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To: -- City Clerk <CityClerk@cityofpetaluma.org>; Darren Racusen <darrenracusen@gmail.com>; sandi.lee.potter@gmail.com; rwhisman@yahoo.com; roger mcerlane <rogermcerlane@mac.com>; Janice Cader Thompson <janicecader@gmail.com>; heidibauer2000@gmail.com; Hooper Blake <bmhoooper1@gmail.com>; Trippel, Andrew <atrippel@cityofpetaluma.org>

Subject: RE: Oyster Cove Mitigated Negative Declaration, May 9, 2023 Planning Commission Meeting

Dear City Clerk - Please add the following comments to the record for this evening's May 9, 2023 Planning Commission meeting:

The City and consultant M group planners continue to pass the buck (*i.e.*, risks, costs) to us Petaluma taxpayers by permitting these river banktop developments. These banktop developments – the North River Apts, the Riverfront development, Scannell, and Oyster Cove should **not** be artificially piecemealed and evaluated separately for environmental impacts. Collectively, all of this constitutes *extensive* development. Both the individual and **cumulative impacts** of these banktop developments constitute SIGNIFICANT impacts to our river ecosystem and our stormwater systems, and it is very deceptive not only to allow for Mitigated Negative Declarations – which are patently bogus (modern construction alone has a massive carbon footprint, 39% of all carbon emissions, every census tract in Petaluma is already adversely impacted by traffic emissions per our GP consultants, and our river is on the Regional Water Quality Control Board's list for impaired water bodies of the state for *E. coli*) – but it is also profoundly deceptive for Olivia Ervin of the M Group to declare in *every* single Environmental Impact Report (EIR) that has passed through the M Group's lens, that any and all significant impacts can be mitigated (*e.g.*, Safeway Gas Station, River Row Apartments, Riverfront Development, Davidon, Sid Commons, Scannell, etc, etc). We are in the throes of climate change, biodiversity loss, and ecological collapse precisely because of this dinosaur way of thinking and, yet, our City continues to allow these false narratives to be perpetuated over and over. This is not climate-forward thinking. These banktop developments, all in close proximity to one another, must be evaluated for the sum total of considerable adverse cumulative impacts they will have on our health and safety, and the ecology of our riverine ecosystem.

Regards Oyster Cove, our town is not like other cities. It is built on a watershed and bisected by a river - and a \$100 million dollar flood wall/weir had to be constructed by the US Army Corps of Engineers (USACE) due to repeated catastrophic flooding. That flood control system was designed in the 1990s and does *not* account for climate change impacts. Oyster Cove in

particular sits in the path of harm. Dave Dawdy at the Federal Emergency Management Agency (FEMA) said the Petaluma floodwall project was the most deceptive Corps project ever built. Per Dave Dawdy, when the floodwaters overtop the USACE floodwall, the water will return to the river at the McNear Channel – and take out infrastructure in its path. Critically, the McNear Channel, which is not dredged, will become a marsh/wetland (per SFEI, 98% of our river wetlands are gone). We need to preserve the flood storage capacity of our river - its banks - so that rising floodwaters can go overbank and not flood/topple infrastructure. And, we must not build on habitat that is essential for the survival of species that reside in the deepwater turning basin, including otters and seals that use the river banks for staging.

It's not for nothing that Sonoma County is #1 out of 14 Western states and ALL 58 CA counties for flood losses (Scripps/USACE, 2019). We place infrastructure where we should not. We know better and our City is not protecting us citizens, fiscally, or from a safety standpoint, and is not protecting our rare and irreplaceable riverine ecosystem; riparian corridors, especially, serve as biodiversity hubs. This is egregious and constitutes a leadership deficit that risks exposing the city to great expense/liability. The river banks should have, at most, a sensitive trail - and wetlands near the turning basin should be restored for flood retention.

It is very wrong to have the M Group planning consultants overseeing EIR management when these consultants are the very ones who receive revenues for getting these same development projects approved. How does our City not see this as a gross conflict of interest? Where developers have gotten the CA courts to agree *not* to hold them liable for climate change impacts, it falls to cities and the taxpayers to bail this vulnerable infrastructure out. This is a case of passing the buck - and allowing a select few to profit at the expense of the many. Let's consider returning to a planning department that works for our citizens, and not the developers. We need bold leadership to protect our town and its ecosystems now. Do not approve more riverbank developments in this era of catastrophic climate change. Their impacts, which are significant, cannot be mitigated.

Sincerely,

Moirra Sullivan
Petaluma citizen and State of CA Scientist