistent with City mobility and climate goals: • Implement TDM in schools: Per action TDM-6 of the Blueprint for Climate Action, partner with Petaluma schools to voluntarily implement TDM plans and parking management strategies. • Ongoing Program Updates: Implement a Safe Routes to School (SR2S) monitoring and update process every five to ten years or following completion of major ATP corridors or school-area improvements consistent with action AT-4 of the Blueprint for Climate Action. Updates shall incorporate the most recent network buildout, confirm new walking and bicycling catchment areas for each campus, and identify remaining gaps or emerging safety issues. • Annual Monitoring: Review SR2S participation levels, mode share, travel patterns, and safety outcomes annually. Monitoring shall include coordination with schools, parent groups, and partner agencies to collect information on student travel, identify barriers, and confirm where new ATP projects or safety treatments may change access patterns. • Safety Data Tracking: Track school-related collision data and traffic stress conditions for walking and bicycling routes. • Program Enhancements: Updated SR2S guidance shall include strategies such as	Partner with Petaluma schools to implement school TDM plans and parking management strategies; implement SR2S monitoring and updates; review participation, mode share, travel patterns, safety outcomes, school reporting, and corrective actions as needed.	During General Plan implementation; annually for monitoring and school reporting; every 5 to 10 years or following completion of major ATP corridors or school-area improvements for SR2S updates.	Annual; every 5 to 10 years for program updates.	City of Petaluma Department of Public Works, Safe Streets and Mobility Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
enhanced crossing treatments, traffic calming around schools, expanded education and encouragement programs, and targeted enforcement measures that support safe travel. • School Reporting: Require participating schools to submit annual summaries documenting program activities, changes in mode share, and operational issues affecting student travel. • Corrective Actions: If performance targets are not met, the City shall consider corrective actions such as prioritizing new ATP projects near schools, adjusting program resources, expanding education efforts, or modifying school arrival and dismissal traffic management plans. • Funding Allocation: Apply available program funds toward improvements and activities that support SR2S goals of increasing safety, expanding equitable access, and promoting active travel for students.							
Tribal Cultural Resources							
TCR-1 Avoidance of Tribal Cultural Resources							
When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. The feasibility of avoiding tribal cultural resources shall be determined by the City in consultation with FIGR, and as required by State law.	Require avoidance of known tribal cultural resources in project design plans. Consult with FIGR on the location of tribal cultural resources and avoidance strategies.	Prior to approval of final design plans.	Once per project	City of Petaluma Department of Community Development, Planning Division; Federated Indians of Graton Rancheria			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
TCR-2 Tribal Cultural Resource Plan							
A Tribal Cultural Resources (TCR) Plan shall be developed in consultation with FIGR and required for development occurring in areas identified as potentially sensitive for tribal cultural resources during consultation with FIGR. If the project includes ground disturbance, the TCR Plan shall include a TCR treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. In the event of an inadvertent discovery of tribal cultural resources or a Native American remain or burial, the TCR Plan shall require consultation with FIGR. The treatment plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in consultation with FIGR and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, preservation in place, protecting the confidentiality of the resource, or heritage recovery. The TCR Plan and treatment plan shall be reviewed and approved by the City and FIGR to confirm compliance with this measure prior to construction.	Require the preparation of a Tribal Cultural Resources (TCR) Plan in consultation with FIGR. Require the preparation of a treatment plan in consultation with FIGR and if applicable, a qualified archaeologist. Review and approve the TCR Plan and treatment plan.	Prior to project approval, construction, and ground-disturbing activities	Once per project	City of Petaluma Department of Community Development, Planning Division; Federated Indians of Graton Rancheria			
TCR-3 Native American Monitoring							
For development activities occurring in areas identified as potentially sensitive for tribal cultural resources through	Retain a FIGR Tribal monitor, or qualified archaeologist from	Prior to and during ground-	During ground-disturbing	City of Petaluma Department of			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
consultation with FIGR, the City shall require the project applicant/proponent to retain a FIGR Tribal monitor to observe ground disturbance as requested by FIGR through the consultation process. If a FIGR Tribal monitor is not available, a qualified archaeologist from FIGR's preferred list of archaeologists will be contacted instead for monitoring purposes. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared as described above under Mitigation Measure TCR-2. In the event of a discovery of tribal cultural resources, the steps identified in the TCR treatment plan prepared under Mitigation Measure TCR-2 shall be implemented.	FIGR's preferred list if a FIGR Tribal monitor is unavailable, to observe ground disturbance when requested by FIGR through consultation.	disturbing activities , as requested by FIGR and specified in the TCR treatment plan	activities, as required	Community Development, Planning Division Federated Indians of Graton Rancheria			
TCR-4 Sensitive Location of Human Remains							
For any development facilitated by the project where human remains are expected to be present based on the results of tribal consultation and/or as identified by a qualified archaeologist, the City shall consult with FIGR on the decision to employ a canine forensics team. If a canine forensics team is employed, the City shall require the team to attempt to identify human remains in a noninvasive way (e.g., non-excavation). Any requirements for the use of a canine forensics team shall be documented in the TCR treatment plan prepared under Mitigation Measure TCR-2. The tribal cultural resources treatment plan may require revisions to the design of development facilitated by the project or an addendum to the treatment plan in the event that human remains are identified, with avoidance as the preferred recommendation, as set forth in Mitigation Measure TCR-1.	Consult with FIGR when development would occur where human remains are expected to be present. Confirm requirements for the use of a canine forensics team is documented in the tribal cultural resources' treatment plan. Consult with FIGR in the event of an inadvertent discovery of tribal cultural resources or Native American remains or burials.	Prior to construction /TCR treatment plan approval; during implementation if human remains are identified or expected based on consultation or archaeological review	Once per project, then as-needed	City of Petaluma Department of Community Development, Planning Division; Federated Indians of Graton Rancheria			