

ENVIRONMENTAL CHECKLIST FOR STREAMLINED REVIEW

**PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE
SECTION 21083.3, GOVERNMENT CODE SECTION 65457(a) AND CEQA
GUIDELINES SECTIONS 15168, 15183, and 15532**

HAYSTACK MIXED-USE PROJECT

Prepared By:

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May 2019

**HAYSTACK MIXED-USE PROJECT
CEQA ENVIRONMENTAL CHECKLIST FOR STREAMLINED REVIEW**

Project Title:	Haystack Mixed-Use Project
Lead Agency:	City of Petaluma 11 English Street Petaluma, CA 94952
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Project Location:	215 Weller Street, City of Petaluma, Sonoma County, California APNs 007-143-003, 004, 007, 014, and 015 (-008 is not part of the project)
Project Sponsor: Property Owner(s):	Abbie Hawkins Phone: (619) 296-9000 ext. 185 Ahawkins@pacificacompanies.com Pacifica Companies 1775 Hancock Street, Suite # 200 San Diego, CA 92110
General Plan Designation:	Mixed-Use
Zoning:	Central Petaluma Specific Plan and Petaluma Station Area Master Plan SmartCode Urban Center (T5), Urban Core (T6), and Urban Core-Open (T6-O)
Description of project:	The project consists of a mixed-use development including 178 residential units and approximately 24,855 square feet of commercial space. The 4.10-acre project site would be developed with 3 and 4-story buildings, plazas, courtyard fronting the transverse street, elevated interior courtyards, a new transverse street, onsite and on-street parking, landscaping and ancillary improvements.
Surrounding land uses and setting; briefly describe the project's surroundings:	The project site is located in downtown Petaluma and is surrounded by existing urban uses including residential, commercial, industrial, and public transit. The site is bounded by East Washington Street to the north, D Street to the south, Copeland Street to the east and Weller Street to the west. The Transit Center (bus) is located adjacent to the site on and the Petaluma downtown SMART station is located east of Copeland Street. The Petaluma River and the Turning Basin is located to the west just beyond Weller Street.
Other public agencies whose approval is required (e.g. permits, financial, or participation agreements):	Sonoma County Water Agency (SCWA) Regional Water Quality Control Board (RWQCB) US Army Corp of Engineers (Corps)
Have California Native American tribes requested consultation pursuant to Public Resources Code section 21080.3.1?	The Federated Indians of Graton Rancheria (FIGR) did not request consultation within the statutory timeframe provided by Public Resources Code §21080.3.1. Notice was delivered to FIGR on April 25, 2016. The City of Petaluma did not receive a response from FIGR requesting consultation.

HAYSTACK MIXED-USE PROJECT

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1. INTRODUCTION

This California Environmental Quality Act (CEQA) Analysis evaluates environmental impacts from the proposed Haystack Mixed-Use Project, which consists of the development of three and four-story buildings containing 178 units, 24,855 square feet of commercial uses, public and private amenities and ancillary improvements (hereinafter referred to as the "Project"). Documentation herein has been prepared by the City of Petaluma as lead agency in full accordance with the procedural and substantive requirements of CEQA, CEQA Guidelines, and the City of Petaluma's Environmental Review Guidelines. This CEQA Analysis uses streamlining and tiering in accordance with CEQA Guidelines 15183 to tier from the program level analysis prepared for the Central Petaluma Specific Plan (CPSP) and its Environmental Impact Report (EIR) and the City of Petaluma's General Plan and its EIR. In addition, the project is consistent (pursuant to CEQA Guidelines Section 15168) with two program level EIRs (City of Petaluma General Plan and CPSP). Furthermore, the proposed Haystack Project is an urban infill development project located on a site that is identified as a priority development area (PDA). The Project also meets the provision of categorical exemption Class 32, set forth in CEQA Guidelines Section 15332.

The Project is required to implement all applicable mitigation measures set forth in the CPSP EIR and the General Plan EIR mitigation monitoring and reporting programs (MMRP) to avoid, reduce or offset environmental impacts resulting from buildout of the Specific Plan and the General Plan. Chapter 6 of this CEQA analysis identifies the relevant conditions of approval that will be required of the proposed Haystack Mixed-Use Project to demonstrate compliance with mitigation measures set forth in the program level EIRs, and policies, programs and goals of the CPSP and General Plan.

1.1. HAYSTACK MIXED-USE PROJECT SUMMARY

The proposed Haystack Mixed-Use Project consists of a mixed-use development including 178 residential units and approximately 24,855 square feet of commercial space on a 4.10-acre site in downtown Petaluma, Sonoma County, California. The project site would be developed with 3 and 4-story buildings, plazas, courtyard fronting the transverse street, elevated interior courtyards, a new transverse street, onsite and on-street parking, landscaping and ancillary improvements. Offsite improvements include modifications to D Street (for the development of a pocket park and to extend the left turn lane at the eastbound approach to Copeland Street), installation and extension of utilities, service lateral connections, and resurfacing and striping for on-street parking. The proposed Project is consistent with the land use and zoning regulations set forth in the Petaluma General Plan 2025 and the Central Petaluma Specific Plan.

1.2. PURPOSE AND SUMMARY OF THIS CEQA DOCUMENT

The purpose of this document is to evaluate compliance of the proposed Haystack Mixed-Use Project under the California Environmental Quality Act (CEQA). The CEQA evaluation contained in this document considers the specific environmental effects of the Haystack Mixed-Use Project as proposed and considers whether such impacts were adequately addressed in prior environmental analyses including the City of Petaluma General Plan EIR and the Central Petaluma Specific Plan EIR. The Project is required to incorporate or comply with all applicable requirements of the mitigation measures identified in the CPSP EIR and the General Plan EIR and applicable conditions of approval. Section 6 of this document contains applicable mitigation measures from the CPSP EIR and General Plan EIR. As presented herein, the Project complies with several exemption provisions of CEQA including the Community Plan Exemption (15183), Consistency with Program EIRs (15168), Consistency with a Specific Plan EIR (65457), and Class 32 Categorical Exemption (15332).

Community Plan Exemption: Development of the project site at the proposed intensity has been planned for and analyzed in the Environmental Impact Reports (EIRs) certified for the City of Petaluma General Plan and the Central Petaluma Specific Plan (CPSP). As such, the analyses in the General Plan and CPSP program-level EIRs are applicable to the project and provide the basis for use of the Community Plan Exemption (California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183).

Consistency with Program EIRs: The City of Petaluma General Plan EIR and CPSP EIR provide for streamlining and/or tiering provisions under CEQA Guidelines Section 15168. The proposed Haystack Mixed-

Use development was analyzed in the certified CPSP EIR and implements the CPSP as envisioned. As described herein, this CEQA Analysis examines the proposed Project in light of the CPSP programmatic EIR to determine whether an additional environmental document must be prepared (see Section 4.0 Evaluation of Environmental Effects). Because no new effects would occur, and no new mitigation measures are required, the proposed Haystack Mixed-Use Project is within the scope of the analysis covered by the General Plan and CPSP EIRs and no new environmental document is required.

Consistency with a Specific Plan: California Government Code Section 65457(a) provides an exemption for residential development projects that are consistent with a Specific Plan for which an EIR was certified after January 1, 1980. The CPSP EIR provides an analysis of potential impacts associated with buildout of the CPSP, which included the development proposed by the Haystack Mixed-Use Project. As such, the project meets the provisions for the Specific Plan exemption.

Class 32 Categorical Exemption: In accordance with Public Resources Code Section 21084 and State CEQA Guidelines Section 15332, the Haystack Mixed-Use project meets the provisions of the Infill Development Exemption.

2. APPLICABLE CEQA PROVISIONS AND FINDINGS

The following discussion presents the relevant provisions of CEQA to which the proposed Haystack Mixed-Use project complies. It provides an overview of the Community Plan Exemption, determination of Consistency with Program level EIRS, and a summary of the Class 32 Infill Exemption. A description of how the Haystack Mixed-use Project complies with each provision is also provided. Finally, this section concludes with the CEQA finding and determination that the project is exempt from further environmental review.

2.1. GENERAL PLAN/COMMUNITY PLAN EXEMPTION (CEQA GUIDELINES SECTION 15183)

California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified.

Section 15183 (a) "mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies."

Section 15183(b) specifies that "in approving a project meeting the requirements of Section 15183, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- 1) Are peculiar to the project or the parcel on which the project would be located;
- 2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;
- 3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or
- 4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR."

Section 15183(c) specifies that if an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for the project solely on the basis of that impact.

Section 15183(d) further states that the streamlining provisions of this section "shall apply only to projects that meet the following conditions: (1) the project is consistent with a community plan adopted as part of a general plan, a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or a general plan of a local agency; and (2) an EIR was certified by the lead agency for the zoning action, the community plan, or the general plan."

APPLICABILITY OF THE HAYSTACK MIXED-USE PROJECT TO 15183

The proposed Haystack Mixed-Use Project is consistent with the General Plan land use designation and zoning for the site, as outlined below, and meets the streamlining provisions under CEQA Guidelines Section 15183(d)(1):

(d)(1)(A) The project is consistent with a community plan adopted as part of a general plan.

The Central Petaluma Specific Plan (CPSP) was approved and the CPSP EIR (SCH Number 2002-11-2039) was certified on June 2, 2003 by Resolution Number 2003-105 N.C.S. The CPSP guides development in the downtown portion of the city both east and west of the Petaluma River and extending north of Highway 101 and south of Lakeville Street. The CPSP EIR assumed a total maximum development potential of 1,617 dwelling units and 2.9 million square feet of commercial uses within four subareas. The CPSP encourages flexible building types that accommodate "mixed uses within a single structure" or which "foster live/work environments." The subject Haystack Mixed-Use project is located within the Turning Basin subarea of the CPSP.

The Haystack Mixed-Use project site is designated Mixed-Use on the CPSP Land Use map. The Mixed-Use designation within the CPSP allows for a variety of residential, commercial office, retail and industrial uses and encourages vertical mixed-use wherever possible. The proposed project is consistent with the CPSP in that it accommodates approximately 24,855 square feet of ground floor retail/commercial uses and 178 residential dwelling units (three of which are live/work units).

The proposed Haystack Mixed-Use project is also consistent with the following CPSP land use policies related to the Turning Basin Subarea:

Policy 2.1: Create an active, publicly oriented commercial center at the riverfront.

Policy 2.4: Promote mixed-use office development around the transit station.

Policy 2.5: Encourage residential development on upper floors of commercial buildings.

The project site is located approximately 150 feet from the east bank of the Petaluma River at the Turning Basin. The Haystack Mixed-Use Project provides publicly oriented ground floor commercial along Weller Street facing the Turning Basin, including commercial space across from Cavanaugh Landing Park.

The project site is well served by major transit facilities including commuter rail and bus service. The project site is located within approximately 800 feet of the Petaluma Downtown SMART Station, which is situated along Lakeville Street between East Washington Street and D Street. The project site is served by 24 bus stops within a half-mile of the project boundaries, including the Copeland Street Transit Center adjacent to the project site along Copeland Street.

The Haystack Mixed-Use Project provides residential development on the ground floor, along Copeland Street and East D Street, with residential on upper floors.

(d)(1)(B) The project is consistent with a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development.

The SmartCode, Appendix A of the 2003 CPSP, provides a zoning map and building and development standards that regulate development throughout the CPSP area. SmartCode amendments were adopted on

July 1, 2013 with the Petaluma Station Area Master Plan (Ordinance No. 2470). The project site is within the following SmartCode designations: Urban Center (T5), Urban Core (T6) and Urban Core-Open (T6-O). The portion of the project site at the corner of Copeland Street and E. Washington Street is designated as "Corner Element Required."

The proposed Haystack Mixed-Use project is consistent with the Urban Center (T5) regulation in that it consists of higher density mixed use buildings that accommodate both commercial and residential uses. The project also provides wide sidewalks, street tree planting and buildings set close to the sidewalks and oriented to the street. The proposed buildings, which are 3 and 4-stories are within the typical building height for this zone, which is 2 to 4-stories. Additionally, the project provides for civic space through inclusion of public ground floor plazas.

The proposed project is consistent with Urban Core (T6) and Urban Core-Open (T6-O) zones in that the buildings form a continuous street wall and provide the highest pedestrian and transit activity. The proposed building massing conforms to this requirement. The project introduces wide sidewalks at the perimeter of the site and provides connectivity to public transit. The project is located adjacent to the Copeland Street Transit Center and in close proximity (approximately 800 feet) to the Petaluma Downtown SMART Station. The proposed buildings, which are 3 and 4-stories are within the typical building height for this zone, which is 3 to 6-stories. The project also provides civic space through pocket plazas, as well as private outdoor areas.

The project proposes to comply with the "Corner Element Required" designation in the SmartCode through distinct architecture and using elements of the building façade to emphasize the unique position and shape of the building.

Section 4.40.150 of the SmartCode identifies the required frontages for the Petaluma Station Area Master Plan area. The proposed project would provide the required private frontages in compliance with the SmartCode, including: shop front, gallery, stoop, and dooryard. In instances where the project meets the intent of the code, but deviates from specific requirements, Section 8.10.020 H of the SmartCode provides for warrants to be granted allowing such deviation.

(d)(1)(C) The project is consistent with the City of Petaluma General Plan.

The Petaluma General Plan 2025 was adopted in 2008 and the Petaluma General Plan EIR (SCH# 2004082065) was certified April 7, 2008. The Petaluma General Plan and General Plan EIR assumed approximately 6,000 additional housing units (approximately 2,000 of which would be accommodated within the CPSP area) for a total buildout of 27,949 units city wide. The General Plan accommodates an additional 6.1 million square feet of non-residential space, which could result in approximately 23 million square feet of non-residential floor area in Petaluma at buildout of the General Plan.

The project site is designated Mixed-Use on the City's General Plan Land Use map. The mixed use classification supports a robust mix of uses, including retail, residential, service commercial and offices. The classification also encourages development that is oriented toward the pedestrian, with parking provided, to the extent possible, in common areas or garages.

The proposed Haystack Mixed-Use Project is consistent with the General Plan in that it provides a mix of residential and commercial uses. The proposed project is a pedestrian-oriented development with internal parking areas, demonstrating consistency with the General Plan.

The proposed project is consistent with the following General Plan policies:

Policy 1-P-2: Use land efficiently by promoting infill development, at equal or higher density and intensity than surrounding uses.

Policy 2-P-22: Encourage development with active ground level uses, plazas and open spaces, while allowing residential and commercial uses at upper floors.

Policy 5-P-31(A): Provide secure, protected parking facilities and support services for bicycles at locations with high bicycle-parking demands such as multi-family housing and shopping and employment centers.

Policy 5-P-43: Support efforts for transit oriented development around the Petaluma Depot and along the Washington Street, Petaluma Boulevard, McDowell Boulevard, Lakeville Street, and other transit corridors.

2.2. CONSISTENCY WITH PROGRAM EIRS (CEQA GUIDELINES SECTION 15168)

The City of Petaluma has certified two program level EIRs that include an analysis of the subject Haystack Mixed-Use Project. The City of Petaluma General Plan EIR and the CPSP EIR provide for streamlining and/or tiering opportunities under CEQA Guidelines Section 15168.

CITY OF PETALUMA GENERAL PLAN AND EIR

The Petaluma General Plan 2025, adopted in 2008, serves the following purposes:

- Reflects a commitment on the part of the City Council and their appointed representatives and staff to carry out the Plan;
- Outlines a vision for Petaluma's long-range physical and economic development and resource conservation; enhances the quality of life for all residents and visitors; recognizes that human activity takes place within the limits of the natural environment; and reflects the aspirations of the community;
- Provides strategies and specific implementing policies and programs that will allow this vision to be accomplished;
- Establishes a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards;
- Allows City departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve and enhance critical environmental resources, and minimize impacts and hazards; and
- Provides the basis for establishing and setting priorities for detailed plans and implementing programs, such as Development Codes, the Capital Improvement Program (CIP), facilities and Master Plans, redevelopment projects, and the Urban Growth Boundary (UGB).

The General Plan EIR reviewed all potentially significant environmental impacts and developed measures and policies to mitigate impacts from buildout of the General Plan. Nonetheless, significant and unavoidable impacts were determined to occur. Therefore, the City adopted a statement of overriding considerations, which balances the merits of approving the project despite the potential environmental impacts. The impacts identified as significant and unavoidable in the General Plan EIR are:

- Increased motor vehicle traffic which would result in unacceptable level of service (LOS) at six intersections covered in the Master Plan:
 - McDowell Boulevard North/Corona Road, Lakeville Street/Caulfield Lane, Lakeville Street/East D Street, Petaluma Boulevard South/D Street, Sonoma Mt. Parkway/Ely Boulevard South/East Washington Street, and McDowell Boulevard North/Rainier Avenue.
- Traffic related noise at General Plan buildout, which would result in a substantial increase in existing exterior noise levels that are currently above City standards.
- Cumulative noise from proposed resumption of freight and passenger rail operations and possible resumption of intra-city trolley service, which would increase noise impacts.

- Air quality impacts resulting from General Plan buildout to population levels that could conflict with the Bay Area 2005 Ozone Strategy. (This regional air quality plan has since been replaced by the 2010 Clean Air Plan, which is further discussed in Sections 3.3 Air Quality and 3.7 Greenhouse Gases.)
- A possible cumulatively considerable incremental contribution from General Plan development to the significant impact of global climate change.

The Petaluma Station Area Master Plan and IS/MND

The Petaluma Station Area Master Plan and IS/MND were adopted in June 2013. The Petaluma Station Area Master Plan establishes the framework for future development in proximity to the Sonoma Marin Area Rail Transit (SMART) Stations (the City of Petaluma identified two potential station locations including one downtown at East Washington and Lakeville Street and the other in the vicinity of the intersection of Corona Road and North McDowell Boulevard). The Petaluma Station Area Master Plan IS/MND tiered from the Petaluma General Plan 2025. The IS/MND incorporated the analysis of the General Plan EIR and added information regarding environmental effects that were different in kind or degree from those studied in the General Plan EIR. It was determined that none of the Master Plan policies created new or more severe significant impacts than those disclosed in the General Plan EIR. SMART introduced commuter rail service in 2017 that provides public transit at the Petaluma Downtown SMART Station located on Lakeville Street between East Washington and D Streets.

CENTRAL PETALUMA SPECIFIC PLAN AND EIR

The Central Petaluma Specific Plan (CPSP) was approved on June 2, 2003 by Resolution Number 2003-105 N.C.S. The CPSP EIR (SCH Number 2002-11-2039) was certified by the City Council on June 2, 2003 by Resolution Number 2003-104. The CPSP provides specific land use and development regulations for nearly 400 acres within the central portion of the city, adjacent to downtown. For planning and environmental analysis purposes, the CPSP EIR assumed a total maximum development potential of 1,617 dwelling units and 2.9 million square feet of commercial uses. Within the Turning Basin subarea of the CPSP, in which the project site is located, the maximum development intensity includes 360 dwelling units and 568,126 square feet of commercial space.

The Plan Area is bounded by Lakeville Street on the east and north, Petaluma Boulevard on the west, and Highway 101 on the south. The Plan envisions Central Petaluma to be a place where a wide range of new employment, housing, shopping, and entertainment activities develop in relative proximity to one another within a lively urban environment adjacent to the historic downtown and the Petaluma River. The CPSP is largely defined by the presence of the Petaluma River, Turning Basin and active rail corridor. The balance of land in the subarea supports warehouse and light industrial uses with a limited amount of office and residential use.

The CPSP EIR reviewed all potentially significant environmental impacts and developed measures and policies to mitigate impacts. Nonetheless, significant and unavoidable impacts were determined to occur under the CPSP. Therefore, the City adopted a statement of overriding considerations, which balances the merits of approving the project despite the potential environmental impacts. The impacts identified as significant and unavoidable in the CPSP EIR are:

- Household and population increases would result in associated physical (environmental) impacts, including significant transportation, public services and utilities, visual, noise, air quality, storm drainage, flood control, geotechnical, and hazardous materials exposure impacts.
- Cumulative impacts on the US 101 Southbound Ramps/East Washington Street intersection.
- Cumulative impacts at the Lakeville Street / D Street intersection.
- Cumulative impacts on US 101.

- Cumulative impacts from the installation of roundabouts at the Copeland Street / East Washington Street and Petaluma Boulevard / D Street intersections.

APPLICABILITY OF THE HAYSTACK MIXED-USE PROJECT TO 15168

The General Plan EIR and the CPSP EIR included the development potential of the Haystack Mixed-Use Project, which proposes 3 and 4-story development containing 178 residential units, 24,855 square feet of ground floor commercial space, public and private outdoor areas, onsite and on-street parking, and ancillary improvements. As described above, the program level EIRs (inclusive of the both the General Plan and CPSP) accounted for the development potential proposed by the subject Haystack Mixed-Use Project.

CEQA Guidelines 15168(c) provide that "later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared." The proposed Haystack Mixed-Use Project is a "later activity" of the program EIRs. Section 4 of this CEQA Analysis provides an assessment of the Haystack Mixed-Use Project's environmental impacts relative to what was analyzed in the program level EIRs. As described in Section 4, the Haystack Project, does not result in environmental effects that were not previously examined. As such, pursuant to CEQA Guidelines Section 15162 and 15163, no subsequent or supplemental EIR is required. In accordance with CEQA Guidelines Section 15168(c)(2), the City can "approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required."

CEQA Guidelines 15168(c)(3) provide that "an agency shall incorporate all feasible mitigation measures and alternatives developed in the program EIR into later activities in the program." Section 6 of this CEQA Analysis presents the General Plan EIR mitigation measures¹ and the CPSP EIR mitigation measures² that are applicable to the Haystack Mixed-Use Project. These measures are incorporated as conditions of approval.

As described below in Section 4, for each environmental resource topic in the Environmental Checklist, with implementation of mitigation measures, the proposed project would not result in significant impacts beyond those analyzed in the program level EIRs. In addition, the project is subject to the payment of Development Impact Fees, which are collected to offset incremental increase in demands for public services and infrastructure from implementation of the General Plan.

2.3. CONSISTENCY WITH CENTRAL PETALUMA SPECIFIC PLAN (SECTION 65457)

California Government Code Section 65457(a) provides an exemption for residential development projects that are consistent with a Specific Plan for which an EIR was certified after January 1, 1980. This exemption does not apply if any of the events identified in Section 21166 of Public Resources Code have occurred, unless a supplemental EIR is prepared.

APPLICABILITY OF THE HAYSTACK MIXED-USE PROJECT TO 65457(a)

As described above, the Haystack Mixed-Use Project is consistent with the CPSP for which an EIR was certified in 2003. As summarized below, the CPSP EIR remains relevant and none of the events identified in Section 21166 of the California Public Resources Code have occurred that require preparation of a supplemental EIR. Therefore, the project is exempt pursuant to California Government Code Section 65457(a).

(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.

¹ All of the mitigation measures identified in the General Plan EIR that were adopted and incorporated into the Petaluma General Plan by Resolution No. 2008-084.

² All of the mitigation measures identified in the EIR were adopted and incorporated into the CPSP by Resolution Number 2003-104 N.C.S.

The proposed Haystack Mixed-Use Project is consistent with the development intensity analyzed in the CPSP EIR. There are no substantial changes to the project that require major revisions of the EIR.

(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

The CPSP has built out in a manner consistent with what was analyzed in the CPSP EIR including planned development, infrastructure and transportation improvements. As anticipated by the CPSP, commuter rail is now operational, and the Petaluma downtown SMART station provides public transit opportunities. While this new service introduces commuter rail to downtown Petaluma, it has been planned for and anticipated by the CPSP. There are no substantial changes to the circumstances under which the project is being undertaken that require major revisions of the CPSP EIR.

(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

There is no new information that would substantially alter the conclusions of the CPSP EIR. The analysis of the CPSP EIR remains applicable to the Haystack Mixed-Use Project.

2.4. CLASS 32 CATEGORICAL EXEMPTION (15332)

CEQA Guidelines 15332 provides for a categorical exemption for infill development projects that are consistent with applicant general plan policies and zoning regulation, are located on a project site that is less than 5 acres and substantially surrounded by urban uses, have no value as habitat for endangered, rare or threatened species, would not result in significant effects relating to traffic, noise air quality or water quality, and are located on a site that can be adequately served by all required utilities and public services.

APPLICABILITY OF THE HAYSTACK MIXED-USE PROJECT TO 15332

(a) The project is consistent with the applicable General Plan Designation, applicable policies and applicable zoning designation and regulations.

As discussed in Section 2.1 above, the Haystack project site is consistent with the applicable General Plan Mixed Use land use designation in that it provides a mix of residential and commercial uses. The project proposes to construct these uses in a manner that is consistent with policies in the General Plan by creating infill transit-oriented development that provides active ground level uses while allowing residential and commercial uses at upper floors. The project is consistent with applicable zoning designations of Urban Center (T5), Urban Core (T-6), and Urban Core Open (T6-O) by providing high-density mixed-use buildings, ROW improvements, and "Corner Element" architecture.

(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by Urban Uses.

As summarized in Section 1.1, the project consists of a mixed-use development on a 4.10-acre site in downtown Petaluma, Sonoma County, California. The project is substantially surrounded by urban uses, including a transit station and residential, commercial, and industrial land uses.

(c) The project has no value as habitat for endangered, rare or threatened species.

As discussed in Section 4.4, the project site does not present any value for special-status plant species due to lack of suitable habitat. Due to surrounding roads and development, frequent site maintenance, and other human presence, the project site does not support special-status wildlife species. No special status plant or wildlife species were observed onsite.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Evaluations of environmental effects relative to traffic, noise, air quality, and water quality are discussed in Chapter 4. A traffic impact study, discussed in Section 4.17, determined that the project would not create significant traffic impacts. Section 4.13 summarizes noise impacts and an Environmental Noise Assessment for the project. Therein, noise impacts from the project are determined not to be significant. Air quality, discussed in Section 4.3 using Bay Area Air Quality Management District (BAAQMD) screening criteria, would not be significantly impacted. Water quality, discussed in Section 4.10, was determined not to be significantly impacted by the project in conjunction with a Stormwater Mitigation Report to reduce runoff from reaching the Petaluma River. None of the impacts assessed for traffic, noise, air quality, or water quality were determined to have significant effects beyond the scope of development projected under the CPSP EIR and General Plan EIR.

(e) The site can be adequately served by all required utilities and public services.

The project site is well served by existing utilities and services systems; it is located within an urbanized area in downtown Petaluma, within the Urban Growth Boundary, and is well served by water, sewer, storm drain systems, natural gas, electricity, police, fire, and other utilities and public services.

EXCEPTION TO EXEMPTIONS

Section 15300.2 of the CEQA Guidelines identify exceptions to exemptions including cumulative impact, significant effect, scenic highway, hazardous waste sites, and historical resources. Cumulative impact, in 15300.2(b) of the CEQA Guidelines, is not applicable since the project will not contribute to successive impacts in the same location. Significant effect, set forth in 15300.2(c), is not applicable since there are no unusual circumstances. Scenic Highways, discussed in 15300.2(d), is not applicable, as the project is not located in the vicinity of a State Designated Highway, nor is it in the vicinity of a locally recognized or designated Scenic Corridor. Hazardous Waste Sites, discussed in 15300.2(e), is not applicable since there are no open hazardous waste sites at the project site. As described below in Section 4.9, one Leaking Underground Storage Tank (LUST) cleanup site is located on the project site with a status of "Completed - Case Closed" from both the San Francisco Bay Regional Water Quality Control Board (RWQCB), Case #: 49-0010, and Sonoma County Local Oversight Program (LOP) Case #: 00002713.³ Historic Resources, discussed in 15300.2(f), will not be adversely impacted by the project since the project site is not located within a historic district, there are no historic resources onsite, and nearby historic resources will not be directly or indirectly affected by development. No exceptions to the Class 32 infill exemption have been identified.

15532 DETERMINATION

The proposed Haystack Mixed-Use Project meets the provisions set forth in 15332 and qualifies for a Class 32 Categorical Exemption. As described above, the project is consistent with the General Plan and Specific Plan Land Use designations, policies, and zoning regulations. The project site is 4.10 acres and is located in a priority development area surrounded by urban uses including downtown Petaluma and the downtown SMART station. The project site was historically used for industrial type activities, has been previously graded and routinely mowed for weed abatement. The site has no habitat value and does not support special status species. As described in detail in Chapter 4.0 below, the Haystack Mixed-Use Project would not result in significant effects relating to traffic, noise, air quality or water quality. The site is well served by all required utilities and public services. In addition, none of the exceptions identified in CEQA Guidelines Section 15300.2 are applicable to the project. Therefore, the proposed Haystack Project qualifies for a Class 32 Categorical Exemption.

2.5. CEQA DETERMINATION AND SUMMARY OF FINDINGS

As summarized above and presented herein, the proposed Haystack Mixed-use Project is eligible for the following CEQA provisions:

³ Geotracker and Envirostor referenced April 22, 2019.

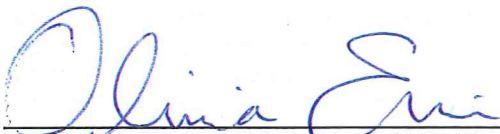
Community Plan Exemption. Streamlined environmental review per Section 15183 of the CEQA Guidelines and California Public Resources Code Section 21083.3. The project is consistent with the CPSP and will not result in significant environmental impacts that were not previously identified as significant project-level, cumulative or offsite effects in the CPSP EIR.

Consistency with Program EIRs. The City of Petaluma General Plan EIR and CPSP EIR provide for streamlining and/or tiering provisions under CEQA Guidelines Section 15168. This CEQA Analysis demonstrate that the Haystack Mixed-Use project would not result in substantial changes or involve new information that would warrant preparation of a subsequent EIR because the level of development proposed is within the development assumptions analyzed in the program level EIRs (General Plan and CPSP). No further environmental review is required.

Class 32 Categorical Exemption: The Haystack Mixed-Use Project complies with Public Resources Code Section 21084 and CEQA Guidelines Section 15332 and is exempt from further environmental review.

As described herein, the proposed project is within the scope of development projected under the General Plan and CPSP. The proposed Haystack Mixed-Use project will implement applicable mitigation measures identified in the General Plan EIR and the CPSP EIR. In addition, the project would be required to comply with applicable conditions of approval. With implementation of required mitigation measures and conditions of approval, the Haystack Mixed-Use Project would not result in a substantial increase in the severity or significant impacts that were previously identified in the program level EIRs, nor would the project introduce any new significant impacts that were not previously identified. Therefore, there would be no additional environmental impacts beyond those analyzed in the CPSP EIR and General Plan EIR.

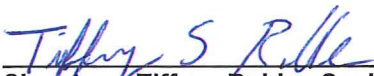
Each of the above findings provides for a separate and independent basis for CEQA compliance. We do hereby certify that the above determination has been made pursuant to State and Local requirements.



Signature: Olivia Ervin, Principal Environmental Planner

5.21.19

Date



Signature: Tiffany Robbe, Senior Planner

5.21.19

Date

3. PROJECT DESCRIPTION

This section of the CEQA Analysis provides a characterization of the subject Haystack Mixed-Use Project including the environmental setting, project location, description of the construction activities and operational uses, and the required project entitlements. A summary of the public outreach efforts is also presented in this section. The Project Description section concludes with a statement regarding the project applicant's commitment to implement the applicable mitigation measures from the General Plan and CPSP EIRs.

3.1. ENVIRONMENTAL SETTING

Regional Setting

Petaluma is located in southwestern Sonoma County along the Highway 101 corridor approximately 15 miles south of Santa Rosa and 20 miles north of San Rafael. It is situated at the northernmost navigable end of the Petaluma River, a tidal estuary that drains to the San Pablo Bay. The City originated along the banks of the Petaluma River, spreading outward over the floor of the Petaluma River Valley as the City developed. The Valley itself is defined by Sonoma Mountain on the northeast and by the hills extending northward from Burdell Mountain on the west. To the south are the Petaluma Marshlands and the San Francisco Bay beyond.

Petaluma's Urban Growth Boundary (UGB) defines the limits within which urban development may occur and encompasses approximately 9,911 acres. The UGB was implemented in 1987 (as the Urban Limit Line), formally adopted as the UGB in 1998 via Measure I and will expire in 2025. The General Plan and EIR evaluated potential impacts associated with existing development and buildout of all land use within the UGB.

The subject project site is located within a regionally defined Priority Development Area (PDA). Priority Development Areas (PDAs) are places identified by Bay Area communities as areas for investment, new homes and job growth. PDAs are the foundation for sustainable regional growth as envisioned through Plan Bay Area, the region's Sustainable Community Strategy (SCS). The most recently adopted SCS is the Plan Bay Area 2040 prepared as a joint effort between the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). Implementation of PDA's enhance mobility and economic growth by linking the location of housing and jobs with transit, thus offering a more efficient land use pattern around transit, reducing greenhouse gas emissions and realizing a greater return on existing and planned transit investments.

Vicinity Setting

The Haystack Mixed-Use Project site is located within one of the four primary districts outlined within Central Petaluma Specific Plan (CPSP); the Turning Basin Subarea, which extends from East Washington Street to D Street on both sides of the river. One of the primary goals of the CPSP was to realize an intense mixed-use district oriented to the river and the train station.

The site is also located within the Petaluma Station Area Master Plan, of the downtown station, which includes a radius of a half-mile from the station. The amended SmartCode, adopted in July 2013 (Ordinance No. 2470 N.C.S) establishes the zoning and design provisions that govern development within the Station Area and CPSP.

Project Site

The project site is comprised of five contiguous assessor's parcels that occupy approximately 4.10 acres. The project site is primarily vacant and consists of an open lot with paved, gravel, and ruderal vegetated areas. There is one existing structure onsite; the 5,700 square foot circa 1953 warehouse building located on APN 007-149-007, which will be demolished as part of the subject project. In addition, there is an existing structure located on APN 007-149-008, which consists of a 4,000 square foot warehouse that was constructed circa 1949 and will remain. APN 007-149-008 is not part of the proposed project; new development proposed by the project will occur around the existing warehouse at APN 008 and will be accommodated through setbacks from the side and rear property lines and the introduction of screening trees.

The project site is generally flat and lacks vegetation, with the exception of a single tree towards the Weller

Street/E Washington Street intersection, groundcover, and ruderal vegetation. The site is routinely mowed for weed abatement purposes. There are patches of pavement and gravel interspersed across the site. Much of the site perimeter contains a narrow sidewalk in various stages of disrepair; some sections lack any sidewalk.

At the eastern property line (along the site's frontage to Copeland Street) as well as along the southern property line (along the site's frontage to D Street) are a series of overhead utility lines that connect to the substation located approximately ¼ mile southwest of the site, on the far side of the Petaluma River. These high voltage overhead lines will remain in their current location. Overhead lines along Copeland Street will be undergrounded as part of the project development.

The project site was historically used for industrial and commercial purposes since at least 1885. Past uses include storage of hay and lumber, fruit drying, and a distillery. In the early 1900's the site was acquired by Petaluma and Santa Rosa Railway and was used as a rail yard including a ticket office and a car repair barn. The railway ceased operations in the late 1940s. The ticket office was moved from the site in the 1990s and the car barn was destroyed by fire in 2001.

In the 1960s the site was leased to Bar Ale Inc. and was used for storage and maintenance of delivery trucks. Bar Ale installed three underground storage tanks for the storage of fuels. One or more of these tanks failed and resulted in hydrocarbon contamination onsite. Clean up and site remediation began in 1990 with the removal of the underground storage tanks, soil excavation and offsite disposal. Site cleanup was conducted under the direction of the San Francisco Regional Water Quality Control Board (RWQCB). On March 1, 2010, the RWQCB granted a case closure letter confirming that the site had been adequately investigated, primary contamination sources removed, and that residual soil and groundwater contamination were at levels that do not represent a current or future public health, ecological or water resources threat.

The Haystack Project site has been subject to several previous environmental site assessments. In 2005 ENVIRON conducted a Phase I and Phase II investigation that assessed past industrial uses including the railroad yard and car painting and maintenance facility. Subsequently, ECON conducted a Phase I Environmental Site Assessment (ESA) in 2012 and a Phase II ESA in 2013. These investigations documented residual petroleum hydrocarbons and metals in the soil. In August 2018, West Yost Associates (West Yost) reviewed planning and design documents for the proposed project and concluded that lead is the only remaining constituent of concern for the site. As described under the Hazards and Hazardous Materials Section below, as a condition of approval, the City will require that the recommendations in the West Yost Technical Memorandum for the subject property be incorporated into construction specifications. The City will also require the preparation of a Soil Management Plan, as a condition of project approval. The hazards and hazardous conditions onsite relating to past contamination and residual lead in soils are further described below under Section 4.9.

The site is underlain by Bay Mud and areas of fill, which are susceptible to subsidence under heavy loads. Bay Mud is alluvial sediment composed of highly compressible plastic clay and silty clay with an elevated water content. The geological conditions onsite will be addressed through routine soil treatment techniques using drilled displacement pressure grouted columns for support of the proposed structures. The soils and geological conditions onsite are further described below under Section 4.8.

3.2. PROJECT LOCATION

The project is located in the central portion of the City of Petaluma, in the County of Sonoma (**Figure 1: Regional Location**). Specifically, the project site is located at 215 Weller Street and includes five contiguous parcels (APNs 007-143-003, 004, 007, 014, and 015 (-008 is not part of the project)).

As seen in **Figure 2: Project Vicinity**, the project site encompasses the area between East Washington Street and D Street (to the north and south, respectively) and between Copeland Street and Weller Street (to the east and west, respectively). The surrounding land uses are designated Mixed Use on all sides. Surrounding uses proximate to the project site include vacant land, the River Plaza shopping center, restaurants, and industrial.

The project site is located within ¼ mile of the public transit including the Copeland Transit Center and the Downtown Petaluma SMART rail station. The SMART corridor and the downtown SMART station is located

within 800 feet of the project site. The Turning Basin of the Petaluma River (which marks the northern most navigable reach of the Petaluma River) is located west of the site, at the far side of Weller Street. The Turning Basin contains an existing public dock, which operates under a lease agreement between the City of Petaluma and the State Lands Commission. A dock extension that will support the Floathouse Rental Facility was approved in 2015 by the City Council and included development of a restroom and shower facility as well as minor ancillary improvements at Cavanaugh Landing Park, which is located across Weller Street immediately west of the subject project site. Construction of the dock pilings to support the new Floathouse dock occurred in 2018 and a building permit has been submitted for installation of the Floathouse dock and construction of the Floathouse kiosk.

The subject project site has a General Plan land use designation of Mixed-Use (**Figure 2: Vicinity Map Use**) and is zoned (T-5) Urban Center, (T-6) Urban Core, and (T6-O) Urban Core-Open per the SmartCode (**Figure 3: Land Use Map**). A small area at the corner of East Washington and Copeland Street is identified as requiring a "Corner Element."

As mentioned above, the project site is located within the City of Petaluma's Priority Development Area (PDA). PDAs are locally-identified, infill development opportunity areas within existing Bay Area communities. They are generally areas of at least 100 acres where there is local commitment to develop more housing along with amenities and services to meet the day-to-day needs of residents in a pedestrian-friendly environment served by transit. The subject Haystack Mixed-Use project is located within the "Petaluma: Central PDA" of the Priority Development Area Investment and Growth Strategy Update.⁴

3.3. PROJECT DESCRIPTION

The proposed project would result in a mixed-use development comprised of 178 residential dwelling units (rental apartments and/or for sale condominium units), approximately 24,855 square feet of retail/commercial use, public and private open space, a new street (transverse street), frontage improvements, parking, landscaping and ancillary improvements (**Figure 5: Site Plan**). The 178 residential units include 16 studios, 55 one-bedroom units, 94 two-bedrooms units, 10 three-bedroom units, and 3 live/work units ranging in size from 574 square feet to 1,724 square feet. A total of 27 units (15%) will be dedicated as affordable units consistent with the City's Housing Element Program 4.3 (City of Petaluma's Inclusionary Ordinance).

The proposed Haystack Mixed-Use Project would result in a total development of approximately 361,616 gross square feet including twenty-five (25) three- and four-story buildings, common and open space areas, utilities and related improvements. Residential uses would occupy 244,002 square feet comprised of 172,686 square feet of rentable space and 71,316 square feet of ancillary residential space including lobby, corridors, stairs, and decks. Approximately 9,332 square feet of indoor amenity space for residents would be provided. The leasing office would occupy 4,714 square feet of the first floor at the northwest corner of Copeland Street and the new transverse street. The parking garages, located on the first and second floors would occupy 78,713 square feet and includes electric, utility, storage space. Commercial spaces are located particularly at the corners of the site and range in size from 1,116 square feet to 4,371 square feet.

The site design is such that buildings are located around the periphery of the site with the internal space of each block occupied by a two-level parking garage capped by a residential courtyard at the third-floor level. A new public transverse street would divide the site into two development blocks. Building rooftops will support solar or tankless hot water heaters and ventilation equipment as well as photovoltaic arrays.

The north development block will be triangular in shape, and will have frontage onto East Washington Street, where the CPSP calls for a "Corner Element Treatment". Commercial, restaurant, and the leasing and mail room uses will be located on the ground floor, especially at each of the three corners. Residential units will be located above the commercial uses and on the ground floor, mid-block along Copeland Street and transverse street. Fourteen buildings (Buildings 1-14), two plaza pocket parks, one on Copeland Street (1,293 square feet)

⁴ Sonoma County Transportation Authority, Priority Development Area Investment and Growth Strategy Update, Adopted June 12, 2017, <https://scta.ca.gov/wp-content/uploads/2017/05/PDA-IGS-2017-update.pdf>. Accessed April 18, 2019. Map 4- Petaluma: Central PDA.

and the other on Weller Street (2,659 square feet), a 2,841 square foot courtyard fronting transverse street, and an 18,765 square foot interior third-floor courtyard will be developed on the north block.

The south development block will result in a nearly square lot, with the exception of APN 007-149-008 which is under different ownership and not a part of the project. The existing warehouse structure on APN 007-149-008 will remain in place and is not part of the subject project. The south block includes mixed-use development including residential and commercial uses and construction of a triangular plaza on the D-Street public right-of-way. Commercial uses will be located on the ground floor at each of the four corners. Residential units will be located above the commercial uses and on the ground floor between commercial uses along Copeland Street and the transverse street; live/work units will be located between commercial uses on East D Street. Eleven buildings (Buildings 15-25), a 6,226 square foot courtyard fronting on transverse street, and a 20,166 square foot interior third-floor courtyard will be developed on the south block, as well as a plaza on the D Street public right-of-way.

Public Open Space

The project proposes three public ground floor pocket plazas. The north plaza is opposite the bus transit station and is anticipated to be associated with the commercial use near the corner of East Washington and Copeland Street. The south plaza will be located on the existing D Street public right-of-way. The west plaza (located in the north block) will function as a pocket plaza and provides continuity to Cavanaugh Landing Park and the Turning Basin (which are located on the opposite side of Weller Street from the project site) and is anticipated to include an area of outdoor dining associated with the abutting commercial use. Public plazas provide passive recreational amenities including seat walls, planting areas and community gathering space.

Private Open Space

The project proposes private common space open areas for residents including two third-floor outdoor courtyards and two near ground level courtyards. The ground floor courtyards open up to and provide perpendicular connectivity to transverse street; these courtyards will be raised a few feet above the sidewalk level to indicate that they are private areas while being visually open to the public area. The third-floor courtyards will be situated within the interior of each block, atop the internal two-level parking garages, and will feature exterior living rooms with outdoor furniture, gardens, planters, BBQ areas and other amenities. Covered areas and shade sails are also proposed to provide shaded areas within the outdoor courtyards.

Site Access and Parking

The project includes internal parking lots that will be situated within the central portion of each block. The north block parking garage provides 90 parking stalls and the south block parking garage provides 107 parking stalls. Both parking garages are designed to accommodate a 24-foot wide internal drive aisle. A total of 254 parking spaces will be provided including 197 within onsite parking garages, and 57 on street parking spaces, which will be publicly available. The project site will be accessible from on street parking located along surrounding roadways (Weller, Copeland, transverse, and D Streets), as well as internally via the garages accessed from Weller Street.

Transverse street will be constructed between the north and south blocks in accordance with the alignment identified in the CPSP and the Station Area Master Plan. The new transverse street will have a 50-foot right of way comprised of two 10-foot wide travel lanes, on street parking (8 feet wide), 5-foot planters and 7-foot wide sidewalks on both sides. The transverse street will support two-way traffic and will be stop sign controlled at its intersection with Copeland and Weller Streets. The transverse street and frontage along surrounding roadways will be dedicated to the City of Petaluma.

Site Preparation and Construction

Site preparation will involve minimal grubbing to remove grasses and vegetation. The project site is generally flat, has been previously grubbed and graded and paved and lacks vegetation. Demolition will consist of removal

of gravel, concrete, remnant hardscape onsite, and structures. The existing warehouse building located at APN 007-143-007 will be demolished as part of the project. The existing building located at APN 007-143-008 will be retained and will remain in its current condition. The proposed Haystack Mixed-Use Project will build around the existing warehouse building on APN -008.

Grading will occur over the entire project site and will result in the distribution of soil across the site to achieve level topography. Grading activities are expected to be minimal as the site is relatively flat. Excess cut from excavation, foundation and utility work may be re-used onsite or exported for disposal. Soil may be imported for use in areas where the ground is exposed such as tree wells, bioretention areas, ground floor courtyards, and ground floor public plazas and parks.

Following completion of grading activities, infrastructure improvements and building foundations will be constructed. Utilities, storm drains and bioretention basins will be installed. As all public utilities currently extend to the project site, improvements will be limited to the installation of new laterals and tie-ins to connect to the existing water, sewer, electric, and gas services in place within the surrounding roadways.

Portions of the project site, proximate to Weller Street, are underlain by Bay Mud deposits and are susceptible to compression under heavy-loads. As such, the project proposes using drilled displacement pressure grouted columns (DDC) to support structures. DDC involves an advancing drilled shaft to displace the soil around the shaft as it extends to the stable ground soil layer below the compressible Bay Mud soil, which extend to a depth of 15 to 25 feet below the ground surface. The open shaft created is backfilled with pressure grout to form a sand-cement column; typically, the columns have diameters of approximately 16 to 18 inches. The effects of displacement and backfilling of grout under pressure will densify or stiffen the soil within the area of influence around the column. The DDC columns will be reinforced with a single bar of reinforcing steel (rebar) to increase shearing and tension resistance, as needed. The DDC will be installed at locations of shallow foundation elements. As such, the areas outside of the treatment zone (i.e., interior slabs, landscaping, planters, etc.) will not be supported by DDC. However, interior slabs will be designed to span across the footings bearing on DDC.

Construction equipment expected to be utilized includes tractors, backhoes, haul trucks, graders, pavers, cranes, water trucks and other heavy-duty construction equipment. Staging of construction equipment and materials will occur within the footprint of the project site and if needed through a temporary encroachment permit for staging along adjacent roadways.

Construction will result in the development of three and four-story buildings, parking areas, plazas, courtyard fronting the transverse street, elevated interior courtyards, the new transverse street, landscaping and ancillary improvements. Development onsite will occur over an approximately two-year construction period.

Landscaping

Site improvements include new landscaping and special pavement treatment across the project site consisting of trees, shrubs, grasses, groundcover, and vines. Ornamental trees will be distributed along the periphery of the site to provide shade and screening, including street trees. Public plazas will include raised landscape planters, seat walls, pavers, outdoor furniture, and bicycle parking.

Private outdoor courtyards located on the third floor of the development will also be landscaped and includes structural elements such as built-in benches, seat walls, game tables, a fenced dog area, pergolas and trellises. Decorative pots and raised planters will support a variety of ornamental vegetation within the internal open space courtyard areas. Outdoor furniture including lounge chairs, benches, and fire pits are also proposed as a part of the landscaping design.

Utilities

Utilities will extend to the project site via existing and proposed utility easements. Wastewater will be accommodated via the installation of new laterals that will connect to the existing sanitary sewer lines in Copeland and D Streets, as well as the installation of new 8-inch diameter sanitary sewer pipelines within

transverse street and Weller Street. The new sewer line infrastructure will connect to the existing sanitary sewer line system within surrounding roadways, which conveys flows to the regional wastewater plant for treatment.

A new water line will be installed within transverse street and water line laterals will be installed to connect the project site to existing water lines within surrounding streets including the 18-inch water line in East Washington Street, the 12-inch water line in Copeland Street, and the 8-inch water lines in East D Street and Weller Street. The new water line in transverse street will serve several new fire hydrants that will be located in the public right-of-way along Copeland Street. New fire hydrants will also be connected to existing water lines within Weller Street and East D Street.

The project will include new storm drainage infrastructure to accommodate the increase in impervious surfaces that will result from development. Onsite improvements will capture storm water runoff and convey flows to the existing outfall to the Petaluma River. The existing offsite 15-inch outfall to the Petaluma River would be retained. The Project would install onsite and offsite stormwater infrastructure including a new 30-inch storm drain pipe in transverse street and an 18-inch pipe in Weller Street. The 30-inch storm drain would extend from Transverse street offsite and tie into the existing 15-inch pipeline that outfalls to the Petaluma River. Improvements include a storm drain system within the parking lots towards the internal portion of the site for both the north and south blocks. The new storm drain system also includes a 15-inch diameter pipeline extending from the parking lots and connecting to the new 18-inch storm drain in Weller Street.

3.4. PUBLIC OUTREACH

The applicant has held four public outreach events to obtain feedback from the community:

- June 23, 2015: This event included a small group of design professionals and community members that have been actively involved in the development of long range plans for the area.
- August 17, 2015: This event was a meeting for neighbors directly adjacent to the property.
- August 19, 2015: This event was open to the entire community.
- March 16, 2017: This event was open to the entire community.

In addition to the public outreach efforts listed above, the development team has had multiple communications and meetings with interested community members, city staff, commissioners, and council members to elicit feedback on the design proposal and make revisions based on feedback received. Additionally, newspaper articles have been written about the project proposal eliciting community response in the comments section of these articles. Also, the project has been presented in various community forums including the "Transit and Transit Oriented Development – What Does it Mean in the North Bay" Event put on by the North Bay Division of the League of California Cities as well as the "Know Before You Grow" Series put on by Urban Chat.

3.5. CITY ENTITLEMENTS

The applicant is requesting approval of a Site Plan and Architectural Review (SPAR) application to construct a mixed-use development, which consists of 178 residential units and 24,855 square feet of commercial space. The project applicant has applied to the City of Petaluma for the following entitlements:

- Site Plan and Architectural Review
- Tentative Parcel Map to create a parcel on each side of the transverse street

3.6. OUTSIDE AGENCY APPROVALS REQUIRED

In addition to the approval necessary from the City of Petaluma as the lead agency, the Haystack Mixed-Use Project will require the following approvals from agencies other than the City:

County of Sonoma Permit & Resource Management Department – For review, approval and acceptance of the Project's Stormwater Management Plan.

Regional Water Quality Control Board – Section 401 of the Clean Water Act for fill to 0.04 acres of seasonal wetlands.

Army Corps of Engineers – Section 404 of the Clean Water Act for fill to 0.04 acres of seasonal wetlands.

3.7. ENVIRONMENTAL CONDITIONS OF APPROVAL

The project must incorporate all feasible mitigation measures set forth in findings of fact for prior applicable Environmental Impact Reports (EIRs). The following EIRs have been determined by the City to be applicable to the Project:

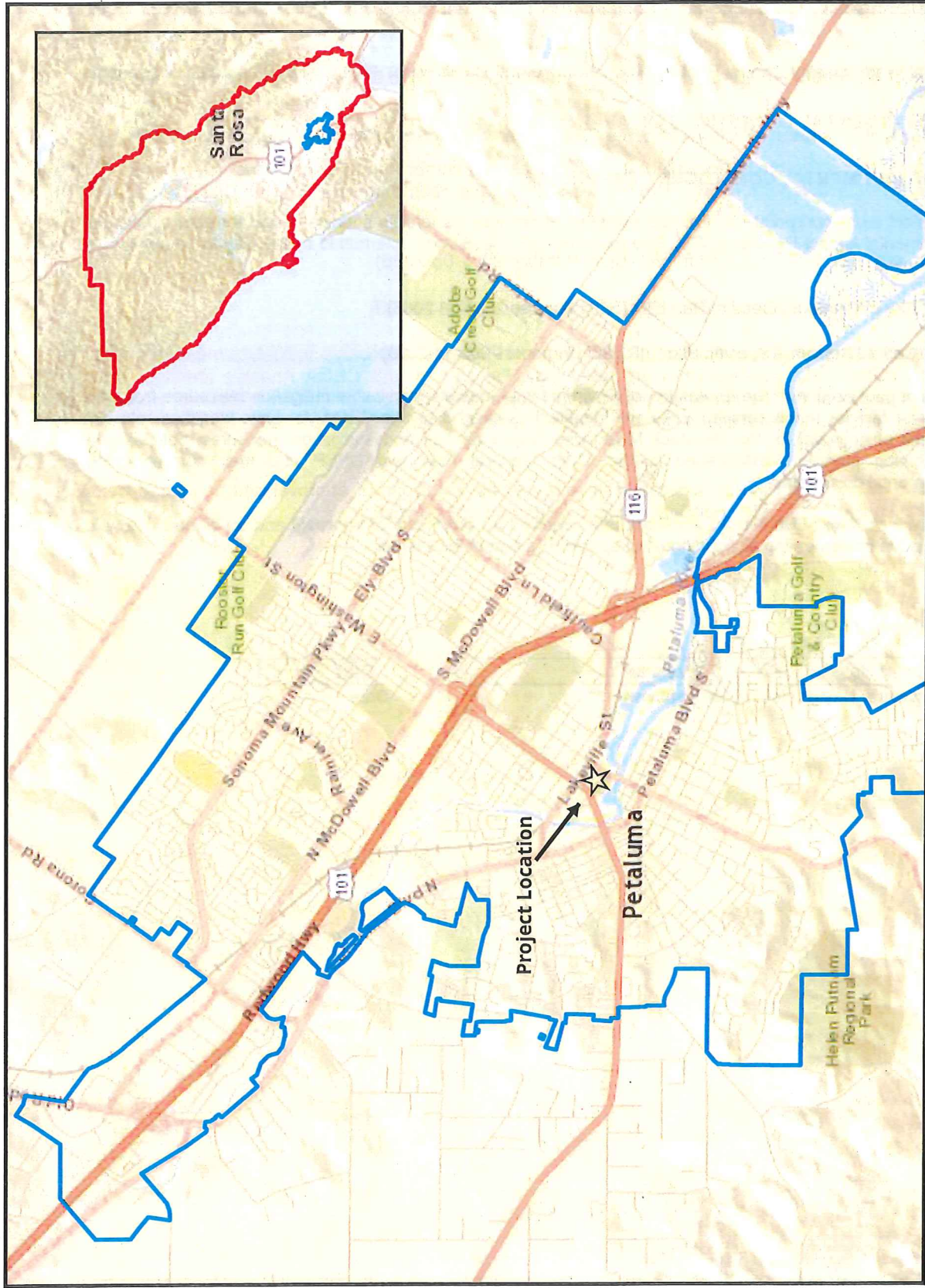
- City of Petaluma General Plan EIR (SCH Number 2004-08-2065)
- Central Petaluma Specific Plan EIR (SCH Number 2002-11-2039)

In each impact section of the Evaluation of Environmental Impacts, applicable mitigation measures from the findings of fact for these certified EIRs are identified. Section 6 of this CEQA Analysis identifies relevant conditions of approval for the Haystack Mixed-Use Project derived from mitigation measures, policies and implementing programs established in the City's General Plan and CPSP and their corresponding environmental documents.

The Haystack Mixed-Use Project applicant has reviewed all conditions of approval and as signed below is committed to implementing all conditional of approval as part of the Project.


Signature: Haystack Project Applicant

5/21/19
Date



Regional Location

Haystack Mixed Use Project
Petaluma, California

☆ Project Location
City Limit
Sonoma County Line

0 0.5 1 1.5 2 Miles

Figure 1

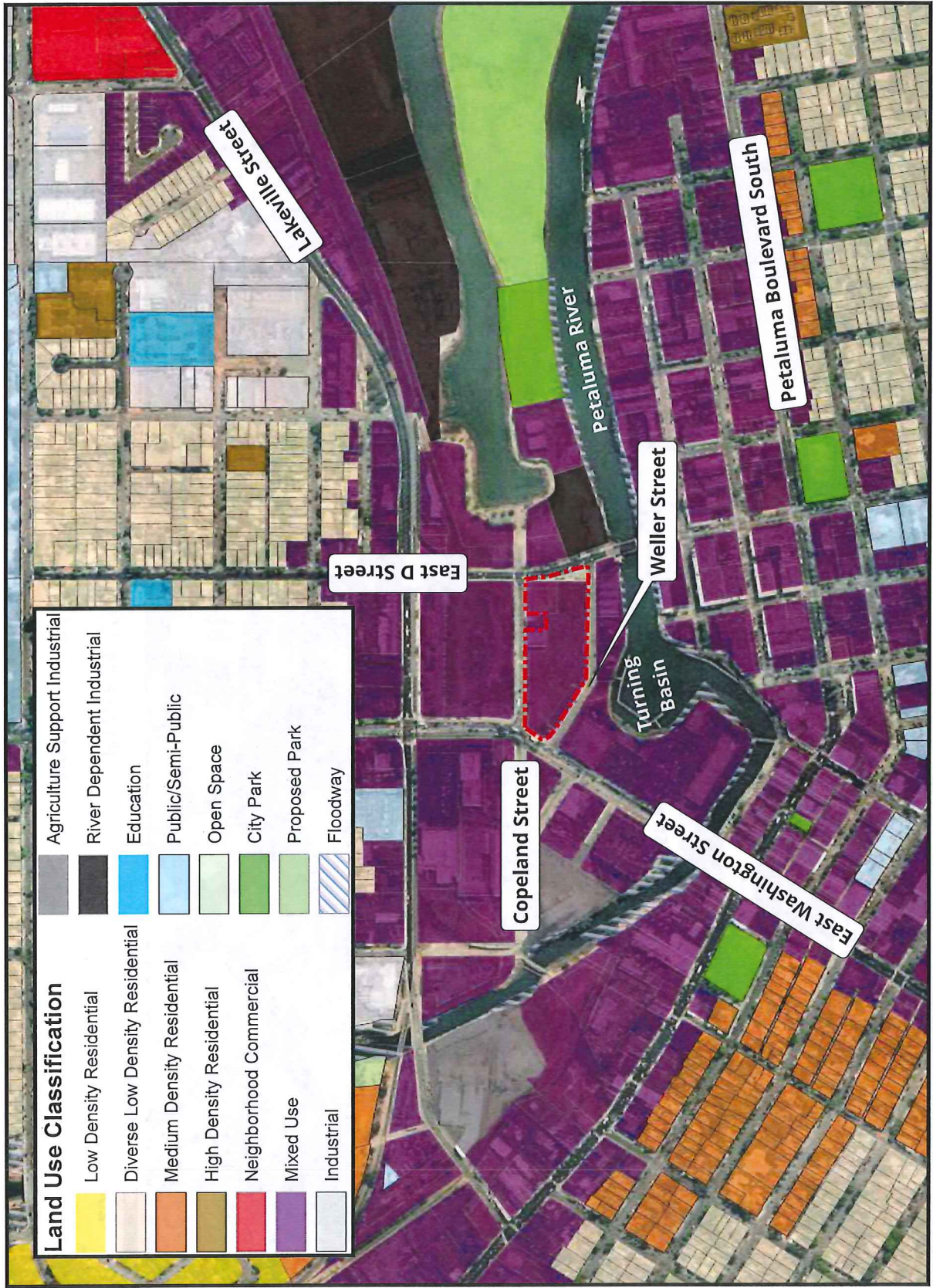


Project Site

Project Vicinity

Haystack Mixed Use Project
Petaluma, California

Figure 2



Land Use Classification	
	Low Density Residential
	Diverse Low Density Residential
	Medium Density Residential
	High Density Residential
	Neighborhood Commercial
	Mixed Use
	Industrial
	Agriculture Support Industrial
	River Dependent Industrial
	Education
	Public/Semi-Public
	Open Space
	City Park
	Proposed Park
	Floodway

Project Site

General Plan 2025 Land Use

Haystack Mixed Use Project

Petaluma, California

0 375 750 1,125 1,500 Feet



Source: City of Petaluma Geographic Information Systems, GP2025 Land Use Shapefile. Updated 8/22/2014

Figure 3



Zoning Map

Haystack Mixed Use Project

Petaluma, California

<p> Project Site</p> <p> Corner Element</p> <p> Urban Core (T6)</p> <p> Urban Core - Open (T6-O)</p>	<p> Urban Center (T5)</p> <p> Railroad District (D2)</p> <p> River Dependent Industrial District (D3)</p>
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Source: SMART Code Figure 2.20:
Regulating Plan Downtown Station Area Detail

Figure 4



Site Plan

Haystack Mixed Use Project

Petaluma, California

4. EVALUATION OF ENVIRONMENTAL EFFECTS

This section examines the Haystack Mixed-Use project's potential environmental effects within the parameters outlined in CEQA Guidelines Section 15183(b). The "Prior EIRs" (as defined in CEQA Guidelines Section 15183(b)(3)) are the City of Petaluma General Plan EIR and CPSP EIR, inclusive of all impact determinations, significance thresholds and mitigation measures identified therein.

The evaluation builds from the Appendix G Environmental Checklist and has been modified to reflect the parameters outlined in CEQA Guidelines Section 15183(b). The checkboxes in the evaluation below indicate whether the proposed project would result in environmental impacts, as follows:

- **New Significant Impact** – The proposed project would result in a new significant impact that was not previously identified in the General Plan EIR or the CPSP EIR.
- **Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR** – The proposed project's specific impact would be substantially greater than the specific impact described in the General Plan EIR or the CPSP EIR.
- **Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR** – The severity of the specific impact of the proposed project would be the same as or less than the severity of the specific impact described in the General Plan EIR or CPSP EIR.

Where the severity of the impacts of the proposed project would be the same as or less than the severity of the impacts described in the General Plan EIR or CPSP EIR, the checkbox for Equal or Less Severity of Impact Previously Identified in GP or CPSP EIR is checked. Where the checkbox for Substantial Increase in Severity of Previously Identified Significant Impact in GP EIR or CPSP EIR or New Significant Impact is checked, there are significant impacts that are:

- Peculiar to project or project site (CEQA Guidelines Section 15183[b][3]);
- Not analyzed as significant impacts in the previous EIRs, including off-site and cumulative impacts (CEQA Guidelines Section 15183[b][2]);
- Due to substantial changes in the project (CEQA Guidelines Section 15162[a][1]);
- Due to substantial changes in circumstances under which the project will be undertaken (CEQA Guidelines Section 15162[a][2]); or
- Due to substantial new information not known at the time the EIRs were certified (CEQA Guidelines Sections 15162[a][3] and 15183[b][4]).

Following the Checklist, a summary of the potential environmental impacts relevant to the proposed project that may result from the Petaluma General Plan and CPSP, as evaluated in the General Plan and CPSP EIRs, are described. Next, the potential project-specific environmental effects of the proposed project, including the project's consistency with the General Plan and CPSP EIRs, are discussed. Last, applicable General Plan and CPSP EIR mitigation measures, as well as General Plan and CPSP Objectives, Policies and Programs, are identified.

As described herein, the proposed project will be required to comply with all applicable mitigation measures identified in the Petaluma General Plan and CPSP EIRs.

This evaluation hereby incorporates by reference the Petaluma General Plan EIR and CPSP EIR discussion and analysis of all environmental topics. The General Plan EIR and CPSP EIR significance thresholds have been consolidated and abbreviated in this Checklist; a complete list of the significance thresholds can be found in the Petaluma General Plan and CPSP EIRs.

The CPSP and General Plan EIR are program level documents that consider the combined effects of implementing several related projects. As such, the analyses presented in the CPSP and General Plan EIRs represent a cumulative analysis of environmental impacts that may occur from buildout of the Specific Plan and the General Plan.

4.1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; Area Plan Petaluma River Access and Enhancement Plan, Adopted May 1996; Site Plan and Architectural Review Submittal prepared by BDE Architecture, dated March 22, 2019; and Preliminary Landscape Plans prepared by Quadriga Landscape Architecture and Planning, Inc., dated January 31, 2019.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant impacts to visual resources due to the intensification of use and affects to visual quality from the introduction of new buildings. The CPSP EIR identifies mitigation measure 9-1, which specifies that all new development along Water Street within the CPSP undergo design review by the City's Site Plan and Architectural Review Committee⁵. The Haystack Project is not located along Water Street and does not have frontage to the Petaluma River. It is located on the west side of the CPSP Turning Basin Subarea and is outside of the Petaluma River Access and Enhancement Plan area. Nonetheless, the Project is subject to Site Plan and Architectural Review (SPAR) in accordance with the City's Zoning Code (Chapter 24.010). The SPAR process provides a systematic approach to ensuring that new development meets design standards, utilizes high quality architectural materials, and contributes to the City's visual character.

The Haystack Mixed-Use Project achieves a satisfactory quality of design, exhibits appropriate building massing, and is in harmony with its surroundings. The Project meets the design objectives of the SmartCode by utilizing quality materials, proposing a site plan that is consistent with the General Plan, CPSP and the TOD Master Plan, introducing four-story buildings (with three-story accent elements) to support a mix of residential and commercial uses, and providing appropriate landscaping, access and circulation, and architecture. The Project introduces commercial uses along Weller Street that are oriented to the River, and transit oriented residential development located in close proximity to the downtown SMART Station. Wide sidewalks, open

⁵ The City Council consolidated the Planning Commission and the Site Plan and Architectural Review Committee into the Planning Commission in 2009 (Ordinance No. 2345 N.C.S.).

space pocket plazas, and commercial opportunities introduced by the Project provide for enhanced pedestrian activity. In addition, the alignment of transverse street maintains connectivity to the Petaluma River by providing a view corridor and access route between the SMART station and the Turning Basin. The Haystack Mixed-Use Project as proposed is consistent with the CPSP's vision for the Turning Basin Subarea and there are no new or different visual impacts relative to what was evaluated in the CPSP EIR.

The General Plan EIR concluded that with policies set forth in the General Plan visual impacts would be less than significant. General Plan policies 2-P-28, 2-P-38, and 2-P-39 relate to orienting new buildings in a manner that acknowledge the Petaluma River as focal point, providing for publicly accessible open space, and fostering connections to the river. As described above, the Haystack Mixed-Use Project achieves these objectives.

The General Plan EIR determined that implementation of the General Plan would result in less than significant impacts due to new sources of nighttime lighting and daytime glare. The City's zoning code regulates lighting levels and the SPAR process requires review of new lighting introduced onsite on building exteriors, parking areas and landscaping. The project's location in the urban center of Petaluma contains various sources of lighting includes streetlights, traffic signals, building and landscape lighting, and headlights from vehicles.

The proposed Haystack Mixed-use Project will not substantially increase light levels relative to existing conditions. The project proposes outdoor lighting, consisting of street lights, lighting for buildings, landscape lighting, and accent lighting. The proposed lighting is in conformance with the City's standards, by being shielded and/or contained within frosted glass lighting fixtures, and not exceeding a height of 20 feet. Lighting detail and design will be considered through the SPAR process to ensure compliance with Implementing Zoning Ordinance (IZO) §21.040(D)(Glare) and confirmed by Planning staff review and approval prior to building permit approval. Furthermore, lighting associated with the subject project has been anticipated by the CPSP and General Plan EIRs. The Project would have no greater impacts to lighting relative what was analyzed in the planning level EIRs.

The project site is flat and excludes any feature (e.g., trees, rock outcropping, historic buildings) that may be considered a scenic resource. The nearby US 101 and State Route 116 (Lakeville Highway) are not designated scenic highways within the City of Petaluma. Therefore, the project would have no impact on scenic resources, including those within a designated State Scenic Highway.

The proposed project would change the project site from an underdeveloped/vacant condition to a high density mixed-use urban development (residential and commercial) consistent with the City's CPSP and General Plan. As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no additional impacts to aesthetic and visual resources beyond those analyzed in the CPSP EIR and General Plan EIR. Furthermore, the project is subject to SPAR in accordance with CPSP mitigation measure 9-1, which requires SPAR review for Specific Plan-facilitated developed. Thus, impacts to aesthetic and visual resources remain at less than significant levels.

4.2. AGRICULTURAL AND FORESTRY RESOURCES

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; and California Department of Conservation Farmland Mapping and Monitoring Program.

The CPSP EIR determined, through the preparation of an Initial Study for the Specific Plan, that implementation of the CPSP would not result in any significant impacts to agricultural land because the area is urbanized and lacks agricultural lands.

The General Plan EIR concluded that with policies set forth in the General Plan, impacts to agricultural resources would be less than significant. General Plan policies 2-P-1 and 2-P-2 promote infill development within the City's UGB.

The project site is underdeveloped/vacant and consists of paved, gravel, and ruderal vegetated areas. The site is routinely mowed for weed abatement purposes and contains a single tree towards the Weller Street/E Washington Street intersection. The project site does not contain farmland or forest land pursuant to Section 12220(g) of the Public Resources Code. As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no additional impacts to agricultural and forestry resources beyond those analyzed in the CPSP EIR and General Plan EIR.

4.3. AIR QUALITY

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Exposure of sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines May 2017; and Construction Community Risk Assessment and GHG Analysis, prepared by Illingworth & Rodkin, March 25, 2019.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant construction-related air quality impacts. The CPSP EIR identifies mitigation measure 11-1 which specifies that all new development within the CPSP implement dust control measures during all construction phases.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant increases in long-term regional air quality emissions from future traffic increases. The CPSP EIR identifies mitigation measure 11-2 which specifies that all new development within the CPSP apply emission control strategies, such as sidewalk improvements, bicycle parking, and implementation of a Transportation Systems Management (TSM) program. However, as determined in the CPSP EIR, even with the implementation of the policies in the Specific Plan, long-term air quality impacts were considered significant and unavoidable.

The General Plan EIR concluded that with policies set forth in the General Plan construction-related air quality impacts would be less than significant. Specifically, General Plan Policy 4-P-12 contains requirements and measures to reduce emissions during construction and demolition phases.

The General Plan EIR determined that significant air quality impacts would result from General Plan buildout population levels that could conflict with the Bay Area 2005 Ozone Strategy. General Plan Policies 4-P-8, 4-P-11, and 5-P-13 strive to reduce emissions from stationary point sources and reduce peak-period trip generation. However, as determined in the General Plan EIR, even with the implementation of the policies in the General Plan, long-term air quality impacts were considered significant and unavoidable.

Consistency with Clean Air Plan

The BAAQMD adopted the 2017 Bay Area Clean Air Plan (CAP) on April 19, 2017 to comply with state air quality planning requirements set forth in the California Health & Safety Code. The most recent BAAQMD CEQA Air Quality Guidelines were updated in May 2017. At present (2019), the San Francisco Bay Area Air Basin (SFBAAB) is designated as non-attainment for both the one-hour and eight-hour state and national ozone standards; 0.09 parts per million (ppm) and 0.070 ppm, respectively. The SFBAAB is also in non-attainment for the PM₁₀ and PM_{2.5} state standards, which require an annual arithmetic mean (AAM) of less than 20 µg/m³ for PM₁₀ and less than 12 µg/m³ for PM_{2.5}. In addition, the SFBAAB is designated as non-attainment for the national 24-hour PM_{2.5} standard. All other national ambient air quality standards within the SFBAAB are in attainment.⁶

The air quality analyses in the General Plan and CPSP EIRs relied on prior BAAQMD screening criteria and clean air plans. Since preparation of the previous EIRs, the BAAQMD has adopted a 2017 Bay Area CAP. As such, the proposed project has been reviewed to determine consistency with the 2017 Bay Area CAP. The BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP. In general, a project is considered consistent if a) the project supports the primary goals of the CAP, b) includes control measures and c) does not interfere with implementation of the CAP measures.

The Haystack Mixed-Use project would have a less than significant impact related to a potential conflict with the CAP since, a) the project supports the goals of the CAP in that it would develop high density land uses in close proximity to public transit and within an identified priority development area; b) includes control measures to protect air quality during construction and at operation; and c) the project would generate air quality emissions below the BAAQMD criteria pollutant thresholds (see Haystack Mixed-Use Air Quality Analysis below). Therefore, the project will have less than significant impact to air quality due to a conflict with the regional air quality plan.

HAYSTACK MIXED-USE PROJECT AIR QUALITY ANALYSIS

⁶ 2017 Bay Area Clean Air Plan, prepared by the Bay Area Air Quality Management District, April 2017.

Air quality emissions associated with the proposed project would result from short-term construction activities and ongoing operation. BAAQMD Guidelines, as adopted in 2010 and updated May 2017 include "screening criteria" that provide a conservative estimate above which a project would be considered to have a potentially significant impact to air quality. Projects that are below the screening criteria threshold are reasonably expected to result in less than significant impacts to air quality since pollutant emissions would be minimal.

The screening level thresholds for single-family dwellings are shown in Table 1: BAAQMD Screening Criteria below.

TABLE 1: BAAQMD SCREENING CRITERIA

Land Use Type	Operational	Construction
Apartment, Mid-Rise	494 du (NOX)	240 du (ROG)
Strip Mall	99 ksf (NOX)	277 ksf (ROG)

Source: Table 3-1, pg. 3-2 Bay Area Air Quality Management District 2010 CEQA Guidelines, May 2017.
 Note: du = dwelling unit; ksf = 1,000 square feet; NOX = oxides of nitrogen; ROG = reactive organic gases

Construction

The proposed project would generate temporary air quality emissions associated with site preparation, ground disturbance, the operation of heavy-duty construction equipment, workers traveling to the site, and the delivery of materials to the project site. These activities would create temporary emissions of fugitive dust from site grading, and the release of toxic air contaminants, particulate matter, and ozone precursors (ROG and NOx) from combustion of fuel and the operation of heavy-duty construction equipment.

Table 1: BAAQMD Screening Criteria above shows that the screening level to determine significant air quality impacts from the construction of mid-rise apartments is 240 dwelling units and from the construction of a strip mall is 277,000 square feet. The proposed project would include the development of 178 residential units, and approximately 24,855 square feet of retail space. As such, the proposed project is below the screening thresholds for criteria pollutants from construction activities.

The BAAQMD CEQA Air Quality Guidelines consider contributions of fugitive dust to be less-than-significant if best management practices (BMPs) are implemented. The proposed project is subject to CPSP mitigation measure 11-1, which specifies that all new development within the CPSP implement dust control measures during all construction phases. CPSP mitigation measure 11-1 has been adjusted to include the most current BAAQMD-recommended BMPs, including a variety of dust control measures to be implemented during construction activities, such as watering the project site, covering haul loads, limiting idling time, and temporarily halting construction when winds are greater than 15 miles per hour. Implementation of CPSP mitigation measure 11-1, as modified, will ensure that construction-related air quality impacts are less than significant. Furthermore, the proposed Haystack Mixed-Use Project will not increase the severity of air quality emissions generated during construction relative to what was analyzed in the CPSP and the General Plan EIRs.

Operation

The proposed project will result in both stationary and mobile sources of emissions at operation. Although there are no new stationary sources emitters proposed, the project will result in area source emissions from use of natural gas, consumer products such as solvents, cleaners, and paints, and landscaping maintenance equipment. A majority of the operational emissions will result from the operation of vehicles by residents, visitor and employees, patrons, and delivery services traveling to and from the project site.

Table 1: BAAQMD Screening Criteria above shows that the operational project-level screening size for mid-rise apartments is 494 dwelling units and 99,000 square feet for strip malls. The proposed project would include the development of 178 residential units and approximately 24,855 square feet of retail space. As such, criteria pollutants generated during operation will be well below BAAQMD thresholds and impacts to air quality as a

result of the project will be less than significant at operation. Therefore, the proposed Haystack Mixed-Use Project will not increase air quality emissions at operation relative to what was analyzed in the CPSP and the General Plan EIRs.

Sensitive Receptors

The project site is surrounded by existing urban uses including residential, retail, and public transit (the downtown SMART transit station and the Copeland Transit Mall). The closest sensitive receptors to the project site are residences in apartments to the northwest and southwest of the project site. During construction, onsite activities will result in the exhaust emissions from vehicles and heavy-duty equipment as well as the generation of fugitive dust from grading and ground disturbing activities. The primary community risk impact associated with construction emissions are cancer risk and exposure to PM_{2.5}.

Illingworth & Rodkin prepared a Construction Community Risk Assessment for the proposed project (**Appendix B**) that evaluated the potential health effects of existing sensitive receptors (residences to the west and east), from construction emissions. Results of the assessment indicate the following:

- The maximum increased residential cancer risks without construction emissions control is projected to be 1.8 in one million for an infant exposure and less than 1.8 in one million for an adult exposure. The maximum residential excess cancer risk would be well below the BAAQMD significance threshold of 10.0 in one million.
- The maximum modeled annual PM_{2.5} concentration, which is based on combined exhaust and fugitive dust emissions, is projected to be 0.02 µg/m³. The maximum annual PM_{2.5} concentration would not exceed the BAAQMD significance threshold of greater than 0.3 µg/m³.
- The maximum modeled annual residential diesel particulate matter (DPM) concentration (i.e., from construction exhaust) is projected to be 0.01, which is lower than the BAAQMD significance criterion of a Hazard Index greater than 1.0 and would not exceed the significance threshold.

The Haystack Mixed-Use Project would have a less-than-significant impact with respect to community risk caused by project construction activities, since maximum cancer risk, maximum annual PM_{2.5} concentration, and the hazard index are below the single-source thresholds of 10.0 per million for cancer risk, 0.3 µg/m³ for annual PM_{2.5} concentration, and 1.0 for the hazard index.

Cumulative community risk impacts were addressed through evaluation of sources located within 1,000 feet of the project site. Within this area, there is E. Washington Street, D Street, Lakeville Street, and two stationary sources of air pollutant or toxic air contaminant (TAC) emissions that affect the area. None of these sources are substantial enough such that the cumulative cancer risk would exceed 100 chances per million or the annual PM_{2.5} concentration would exceed 0.08 µg/m³. Therefore, cumulative community risk impacts from construction of the Haystack Mixed-Use Project would be less than significant.

Conclusion

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to air quality beyond those analyzed in the CPSP EIR and General Plan EIR. Implementation of CPSP mitigation measure 11-1, as modified to reflect the most recent BMPs set forth by BAAQMD, will ensure that construction-related air quality emissions result in less than significant impacts to air quality.

4.4. BIOLOGICAL RESOURCES

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified	Equal or Less Severity of Impact than Previously
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		Significant Impact in GP or CPSP EIR	Identified in GP or CPSP EIR
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (Formerly Fish and Game) or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (formerly Fish and Game) or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; and Biological Resources Assessment, prepared by WRA Environmental Consultants, July 2017, revised February 2018.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant impacts to biological resources from the loss of heritage and/or landmark trees, special-status plant species, and jurisdictional wetlands. The CPSP EIR identifies mitigation measure 15-1, which specifies that all new development along Copeland Street that may impact one or more landmark trees, conduct a tree survey and either establish development setbacks or obtain a tree removal permit. Mitigation measures 15-2 and 15-3 require pre-construction surveys for special-status plant species and consultation with applicable regulatory agencies for disturbance to wetlands. The CPSP EIR determined that with implementation of mitigation measures 15-1 through 15-3, impacts to biological resources would be reduced to less than significant levels.

The General Plan EIR concluded that with policies set forth in the General Plan, impacts to biological resources would be less than significant. General Plan Policies 4-P-1 through 4-P-5 serve to protect and enhance the Petaluma River and its tributaries, conserve wildlife ecosystems and sensitive habitat areas, and protect special-status plant and animal species. Policy 4-P-4 requires that appropriate mitigation measures be imposed on a project-by-project basis to reduce impacts to sensitive habitats and special status species. Policy 4-P-5

requires assessments of biological resources prior to approval of any development in or within 300 feet of ecologically sensitive areas.

A Biological Resources Assessment was prepared by WRA Environmental Consultants on July 2017, and revised February 2018 for the proposed project (**Appendix C**). On February 23, March 17, and April 11, 2017, site visits were conducted to determine: 1) plant communities present within the Project Area, 2) if existing conditions provided suitable habitat for any special-status plant or wildlife species, and 3) if sensitive habitats were present.

The project site contains non-sensitive biological communities, including developed land, paved and graveled areas, and ruderal vegetation. Developed or hardscape areas on the project site occupy 2.5 acres. Ruderal vegetation occupies 1.60 acres. Sensitive biological communities on the Haystack Mixed-Use Project site are limited to two seasonal wetland depressions, which combined total 0.04 acres.

The developed areas of the project site are comprised of buildings, hardscape, landscaped or planted vegetation, and infrastructure. One Raywood ash (*Fraxinus oxycarpa*) (30 inches DBH) is located in the northern portion of the project site. The tree is not a native species, nor is it registered as a heritage or landmark tree according to Implementing Zoning Ordinance Chapter 17 and Register of Heritage and Landmark Trees.

Plant species observed in ruderal vegetated areas within the project area included Italian ryegrass, vetch (*Vicia sp.*), wild barley (*Hordeum leporinum*), bristly ox-tongue (*Helminthotheca echioides*), wild radish, slender wild oat (*Avena barbata*), and fennel (*Foeniculum vulgare*).

There are two depressions on the project site that show indicators of meeting wetlands parameters, including a prevalence of wetland classified plants (*hydrophytic vegetation*) and saturated or inundated soil. Plant species observed in seasonal wetland plant communities present on the project site include Italian ryegrass (FAC), meadow barley (*Hordeum brachanthyrum*, FACW), curly dock (*Rumex crispus*), hyssop loostrife (*Lythrum hyssopifolia*, FACW), and brass buttons (*Cotula coronopifolia*, OBL). It is likely that these depressions are the result of past earth movement and soil remediation activities. These potentially jurisdictional seasonal wetlands comprise approximately 0.04 acre.

The Project proposes to fill the two potentially jurisdictional seasonal wetlands to accommodate development. The Project is subject to CPSP mitigation measure 15-3 as modified, which requires that mitigation protocols established by the California Department of Fish and Wildlife (CDFW), the Regional Water Quality Control Board (RWQCB) and or the U.S. Army Corps of Engineers (ACOE), as appropriate, are implemented. The proposed project is also subject to General Plan Policy 4-P-2 and 4-P-3, which require preparation of a Biological Resources Assessment and protection of sensitive areas through avoidance, on-site mitigation, or off-site mitigation. In accordance with CPSP mitigation measure 15-3 and protocols established by the regulatory agency, fill to the 0.04-acre season wetlands onsite will be offset through the purchase of compensatory mitigation credits at a 1:1 ratio or as otherwise directed by the regulatory agency.

The Project site is unlikely to support any of the special-status plant species documented in the vicinity primarily due to a lack of suitable habitat. No special-status plant species were observed onsite during the site visits.

Because of frequent human disturbance and presence, the site offers limited value for most special-status wildlife species that may occur in the vicinity. With development and roads surrounding the Project site, the site is relatively inaccessible to many species, and eliminates the possibility of the site functioning as a movement corridor. The ruderal vegetation that occupies a majority of the Project site offers little to no cover and meets few habitat requirements for most special status species. No special-status wildlife species were observed.

The special-status wildlife species that have the potential to occur on the project site include: Pallid Bat (*Antrozous pallidus*) and White-tailed kite (*Elanus leucurus*). Although no signs of Pallid Bats were observed onsite, the existing warehouse proposed to be demolished by the Project represents potentially suitable roosting habitat. While no sign of White-tailed kites was observed, this species could potentially forage in the ruderal

vegetation onsite. Common bird species protected by the Migratory Bird Treaty Act (MBTA) may also occur onsite or in the project vicinity.

The proposed project is subject to General Plan policy 4-P-3, which states that appropriate mitigation measures to reduce impacts to sensitive habitats and special status species shall be imposed on a project-by-project basis according to Petaluma's environmental review process. As conditions of approval, the Project is required to implement the avoidance measures identified in the Biological Resources Assessment related to special-status species (bats and raptors) and birds protected by the MBTA.

As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no additional impacts to biological resources beyond those analyzed in the CPSP EIR and General Plan EIR. Implementation of CPSP mitigation measure 15-3 and compliance with General Plan Policy 4-P-3, will ensure that impacts to biological resources remain less than significant. Furthermore, as a condition of approval, the City will require that the mitigation measures identified in the Biological Resources Assessment related to the fill of potentially jurisdictional seasonal wetlands (0.04 acre), special-status species (bats and raptors) and birds protected by the MBTA, be incorporated into construction contract specifications.

4.5. CULTURAL RESOURCES

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The CPSP EIR determined that implementation of the Specific Plan may result in potentially significant impacts to existing unrecorded sensitive archaeological resources from future development and redevelopment activities. The CPSP EIR identifies mitigation measure 7-1 which specifies that prior to all new development within the CPSP, it be determined whether the particular project site is located in a sensitive area, and if so, a preliminary field inspection should be conducted for archaeological resources. Mitigation measure 7-1 also stipulates actions to be taken if a significant archaeological resource is identified through the field inspection process, or in the case of accidental discovery of archaeological resources, or human remains during ground-disturbing activities.

The CPSP EIR determined that implementation of the Specific Plan could result in potentially significant impacts related to the destruction or degradation of historic resources. The CPSP EIR identifies mitigation measure 7-2 which specifies that prior to all new development within the CPSP, it be determined whether one or more of the identified potentially significant historic resources would be impacted. The CPSP EIR determined that the demolition or material impairment of an HRS-identified historic resource would be considered a significant and unavoidable impact.

The General Plan EIR concluded that with the policies set forth in the General Plan, impacts to historic and undiscovered archaeological resources would be less than significant. General Plan Policy 3-P-5 provides for

the protection of historic resources; it requires that future development plans are complimentary to the historic preservation goals and policies set forth in the General Plan.

The Haystack Mixed-Use project site is not located within any historic districts identified in the CPSP or General Plan, nor does it contain any historic resources within the project boundaries. The existing warehouse building on the project site, proposed to be demolished, and the adjacent warehouse located on APN -008 (not part of the project) are not identified as eligible or potentially eligible historic resource in the CPSP EIR. Pursuant to Sanborn Maps and County Assessor's data, the off-site/southern warehouse dates to circa 1949 and the on-site/northern warehouse dates to circa 1953 and neither are associated with the historic railway operations (which ceased operations in the late 1940s). There are no records indicating that either of these two warehouses, one of which will be demolished under the proposed project, meet any of the four criterion used to assess historic significance.⁷ Furthermore, the historic building inventory conducted as part of the CPSP did not identify either of these buildings as potential individual resources or contributors to potential historic districts.

The nearest identified historic resource is the Burns-Farrell House (a 1903 Queen Anne) located at 222 Weller Street, which was relocated to its current location from 500 E Washington Street and listed as City Historic Landmark No. 3. The landmark building at 222 Weller Street is located a sufficient distance and across Weller Street from the proposed Haystack Mixed-Use Project site such that no direct or indirect impacts would occur. Also because of the sufficient distance and separation by Weller Street, no direct or indirect impacts from construction of the Project are anticipated to either the P&SR Ticket Office & Depot relocated to 226 Weller Street (from the project site along East Washington Street in the 1990's) which Dan Peterson's 1977 survey identified as a building which appears to meet the criteria of the National Register at a local, state, or National level, or to the circa 1938 warehouse structure addressed as 224 Weller Street (near D Street).

As described in Section 2.1 Environmental Setting, the site has been used for industrial and commercial purposes since at least 1885. In 1960, the site was leased to Bar Ale Inc. installed three underground storage tanks for the storage of fuels, which were later removed, and the site remediated. Based on the project site's past disturbance, it is unlikely that ground-disturbing activities on the project site would result in the discovery of archaeological resources or human remains. Nonetheless, the proposed project is subject to CPSP mitigation measure 7-1, which requires that in the event that subsurface cultural resources or human remains are found during construction, work in the immediate vicinity shall be stopped and a qualified archaeologist retained to evaluate the find and follow the procedures identified in CPSP measure 7-1. The proposed project is also subject to General Plan Policy 3-P-1K, which requires the preparation of a resource mitigation plan and monitoring program by a qualified archaeologist in the event that archaeological remains are discovered.

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to historic or archaeological resources beyond those analyzed in the CPSP EIR and General Plan EIR. Implementation of CPSP mitigation measure 7-1 and compliance with General Plan Policy 3-P-1K, will ensure that potential impacts to historic and archaeological resources remain less than significant. The proposed project would not conflict with any CPSP or General Plan policies that provide for the protection and preservation of historic and archeological resources. As such, the project will not result in any new or more severe impacts to cultural resources beyond what has been identified in the CPSP and General Plan EIRs.

4.6. ENERGY

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
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⁷ Lilly Bianco, former Contract Historic Preservation Specialists for the City of Petaluma, reviewed historic aerials, Sanborn maps, and assessed eligibility, August 2017.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The CPSP and General Plan contain a number of policies which directly and indirectly serve to reduce energy consumption. Policies aimed at reducing GHG emissions and traffic congestion within the city, also help reduce energy consumption. Policies that promote water conservation, solid waste reduction, and green building practices also encourage energy efficiency by reducing energy consumption. The General Plan EIR included an analysis of wasteful, inefficient or unnecessary consumption of energy and determined that buildout of the General Plan would have a less than significant impact on energy resources.

Energy resources include fuels such as natural gas, renewable resources such as solar, and production of electricity. Electricity production requires the conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. Energy production and energy use both result in depletion of non-renewable energy resources (e.g. oil, coal, natural gas, etc.) and emission of pollutants. Sustainable usage of energy resources can be fostered through conservation of non-renewable energy resources and development of alternative or renewable energy resources (e.g. wind, solar, geothermal, etc.). Energy consumption is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one pound of water by one degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (one therm) of natural gas, and a kilowatt hour of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

Activities in the City of Petaluma use electricity, natural gas, and petroleum-based fuels as primary energy resources. Energy use provides lighting, heating and cooling for indoor environments, and powers transportation systems. In 2010, the City of Petaluma consumed, on average, 6,000 kilowatt hours of electricity per household, per year. This rate is significantly lower than the state and county average energy consumption rate per household per year of 9,320 and 7,042 kilowatt hours, respectively⁸.

The General Plan EIR determined that if compliance with the California Energy Commission's (CEC) Title 24, and General Plan policies aimed at energy reduction are achieved, the General Plan would not result in wasteful, inefficient, or unnecessary consumption of energy by residential, commercial, industrial, or public uses. Additionally, the General Plan EIR determined that to mitigate substantial increases in transportation energy consumption caused by the General Plan, high-density residential, mixed use, and neighborhood commercial land use patterns should be encouraged in core areas, thereby reducing the length and number of vehicle trips.

The proposed Haystack Mixed-Use Project will result in the efficient use of energy by introducing higher density housing proximate to the downtown SMART station, which provides for safe and convenient public transit, meeting or exceeding Cal Green standards for energy efficiency in building design and introducing roof-mounted photo-voltaic arrays. As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no additional impacts to energy consumption beyond those analyzed in the CPSP EIR and General Plan EIR.

4.7. GEOLOGY AND SOILS

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified	Equal or Less Severity of Impact than Previously
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⁸ Sonoma County Regional Climate Action Plan, Sonoma County Regional Climate Protection Authority, 2016.

	Significant Impact in GP or CPSP EIR		Identified in GP or CPSP EIR
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong Seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; Geotechnical Exploration, prepared by ENGEO, March 8, 2006; Letter from ENGEO to Pacifica Companies, Updated Seismic Criteria and Foundation Recommendations, August 22, 2008; Letter from ENGEO to Pacifica Companies, Geotechnical Engineering Consultation, August 3, 2012; Letter from ENGEO to Pacifica Companies, Updated Geotechnical Engineering Recommendations, March 20, 2014; Letter from ENGEO to Pacifica Companies regarding drilled displacement pressure grouted columns, dated February 2, 2017.

The CPSP EIR determined that implementation of the Specific Plan may result in potentially significant impacts related to ground settlement, earthquake-induced ground failure, riverbank erosion, and expansive soils. The CPSP EIR identifies mitigation measures 13-1 through 13-4 which require the preparation of geologic reports to describe potential hazards and identify engineering specifications necessary to reduce all ground failure risks to an acceptable level.

The General Plan EIR concluded that with policies set forth in the General Plan, potentially significant impacts related to soil erosion or the exposure of people or structures to strong seismic ground shaking or seismic-

related ground failure would be less than significant. General Plan Policy 10-P-1 requires the preparation of geotechnical studies prior to development approval in geologic and/or seismic hazard areas.

In compliance with CPSP mitigation measures 13-1 through 13-4 and General Plan Policy 10-P-1, a Geotechnical Exploration was conducted by ENGEO in March 2006 for the project site. ENGEO found that the main geotechnical concern on the project site was the presence of potentially liquefiable soils and soft compressible soils. ENGEO determined that development at the Haystack Mixed-Use was feasible from a geotechnical perspective provided that the recommendations included in the report were incorporated into the design and construction of the project.

ENGEO provided further geotechnical engineering consultation services in 2008, 2012 and 2014. ENGEO's most recent geotechnical engineering recommendations were provided in February 2017 (see **Appendix D**). The project site is underlain by local deposits of soft compressible soils and potentially liquefiable sands within the upper 15 to 25 feet below the existing ground surface. ENGEO provided preliminary recommendations for ground improvement using drilled displacement pressure grouted columns (DDC) for support of the planned structures on the project site. ENGEO concluded that DDC construction would mitigate the site's compressible soils and provide adequate soil stabilization to support the proposed structures on shallow foundations. For a description of the DDC construction technique, see Section 2.3 Project Description.)

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to geology and soils beyond those analyzed in the CPSP EIR and General Plan EIR. The proposed Haystack Mixed-Use project has implemented CPSP EIR mitigation measures 13-1 to 13-4 through the preparation of geologic reports that describe potential hazards and identify engineering specifications necessary to reduce all ground failure risks to an acceptable level. As a condition of approval, the City will require that the recommendations in the ENGEO letter dated February 2017 for the subject property be incorporated into construction contract specifications.

4.8. GREENHOUSE GAS EMISSIONS

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; BAAQMD 2017 Bay Area Clean Air Plan; BAAQMD CEQA Guidelines May 2017; Construction Community Risk Assessment and GHG Analysis, prepared by Illingworth & Rodkin, March 25, 2019.

The CPSP and General Plan contain a number of policies which directly and indirectly serve to reduce greenhouse gas (GHG) emissions within the City of Petaluma. For example, policies aimed at improving air quality and traffic congestion within the city, would also help reduce the emissions of greenhouse gases. Policies that promote water conservation, energy conservation, and green building practices also reduce greenhouse gas emissions.

The City of Petaluma has taken steps to address GHG emissions within its city limits. The City adopted Resolutions 2002-117 and 2005-118, which call for the City's participation in the Cities for Climate Project effort and established GHG emission reduction targets of 25% below 1990 level by 2015 for community emissions and 20% below 2000 levels by 2010 for municipal operations. In addition, in 2016 the Climate Action Plan 2020

and Beyond (CA2020) was prepared by the Sonoma County Regional Climate Protection Authority on behalf of Sonoma County municipalities including the City of Petaluma and is an advisory document to assist in achieving GHG emission reductions. Additionally, the General Plan calls for the City to work with regional and other agencies to implement the Sonoma Marin Area Rail Transit (SMART) Plan. The downtown Petaluma SMART Station is now operational and provides light rail commuter service. The light rail effort is estimated to take more than 1.4 million car trips off Highway 101 annually and reduce greenhouse gases, which contribute to global warming, by at least 124,000 pounds per day.

As mentioned in the Section 3.3 Air Quality, the most recent BAAQMD CEQA Air Quality Guidelines were updated in May 2017, and aid in determining a project's potential to result in a significant contribution to local/regional air quality. The BAAQMD recommends a GHG threshold of 1,100 metric tons of carbon dioxide equivalence (MT CO₂e) per year or 4.6 MT CO₂e per capita. Projects that generate GHG emission below this threshold are considered to have a less than significant impact to GHG contributions. Although BAAQMD has not published a quantified GHG thresholds for 2030, this assessment uses a "Substantial Progress" efficiency metric of 2.8 MT CO₂e per capita and a bright line thresholds of 660 MT CO₂e per year based on the GHG reduction goals of Executive Order (EO) B-30-15.

Construction

During construction activities, the proposed project would generate GHG emissions from the operation of heavy-duty construction equipment, workers traveling to the site, and material delivery and hauling. Construction GHG emissions are short-term and will cease once construction is complete. It is projected that the Haystack Mixed-Use Project will result in the emission of 347 MT CO₂e over the entire construction period.

The BAAQMD has not established thresholds of significance for GHG emissions resulting from construction activities. Rather, BAAQMD encourages the incorporation of best management practices to reduce GHG emissions during construction. As stated under the Section 4.3 Air Quality, CPSP Mitigation Measures 11-1, as modified to reflect the most up to date BAAQMD recommendations shall be implemented. As such, GHG emissions from construction activities will be minimized and the Project will not result in any new or more severe environmental impacts due to GHG emissions relative to what was analyzed in the CPSP and General Plan EIRs.

Operation

The proposed Haystack Mixed-Use Project will result in GHG emissions at operation. Operational GHG emissions are ongoing for the life of the project and result from on-site lighting, heating, and cooling of the buildings and structures, the treatment and transport of water and wastewater, solid waste disposal, maintenance activities, and vehicles traveling to and from the project.

Illingworth & Rodkin prepared a Construction Community Health Assessment and GHG Analysis for the proposed project and estimated GHG emissions at operation (**Appendix B**). The California Emissions Estimator Model, CalEEMod version 2016.3.2, was used to predict GHG emissions assuming full build-out of the proposed Haystack Mixed-Use Project. Table 2: Annual GHG Emissions (CO₂e) in Metric Tons shows the GHG emissions generated at operation of the Project.

TABLE 2: ANNUAL GHG EMISSIONS (CO ₂ e) IN METRIC TONS		
Source Category	2020	2030
Area	9	9
Energy Consumption	340	338
Mobile	736	561
Solid Waste Generation	53	53
Water Usage	26	21

Total	1,164	982
Significance Thresholds per year	1,100	660
Service Population	2.4	2.0
Significance Thresholds per capita	4.6	2.8
Exceeds both BAAQMD Thresholds?	No	No

Source: Table 3 Construction Community Health Assessment and GHG Analysis, prepared by Illingworth & Rodkin, March 25, 2019.

Note: Per Capita Emissions based on 484 persons using the 2.72 person per household 2018 estimate for Petaluma.

As shown in Table 2, the computed GHG operational emissions exceeds the "Bright Line" significance threshold of 1,100 MT CO₂e per year for 2020 and 982 MT CO₂e per year for 2030. However, the project falls below the per capita significance thresholds based on the service population for both 2020 and 2030. The project's per capita GHG emission projections are in line with State goals to achieve a 40-percent reduction in GHG emissions by 2030, compared to 1990 levels. Therefore, operational GHG emissions from the proposed Haystack Mixed-Use Project would have less than significant impacts. The proposed project is within the scope of development projected under the CPSP and General Plan. Development of the proposed Haystack Mixed-Use project would not result in new or more severe impacts related to GHG emissions relative to the CPSP and General Plan EIRs.

4.9. HAZARDS/HAZARDOUS MATERIALS

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- | | | | |
|---|--------------------------|--------------------------|-------------------------------------|
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; and Phase I and Phase II Environmental Site Assessment (ESA), prepared by ENVIRON, 2005; Phase I ESA, prepared by ECON, August 12, 2012; Phase II ESA, prepared by ECON, April 30, 2013; Technical Memorandum, prepared by West Yost Associates, August 22, 2018; and 2019 Environmental Screening Levels prepared by San Francisco Bay Regional Water Quality Control Board.

The CPSP EIR determined that implementation of the Specific Plan would result in less than significant impacts related to hazards and hazardous materials through compliance with all applicable state- and city-mandated site assessment remediation procedures, including the removal and disposal requirements for soil, surface water, and/or groundwater contamination. Hazardous material or waste were commonly used in past industrial, agricultural, and business uses within the Specific Plan Area. The CPSP EIR identified the primary sources of hazardous materials within the Specific Plan including asbestos and polychlorinated biphenyls (PCBs), in older buildings, and underground storage tanks (UST), above ground storage tanks (AST), waste storage and handling activities, and non-point sources. The CPSP EIR concluded that health and safety impacts associated with potential hazardous materials would be less than significant with proper identification and removal requirements implemented by the City during redevelopment activities.

The General Plan EIR concluded that with policies set forth in the General Plan, impacts related to hazards and hazardous materials would be less than significant. General Plan policy 10-P-4 requires compliance with the Sonoma County's Integrated Waste Management Plan (CoIWMP) as well as the Consolidated Unified Protection Agency (CUPA) program elements. Policy 10-P-4 further requires the city to prepare and maintain an inventory of environmentally contaminated sites and work directly with landowners in the cleanup of these sites.

The Haystack Mixed-Use Project site was historically used for commercial and industrial purposes since at least 1885 and was subject to past contamination associated with leaking fuel underground storage tanks. The site has been subject to multiple investigations to identify contaminants and has undergone remediation and cleanup to the satisfaction of the Regional Water Quality Control Board (RWQCB).⁹

The following provides a summary of the past Environmental Site Assessments conducted for the project site and their findings.

ENVIRON conducted a Phase I and Phase II Environmental Site Assessment (ESA) in 2005 to evaluate the potential to encounter hazardous substances on the project site. A Phase I ESA was conducted for the project site by ECON on August 12, 2012 and made the following findings:

- **Residual Petroleum Hydrocarbons in Soil:** Three separate diesel tanks ranging from 1,000 to 12,000 gallons have been removed from the site. Furnaces and an above ground fuel tank used in previous functions of the site may also have adversely affected the soil. Residual concentration of petroleum hydrocarbons exist in the soil as a result of leaks from these sources.
- **Metals in Soil:** Concentrations of antimony, arsenic, cadmium, lead, vanadium, and mercury exceeding designated Environmental Screening Levels (ESLs) for residential uses were detected in shallow soil at the Site in 2005. Concentration of the arsenic and vanadium were found to be consistent with soil data collected from other environmental site assessments conducted in the vicinity of the site, indicating that these concentrations are representative of background or natural soil conditions.

⁹ Case Closure Letter issued by the RWQCB, March 1, 2010. San Francisco Bay Regional Water Quality Control Board (RWQCB), Case #: 49-0010, and Sonoma County Local Oversight Program (LOP) Case #: 00002713.

- **Methane in Soil Gas:** Methane was detected in 4 of 12 soil gas samples collected in 2005. The concentrations were greatest in the northern portion of the Site and in the area around the underground storage tank (UST) excavations. There are no ESLs for methane, but it is classified as a potential explosion and health hazard. It is likely that methane occurs naturally at the site due to decomposing organic matter from when the site was part of an extensive wetland surrounding the Petaluma River in the past.

The Phase II ESA conducted by ECON dated April 30, 2013 evaluated seventeen exploratory soil and groundwater borings and made the following findings:

- TPHmo concentrations exceeded ESLs for groundwater in five boring sites.
- Lead concentrations exceeded ESL for residential screening at two boring sites.
- Antimony slightly exceeded residential ESL from one boring site.

West Yost Associates (West Yost) reviewed planning and design documents for the proposed project and prepared a Technical Memorandum dated August 22, 2018 that evaluates the concentration of contaminants onsite relative to the ESL and provides recommendations for soil and groundwater management during and after construction of the Haystack Mixed-Use Project (**Appendix E**). West Yost's findings presented below are based on 2016 ESLs established by the RWQCB.

- After comparing the 2016 ESL values to the site analytical data (2013), the only constituents that exceed ESLs are arsenic and lead.
- The concentrations of petroleum hydrocarbons, antimony, cadmium, vanadium, and mercury detected at the site are all below the 2016 ESLs.
- Arsenic concentrations range from 1.1 to 33 mg/kg. These concentrations are above the current residential land use ESL of 0.067 mg/kg. However, the arsenic concentrations are consistent with concentrations in native soils throughout the Bay Area and reflect ambient (background) conditions.¹⁰
- Lead is the only remaining constituent of concern for the site. Lead concentrations range from 1.8 to 1,200 mg/kg. Lead was found at concentrations above the current residential ESL of 80 mg/kg in nine out of 62 soil samples.
- Methane gas in onsite soils is not considered a potential environmental hazard. Methane does not have an ESL, but it is classified as an asphyxiant and potential explosion hazard if allowed to accumulate in an enclosed space. The most likely source of methane is decaying vegetation in the soil from marshes that once covered the area. West Yost evaluated the potential methane hazard by researching Petaluma Fire Department records for methane related incidents within former marshlands in other parts of the City. There were no records of fires or explosions in the last ten years caused by methane.

In 2019 the San Francisco Bay RWQCB updated ESLs. West Yost reviewed the 2019 ESLs and confirmed that all conclusions and recommendations set forth in the 2018 Technical Memo remain valid.¹¹

Based on the concentrations of lead in the on-site soil, West Yost recommends that the following be implemented during construction and any future redevelopment of the Haystack Mixed-Use Project:

- Conduct construction work in accordance with CCR Title 8 Section 1532.1, Lead in Construction.

¹⁰ The West Yost Technical Memorandum is supported by an evaluation of background concentrations of arsenic in urbanized flatland soils within the Bay Area, completed at San Francisco State University in coordination with RWQCB staff, which established an upper-limit background concentration of 11 milligrams per kilogram (mg/kg).

¹¹ Personal communication with Pete Dellavalle Principal Geologist, West Yost Associates, May 15, 2019.

- Use appropriate site control measures such as wet methods to minimize airborne dust generation.
- Excavate soil from the tree wells and bio-retention areas to a depth of not less than 2 feet below final grade. Replace the excavated materials with clean imported fill.
- Place any excess soil re-used onsite under buildings.
- Characterize soil export by sampling and analysis for proper disposal.
- Prepare a Soil and Groundwater Management Plan to inform and guide construction and post-development construction and maintenance that involves exposure to soil and or groundwater.

As a condition of approval, the City will require that the recommendations in the West Yost Technical Memorandum for the subject property be incorporated into construction specifications and implemented. Furthermore, a condition of approval requires an assessment of asbestos and PCB for the warehouse building prior to demolition and if asbestos containing materials are present prepare and implement an Asbestos Abatement Plan. Therefore, the proposed Haystack Mixed-Use Project would not result in any additional impacts related to hazards and hazardous materials beyond those analyzed in the CPSP EIR and General Plan EIR.

4.10. HYDROLOGY AND WATER QUALITY

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern on the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

☐☐☒

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; and Stormwater Mitigation Report, prepared by Steven J. Lafranchi & Associates, January 2016.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant impacts related to storm drainage, flood control and water quality. The CPSP EIR identifies mitigation measure 12-1 which requires individual applicants to comply with applicable state, regional and City water quality provisions as follows:

- a) File of Notice of Intent with the RWQCB to comply with the Statewide General Permit for Construction Activities.
- b) Prepare and implement a project-specific Stormwater Pollution Prevention Plan (including an erosion control plan) if grading is involved.
- c) Implement a monitoring, inspection, and documentation program to assure the effectiveness of control measures.
- d) Obtain or comply with existing General Stormwater Discharge Permit(s) for Industrial Activities, where applicable, and
- e) Comply with the NPDES Phase II Non-Point Discharge Program.

The CPSP EIR concluded that with implementation of mitigation measure 12-1, impacts related to hydrology and water quality would be reduced to less than significant levels.

The General Plan EIR concluded that with policies set forth in the General Plan and mitigation measures identified in the EIR, impacts related to hydrology and water quality would be less than significant. General Plan policies 8-P-37 require that all development activities are constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System (NPDES) permit requirements. Policies 8-P-20, 8-P-28 through 8-P-32, and mitigation measure 3.6(a) relate to the control of new impervious surfaces to: ensure that groundwater recharge areas are protected; minimize the alteration of existing drainage patterns; and reduce the exposure of people or structures to the risk of flooding hazards. Policies 8-P-33 through 8-P-36 and mitigation measure 3.6(b) aim to minimize impacts to the existing storm drain system capacity.

The mandatory requirements of the NPDES General Permit apply to the proposed project's construction and post-construction stormwater discharges. Prior to construction, the project applicant is required to file for coverage under the State Water Resources Control Board (SWRCB), Order No. 99-08-DWQ, NPDES General Permit No. CAS000002 for Discharges of Storm Water Runoff Associated with Construction Activity (General Permit). Petaluma is also covered under the Phase II Small MS4 general permit dated July 1, 2014, Order # 2013-001 DWQ for post construction water regulations.

Mandatory requirements cover construction activities including, but not limited to, clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement of impervious surfaces (e.g., asphalt). Compliance is initiated through submittal of a Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) and carried out through a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP contains a site map, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must also identify Best Management Practices (BMPs) to protect storm water runoff.

The NPDES General Permit also includes performance standards for post-construction that are consistent with State Water Board Resolution No. 2005-0006, "Resolution Adopting the Concept of Sustainability as a Core Value for State Water Board Programs and Directing Its Incorporation," and 2008-0030, "Requiring Sustainable

Water Resources Management." Standards require all construction sites to match pre-project hydrology to ensure that the physical and biological integrity of aquatic ecosystems are sustained. This "runoff reduction" approach is analogous in principle to Low Impact Development (LID) and serves to protect related watersheds and water bodies from both hydrologic-based and pollution impacts associated with post-construction conditions.

Currently, there is no stormwater infrastructure onsite and runoff sheet flows to surrounding streets and towards the Petaluma River. The preliminary stormwater mitigation plan for the proposed Haystack Mixed-Use Project is presented in Sheet LID-1 of the Plan Set. It identifies pervious and impervious surfaces within each drainage management area and the bioretention areas proposed onsite. The project captures and conveys stormwater runoff to new storm drains located within Weller and transverse street that discharge through an existing outfall pipe to the Petaluma River. As proposed the preliminary stormwater mitigation plan provides adequate onsite facilities and control measures to achieve the standards and criteria outlined by the Bay Area Stormwater Management Agencies Association (BASMAA) Post Construction Manual (January 2019). Stormwater will be controlled, and water quality protected by directing runoff from impermeable surfaces such as the roof, hardscaped, and paved areas to existing treatment areas.

A Stormwater Mitigation Report was prepared for the project site by Steven J. Lafranchi & Associates in January 2016 (**Appendix F**). As stated in the report, the project proposes to incorporate several post-development measures to reduce stormwater runoff and remove pollutants prior to reaching the Petaluma River. Post-construction LID measures include interceptor tree planting, bio-retention filtration, and underground storage and dissipation.

As the proposed project is within the scope of development projected under the General Plan and CPSP and is required through conditions of approval to comply with the mandatory requirements of the NPDES General Permit and SWPPP. Thus, there would be no additional impacts to hydrology and water quality beyond those analyzed in the CPSP EIR and General Plan EIR.

4.11. LAND USE AND PLANNING

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The CPSP EIR identified potential land use conflicts with the Petaluma General Plan and sets forth mitigation measure 4-1, which requires that all mitigation measures identified in the CPSP EIR be implemented to avoid or mitigate environmental effects. The CPSP EIR mitigation measure 4-2 provides that through the City's Site Plan and Architectural Review process individual projects would be required to ensure that there is adequate land use separation, view protection, odor control, off-street parking provisions, truck loading and routing provisions, and other common measures to reduce potential land use conflicts. The CPSP EIR concluded that with implementation of mitigation measures 4-1 and 4-2, potential impacts related to land use and planning conflicts would be reduced to less than significant levels.

The General Plan EIR concluded that with policies set forth in the General Plan, land use and planning impacts would be less than significant. General Plan policies 2-P-1 and 2-P-2 promote a range of land uses to serve

the community needs within the UGB and promote infill development. Policies 2-P-14 (promote development and intensification), 2-P-16 (enhance downtown linkages), 2-P-20 (allow greater intensity) support redevelopment at higher density in the CPSP and provide for connectivity to the downtown core. The proposed Haystack Mixed-Use Project is consistent with the General Plan policies adopted for the purposes of avoiding or mitigating an environmental effect.

The Haystack Mixed-Use Project site has a General Plan land use designation of mixed-use with densities and FARs in accordance with the CPSP (**Figure 2: Vicinity Map**) and is zoned (T-5) Urban Center, (T-6) Urban Core, and (T6-O) Urban Core-Open per the SmartCode. A small area at the corner of East Washington and Copeland Street is identified as requiring a "Corner Element" (**Figure 3: Land Use Map**

). The surrounding land uses are designated Mixed Use on all sides and include vacant land to the east and south, industry to the north and south, and the River Plaza shopping center, Petaluma River, office and commercial uses to the west.

The proposed Haystack Mixed-Use Project is consistent with the CPSP, CPSP EIR, General Plan, General Plan EIR, and the zoning designation for the site. Development of the proposed project, which would include 178 residential dwelling units, 24,855 square feet of retail/commercial use, public and private open space, a new public transverse street, and an architectural corner element at E. Washington and Copeland Street would not introduce new physical features that would remove mobility or divide an established community. Rather, the Haystack Mixed-Use Project implements the CPSP by developing a vacant parcel, identified as a priority development area, within the central portion of the City of Petaluma. The Project introduces a mix of residential and commercial uses at an intensity planned for by the CPSP and the General Plan. The location of the site provides opportunities for pedestrian access to goods and services in downtown Petaluma, to the existing SMART station providing commuter rail to the region, and to the existing Copeland Transit Center providing public transportation throughout the City of Petaluma and beyond.

As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no additional impacts to potential land use and planning conflict beyond those analyzed in the CPSP EIR and General Plan EIR.

4.12. MINERAL RESOURCES

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The CPSP EIR determined, through the preparation of an Initial Study for the Specific Plan, that implementation of the CPSP would not result in any significant impacts to mineral resources because the area is urbanized and lacks such resources. The General Plan EIR concluded that no mineral resources would be affected from implementation of the General Plan.

As the proposed Haystack Mixed-Use Project is located within the CPSP subarea adjacent to the downtown core in the City of Petaluma development of the project site would have no impacts mineral resources.

4.13. NOISE

Would the project result in:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; Environmental Noise Assessment, prepared by Illingworth and Rodkin, May 21, 2014, updated March 24, 2016; Update of 3.24.16 Noise Analysis for Current Project Design, prepared by Illingworth and Rodkin, August 3, 2017; and personal communication with Fred Svinth May 2019.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant impacts related to the exposure of existing and future residential uses to environmental, roadway, and railroad noise levels above City standards. The CPSP EIR identifies mitigation measure 10-1 which specifies that all new residential development located adjacent to major central area roadways or along the railroad corridor, to prepare an acoustical assessment and require implementation of recommended measures necessary to comply with City of Petaluma and state noise standards. The CPSP EIR determined that with implementation of mitigation measure 10-1, operational noise impacts would be considered less than significant.

The CPSP EIR determined that implementation of the Specific Plan would result in potentially significant construction-related noise impacts to existing residential and other noise-sensitive uses within the CPSP. The CPSP EIR identifies mitigation measure 10-2 which requires that all private and public development adhere to limited construction hours, construction equipment muffling, and idling prohibitions, among others. The CPSP EIR determined that with implementation of mitigation measure 10-2, construction-related noise impacts would be considered less than significant.

The General Plan EIR concluded that even with policies set forth in the General Plan, noise generated from increased local traffic volumes at buildout would be considered significant and unavoidable. General Plan policy 10-P-7 discourages the location of new noise-sensitive uses in areas with projected noise levels greater than 65 dB CNEL and ensure that interior noise levels do not exceed 45 dB CNEL. Policy 10-P-9 requires the control of noise or mitigation measures for any noise-emitting construction equipment or activity; this policy also controls for groundborne noise and vibration.

The General Plan EIR determined that implementation of the General Plan would result in less than significant impacts from new stationary sources and construction-related noise and groundborne vibration. General Plan

policy 10-P-3 provides protection for the siting of new sensitive noise receptors, ensures compatibility with the City's Noise Ordinance, including construction noise controls, and establishes a significance threshold for new development that would increase ambient noise by four or more dBA.

The Haystack Mixed-Use Project site is located in the downtown area of the City of Petaluma. The ambient noise environment is influenced roadway noise from Highway 101 and local arterials, railroad noise and vibration, and industrial and commercial activities in the area.

An Environmental Noise Assessment was prepared in May 21, 2014 and updated on March 24, 2016 by Illingworth and Rodkin. Subsequently, Illingworth & Rodkin reviewed revised Site Plans and issued a 2017 memo concluding that the results and recommendations from the 2016 Noise Analysis remain applicable (**Appendix G**). The following discussion summarizes the result of the Noise Assessment.

Construction Vibration¹²

Construction activities that result in the greatest amount of groundborne vibration typically occur during site preparation, grading, and excavation including foundation work and installation of utilities. The project construction method proposes the use of drilled displacement pressure grouted columns (DDC). Construction techniques that generate the highest vibration levels, such as impact or vibratory pile driving, are not proposed.

For cosmetic damage, the California Department of Transportation uses a vibration limit of 0.5 inches/second, peak particle velocity (in/sec, PPV) for structurally sound buildings and those designed to modern engineering standards. Older residential buildings use a 0.3 in/sec PPV and for historic and very old buildings a conservative PPV of 0.25 is used.

Error! Reference source not found. provides the vibration source levels at 25 feet for various types of construction equipment:

TABLE 3: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (in/sec)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Federal Transit Administration, Office of Planning and Environment, May 2006.

For the proposed project, the only potentially significant source of groundborne vibration would be generated by the short-term construction activities. Vibratory rollers have the potential to generate the greatest vibratory noise levels. The DDC technique would generate vibration levels similar to Caisson drilling, which are less than that of a vibratory roller. As shown in Table 3 above, at a distance of 25 feet, vibration levels have the potential to reach 0.210 in/sec PPV.

¹² Transportation and Construction Vibration Guidance Manual, prepared by Caltrans, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf, accessed August 28, 2018.

Vibration levels are greatest closest to the source and then attenuate with increasing distance. The closest sensitive building potentially susceptible to groundborne vibration is located approximately at 222 Weller Street. The buildings at 222 Weller is the Burns/ Farrell House, which is recognized as City Historic Landmark #3. The Local Landmark is a 1903 Queen Anne Residence that was moved from its original location at 500 Weller Street and fronts onto the Petaluma River. The nearest construction activity occurring in proximity to 222 Weller is installation of a 30-inch stormdrain pipe located approximately 25 feet to the south of the existing building. At a distance of 25 feet, vibration levels from trenching have the potential to reach approximately 0.089 in/sec PPV at the Landmark building.¹³ As such, groundborne vibration levels are calculated to be below the established threshold of 0.25 in/sec PPV for older buildings.

Construction activities would occur at distances of more than 200 feet from other vibration sensitive uses including those containing residents. At a distance of 200 feet, vibration levels have the potential to reach 0.009 in/sec PPV. As such, the groundborne vibration levels at nearby sensitive receptors at distances of 200 feet from the project site would be below a level of 0.5 in/sec PPV, the established threshold for structurally sound modern buildings. Therefore, impacts related to exposure of groundborne vibration resulting from project construction will be less than significant.

Construction Noise

Construction of the project would temporarily increase noise levels in the project area. Construction activities that will contribute to the ambient noise environment include the removal of existing structures and pavement, site excavation and foundation work, trenching and installation of utilities, building erection, paving, and landscaping. The hauling of construction materials and construction workers traveling to and from the project site would contribute to noise levels on project area roadways. Construction noise levels would vary by stage based on the amount of equipment in operation and location where the equipment is operating. Typically, demolition and construction noise is in the range of 80 to 90 dBA at a distance of 50 feet from the source

The nearest noise sensitive uses proximate to the project site are located more than 200 feet from the closest project construction activities. Based on the results of Illingworth and Rodkin's noise measurements along E. Washington Street, the existing daytime noise levels at nearby noise sensitive uses are estimated to be between 63 and 73 dBA. Intervening structures or terrain would result in lower noise levels, especially for activities below grade. The closest residences would be intermittently exposed to noise levels ranging from 68 to 78 dBA throughout the construction period. Construction noise impacts do not generally occur when the noisiest construction activities do not exceed the ambient noise environment by 5 dBA Leq for a period greater than one year. Although the overall construction duration for the proposed Haystack Mixed-Use Project will exceed one year, the noisiest construction activities including demolition, site preparation and grading are expected to be completed in under a year. Additionally, as construction activities move away from the site margins and interior construction work proceeds, noise levels in the project site vicinity will be greatly reduced. Furthermore, implementation of standard construction noise control measures is required as a project condition of approval and implements mitigation measure 10-2 set forth in the CPSP EIR as means to reduce construction related noise to levels below significance. Typically, significant noise impacts do not result when standard construction noise control measures are enforced. Therefore, the proposed Haystack Mixed-Use Project would result in similar construction noise impacts relative to what was analyzed in the CPSP EIR and potential impact to nearby sensitive noise receptors would be less than significant.

Operation

The proposed Haystack Mixed-Use Project would place high density urban uses (residential and commercial) in downtown Petaluma where ambient noise levels are in the range of 68 to 75 dBA Ldn. Based on the City of Petaluma's Land Use Compatibility Standards multi-family residential uses are conditionally acceptable noise environments up to 70 Ldn and normally unacceptable up to 75 Ldn. As such, the project will introduce new residents to an area with elevated noise levels and is subject to design measures and conditions to ensure that

¹³ Groundborne vibration from construction equipment is calculated using the following formula: $PPV_{Equipment} = PPV_{Ref} (25/D)^n$ (in/sec), where PPV_{Ref} is the reference PPV at 25 feet, D is the distance from the equipment to the receiver in feet, and $n=1.1$; $0.89 = 0.089 \text{ in/sec } (25/25)^{1.1} \text{ in/sec}$.

outdoor and indoor noise levels achieve acceptable standards. It is noted that ambient noise levels are a result of existing conditions in downtown Petaluma including commercial and industry, noise from roadways including local arterials and Highway 101, and railway operations including commuter rail and freight along the SMART corridor. Ambient noise levels are not a result of the proposed project, rather they reflect background levels in the Specific Plan area.

Outdoor use areas for the proposed residential uses will be in central common space areas at the second floor level over the central surface parking lots. Based on the proposed site layout, noise levels within these outdoor common areas will be consistent with the outdoor noise exposure allowed under the City's General Plan. Individual residences may also have private outdoor decks or patios. While these areas would not be noise protected, like the interior courtyards, the CPSP states (on page 76) that, "The City recognizes that meeting the outdoor goal on private decks and patios in the Central Petaluma Area is not feasible and does not apply these standards to private decks and patios in multi-family developments."

The residential facades of new buildings adjacent to surrounding roadways may be exposed to an Ldn of between 62 and 76 dBA under future conditions. Typical wood frame construction techniques with standard thermal insulating glass in moderately sized (less than one-third of the exterior wall area) closed windows will reduce exterior noise levels by about 25 dBA. When windows are opened, noise attenuation from exterior to interior is reduced by approximately 15 dBA. Based on the average exterior to interior noise attenuation, interior levels in the apartments on the site perimeter would be between 37 and 51 dBA Ldn with standard windows closed and 47 and 61 dBA Ldn with windows open.

Interior noise levels within new residential units are required by the City of Petaluma to be maintained at or below 45 dBA Ldn. Therefore, all perimeter residential units, adjacent to East Washington, East D, Copeland, or Weller Streets, will need to have closed windows to achieve the interior standard to achieve the City's interior noise goal, and residences adjacent to East Washington Street and East D Streets would require the incorporation of sound rated construction techniques to meet the 45 dBA Ldn interior noise standard.

Although typical building construction techniques will be sufficient to maintain acceptable average day/night noise levels within residential units along Copeland Street, train horns would be expected to exceed an interior maximum level of 55 dBA without the incorporation of noise insulation features in the project design. All residential bedrooms with a direct view of passing trains (primarily on the northern and eastern project façades of the buildings, but there could be others), will require sound rated windows and construction methods necessary to provide 35 to 37 dBA of noise reduction from exterior to interior. Sound rated windows and doors will need to be between 35 STC and 38 STC to achieve the interior noise standard of 45 dBA. In addition, all residences will be equipped with mechanical ventilation to supply fresh air while windows and exterior doors are closed. As such, noise exposure for residential uses due to a conflict with established noise standards would be considered less than significant.

For the non-residential uses, future noise levels at facades of the project buildings facing East D, Copeland and East Washington Streets will exceed 65 dBA Ldn. Following the State of California Cal Green Building Code standard, exterior sound transmission control must be incorporated in the design of these buildings using either the prescriptive (section 5.507.4.1) or performance (section 5.507.4.2) analysis methods. As such, noise exposure for non-residential uses due to a conflict with established noise standards would be considered less than significant.

Conclusion

In accordance with CPSP mitigation measure 10-1 a project specific Noise Assessment was performed and identified noise control measures to ensure that new uses introduced onsite are not exposed to excessive noise levels. Control measures identified in the Noise Assessment are included as conditions of project approval. In addition, consistent with CPSP mitigation measure 10-2 the project is required to implement construction control measures during all phases of construction in order to minimize construction related noise impacts. As the proposed Haystack Mixed-Use Project is within the scope of development projected under the General Plan and CPSP and based is required to implement control measures identified in the Noise Assessment, there

would be no new or more severe impacts to noise and vibration beyond those analyzed in the CPSP EIR and General Plan EIR.

4.14. POPULATION AND HOUSING

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The CPSP EIR determined that implementation of the Specific Plan would result in household and population increases that would be associated with physical (environmental) impacts, including significant transportation, public services and utilities, visual, noise, air quality, storm drainage, flood control, geotechnical, and hazardous materials exposure impacts. The CPSP EIR determined that even with implementation of the mitigation measures in the EIR, some of the associated physical environmental impacts would remain significant and unavoidable. The CPSP and CPSP EIR assumed the development of 1,617 dwelling units and a buildout population of 4,444 additional residents.

The General Plan EIR concluded that implementation of the General Plan is not expected to have an adverse impact on the jobs/housing balance and therefore would not contribute, directly or indirectly, to a regional, subregional, or citywide growth inducing impact. Buildout under the General Plan will add more population than it will jobs, and the jobs/employment balance will decrease. The General Plan seeks to improve this balance by providing a diversity of employment opportunities within the city as well as by providing for alternative modes of travel. The General Plan contemplated the development of approximately 6,000 additional residential units and a buildout population of approximately 72,700.

The Haystack Mixed-Use Project proposes the development of 178 residential dwelling units. Assuming 2.72 persons per household¹⁴, the projected population increase from the proposed project would be approximately 484 people. The projected population does not constitute a substantial increase and remains sufficiently below the CPSP and General Plan population projections. The extension of utilities will be limited to provide services to the subject property and will not extend services to areas where services were previously unavailable. Therefore, the project will have less than significant impacts related to growth inducement.

At present the project site is vacant except for the existing warehouse, which is proposed to be demolished as part of the project. The project will not displace any existing housing units or people, necessitating the construction of replacement housing elsewhere. The project implements the City's Housing Element by contributing 178 residential dwelling units to the existing housing stock within the City of Petaluma. Therefore,

¹⁴ State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2018*. Sacramento, California, May 2018. As a 178-unit development, the proposed project is expected to add approximately 484 people.

the project will have no impacts that displace people or existing housing.

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to population and housing beyond those analyzed in the CPSP EIR and General Plan EIR.

4.15. PUBLIC SERVICES

Would the Project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; and City of Petaluma Development Impact Fees.

The CPSP EIR determined that implementation of the Specific Plan would result in less than significant impacts related to public services. As described in the CPSP and as standard practice as part of the development review process, the City requires the police and fire departments to review and approve project plans. As service demands warranted, additional police officers, fire fighters, and facilities are acquired through the City's general fund. The CPSP determined that there would likely be adequate enrollment capacity to support future development projects and that payment of school impact fees would provide funds to support school facility improvements as needed.

The General Plan EIR concluded that with policies set forth in the General Plan, public services impacts would be less than significant. General Plan policy 7-P-12 requires the City to work with school districts to ensure availability of appropriate sites to accommodate needs of the City's School Districts. Policies 7-P-17 through 7-P-36 ensure that facilities, equipment and personnel are adequate to maintain police and fire protection services. Policies 7-P-22 through 7-P-24 ensure that emergency response equipment, personnel training, and critical facilities are adequate to serve the city in an emergency (e.g., earthquake, flood, severe storm).

The City of Petaluma charges one-time impact fees on new private development to offset the cost of improving or expanding City facilities to accommodate the demand generated by new development. Petaluma also

collects impact fees for open space, parkland, and other amenities. Development impact fees finance public facilities and service improvements and pay for new development's fair share of the costs of the City planned public facilities and service improvements identified to accommodate buildout of the General Plan.

The Haystack Mixed-Use Project is not anticipated to induce substantial growth in the area, either directly or indirectly beyond what has been anticipated by the CPSP and the General Plan. The increase in residents introduced by development of the Project will incrementally increase demands for fire and police services, schools, and parks. As a standard condition of project approval, the applicant shall pay all development impact fees applicable to a mixed-use project, including a facilities fee for identified fire/police facility improvements, statutory school impact fees, and parkland fees.

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to public services beyond those analyzed in the CPSP EIR and General Plan EIR.

4.16. RECREATION

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; and City of Petaluma Development Impact Fees.

The CPSP EIR determined that implementation of the Specific Plan would result in less than significant impacts related to recreation. The Specific Plan calls for the development of approximately 25 acres of parkland on the McNear Peninsula. In addition, future development projects within the CPSP would be required to comply with the City's standard parkland dedication or in-lieu park impact fee requirements.

The General Plan EIR concluded that with policies set forth in the General Plan, parkland impacts would be less than significant. General Plan policies 6-P-1 through 6-P-25 aim to retain and expand recreational facilities, ensure ongoing maintenance of parklands, and support the health, education, social activities and well-being of citizens by providing safe and accessible recreational facilities.

The Haystack Mixed-Use Project proposes to introduce onsite outdoor recreation for residents and public outdoor spaces and plazas consistent with the CPSP. The Project Site is located in downtown Petaluma in the vicinity of existing and planned future public community parks and neighborhood parks including Cavanaugh Landing, Walnut Park, Penry Park, Steamer Landing Park, and Kenilworth Community Park.

The increase in residents and employees introduced by the proposed Project will incrementally increase demands for parks and recreational facilities. New demands on parks and recreational facilities generated by the Haystack Mixed-Use Project have been previously anticipated as part of CPSP and the General Plan. As a standard condition of project approval, the applicant is required to pay all development impact fees applicable to a Mixed-Use development, including parkland and open space acquisition impact fees. As the proposed

project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to recreation beyond those analyzed in the CPSP EIR and General Plan EIR.

4.17. TRANSPORTATION

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sources: City of Petaluma General Plan and EIR; Central Petaluma Specific Plan and EIR; Petaluma Station Area Master Plan (SAMP) and IS/MND; Technical Advisory on Evaluating Transportation Impact in CEQA, prepared by the California Office of Planning and Research, December 2018; and Haystack Traffic Impact Study, prepared by W-Trans, April 16, 2019.			

The CPSP EIR determined that implementation of the Specific Plan would result in significant and unavoidable cumulative transportation and circulation impacts at the following locations: US 101 Southbound Ramps/East Washington Street intersection; Lakeville Street / D Street intersection; US 101; roundabouts at the Copeland Street / East Washington Street and Petaluma Boulevard / D Street intersections.

The CPSP EIR determined that implementation of the Specific Plan would result in less than significant transportation and circulation impacts at the intersections: US 101 Northbound Ramps/Redwood Highway; US 101 Southbound Ramps/Redwood Highway; Lakeville Street/Caulfield Lane; Lakeville Street/Baywood Drive; Lakeville Street/East Washington Street; Copeland Street/East Washington Street; Petaluma Boulevard Street/East Washington Street; Liberty Street/East Washington Street; Petaluma Boulevard/D Street; and Petaluma Boulevard/I Street.

The General Plan EIR concluded that with increased motor vehicle traffic from buildout of the General Plan, unacceptable level of service (LOS) would result at six intersections: McDowell Boulevard North/Corona Road, Lakeville Street/Caulfield Lane, Lakeville Street/East D Street, Petaluma Boulevard South/D Street, Sonoma Mt. Parkway/Ely Boulevard South/East Washington Street, and McDowell Boulevard North/Rainier Avenue.

The General Plan EIR determined that implementation of the General Plan would result in less than significant impacts from an increased demand for transit service and safe bicycle parking. General Plan policies 5-P-40 through 5-P-45 support the expansion of the bus transit system and the location of transit-oriented development along transit corridors (i.e., Washington Street). General Plan policy 5-P-31 requires future development to provide necessary bicycle support facilities throughout the city.

W-Trans prepared a Traffic Impact Study to evaluate the project's potential to impact pedestrian, bicycle and traffic safety, level of service standards, access, and/or introduce conflicts with the CPSP and General Plan (Appendix H). Based on standard trip generation rates, the proposed Haystack Mixed-Use Project would generate an average of 732 daily trips, with 76 trips during the AM peak and 95 trips during the PM peak. The study area for the project includes the intersections of East Washington Street/Weller Street, East Washington

Street/Copeland Street, East D Street/Weller Street, East D Street Copeland Street, and the future intersections of the project's transverse street with Weller Street and Copeland Street. All the study intersections are currently operating acceptably overall at LOS D or better and would be expected to continue operating at the same service levels with the addition of project trips.

Under future conditions, the study area intersections are expected to continue operating acceptably (LOS D or greater), except for the intersection of East D Street/Copeland Street, which is expected to operate unacceptably at LOS F during both the AM and PM peak hours. This intersection is currently unsignalized with stop sign-control on Copeland Street. Signalization of this intersection would correct the future condition LOS deficiency and would ensure that it operates acceptably during both peak hours.

As described in the Traffic Impact Study a traffic signal warrant was performed based on the *California Manual on Uniform Traffic Control Devices for Streets and Highways* and determined that Warrant 3, the Peak Hour volume warrant was fulfilled. The Traffic Impact Study further notes (page 19) that "satisfying the warrant does not in and of itself necessarily indicate that an intersection should be signalized." Rather, it is a metric used in combination with peak hour traffic operations and review of traffic characteristics to determine if an intersection should be signalized.

Signalization of East D Street/Copeland Street is planned for per the Station Area Master Plan. Warrant 3 is satisfied for the intersection both without and with the new trips added as a result of the proposed Haystack Mixed-Use Project. As such, the Project is required to pay a proportional share of the cost of signalization for the East D Street/Copeland Street intersection. As a condition of project approval, the applicant shall pay a proportional share equal to 5.4 percent of the East D Street/Copeland Street signalization cost.

Additionally, the Traffic Impact Study reviewed the lane configuration for future conditions and determined that exclusive left-turn lanes on all approaches with shared through/right turn lanes would be adequate. However, to best serve future traffic volumes the Traffic Impact Study recommends that the eastbound left-turn lane on East D Street at Copeland Street provide for a minimum of 100 feet of storage. As a condition of project approval, the applicant will extend the left-turn lane on East D Street for a length of at least 100 feet, as the plans propose.

Sight distances at the new transverse street intersections with Weller Street and Copeland Street and at all project driveways would be adequate, except that corner sight distance for vehicles turning left onto Weller Street from the transverse street would be limited by the curvature of Weller Street and the location of the project building. Accordingly, left-turns from the new transverse street to Weller Street will be prohibited. Landscaping at all project driveways should be maintained and trimmed back to provide clear sight lines. These recommendations set forth in the Traffic Impact Study relating to sight distances are incorporated conditions of project approval.

In addition to the LOS analysis presented in the Traffic Impact Study and summarized above, the project was also considered relative to the CEQA Guidelines section 15064.3 subdivision (b), which provides criteria for analyzing transportation impacts under a "vehicle miles traveled" (VMT) metric. VMT for the Haystack Mixed-Use Project were calculated to be 2,340 daily VMT using average trip distances published by the Sonoma County Transportation Authority in the County Model.

As stated in the CEQA Guideline Section 15064.3, subdivision (b)(1), land use projects that are located "within one half-a-mile of either an existing major transit stop or a stop along a high quality transit corridor¹⁵ should be presumed to have a less-than-significant impact on VMT. The presumption of less than significant impacts on VMTs for projects near transit stations is set forth in the Technical Advisory on Evaluating Transportation Impact in CEQA issued by the Office of Planning and Research (OPR) in December 2018. The Haystack Mixed-Use Project is located adjacent to the Copeland Transit Mall and within a quarter-mile from the Petaluma SMART Station. As such, the project would have a less than significant impact to vehicle miles traveled.

¹⁵ Public Resources Code Section 21155 defines a high-quality transit corridor as a corridor with fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours.

The project is consistent with City plans, ordinances and policies to integrate alternative modes of travel into the transportation and circulation system. The project proposes to dedicate right of way at the site perimeter to accommodate roadway improvements consistent with the City's SmartCode Section 5 and Bicycle and Pedestrian Plan (totaling 0.57 acres of dedication). Right of way dedication provides the necessary width to accommodate planned roadway improvements along project area streets (including a Class II bicycle facilities along the project site frontage to East D Street, sidewalk and Class III bicycle facilities along the project site frontage to Copeland and sidewalk width along E. Washington Streets). Additionally, the Haystack Mixed-Use Project includes the development of the new transverse street, constructed to City standards and provides wide sidewalks around the site perimeter consistent with the SmartCode and the City's Bicycle and Pedestrian Plan.

Given the expected level of pedestrian activity at the Copeland Street/transverse street intersection, at midblock on transverse street, and at the midblock crosswalk on Weller Street, the Traffic Impact Study recommends that pedestrian warning signs, curb bulb outs, and rectangular rapid flashing beacons (RRFB) or similar warning features be installed. Additionally, it is recommended that the midblock crosswalk at transverse street be treated with colored pavement to provide for traffic calming and improve pedestrian comfort. Further recommendations provide for the installation of "sharrows" along Copeland Street and, at the discretion of the City, Weller Street, bicycle route signage on transverse street, and wayfinding signage directing bicyclists and pedestrians to points of interest and transit connections. These recommendations have been added as conditions of project approval.

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to transportation and circulation beyond those analyzed in the CPSP EIR and General Plan EIR. Recommendations set forth in the Traffic Impact Study have been added as conditions of project approval. Therefore, the Haystack Mixed-Use Project will not result in any new or more severe transportation related impacts relative to what was analyzed in the CPSP and General Plan EIRs.

4.18. TRIBAL CULTURAL RESOURCES

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The Federated Indians of Graton Rancheria (FIGR) did not request consultation within the statutory timeframe provided by Public Resources Code §21080.3.1. The City of Petaluma provided notice to FIGR in April 2016 of the proposed Haystack Mixed-Use Project in accordance with the Public Resources Code. FIGR received the notification letter on April 25, 2016 and provided no reply to the City of Petaluma within the thirty (30) day time-period provided for consultation requests. Additionally, no subsequent request or correspondence by the FIGR has been received by the City of Petaluma.

This section incorporates by reference all text included within the Cultural Resources discussion above. Given past industrial activities on the project site, past disturbance to onsite soils, existing uses, and the protective measures added as conditions of project approval under the Cultural Resources category, development of the Haystack Mixed-Use Project is not expected to significantly impact tribal cultural resources.

As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no additional impacts to tribal cultural resources beyond those analyzed in the CPSP EIR and General Plan EIR. Implementation of CPSP mitigation measure 7-1 and compliance with General Plan Policy 3-P-7, as described in Section 4.5 Cultural Resources, will ensure that impacts to tribal cultural resources remain less than significant.

4.19. UTILITIES AND SERVICE SYSTEMS

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR; and City of Petaluma Water Resource and Conservation 2015 UWMP.

The CPSP EIR determined that implementation of the Specific Plan would result in less than significant impacts related to increases in the demand for water supply, wastewater treatment, and solid waste disposal. As stated in the CPSP EIR, future projects within the Specific Plan area will be required to include assessments of available water supply to serve the individual project. The CPSP EIR concluded that the wastewater treatment facility and the existing landfill would have adequate capacity to accommodate anticipated buildout under the Specific Plan.

The General Plan EIR determined that implementation of the General Plan would result in less than significant impacts regarding the sufficiency of water supplies to meet development at buildout. General Plan policies 8-P-1 through 8-P-7 aim to optimize the use of imported water from the SCWA, work with the SCWA to ensure adequate potable water for the city, develop alternative sources of water to supplement imported supply, limit the provision of potable water service to lands within the UGB, and require the City to routinely assess its ability to meet demand for potable water.

The General Plan EIR concluded that with policies set forth in the General Plan, wastewater treatment and solid waste disposal impacts would be less than significant. General Plan policies 8-P-9 through 8-P-17 relate to the provision of recycled water to reduce potable water demand, maintain the capacity of the water recycling facility, and comply with the current Statewide General Waste Discharge Requirements. General Plan policies 4-P-21 and 4-P-22 relate to reducing solid waste generation, increasing recycling, and implementing a residential and commercial food waste composting program.

In 2015, the City updated its Urban Water Management Plan (UWMP) including a baseline demand analysis in compliance with the interim 2015 Urban Water Use target, an Urban Water Use target analysis for 2020, projected urban water use through the year 2040, and a description of programs to achieve the target demand reductions in the UWMP. Instream flow requirements have also been established to protect fish and wildlife species and recreation.¹⁶ Based on regional water supply availability, the SCWA expects to be able to increase annual water deliveries to Petaluma from approximately 7,200 acre-feet (AF) in 2010 to 11,400 AF by 2035.

In 2018 the City's average per capita water usage rate was 75.35 gallons per capita per day (GPCD).¹⁷ As presented in the City's UWMP the SB X7-7 GPCD target for the City of Petaluma, was 130.74 for the year 2018.¹⁸ The results of that comparison find that potable water demand is well within the available SCWA supply, both for this project, and for cumulative demand through 2035 as set forth in the 2015 UWMP. A comparison of actual demand for potable water was made relative to the an annual SCWA supply limit for Petaluma of 4,366 million gallons per year (13,400 acre-feet) and a peak supply limit of 21.8 million gallons per day. In both instances, potable demand is well within available SCWA supply capacity. The projected demand is less than 10,000 acre-feet.¹⁹ Tiered water rates, conservation efforts, and the conversion of Rooster Run Golf Course to recycled water have in recent years kept annual and peak demands within the available SCWA supply.

The proposed Haystack Mixed-Use Project will increase demands for water supplies, wastewater treatment, and solid waste disposal. The project site is located within the City's UGB and is currently well served by existing utilities and service systems. New service connections will be required that tie into the existing facilities, which are located within Weller Street, Copeland Street, D Street, and East Washington Street. The extension and connection of water and wastewater services will not require infrastructure improvements or enhancements beyond what has been identified in the CPSP and General Plan in order to adequately serve the Haystack Mixed-Use project.

The project will install new laterals and utility pipelines to accommodate increased service demands generated by the project. Wastewater infrastructure includes the installation of a new 8-inch diameter sanitary sewer

¹⁶ State Water Resources Control Board: Decision No. 1610 (<http://www.waterboards.ca.gov/waterrights>).

¹⁷ Water Usage Summary February 2019, City of Petaluma Department of Public Works.

¹⁸ City of Petaluma 2015 UWMP page 23.

¹⁹ See Item 4(B) of June 1, 2015 City Council agenda (<http://cityofpetaluma.net/ccclerk/archives.html>).

pipelines within transverse street and Weller Street, as well as the installation of wastewater laterals to connect to the existing sanitary sewer lines in Copeland and D Streets. The new sewer line infrastructure will connect to the existing sanitary sewer line system within surrounding roadways, which conveys flows to the regional wastewater plant for treatment.

A new water line will be installed within transverse street and water line laterals will be installed to connect the project site to existing water lines within surrounding streets including the 18-inch water line in East Washington Street, the 12-inch water line in Copeland Street, and the 8-inch water lines in East D Street and Weller Street. A condition from the Petaluma Department of Water Resources and Conservation requires that the project comply with the City's Water Conservation Ordinance for interior and exterior water usage. Water demand onsite will be limited through efficient irrigation of the landscaping and water efficient fixtures and appliances indoors, consistent with requirements established by the CalGreen Building Code.

The City is currently under contract with Recology for solid waste disposal and recycling services. This company provides canisters for garbage, green (plant waste) materials, and recycling. Solid waste is collected and transferred to the Sonoma County landfill sites. Solid waste disposal facilities are owned and operated by the Sonoma County Department of Transportation and Public Works and the City maintains a franchise solid waste hauling agreement requiring the franchise hauler as part of its contractual obligations to select properly permitted Approved Disposal Location(s) with adequate capacity to serve city service needs. The project would be supplied with the same solid waste and recycling opportunities through the County's existing waste management system via the City's solid waste service provider. Although the project would generate additional solid waste, it is not expected to exceed landfill capacity and is not expected to result in violations of federal, state, and local statutes and regulations related to solid waste. Therefore, the project will have a less than significant impact due to the generation and disposal of solid waste.

As the proposed project is within the scope of development projected under the General Plan and CPSP there would be no additional impacts to utilities and service systems beyond those analyzed in the CPSP EIR and General Plan EIR.

4.20. WILDFIRE

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR; and CalFire Sonoma County.

Petaluma is susceptible to wildland fires due to the steep topography, abundant fuel load, and climatic conditions, particularly along the edges of the City. The areas most susceptible to fire hazards are located near the wildland urban interface at the City margins. Lands surrounding the City of Petaluma that are within the State Responsibility Area are classified as moderate fire hazard severity zone to the west and south of the City and high and moderate to the east and north. Land within City limits is classified as non-Very High Fire Hazard Severity Zone (VHFHSZ) in local, state or federal responsibility areas.

In October 2017, the Tubbs Fire (Central LNU Complex) burned approximately 36,807 acres in Sonoma County. Residents were exposed to direct effects of the wildfire, such as the loss of a structure, and to the secondary effects of the wildfire, such as smoke and air pollution. Smoke generated by wildfire consists of visible and invisible emissions that contain particulate matter (soot, tar, water vapor, and minerals) and gases (carbon monoxide, carbon dioxide, nitrogen oxides). Public health impacts associated with wildfire include difficulty in breathing, odor, and reduction in visibility.

The California Department of Forestry and Fire Protection (CAL FIRE) produce Fire Hazard Severity Zone Maps that indicate Petaluma is susceptible to wildland fires in moderate- and high-risk zones, particularly along the northern, eastern, and southern edges of the City, as well as pockets of moderate-risk within the City near the Highway 101 corridor approximately one and one half miles from the City Core.

The Haystack Mixed-Use Project site is located within the City's urban core, proximate to downtown, and is surrounded by roadways, the Petaluma River and developed urban uses. There are no additional factors, such as steep slopes, prevailing winds, or the installation or maintenance of new infrastructure that would exacerbate fire risk or expose project occupants to the uncontrolled spread of a wildfire, pollutant concentrations from a wildfire, post-fire slope instability, or post-fire flooding. CAL FIRE categorizes the site and surrounding land uses as non-very high fire hazard severity zone (VHFHZ). As such, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Additionally, the proposed buildings would be constructed according to the latest California Building Code, which contains standards for building materials, systems, and assemblies used in the exterior design and construction of new buildings. As the project is not closer than one mile from a state responsibility area, is not classified as a very high fire hazard severity zone, and does not propose changes that would affect these factors, there would be no impacts to wildfire as a result of the project.

4.21. MANDATORY FINDINGS OF SIGNIFICANCE

A focused or full environmental impact report for a project may be required where the project has a significant effect on the environment in any of the following conditions:

Would the project:	New Significant Impact	Substantial Increase in Severity of Previously Identified Significant Impact in GP or CPSP EIR	Equal or Less Severity of Impact than Previously Identified in GP or CPSP EIR
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

important examples of the major periods of California history or prehistory?

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)

☐☐☒

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

☐☐☒

Sources: City of Petaluma General Plan and EIR and Central Petaluma Specific Plan and EIR.

The project is located within the CPSP in an established urban area in downtown Petaluma proximate to the downtown SMART Station and the Petaluma River. The project site is currently underutilized/vacant and is identified as a priority development area. The proposed Haystack Mixed-Use Project is consistent with the CPSP and General Plan and supports the goals, policies, and programs outlined in therein.

The project is consistent with the surrounding land uses and implements the intent of the UGB through the development of an underutilized parcel in the existing urbanized area at an elevated density (General Plan Policy 1-P-2). Public utility and service providers are capable of serving the project with existing and planned facilities. The project will contribute to cumulative impacts identified in the City's CPSP and General Plan EIRs and would not result in any new or more severe cumulative impacts not previously considered.

Consistent with the policies and programs of the CPSP and General Plan and the mitigation measures set forth in the CPSP and General Plan EIR, the project is subject to conditions of approval relating to air quality, biological resources, cultural resources, geology and soils, noise, hydrology and water quality, transportation, and utilities. As the proposed project is within the scope of development projected under the General Plan and CPSP, there would be no new or more severe impacts beyond those analyzed in the CPSP EIR and General Plan EIR.

5. REFERENCE DOCUMENTS

The following reference documents are hereby incorporated by reference and are available for review during normal business hours at the City of Petaluma, 11 English Street, in the Community Development Department.

5.1. TECHNICAL APPENDICES

- A. Haystack Mixed-Use Project Site Plans: Site Plan and Architectural Review Submittal prepared by BDE Architecture, dated March 22, 2019; and Preliminary Landscape Plans prepared by Quadriga Landscape Architecture and Planning, Inc., dated January 31, 2019.
- B. *Construction Community Risk Assessment and GHG Analysis*, prepared by Illingworth & Rodkin, March 25, 2019.
- C. *Biological Resources Assessment*, prepared by WRA Environmental Consultants, July 2017, revised February 2018.
- D. *Recommendations for Ground Improvement Using Drilled Displacement Pressure Grouted Columns*, prepared by ENGEO, February 2, 2017.
- E. *Technical Memorandum*, prepared by West Yost Associates, August 22, 2018.

- F. *Stormwater Mitigation Report*, prepared by Steven J. Lafranchi & Associates, January 2016.
- G. *Environmental Noise Assessment*, prepared by Illingworth & Rodkin, May 21, 2014, updated March 24, 2016; and Update of 3.24.16 Noise Analysis for Current Project Design, prepared by Illingworth and Rodkin, August 3, 2017.
- H. *Traffic Impact Study*, prepared by W-Trans, April 16, 2019.

5.2. OTHER DOCUMENTS REFERENCED

1. *BAAQMD 2017 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2017. http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en
2. *California Department of Conservation Farmland Mapping and Monitoring Program*. <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx>.
3. *California Environmental Quality Act Air Quality Guidelines*, prepared by the Bay Area Air Quality Management District, May 2017. http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en
4. California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed March 2019.
5. City of Petaluma, Central Petaluma Specific Plan EIR, 2003. Available in hardcopy at planning counter.
6. City of Petaluma, Central Petaluma Specific Plan, 2003. <http://cityofpetaluma.net/cdd/pdf/cpsp/CentralPetalumaSpecificPlan.pdf>
7. City of Petaluma, Central Petaluma Specific Plan: SmartCode, 2013. <http://cityofpetaluma.net/cmgr/pdf/smartcode-final.pdf>
8. City of Petaluma, General Plan 2025. <https://cityofpetaluma.net/cdd/pdf/general-plan-may08/general-plan-may08.pdf>
9. City of Petaluma, General Plan 2025 EIR. <http://cityofpetaluma.net/cdd/pdf/deir-without-exhibits.pdf>
10. City of Petaluma 2015 Urban Water Management Plan, prepared June 2016.
11. Geotechnical Engineering Consultation, prepared by ENGEO, August 3, 2012.
12. Geotechnical Exploration, prepared by ENGEO, March 8, 2006.
13. Petaluma SMART Rail Station Areas: TOD Master Plan, prepared April 2012.
14. Updated Geotechnical Engineering Recommendations, prepared by ENGEO, March 20, 2014, revised March 24, 2014.
15. Updated Seismic Criteria and Foundation Recommendations, prepared by ENGEO, August 22, 2008.
16. 2008 Energy Action Plan Update, prepared by the California Energy Commission, <http://www.energy.ca.gov/2008publications/CEC-100-2008-001/CEC-100-2008-001.PDF>, accessed April 3, 2018.
17. 2011 Energy Efficiency Strategic Plan, prepared by the California Energy Commission, http://www.energy.ca.gov/ab758/documents/CAEnergyEfficiencyStrategicPlan_Jan2011.pdf, accessed April 3, 2018.
18. 2016 California Green Building Standards Code (CalGreen), Effective January 1, 2017.

6. ENVIRONMENTAL CONDITIONS OF APPROVAL

The following conditions of approval have been identified through this analysis and ensure implementation of applicable mitigation measures and policies set forth in the CPSP and its EIR and the General Plan and its EIR.

Air Quality

1. In accordance with CPSP mitigation measure 11-1, latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all demolition and construction plans to require implementation of the following:
 - a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
 - b) All haul trucks transporting soil, sand, or other loose material shall be covered.
 - c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
 - d) All vehicle speeds on unpaved roads shall be limited to 15 mph.
 - e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
 - f) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
 - g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper working condition prior to operation.
 - h) Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Biological Resources

2. In order to avoid impacts to birds protected under the Migratory Bird Treaty Act, site preparation activities, including the removal of trees and building demolition, should occur outside of the bird-nesting season between September 1st and January 31st. If vegetation removal or construction begins between February 1 and August 31, preconstruction surveys including call sounds shall be conducted within 14 days prior to such activities to determine absence or the presence and location of nesting bird species. If active nests are present, temporary protective breeding season buffers shall be established by a qualified biologist in order to avoid direct or indirect mortality or disruption of these birds, nests or young. The appropriate buffer distance is dependent on the species, surrounding vegetation and topography and will be determined by a qualified biologist to prevent nest abandonment and direct mortality during construction. Buffers may be larger for special-status species. Work may proceed if no active nests are found during surveys or when the young have fledged the nest, or the nest is determined to be no longer active.
3. Pre-construction bat hibernation and maternity roost surveys shall be performed by a qualified biologist to assess the suitability of all existing structures onsite not more than 30 days prior to start of construction including building demolition. If suitable bat roost sites are identified, they shall be surveyed by way of evening emergence surveys and/or internal inspections to determine presence/absence of bat maternity roosts. Internal entrance surveys should be performed by a qualified biologist no sooner than 14 days prior to demolition to determine if buildings support roosting bats. If bats are determined to be present, appropriate methods should be used to exclude bats from the building. Such methods may include installation of one way "valves" to allow bats to exit, but not allow them to reenter the building, or play-back of ultrasonic noise and/or predator calls to deter bats from returning to buildings. Species and roost

appropriate evacuation and exclusion procedures shall be developed based on the results of the survey in consultation with CDFW. All active maternity roosts identified during surveys shall be protected by establishing a 200-foot buffer around the maternity site until bats are no longer utilizing the roost site. Non-maternity roost sites shall be removed under the direction of a qualified biologist. Survey results are valid for 30 days from the survey date. Surveys should be repeated if commencement of structure demolition begins after 30 days or more from the survey date.

4. Fill to the 0.04 acres of man-made wetlands onsite shall be offset through compensatory credits at a 1:1 ratio purchased from an approved mitigation bank or as otherwise directed by the regulatory agencies. The City shall be provided with documentation demonstrating regulatory approval (U.S. Army Corps of Engineers and Regional Water Quality Control Board) and proof of purchase of mitigation bank credits prior to issuance of a grading permit.

Cultural Resources

5. If during the course of ground disturbing activities, including, but not limited to excavation, grading and construction, a potentially significant prehistoric or historic resource is encountered, all work within a 100-foot radius of the find shall be suspended for a time deemed sufficient for a qualified and city-approved cultural resource specialist to adequately evaluate and determine significance of the discovered resource and provide treatment recommendations. Should a significant archeological resource be identified a qualified archaeologist shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).
6. In the event human remains are uncovered during earthmoving activities, all construction excavation activities shall be suspended in the immediate vicinity of where the human remains are located, and the following measures shall be undertaken:
 - a) The Sonoma County Coroner shall be contacted to determine that no investigation of the cause of death is required.
 - b) If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission within 24 hours.
 - c) The applicant shall retain a City-approved qualified archaeologist to provide adequate inspection, recommendations and retrieval, if appropriate.
 - d) It shall be the responsibility of the Native American Heritage Commission rather than the applicant or the City to identify the person or persons it believes to be the most likely descended from the deceased Native American, and to contact such descendant in accordance with state law.
 - e) The applicant shall be responsible for discussing and conferring with Native American descendants all reasonable options regarding the descendants' preferences for treatment, as provided in Public Resources Code Section 5097.98(b), and for carrying out all obligations of the applicant as provided at Public Resources Code Section 5097.98.

Geology and Soils

7. As determined by the City Engineer and/or Chief Building Official, all recommendations outlined in the Geotechnical Investigations dated August 3, 2012, March 24, 2014, and February 2, 2017 prepared for the

subject property by ENGEO, including but not limited to, site preparation and grading, DDC columns, excavation, seismic design, and foundations system design are herein incorporated by reference and shall be adhered to in order to ensure that appropriate construction measures are implemented. Final grading plan, construction plans, and building plans shall demonstrate that recommendations set forth in the geotechnical reports have been incorporated into the design of the project. Nothing in this measure shall preclude the City Engineer and/or Chief Building Official from requiring additional information to determine compliance with applicable standards. The geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy that the improvements have been constructed in accordance with the geotechnical specifications.

8. In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities all ground disturbing activities shall halt in the immediate vicinity of where the resources are located, and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.

Greenhouse Gases

9. In accordance with Section A4.106.4 of the 2016 California Green Building Standards Code, the project shall provide at least 3% of the total parking spaces as capable of supporting future electric vehicle supply equipment. As required by City of Petaluma General Plan Policy 4-P-9, the project shall be constructed to include electrical vehicle charging stations at a ratio of least 1% of the total parking spaces. For purposes of determining compliance with this measure, fractional numbers shall be rounded up to the next whole number.

Hazards and Hazardous Materials

10. Prior to issuance of a permit for demolition at 19 Copeland Street or prior to any activities involving the demolition or alteration of the existing building on site, an asbestos survey adhering to sampling protocols outlined by the Asbestos Hazard Emergency Response Act and material sampling to determine lead presence will occur. Construction activities that disturb materials or paints containing any amount of lead and/or asbestos may be subject to certain requirements of the Occupational Safety and Health Administration (OSHA) lead standard contained in 29 CFR 1910.1025 and 1926.62, AHERA requirement, and any other local, state, or federal regulations. In the event that such substances are found, the applicant will adhere to all requirements put forth by OSHA and other agencies regarding the treatment, handling, and disposal of these materials.
11. Prior to issuance of any demolition, grading, or building permit, the project applicant shall prepare and receive approval of a Risk Management Plan and Site Health and Safety Plan by the City of Petaluma Fire Department. The purpose of these plans is to address the identified need for the removal and disposal of lead-impacted soils at the project site but shall also address the potential for accidental discovery of hazards and hazardous materials during construction activities including groundwater contamination. Said plans shall be implemented during construction and future redevelopment and shall address the following:
 - a) Conduct construction work in accordance with CCR Title 8 Section 1532.1, Lead in Construction.
 - b) Use appropriate site control measures such as wet methods to minimize airborne dust generation.
 - c) Excavate soil from the tree wells and bio-retention areas to a depth of not less than 2 feet below final grade. Replace the excavated materials with clean imported fill.
 - d) Place any excess soil re-used onsite under buildings.
 - e) Characterize soil export by sampling and analysis for proper disposal.

- f) Soil and Groundwater Management Plan to inform and guide construction and post-development construction and maintenance that involves exposure to soil and/or groundwater.
12. The project applicant shall implement all of the following Best Management Practices (BMPs) regarding potential soil and groundwater hazards:
- a) Soil generated by construction activities shall be stockpiled onsite in a secure and safe manner or if designated for off-site disposal at a permitted facility, the soil shall be loaded, transported and disposed of in a safe and secure manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Specific sampling and handling and transport procedures for reuse or disposal shall be in accordance with applicable local, state and federal agencies laws, in particular, the Regional Water Quality Control Board (RWQCB) and/or the Sonoma County Environmental Health & Safety Department and the City of Petaluma. The excavation, on-site management, and off-site disposal of soil from the project site shall follow an approved Risk Management Plan.
 - b) Groundwater pumped from the subsurface shall be contained onsite in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies of the City of Petaluma, the RWQCB and/or Sonoma County Environmental Health & Safety Department. Engineering controls shall be utilized, which include impermeable barriers to prohibit groundwater and vapor intrusion into buildings.
 - c) Prior to issuance of any demolition, grading, or building permit, the applicant shall submit for review and approval by the City of Petaluma, written verification that the appropriate federal, state or county oversight authorities, including but not limited to the RWQCB and/or the Sonoma County Health & Safety Department, have granted all required clearances and confirmed that all applicable standards, regulations and conditions for all previous contamination at the project site.
13. The RWQCB, Sonoma County Health Department, Public Works Department, and the appropriate planning and building departments shall be notified prior to any changes in land use, grading activities, excavation, and/or installation of water wells. Notification shall include a statement that residual contamination may exist on the property and list all mitigation actions, if any, necessary to ensure compliance with RWQCB closure letter issued March 1, 2010.

Hydrology and Water Quality

14. Prior to issuance of a grading permit, the applicant shall file a Notice of Intent with the RWQCB and demonstrate compliance with the Statewide General Permit for Construction Activities.
15. Prior to issuance of a building permit, the applicant shall prepare a design-level Stormwater Mitigation Plan that provides calculation and documentation that the storm drain system has adequate capacity to serve the project. The storm drain system shall be reviewed and approved by the City Engineer and the Sonoma County Water Agency.
16. In accordance with the National Pollution Discharge Elimination System (NPDES) regulations, the applicant shall prepare and implement a project-specific Stormwater Pollution Prevention Plan, including an erosion control plan, for grading and construction activities. The SWPPP shall address erosion and sediment control during all phases of construction, storage and use of fuels, and use and clean-up of fuels and hazardous materials. The SWPPP shall designate locations where fueling, cleaning and maintenance of equipment can occur and shall ensure that protections are in place to preclude materials from entering into storm drains or the Petaluma River. The contractor shall maintain materials onsite during construction for containments and clean-up of any spills. The applicant shall provide approval documentation from the RWQCB to the City verifying compliance with NPDES.
17. The applicant shall prepare and implement an erosion control plan for all grading activities. The plan shall be reviewed and approved by the City of Petaluma prior to issuance of grading permits. The erosion control plan shall include limiting areas of disturbance, designating restricted-entry zones, diverting runoff away

from disturbed areas, inlet/outlet protection at nearby drains, and provisions for revegetation and mulching. The erosion control plan shall prescribe treatment to trap sediment, such as inlet protection, straw bale barriers, straw mulching, and straw wattles.

18. Prior to issuance of an occupancy permit, the applicant shall demonstrate compliance with the City's municipal separate stormwater system (MS4s) for new stormwater facilities located within Weller Street and transverse street, and connecting to the existing municipal stormwater system.

Noise

19. Prior to issuance of building permits an acoustical consultant shall determine the appropriate Sound Transmission Class (STC) rating necessary to achieve the 55 dBA Lmax and 45 dBA Ldn interior noise standards. Based on initial acoustical analysis the following performance standards have been identified:
 - a) Residential bedrooms with direct views of passing trains (primarily northern and eastern project facades) require sound rated windows, doors, and construction methods that achieve a 35 to 37 dBA exterior to interior noise reduction.
 - b) All residential units shall be equipped with mechanical ventilation capable of supplying fresh air needs while exterior windows and door are closed.
 - c) Commercial uses with building facades facing East D Street, Copeland and E. Washington Street, the Cal Green Building Code standards shall be incorporated in the design. Using the prescriptive method the STC rating of at least 50 or a composite OITC rating of no less than 40 and exterior windows on the eastern façade shall have a minimum STC rating of 40 or minimum OITC rating of 30. Using the performance method an interior noise environmental shall not exceed an hourly equivalent of 50 dBA in occupied areas during operation.
20. Construction activities shall comply with the following measures and all shall be noted on construction documents:
 - a) Construction Hours/Scheduling: The following are required to limit construction activities to the portion of the day when the number of persons in the adjacent sensitive receptors are lowest:
 - i. Construction activities for all phases of construction, including servicing of construction equipment shall only be permitted during the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday and between 9:00 a.m. to 5:00 p.m. on Saturdays. Construction activities shall be prohibited on Sundays, and State, Federal, and local holidays recognized by the City of Petaluma.
 - ii. Delivery of materials or equipment to the site and truck traffic coming to and from the site is restricted to the same construction hours specified above.
 - b) Construction Equipment Mufflers and Maintenance: All construction equipment powered by internal combustion engines shall be properly muffled and maintained.
 - c) Idling Prohibitions: All equipment and vehicles shall be turned off when not in use. Unnecessary idling of internal combustion engines is prohibited.
 - d) Equipment Location and Shielding: All stationary noise-generating construction equipment, such as air compressors, shall be located as far as practical from Weller Street and the existing warehouse to remain. Acoustically shield such equipment when it must be located near occupied uses along Weller Street and the warehouse.
 - e) Quiet Equipment Selection: Select quiet construction equipment, particularly air compressors, whenever possible. Motorized equipment shall be outfitted with proper mufflers in good working order.
 - f) Staging and Equipment Storage: The equipment storage location shall be sited as far as possible

from nearby sensitive receptors.

- g) Generators: No generators shall be utilized during nighttime hours (i.e., sunrise to sunset) to power equipment (e.g., security surveillance) when normal construction activities have ceased for the day. All such equipment should be powered through temporary electrical service lines.
- h) Notification. Notify nearby residents (within 500 feet) in writing of the demolition and construction schedule.
- i) Noise Disturbance Coordinator: Developer shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. This individual would most likely be the contractor or a contractor's representative. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would require that reasonable measures to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors, within a 500-foot radius of the site, regarding the construction schedule.

Public Services + Recreation

- 21. Prior to issuance of occupancy for residential units and prior to issuance of building permits for non-residential development, the applicant shall be subject to the City's most recent City Facilities Development Impact Fees.

Transportation

- 22. Prior to the Recreation, Music, and Parks Committee review or building permit approval, in accordance with General Plan policy 5-P-31 B, the Haystack Mixed-Use Project shall include at least one public drinking fountain to accommodate people and their pets. The location of the drinking fountain shall be easily accessible to pedestrians and bicyclists and may be located within or proximate to onsite public plazas.
- 23. Prior to the final on the 85th percentile residential unit, the applicant shall prepare a cost estimate for acceptance by the City Engineer and shall pay a proportional share equal to 5.4 percent of the East D Street/Copeland Street signalization cost.
- 24. Prior to public improvement plan approval, as part of the project development, the applicant shall coordinate with the City of Petaluma Public Works Department to design and install striping, signage, and improvements along East D Street to the satisfaction of the City Engineer including the extension of the left-turn lane on eastbound East D Street for a length of at least 100 feet from the Copeland Street intersection.
- 25. Prior to public improvement plan approval, to avoid conflicts with sight distances due to the curvature of Weller Street, westbound left-turn movements from the new transverse street onto Weller Street shall be prohibited.
- 26. To avoid conflicts with sight distances at project driveways, as well as the intersections of the transverse street with Copeland and Weller Streets landscaping shall be maintained and trimmed back to provide unobstructed sight lines. Generally precluding ground cover and shrubs from exceeding 3 feet in height and limbing up to ensure that tree branched do the extend below 7 feet from the ground provide for adequate corner sight line distances.
- 27. Prior to public improvement plan approval, to establish safe and convenient pedestrian circulation around the project site, pedestrian warning signs, curb bulb outs, and rectangular rapid flashing beacons (RRFB) or similar warning features shall be installed at the Copeland Street/transverse street intersection, at the midblock crosswalk on transverse street, and at the midblock crosswalk on Weller Street. The midblock crosswalk at transverse street shall be treated with colored pavement or decorative treatment, subject to

staff (and/or the Recreation, Music and Parks Committee) review and acceptance, to further provide for traffic calming and improve pedestrian comfort.

28. Prior to public improvement plan approval, in accordance with the City's Bike and Pedestrian Plan "sharrow" striping and signage pursuant to City standards shall be installed along Copeland Street and Weller Streets to provide alternate routes for bicycles. Bicycle route signage shall be installed on transverse street.
29. Prior to public improvement plan approval, wayfinding signage shall be shown directing bicyclists and pedestrians to points of interest (including downtown and the river) and transit connections (SMART and the transit center) in the project vicinity shall be installed at the project site on either end of the transverse street, at the two project corners with East D Street and at the two project corners with East Washington Street. Signage shall be designed by the applicant and submitted as part of the public improvement plans for review and approval by Public Works and Planning staff.
30. Prior to public improvement plan approval, a minimum of 20 bicycle parking spaces shall be provided onsite to provide safe and convenient access to residences and businesses.

Public Utilities

31. The City of Petaluma Public Works and Utilities, Environmental Services Division's standard conditions of approval regarding water conservation, irrigation, and water use efficiency shall be implemented.
32. A Construction Waste Management Plan shall be prepared and implemented during all stages of construction. The Construction Waste Management Plan shall meet the minimum requirements of the CalGreen code for residential and commercial development including but not limited to regional material sourcing (A5.405.1), Bio-based materials (A5.105.2), Reused materials (A5.405.3), and materials with a recycled content (A5.405.4).
33. In accordance with CalGreen Section 4.410.2 onsite recycling shall be provided in readily accessible areas for the depositing, storage and collection of non-hazardous materials including at a minimum paper, cardboard, glass, plastics, organic waste, and metals.
34. The applicant shall coordinate with Recology to appropriately size trash enclosures and ensure that maximum waste stream diversion occurs by providing onsite pre-sorting for recyclables and greenwaste for compostable and organic material.

