

Riverfront Spirit Living

CITY PROJECT FILE# PLSR-2022-0020

ADDENDUM TO THE RIVERFRONT MIXED-USE PROJECT ENVIRONMENTAL IMPACT REPORT (EIR)

(CERTIFIED BY CITY COUNCIL RESOLUTION 2014-125, JULY 21, 2014)

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JULY 2023

RIVERFRONT SPIRIT LIVING

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1 INTRODUCTION

This document presents an addendum to the Riverfront Mixed-Use Project Environmental Impact Report (SCH No. 2013062004) (hereafter referred to as the "2014 EIR"), certified by the Petaluma City Council on July 21, 2014 (Resolution 2014-125). The 2014 EIR was certified prior to approving project entitlements including a Zoning Map Amendment (Ordinance 2508) and Tentative Subdivision Map (Resolution 2014-127).

The Riverfront Mixed-Use Project EIR analyzed development of a mix of residential and commercial land uses, including 90,000 square feet of commercial space (30,000 square feet of retail and 60,000 square feet of office), a 120-room hotel, approximately 4.0 acres of parks, a system of multi-use trails and a community boathouse adjacent to the Petaluma River. Residential uses analyzed in the EIR included 134 single-family residences, 39 townhomes, inclusive of 4 work/live units, and up to 100 rental apartment units. Maximum project buildout anticipated by the EIR was 273 residential units. As detailed in the 2014 EIR, the Tentative Map includes eight phases of development, as presented below and as shown on Sheet TM-8 of the approved Tentative Map (Appendix A).

- 1. Dark Green (Public Path)
- 2. Light Blue Phase (50 single-family dwellings)
- 3. Magenta Phase (47 single-family dwellings)
- 4. Orange Phase (37 single-family dwellings)
- 5. Dark Blue Phase (Active Park)
- 6. Red Phase (Hotel, Office, and Parking)
- 7. Yellow Phase (Mixed-Use)
- 8. Green Phase (Townhomes)

1.1 Purpose of the Addendum

The California Environmental Quality Act (CEQA) recognizes that following approval of an environmental document and prior to project implementation, one or more of the following may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information may arise. Prior to proceeding with project implementation, CEQA requires the Lead Agency to evaluate these changes to determine whether they affect the conclusions in the approved environmental document.

CEQA Guidelines Sections 15162 and 15164 establish criteria to assess the appropriate level of environmental review when a project analyzed in a previously approved IS/MND or EIR has changed, or the environmental setting within which the review was carried out has changed. The Lead Agency is responsible for determining whether an addendum, supplemental, or subsequent environmental document is appropriate.

As stated in CEQA Guidelines Section 15162 subdivision (a), a subsequent EIR or MND is not required unless the Lead Agency determines, on the basis of substantial evidence in light of the whole record, that:

- 1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the CEQA Guidelines specifies that the Lead Agency may prepare an addendum to an adopted Negative Declaration or EIR if only minor technical changes or additions are necessary and none of the conditions described in Section 15162, listed above, have occurred.

1.2 Applicability and Use of the Addendum

Based on the Project applications and technical studies prepared, the City of Petaluma has determined that the proposed changes to the previously approved Riverfront Mixed-Use Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project (Riverfront Spirit Living) increase the severity of any impacts previously identified in the Riverfront Mixed-Use Project EIR (SCH No. 2013062004). Furthermore, there are no previously infeasible alternatives that are now considered feasible and no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effects. Lastly, none of the other factors set forth in CEQA Guidelines Section 15162(a)(3) apply to the Project.

As proposed, the Project requires minor alterations to the public record to ensure that the previously adopted 2014 EIR accurately reflects the Project as currently proposed. As such, the City of Petaluma, acting as the Lead Agency, has determined that an addendum to the previously approved EIR is the appropriate level of review to address revisions to the Riverfront Mixed-Use Project. Consistent with the

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requirements of CEQA, this addendum document addresses impact categories that warrant an update to clarify the Project modifications and most recent environmental setting.

2 BACKGROUND AND PROJECT DESCRIPTION

This section provides a brief background of the current status of the Riverfront Mixed-Use Project as well as a detailed project description for the Riverfront Spirit Living Project ("Project"), which is the subject of this addendum.

2.1 Background

Following approval of the Riverfront Mixed-Use Project in 2014, phased Tentative and Final Subdivision Map and Site Plan and Architectural Review (SPAR) applications, followed by building permits to develop various phases of the site have been submitted. To date, all components of the Riverfront Mixed-Use project have SPAR Tentative Map and Final Map approval, except for the Townhouses which are pending Final Map approval, and all components have SPAR approval except for the office building and development of Lots 5 and 6. The portion of the Project referred to as the Yellow Phase includes Lots 5 and 6 (mixed-use parcels), of the Riverfront Subdivision Final Map and is the subject of this addendum. Based on feedback provided at Planning Commission study sessions in July and November 2021, the applicant submitted for Site Plan and Architectural Review to develop Lots 5 and 6 with work/live units, commercial condominium lofts, a residential care facility for the elderly (RCFE), and market-rate apartments. A detailed description of the proposed Project is provided below.

2.2 Riverfront Spirit Living

Project Location

The Riverfront Spirit Living Project is part of an overall site that encompasses the Riverfront Mixed-Use Project and includes Lot 5 (30,768 square feet) and Lot 6 (48,045 square feet), of the Riverfront Subdivision Final Map (Appendix B). The site is in southwest Petaluma west of U.S. 101 (**Figure 1: Regional Location**), south of the Sonoma Marin Area Rail Transit (SMART) corridor, and north of the Petaluma River (**Figure 2: Project Vicinity**).

General Plan and Zoning

The Project site has a General Plan Land Use designation of Mixed Use (

Figure 3: General Plan) which requires a combination of uses, including retail, residential, service commercial, and/or offices. Development is oriented toward the pedestrian, with parking provided in larger common areas or garages. The maximum permitted floor area ratio (FAR) for both residential and non-residential uses is 2.5, and there is no maximum residential density that applies.

Lots 5 and 6 of the Project site are zoned Urban Core (T6)) (**Figure 4: Zoning**). As set forth in Appendix A of the Petaluma SmartCode, the T6 zoning district provides for the highest density and height with a range of uses. Work/live uses are conditionally permitted and residential uses in a mixed-use building are permitted by right within the T6 zone.

Site Plan

On Lot 5, the Project proposes a four-story, 78,768 gross square foot residential care facility for the elderly with six work/live units. The RCFE consists of support functions and the six work/live units on the 1st floor, 35 apartments each on the 2nd and 3rd floors, and 36 memory care units on the fourth floor. The resulting FAR and residential density of the RCFE is 2.5 and 151 dwelling units/acre, respectively.

On Lot 6, the Project proposes a four-story, 133,353 square foot mixed-use building with 120 market-rate apartments and 13 work/live units. The building consists of the 13 work/live units and tenant amenities on the 1st floor, and 40 apartments each on the 2nd, 3rd, and 4th floors. The resulting FAR and residential density of the mixed-use building is 2.7 and 109 dwelling units/acre, respectively.

Access and Parking

The site will be accessed via Hopper Street, which runs parallel with Lakeville Highway from East D Street to the Project site. Lots 5 and 6 are located at the entrance of the Subdivision and are accessible via a one-way looped drive aisle. As proposed, Lot 6 includes 112 parking spaces inclusive of 12 parallel street spaces along the looped drive aisle, 13 surface spaces, 5 covered spaces, 3 ADA, 4 electric vehicle (EV) spaces, and 75 parking stacker spaces. Lot 5 includes 42 parking spaces inclusive of 11 parallel street spaces along the looped drive aisle, 3 surface spaces, 2 covered spaces, 2 ADA, 1 EV, and 23 parking stacker spaces. The combined parking total for the two lots is 154 spaces. In addition to providing parking onsite, the Project proposes to implement a peer-to-peer car sharing program to reduce the need for individual car ownership and will also operate a full-time van service to meet the transportation needs of residents of the care facility and serve as a shuttle to the Sonoma Marin Area Rail Transit (SMART) station.

In addition to vehicular parking, Lots 5 and 6 also include covered bicycle parking. Lot 5 includes a bicycle storage room accommodating up to 16 bicycles, and Lot 6 includes a storage room accommodating up to 12 bicycles.

Architecture

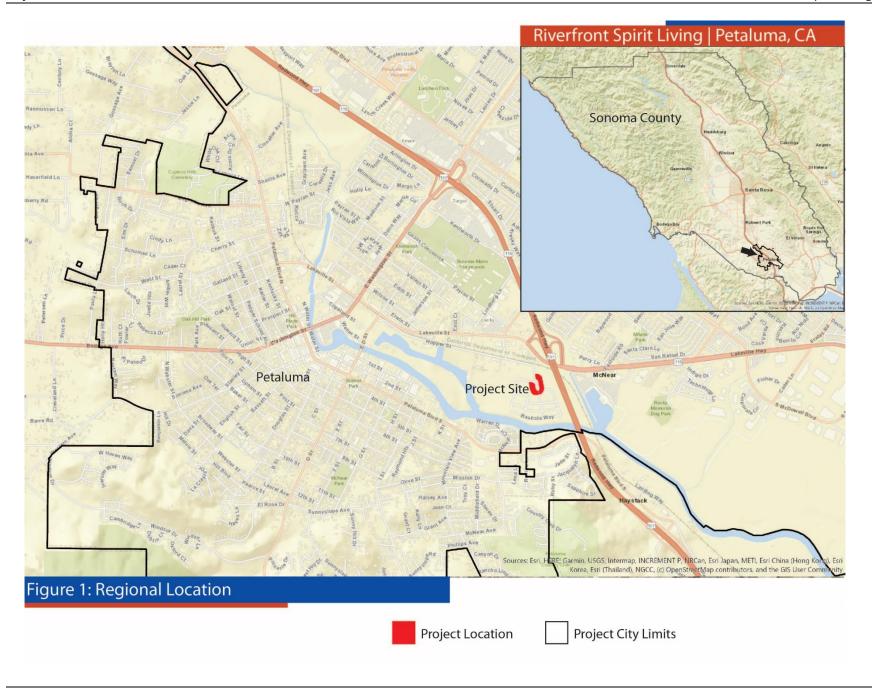
Contemporary building architecture is proposed with a footprint that follows the curved shape of the sites; floor-to-ceiling glass storefronts along the buildings' ground-floor street frontage; vertical board-formed concrete wall sections between the storefronts; offset wall planes; and a mix of exterior building finishes that include vertical board-formed concrete, metal, wood, sand finished stucco, and anodized aluminum canopies.

Required Discretionary Actions

The Project requires the following discretionary entitlements:

- Conditional Use Permit
- Site Plan and Architectural Review
- Warrants

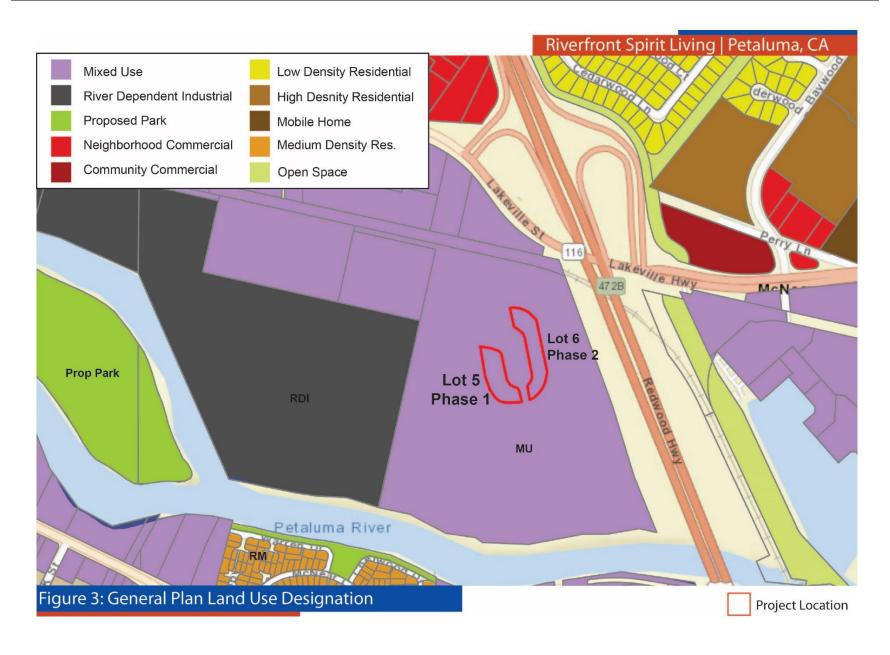
City of Petaluma Riverfront Spirit Living



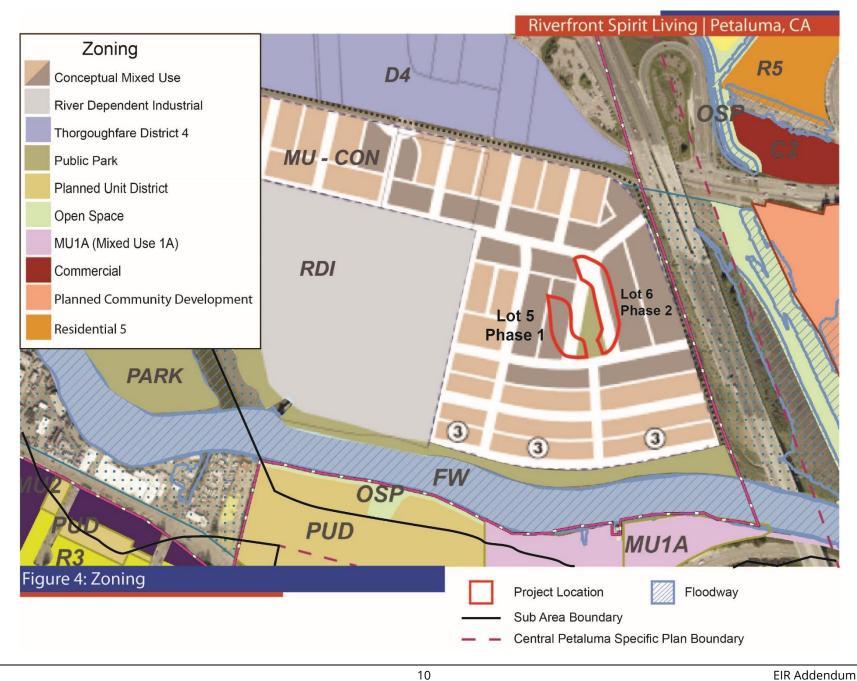
City of Petaluma Riverfront Spirit Living



City of Petaluma Riverfront Spirit Living



City of Petaluma **Riverfront Spirit Living**



3. FINDINGS OF THE ADDENDUM

As previously stated, this document serves as an addendum to the previously certified EIR for the Riverfront Mixed-Use Project (SCH No. 2013062004). The Environmental Analysis section below, describes the environmental impacts of the proposed Riverfront Spirit Living Project as compared to the impacts of the previously approved Riverfront Mixed-Use Project. Specifically, the following section addresses those areas that could potentially result in new or more severe impacts, discusses the adequacy and applicability of previously adopted mitigation measures to the revised Project, and addresses whether any new or more severe impacts would result from the revised Project.

4. ENVIRONMENTAL ANALYSIS

This section includes an analysis of the impacts of the proposed Project, as revised, compared to the environmental analysis prepared for the Riverfront Mixed-Use Project.

4.1 Riverfront Mixed-Use Project Addendum

The previously adopted Riverfront Mixed-Use Project EIR identified significant impacts and proposed mitigation measures to reduce such impacts to levels below significance related to Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Hazardous Materials, Hydrology/Water Quality, Noise, Traffic, and Cumulative Impacts. Consistent with the CEQA Guidelines, this Addendum only addresses those resource areas that could potentially result in new impacts or impacts of greater severity specific to the Project site as compared to those that were addressed in the Riverfront Mixed-Use Project EIR. Based on the significance findings, application of site-specific mitigation measures, and requirement that the Project comply with applicable standard conditions and Best Management Practices (BMPs), further discussion of the following sections are not included in the Addendum to the Riverfront Mixed-Use Project EIR:

- Agricultural & Forestry Resources
- Biological Resources
- Cultural Resources
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Public Services
- Recreation
- Utilities and Service Systems

The above discussion topics do not warrant further review because the prior CEQA analysis captured the development footprint of the entire project site and the same with the projects proposed height and Floor Area Ratio. So all physical land disturbance impacts have been adequately analyzed, and increasing residential density and providing a range of housing types, including housing for seniors is in line with State and City goals to address the housing crisis and declared climate emergency by providing more housing within city limits, which was analyzed as part of the recent Housing Element mitigated negative declaration.

All relevant mitigation measures, conditions of approval, and BMPs identified in the Riverfront Mixed-Use Project EIR for these resource areas are incorporated by reference and will be a requirement of approval for the Riverfront Spirit Living Project. The Riverfront Mixed-Use Project MMRP is included in Appendix G hereto. In addition, an Applicability Matrix A is included in Appendix H to demonstrate the applicability of adopted mitigation measures to the Riverfront Spirit Living project.

At the time of original approval, the Riverfront Mixed-Use Project conceptually proposed construction of 30,000 square feet of mixed-use space and 100 apartments across Lots 5 and 6 of the Riverfront Subdivision. As described in detail above, the Riverfront Spirit Living Project proposes construction of 106 residential care facility units and 6 work/live units on Lot 6 and 120 residential units and 13 work/live units on Lot 5, resulting in an increase in the total number of residential units from 273 to 418, a net increase of 145 residential units. However, based on existing population and average household size, the Project would remain within the General Plan buildout populations and would not result in impacts not previously analyzed. The following analysis includes a discussion of those resource areas that warrant an update to address the revised Project and changes to the environmental setting, impacts, and mitigation measures since adoption of the Riverfront Mixed-Use EIR. The analysis includes a discussion of the following:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions (GHG)
- Noise
- Population and Housing
- Transportation

AESTHETICS

The Riverfront Mixed-Use EIR concluded that the project would result in less than significant impacts to aesthetic resources as it would not adversely affect a scenic vista, substantially degrade the existing visual character or quality of the site and the surrounding area and would not create new sources of substantial light or glare that would effect day or nighttime views. As the project is not located along or in the vicinity of a designated State scenic highway, the EIR concluded that the project would have no impact as a result of damage to scenic resources within a State scenic highway.

The City's General Plan EIR identifies hills to the west and south, vistas of Sonoma Mountain, and areas along the Petaluma River as important scenic viewpoints as viewed from the Washington Street overpass, McNear Peninsula, and Rocky memorial Dog Park. Additionally, the Central Petaluma Specific Plan (CPSP) EIR notes that there are visually interesting short-range views of the Petaluma River and Sonoma Mountain within the Lower Reach subarea in which the project site is located. Specifically, the CPSP EIR notes that the McNear Peninsula, once developed as a park will become an important vantage point. Since preparation of the 2014 EIR, the McNear Peninsula, now referred to as the Petaluma River Park, has been purchased and is in the early stages of development. Petaluma River Park contains formalized walking paths and is currently publicly accessible. As demonstrated in the images shown on Sheet AP0.03 of the SPAR application, the proposed project will not be distinguishable from existing development and vegetation as seen from scenic viewpoints proximate to the site (McNear Peninsula and Rocky Memorial Dog Park). Furthermore, though portions of the

project site may be visible from Petaluma River Park, the proposed buildings will be of a similar height and mass as the adjacent Marriott Hotel and will not adversely impact short-range views of the Petaluma River and Sonoma Mountain within the Lower Reach subarea of the CPSP. As such, the project will not result in new or more severe impacts on a scenic vista and impacts will continue to be less than significant.

The Project is subject to review and approval of SPAR, which provides an opportunity to review the architectural design, massing, and scale of the proposed buildings to ensure compatibility with the surrounding area. As discussed in the 2014 EIR, the height of the proposed buildings is consistent with the development intensity envisioned in the CPSP. The architectural design of the proposed buildings features a modern style similar to that of the adjacent Marriott Hotel and includes a variety of materials intended to blend with the surrounding natural environment. Based on the project's requirement to obtain SPAR approval, which includes design related findings with regard to compatibility of surroundings, impacts resulting from degradation of the existing visual character or quality of the site and the surrounding area will continue to be less than significant.

The project will be subject to the performance standards contained in Chapter 21 of the Implementing Zoning Ordinance (IZO), including requirements to direct lighting downward to avoid off-site light and glare. As such, the project will not create new sources of substantial light or glare that would effect day or nighttime views and impacts will continue to be less than significant.

AIR QUALITY

The Riverfront Mixed-Use EIR concluded that with implementation of mitigation measures, the Project would result in less than significant impacts to air quality during construction due to a violation of air quality standards and exposure of sensitive receptors to substantial pollutant concentrations. Likewise, impacts due to exposure of future residents to objectionable odors associated with operation of the nearby City-owned Primary Influent Pump (PIP) station were determined to be less than significant with implementation of mitigation measures. The EIR concluded that the Project would have a less than significant impact due to a cumulatively considerable net increase of criteria pollutants and exposure of sensitive receptors to substantial pollutant concentrations during project operation and concluded that there would be no impact with regard to a conflict with an applicable air quality plan.

Following approval of the Riverfront Mixed-Use Project and certification of the EIR and prior to submittal of the Riverfront Spirit Living Project, the Bay Area Air Quality Management District (BAAQMD) adopted the 2017 Bay Area Clean Air Plan (CAP), which updated the 2010 CAP. The 2017 CAP includes measures to reduce emissions of ozone precursors and reduce transport of ozone and its precursors to neighboring air basins and also builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and toxic air contaminants. The proposed Riverfront Spirit Living Project includes a mix of residential and commercial uses, which is consistent with the originally approved Riverfront Mixed-Use Project. Though the proposed Project will introduce a greater number of residential units as compared to the Riverfront Mixed-Use Project, the number of units proposed, and the resulting population is within buildout projections contained in the City of Petaluma General Plan (see Population and Housing discussion below). Furthermore, the Project proposes development within the City of Petaluma urban limits, thereby limiting sprawl; will be required to implement best management practices (BMPs) to protect air quality during construction; and will generate air quality

emissions below thresholds established by BAAQMD, as further discussed below. In addition, the project proposes to implement a peer-to-peer car sharing program and will operate a full-time van service to meet the transportation needs of elderly residents and serve as a shuttle to the Petaluma Downtown SMART station, thereby reducing single occupancy vehicle trips and reducing emissions. The proposed Project continues to support the stated goals of the 2017 CAP, which serves as an update to the 2010 CAP under which the analysis in the 2014 EIR is based, and as such the proposed Project will not conflict with an applicable air quality plan and impacts of the Project will continue to be less than significant.

An Air Quality and Greenhouse Gas Assessment was prepared by Illingworth & Rodkin on August 22, 2022 (Appendix D) to analyze air quality impacts associated with construction and operation of the Riverfront Spirit Living Project and to identify any new or more severe impacts as compared to impacts identified in the Riverfront Mixed-Use Project EIR. Following certification of the 2014 EIR and prior to submittal of the Riverfront Spirit Living Project, BAAQMD updated the CEQA Air Quality Guidelines to include the most recent significance thresholds. Air quality impacts in the Riverfront Mixed Use EIR were analyzed consistent with the 2011 BAAQMD CEQA Guidelines whereas the proposed Project's impacts are analyzed consistent with the 2017 BAAQMD CEQA Guidelines. It should be noted that criteria pollutant emissions thresholds from the 2011 and 2017 Guidelines are the same.

The California Emissions Estimator Model (CalEEMod) was used to calculate air quality emissions associated with construction and operation of the proposed Project as compared to emissions associated with the entire Riverfront Mixed-Use Project as well as site-specific land uses previously approved for Lots 5 and 6. As shown in Table 1, the Riverfront Spirit Living Project will not exceed BAAQMD thresholds for any criteria pollutants during construction or operation of the project.

TABLE 1: CONSTRUCTION AND OPERATIONAL EMISSIONS

	AVERAGE DAILY EMISSIONS (LBS/DAY)			
	ROG	NOx	PM10	PM2.5
CONSTRUCTION				
Riverfront Spirit Living (Project)				
2022 (44 construction days)	3.7	35.4	1.7	1.6
2023 (261 construction days)	6.2	16.3	0.8	0.7
2024 (198 construction days)	10.7	15.5	0.7	0.6
Riverfront Mixed-Use (Site Land Uses)	9.3	12.0	1.4	1.3
Riverfront Mixed-Use (Total)	13.9	40.4	2.1	2.0
BAAQMD THRESHOLDS	54	54	82 (exhaust)	54 (exhaust)
EXCEEDS THRESHOLD?	No	No	No	No
OPERATION				
Riverfront Spirit Living (Project)	8.0	3.5	4.6	1.3
Riverfront Mixed-Use (Site Land Uses)	8.0	5.8	7.0	1.9
Riverfront Mixed-Use (Total)	35.9	23.9	0.5	0.5
BAAQMD THRESHOLDS	54	54	82	54
EXCEEDS THRESHOLD?	No	No	No	No

Construction activities will temporarily generate fugitive dust in the form of PM10 and PM2.5. Consistent with BAAQMD requirements, the Riverfront Spirit Living Project will be required to implement Mitigation Measure AIR-1 and AIR-2 of the 2014 EIR. Implementation of measures AIR-1 and AIR-2 will reduce fugitive dust emissions by over 50 percent and up to 80 percent, and as such

the Riverfront Spirit Living Project will continue to have a less than significant impact to air quality during construction. Additionally, as stated previously and as shown above, operation of the Project falls below BAAQMD thresholds for operational emissions and as such will continue to result in less than significant impacts to air quality during operation. Furthermore, the residential and commercial elements of the Project will not create perceptible odors at operation and as such will continue to have a less than significant impact to air quality as it will not result in other emissions that adversely affect a substantial number of people. As discussed in detail in the 2014 EIR, the site's proximity to the City-owned Primary Influent Pump station has the potential to expose future residents and visitors to objectionable odors. Though this is not considered an environmental impact of the Project, it is discussed in the 2014 EIR for purposes of land use compatibility. As noted therein, implementation of Mitigation Measure AIR-4, which requires reimbursement to the City for the design and construction of the Primary Influent Pump Station mechanical odor control unit, would reduce any potential odor impacts to less than significant. The proposed Project does not alter the conclusion of the 2014 EIR and as such, implementation of measure AIR-4 will ensure impacts remain less than significant.

Similar to impacts identified in the 2014 EIR, construction of the proposed Project could result in health risks to sensitive receptors within the immediate vicinity due to exposure to exhaust emissions generated during temporary construction activities. As noted in the Assessment prepared by Illingworth & Rodkin, Mitigation Measure AIR-3 of the 2014 EIR, which requires use of Tier 2 or greater construction equipment, was assumed to reduce diesel particulate matter (DPM) emissions by 60 percent, thus reducing potential health risk impacts to less than significant. Following approval of the Riverfront Mixed-Use Project, new diesel-powered off-road equipment has been required to meet EPA Tier 4 requirements, which has emissions 60 to 80 percent lower than emissions generated by Tier 2 equipment. Compliance with current requirements to utilize Tier 4 equipment as well as the requirement for the Project to implement AIR-1 and AIR-2, which aim to control fugitive dust emissions during construction will reduce DPM emissions by approximately 85 percent and fugitive dust emissions by 50 to 80 percent. As such, health risks impacts to sensitive receptors during construction will continue to be less than significant. As shown in Table 1, operational emissions from the Project are predicted to be lower than emissions that would be generated by the uses proposed and approved for the site as part of the Riverfront Mixed-Use Project. As such, impacts to sensitive receptors at operation will continue to be less than significant.

As stated above, the residential and mixed-use land uses previously analyzed in the 2014 EIR have been replaced with 106 residential care facility units and 6 work/live units on Lot 6 and 120 residential units and 13 work/live units on Lot 5. Mitigation Measures AIR-1 and AIR-2 remain applicable to the Project and are required to be implemented during construction. As proposed, and with implementation of applicable mitigation measures, air quality impacts of the Riverfront Spirit Living Project will continue to be less than significant.

GREENHOUSE GAS EMISSIONS

The Riverfront Mixed-Use Project EIR concluded that greenhouse gas emissions resulting from project operation would be below thresholds established by the BAAQMD (4.6 MT of CO2e/year/service population)¹ and therefore impacts of the project would be less than significant. The EIR also

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¹ MT CO2e = metric tons of CO2 equivalent

concluded that the project would not conflict with an applicable GHG emissions reduction plan and impacts would be less than significant.

Following approval of the Riverfront Mixed-Use Project and prior to submittal of the Riverfront Spirit Living Project, BAAQMD adopted new thresholds of significance for determining whether a project would result in significant operational GHG emissions. As such, the proposed Project is being reviewed under the newly adopted thresholds. However, for comparison purposes, the Air Quality and Greenhouse Gas Assessment prepared by Illingworth & Rodkin quantified GHG emissions resulting from construction and operation of the Riverfront Spirit Living Project. Neither the City of Petaluma nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, however, construction-related GHG emissions were estimated for disclosure purposes. As presented in the Assessment prepared for the Project, construction would result in 898 MT CO2e. Though there are no adopted thresholds for construction period emissions, BAAQMD encourages incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable. With incorporation of BMPs, GHG-related Project impacts will continue to be less than significant.

As stated above, operation-related GHG emissions were estimated using CalEEMod for the Riverfront Spirit Living Project as well as the prior land uses approved for Lots 5 and 6 as part of the Riverfront Mixed-Use Project to provide a quantifiable comparison between the previously approved and proposed uses. The results of the analysis are presented in Table 2 which demonstrates that GHG emissions associated with the proposed Project will be less than previously estimated for the land uses approved as part of the Riverfront Mixed-Use Project.

Riverfront Spirit Living Riverfront Mixed-Use Source Category (Project) (Site Land Uses) Area 3.1 5.3 **Energy Consumption** 86.8 96.5 Mobile 747.9 1.146.7 Solid Waste Generation 81.0 39.0 25.7 15.6 Water Usage Total 945 MT CO2e 1,303 MT CO2e

TABLE 2: GHG EMISSIONS (CO2E) IN METRIC TONS

Furthermore, as demonstrated below, the Project meets all project design elements set forth by BAAQMD in the newly adopted GHG thresholds.

1. Buildings

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).
 - Consistent with City of Petaluma regulations prohibiting installation of natural gas infrastructure in new buildings, the Project will not include natural gas appliances or plumbing.
- b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

The Project's compliance with CALGreen Building Standards Code requirements will ensure that the Project does not result in any wasteful, inefficient, or unnecessary energy usage.

2. Transportation

a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target (16.8 percent adopted by the City of Petaluma), reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA.

As discussed in detail below, the traffic study prepared for the Project concluded that VMT per capita and per employee would not exceed the City's VMT threshold of 16.8 percent below citywide/regional average trip length.

b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

The Project will include electric vehicle charging infrastructure that meets or exceeds current Building Code CALGreen Tier 2 requirements.

Based on the Project's GHG emissions being lower than previously approved uses as well as the Project's compliance with newly adopted BAAQMD thresholds of significance, it can be concluded that the Project will not result in new or more severe impacts and construction and operational related GHG impacts will continue to be less than significant.

NOISE

The Riverfront Mixed-Use EIR determined that, with implementation of Mitigation Measures, the Project would have a less than significant impact due to exposure of Project residents to noise levels exceeding City-established thresholds. Similarly, with mitigation, the 2014 EIR concluded that temporary increases in noise as a result of construction would be less than significant. Impacts related to a permanent increase in ambient noise levels in exceedance of established thresholds as well as exposure to excessive groundborne vibration or noise associated with operation of the nearby railway or from construction activities were determined to be less than significant. Since the Riverfront Mixed-Use site is located outside an airport land use plan area and is not located within the vicinity of a private airstrip, the 2014 EIR concluded that the Project would have no impacts due to exposure of residents, employees, or customers to excessive noise associated with operation of a public or private airport.

Mitigation Measure NOISE-1 of the 2014 EIR was imposed to reduce impacts related to exposure to noise levels in exceedance of established standards to less than significant and requires preparation of a detailed acoustical report as part of the design phase to determine appropriate noise control treatments for residential buildings. Consistent with measure NOISE-1, Illingworth & Rodkin prepared the Riverfront Parcels 5 & 6 Mixed-Use Development Acoustical Report on August 12, 2022 (Appendix E) which represents a detailed analysis specific to the Project site and proposed uses. The City's General Plan considers exterior noise levels up to 65 dBA CNEL² to be normally acceptable for multi-

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² dBA CNEL is the Community Noise Equivalent Level which is a measure of the cumulative noise exposure in a community, with a 5 dB penalty added to evening (7:00 pm - 10:00 pm) and a 10 dB addition to nocturnal (10:00 pm - 7:00 am) noise levels.

family residential uses to achieve an interior noise level of 45 dBA CNEL or less. In areas where exterior noise levels exceed 65 dBA CNEL, noise attenuation methods such as thicker walls, stucco siding, or sound insulating windows are required to ensure interior noise levels do not exceed 45 dBA CNEL.

As detailed in the acoustical report prepared for the Project and as shown in Figure 5, based on the distance and orientation to Highway 101, the eastern side of Building 1 (mixed-use building) would be exposed to noise levels between 70 and 72 dBA CNEL, the southeast portion of Building 2 (residential care facility for the elderly) would be exposed to noise levels between 69 and 70 dBA CNEL, and the remaining portions of Buildings 1 and 2 would be exposed to noise levels of 65 dBA CNEL or less. In addition to noise associated with Highway 101, the proposed Project would also be exposed to noise associated with operation of the SMART train as well as future freight service operating between Novato and Santa Rosa, some of which is anticipated to occur during nighttime hours. With the Quiet Zone rail designation in place, noise levels from operation of SMART at 50 feet from the rail line would be 60 dBA CNEL. The northern façade of Building 1 is the closest point to the rail line and is located approximately 310 feet away. Based on the distance from the rail line, the northern façade of Building 1 would be exposed to noise levels of 48 dBA CNEL resulting from operation of SMART. Noise levels associated with operation of freight service at 50 feet from the rail line would be 70 dBA CNEL. The resultant noise levels at the closest point of Building 1 would be 58 dBA. Additional studies conducted by Illingworth & Rodkin indicate that passing SMART trains would expose Buildings 1 and 2 to maximum noise levels (Lmax) of 69 and 66 dBA, respectively.

Facades Exposed to 70 and 72 dBA CNEL
Facades Exposed to 69 and 70 dBA CNEL
Facades Exposed to 65 dBA CNEL or less

FIGURE 5: NOISE EXPOSURE LEVELS³

Based on the noise exposure levels resulting from the site's location proximate to Highway 101 and the rail line, the acoustical report recommended that all units be equipped with mechanical ventilation to supply fresh air. Additionally, the report recommends that the sound isolation rating for exterior wall assemblies with stucco have a Sound Transmission Class (STC) rating of STC-46, walls with fiber cement siding, STC-42, and walls with phenolic wood panel siding, STC-39. Based on these sound isolation ratings and the wall-to-window percentages of the proposed residential and RCFE units, the acoustical report recommended the following window STC ratings:

Eastern-facing units (Building 1):

- 30-STC rating with stucco exterior wall finishes
- 32-STC rating with fiber cement exterior wall finishes
- 34-STC rating with phenolic wood exterior wall finishes

Eastern-facing units at south-east end (Building 2):

- 28-STC rating with stucco exterior wall finishes
- 30-STC rating with fiber cement exterior wall finishes
- 32-STC rating with phenolic wood exterior wall finishes

³ Illingworth & Rodkin, Riverfront Parcels 5 & 6 Mixed-Use Development, Petaluma, CA Acoustical Report to address Riverfront Mitigation Measure Noise-1, Figure 1, page 6.

All other units (Buildings 1 and 2):

• Standard thermal insulating windows

Though the Project includes a common open-air rooftop deck on the roof of Building 2, this area will be exposed to 65 dBA CNEL or less, which is considered normally acceptable for multi-family residential uses. As such, no additional measures are required to attenuate noise at this open space area. With implementation of recommendations contained in the Project-specific acoustical report, impacts resulting from introduction of a new use in an incompatible noise environment will be less than significant.

At operation, the Riverfront Spirit Living Project will contribute to the ambient noise environment as a result of activities typical of mixed-use and residential uses such as people talking and building maintenance activities. In addition, operation of vehicles, use of parking along the drive aisle, parking stackers, and operation of heating ventilation and air conditioning (HVAC) units and other mechanical equipment will contribute to the existing noise environment. Noise levels associated with movement and operation of passenger vehicles in the drive aisle and surface parking areas are anticipated to be between 53 to 63 dBA at 50 feet with average noise levels approximately 5 dBA lower. The use of parking stackers is anticipated to result in maximum noise levels of 58 dBA and average noise levels of 53 dBA at 50 feet. Based on the location of adjacent residential uses and the average noise levels noted above, residential uses would be exposed to less than 60 dBA as a result of operation of parking facilities. Mechanical equipment for commercial uses in the mixed-use building are anticipated to be between 58 to 63 dBA at 50 feet and between 47 to 50 dBA at 50 feet for operation of mechanical equipment for residential units. Based on the location of residential uses, average noise levels from HVAC equipment would also expose such uses to less than 60 dBA. Though noise resulting from operation of the Project may be a noticeable change as compared to existing conditions, the resulting noise levels will comply with established standards and impacts of the Project will continue to be less than significant.

As with the Riverfront Mixed-Use Project, the Riverfront Spirit Living Project will result in temporary increases in ambient noise levels as a result of construction activities. The Project is subject to Mitigation Measure NOISE-2, which requires incorporation of standard construction noise controls. With implementation of measure NOISE-2, impacts resulting from temporary increases in ambient noise during construction will continue to be less than significant.

POPULATION AND HOUSING

The Riverfront Mixed-Use EIR concluded that impacts resulting from substantial population growth would be less than significant and that the Project would have no impact due to displacement of substantial numbers of existing housing units or people, necessitating construction of replacement housing elsewhere.

At the time of preparation of the 2014 EIR, the City of Petaluma had an estimated population of 58,804 residents and an average household size of 2.6 residents per dwelling.⁴ As of January 1, 2022, the City

⁴ Riverfront Mixed Use Revised Initial Study, Page 15; California Department of Finance City/County Population and Housing Estimate (January 1, 2013).

had an estimated population of 58,945 residents and an average household size of 2.5 people.⁵ The City's General Plan 2025 forecasts a total population of 72,707 residents at General Plan buildout. Based on the total number of residential units approved under the Riverfront Mixed-Use Project (273) and the average household size at the time of approval (2.6), the resulting Project population was anticipated to be 710 people. As noted previously, Lots 5 and 6 were approved for up to 100 apartments as part of the Riverfront Mixed-Use Project which would equate to 260 residents on Lots 5 and 6. Under the Riverfront Spirit Living Project, a total of 245 residential units are proposed (106 RCFE units, 120 market-rate units, and 19 work/live). Based on applicant-provided information on the number of beds in the RCFE as well as current average household size information provided by the California Department of Finance, the total Project resident population is anticipated to be 466 people.⁶ As proposed, the Riverfront Spirit Living Project would result in 206 more residents on site as compared to the previously approved Riverfront Spirit Living Project. Though the Project will introduce a greater number of residents, the total population is well within the population of 72,707 anticipated at General Plan buildout. As such, the Project will not induce substantial population growth beyond what is anticipated and planned for, and impacts will continue to be less than significant.

TRANSPORTATION

The Riverfront Mixed-Use EIR concluded that, with implementation of mitigation measures, the Project would have a less than significant impact resulting from a safety hazard associated with the at-grade rail crossing at Caulfield Lane. Since adoption of the 2014 EIR, SMART has become operational and appropriate safety measures have been installed at the at-grade intersection. The 2014 EIR also concluded that the Project would have less than significant impacts resulting from a conflict with an applicable plan, ordinance, or policy addressing the performance of the circulation system, due to a conflict with an applicable congestion management program, inadequate emergency access, or due to a conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities or otherwise decrease the performance or safety of such facilities. It should be noted that at the time of preparation of the 2014 EIR, impacts due to a conflict with CEQA Guidelines section 15064.3(b) related to vehicle miles traveled (VMT) were not required to be analyzed and as such there is no discussion of VMT impacts contained in the EIR.

Since approval of the Riverfront Mixed-Use Project, SB 743, which changed how transportation impacts are evaluated under CEQA, went into effect. Under SB 743, transportation impacts of a project are required to be evaluated using a VMT metric. Pursuant to Government Code Section 15064.3(b), the City of Petaluma adopted the Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines, prepared by Fehr & Peers in July 2021. Under the City's VMT Guidelines, Project's resulting in VMT generation 16.8% below the citywide/regional average are considered to have less than significant environmental impacts. Consistent with the requirements of CEQA, the Focused Transportation Study prepared by W-Trans on September 6, 2022 (Appendix F) included an analysis of the proposed Project's VMT. As shown in Table 3, the Project's VMT per capita and per employee would be 12.6 and

⁵ California Department of Finance City/County Population and Housing Estimate (January 1, 2022).

⁶ Includes 118 RCFE residents which is equal to the number of beds proposed at the facility plus 348 residents in market-rate and work/live units ((120 market rate units +19 work live units) X 2.5 average household size).

7.9, respectively, which is less than the 16.8% below citywide average threshold. As such, the Project will result in less than significant impacts related to VMT.

TABLE 3: VEHICLE MILES TRAVELED

VMT METRIC	BASELINE VMT	VMT THRESHOLD	PROJECT VMT
VMT per Capita	19.3	16.1	12.6
VMT per Employee	22.7	18.9	7.9

Source: W-Trans Focused Transportation Study for the 500 Hopper Street Project, Table 2

Notes: Baseline VMT is the citywide/regional average; VMT threshold is 16.8% below citywide/VMT average; Project VMT is measured in home-based commute VMT per employee or per capita and is based on the project's traffic analysis zone (TAZ 888).

The City of Petaluma General Plan seeks to maintain an intersection Level of Service (LOS) D or better to ensure efficient traffic flow and support multi-modal mobility goals. As described in the 2014 EIR, under the Riverfront Mixed-Use Project all existing study area intersections were operating at acceptable levels of service D or better during both the AM and PM peak hours. The EIR concluded that with the addition of project traffic, study intersections would continue to operate at acceptable levels of service, although delays would slightly increase, and LOS at the Lakeville Street/Caulfield Lane intersection would decrease from C to D. As presented in the Transportation Study prepared by W-Trans, the Riverfront Spirit Living Project would result in 1,051 daily trips including 82 during the morning peak hour and 94 during the evening peak hour. This represents a net decrease of 944 daily trips including 49 fewer trips during the evening peak hour as compared to the Riverfront Mixed-Use Project. Though the Project would result in one additional trip during the morning peak hour, as the Project would result in fewer daily and evening peak hour trips, it can be concluded that LOS of surrounding intersections would continue to operate acceptably. As such, the Project will continue to have less than significant impacts due to a conflict with adopted regulations regarding the performance of transportation facilities.

Though the Project will result in additional residents onsite, the overall Riverfront Subdivision site, which includes bicycle and pedestrian facilities as described in the 2014 EIR, will be adequate to serve Project residents and employees. Additionally, the Project is located approximately one mile from the Downtown Petaluma SMART station and Petaluma Transit Mall, both of which provide local and regional access and have adequate capacity to serve the additional Project residents. Additionally, the Project includes a peer-to-peer car sharing program and a full-time van service to serve as a shuttle between the Project site and the station, which is consistent with adopted goals and policies that seek to reduce single-occupancy vehicle use. As such, the Project will continue to have less than significant impacts as a result of a conflict with adopted policies, programs, and regulations related to the circulation system.

The Project is located within the Central Petaluma Specific Plan area, which sets forth parking requirements based on land uses within each Transect Zone. The Project site is within the T-6 Urban Core zone, which requires one parking space per market-rate residential unit, including work/live units, and two parking spaces per 1,000 square feet of floor space for all the other land uses. Based on the proposed uses, the Project requires a total of 236 parking spaces (133 spaces for Building 1 and 103 spaces for Building 2), as shown in Table 4. As proposed, the Project includes 154 parking spaces, which does not meet the parking requirements set forth in the SmartCode. However, consistent with Section 8.10.020(H) of the SmartCode, the Project may deviate from the specific requirements of the code through approval of a Warrant if such deviation is justified by the provisions

of the intent of the SmartCode. A parking demand analysis was conducted as part of the Focused Transportation Study to justify the reduction in parking demand and estimate the actual parking demand of the proposed Project. The analysis utilizes parking demand rates published by the Institute of Transportation Engineers (ITE) for "Nursing Home" (LU #620) and "Multifamily Housing (Mid-Rise)" (LU #221). As there is no published ITE parking rate for work/live units, the study utilizes adopted parking standards from the City of Emeryville, which is one of the only jurisdictions with an adopted parking rate for such use. The results of the parking demand analysis are presented in Table 4, below.

TABLE 4: PARKING SUMMARY

LAND USE	UNITS	RATE	PARKING SPACES		
BUILDING 1 - CITY-REQUIRED PARKING					
Multifamily Housing	120 du	1/du	120		
Work/Live	13 du	1/du	13		
Total			133		
BUILDING 2 - CITY-REQUIRED PARKING					
Residential Care Facility for the Elderly	48,350 s.f.	2 /1000 sf	97		
Work/Live	6 du	1/du	6		
Total			103		
Total Ci	236				
BUILDING 1 - PARKING DEMAND ESTIMATE					
Multifamily Housing (ITE LU #221)	150 bedrooms	0.75/bedroom	113		
Work/Live (City of Emeryville)	13 du	1.5/du	20		
Total			133		
BUILDING 2 - PARKING DEMAND ESTIMATE					
Nursing Home (ITE LU #620)	30 employees	0.67/employee	20		
Work/Live (City of Emeryville)	6 du	1.5/du	9		
Total			29		
•	162				

Source: W-Trans Focused Transportation Study for the 500 Hopper Street Project, Table 3

Notes: du = dwelling unit; sf = square feet; note that the total number of work/live units in Building 1 were reduced from 14 to 13. The table provided herein utilizes the parking rates provided in the Transportation Study, but has been updated to reflect the most recent proposal.

As noted previously, the Project proposes 112 parking spaces for Building 1 and 42 parking spaces for Building 2, representing a deficit of 21 spaces and a surplus of 13 spaces, respectively, based on the parking demand analysis conducted for the Project and as set forth in Table 4 above. Consistent with Section 6.10.030(E)(1) of the SmartCode, the Transportation Study analyzed surrounding on-street parking spaces to determine if there is available supply to accommodate the deficit of the Project. though the SmartCode allows off-site parking within a 1,250 foot walking distance, due to the site's location proximate to the rail line and Highway 101, only on-street parking within 300 feet of the site was counted. Based on the analysis conducted, there are a total of 63 on-street parking spaces within 300 feet of the site including 43 spaces west of the site and 20 spaces north of the site. Since street parking would be utilized by other surrounding uses, including the Marriott Hotel, proposed office, and 2.2 acre active park, a shared parking analysis was conducted, as shown in Table 5.

TABLE 5: SHARED PARKING DEMAND ANALYSIS

LAND USE	PEAK WEEKDAY DEMAND 10:00 AM	PEAK SATURDAY DEMAND 1:00 PM
Marriott Hotel	88	109
General Office	100	10
Active Park	19	62
Total	207	181
Marriott Hotel Parking Supply	180	180
Spillover into On-Street Parking	27	26

Source: W-Trans Focused Transportation Study for the 500 Hopper Street Project, Table 4

Note: the 26-vehicle spillover during the peak Saturday demand is due to only 36 of the 62 vehicles associated with the active park being accommodated within the parking lot easement on the Marriott Hotel site.

The 63 on-street parking spaces within 300 feet of the Project site are adequate to accommodate the 27 vehicle spillover during the weekday peak, 26 vehicle spillover during the Saturday peak, and the 21 vehicle spillover associated with the mixed-use building proposed by the Riverfront Spirit Living Project. Furthermore, peak parking demands for the proposed Project and surrounding uses are not anticipated to occur at the same time as peak parking demand for multifamily housing would occur between 12:00 am and 4:00 a.m. when there would be no demand for the office and active park land uses. Similarly, during the peak parking demand of surrounding land use the proposed Project is expected to have a parking demand of 82 vehicles on weekdays and 88 vehicles on weekends, which can be accommodated within the parking supply of Building 1. Based on the analysis contained in the Transportation Study, proposed Parking in conjunction with available on-street parking would be adequate to serve the Project and surrounding uses. As such, with approval of the request Warrant, the Project would not conflict with adopted regulations and impacts would continue to be less than significant.

As proposed and conditioned, the Project will not increase hazards due to a geometric design feature nor would the Project result in inadequate emergency access. As such, impacts of the Project will continue to be less than significant.

5. CONCLUSION

As described above, the Riverfront Spirit Living Project will not result in new or more severe environmental impacts beyond those identified in the Riverfront Mixed-Use Project EIR, approved in 2014. The Riverfront Spirit Living Project will be subject to all applicable mitigation measures identified in the MMRP adopted for the approved Riverfront Mixed-Use Project, summarized below and fully detailed in the MMRP Applicability Matrix included as Appendix H to this addendum. Therefore, the Riverfront Spirit Living Project will not result in any new or more severe impacts as compared to impacts previously identified for the site. As such, no further environmental review beyond this addendum is warranted.

Applicable Mitigation Measures:

AIR-1

AIR-3

AIR-2

CULT-1

- CULT-2
- GEO-1
- GEO-2
- HAZMAT-1
- HAZMAT-2

- HYDRO-2
- HYDRO-3
- HYDRO-5
- NOISE-1
- NOISE-2

6. REFERENCE DOCUMENTS

6.1 Appendices

- A. Riverfront Mixed-Use Project Tentative Map (Sheet TM-8)
- B. Riverfront Mixed-Use Project Final Map
- C. Project Plans
- D. Air Quality and Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, August 22, 2022
- E. Acoustical Report, prepared by Illingworth & Rodkin, August 12, 2022
- F. Focused Transportation Study, prepared by W-Trans, September 6, 2022
- G. Riverfront Mixed-Use Project Mitigation Monitoring and Reporting Program (MMRP)
- H. Riverfront Spirit Living MMRP Applicability Matrix

6.2 Other Referenced Documents

- 1. City Council Resolution 2014-125
- 2. City Council Resolution 2014-126
- 3. City Council Resolution 2014-127
- 4. City Council Ordinance 2508