

From: [REDACTED]
To: [Barrett, Teresa](#); [Pocekay, Dennis](#); [Fischer, D"Lynda](#); [Barnacle, Brian](#); -- City Clerk; [Kendall Sawyer](#); [REDACTED]
Subject: RE: Rainier Cross-Town Connector
Date: Monday, October 10, 2022 1:57:12 PM

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Dear City Clerk, Councilmembers, and Planning Commissioners,

Please add my comments to the record for the Rainier Cross-Town Connector Workshop.

The Rainier DEIR and the 2015 staff report summarizing the DEIR and responses to comments (Olivia Ervin) are profoundly deceptive documents. In fact, as a State of CA scientist, I've never seen anything more deceptive. Rainier violates one of our City's major policy documents, the USACE Flood Control Plan, which states that, "building upstream of the transition weir [above Lynch Creek] would degrade flood protections". The Corps flood project cost \$100 million dollars and we citizens paid out \$23 million for uninsured losses in the early 2000s due to flood waters. The USACE Flood control Project also reads (3.2.2. Sedimentation and Erosion, pg., 35), "Sedimentation of the Petaluma River is a significant problem affecting both channel capacity and navigability....Areas of highly erodible soils on steep slopes and active landsliding are reported in the Northwesterly portion of the Petaluma River watershed (SCWA, 1986)....Development in the hilly west side could generate significant quantities of sediment...the areas of dredging only extend to the turning basin". This is a non-starter in a river town that regularly floods.

Rainier is a development project rationalized as a transportation fix. The EIR and staff report both acknowledge that the Rainier connector would ***not*** provide traffic relief. To quote: "Decreased delay times at the McDowell/Rainier intersection and a shift in traffic patterns that would increase delays at other intersections, and *a degradation of level of service*". The EIR and staff report readily acknowledge that, "The Rainier Cross-Town Connector will cumulatively contribute to previously identified significant and unavoidable impacts to air quality, noise, and traffic". The document acknowledges that the project, "Will increase the base flood elevation" - and it does not take into account climate change impacts and does not include *any* updated flood modeling/estimates. That renders it useless. Further, per the EIR/staff report, "The project would introduce structures and impervious surfaces within the floodway and within the 100-year floodplain, which has the potential to impede, redirect flows or increase runoff". Our city has a No Net Fill policy. With sea-level rise and more severe storms, we cannot permit any development that will increase runoff!

The EIR did ***not*** analyze the impacts of future connections, including from adjacent parcels along the roadway (and all are in the floodplain, to boot). Further and unapologetically, the staff report reads, "Construction of this roadway would add considerable incremental contribution to the significant cumulative impacts of Global Climate Change". ***This is in no way in line with our City's declared climate goals, thus it violates the City's vision and stated policy goals.*** Per Petaluma's General Plan, "the last remaining vestige of the Petaluma River's oak woodlands and other mature riparian trees can be found here". Ruth Pratt, Senior Biologist

with the US Fish and Wildlife Service described it as, "the most pristine examples of riparian habitat along the river corridor". *With catastrophic climate change on our heels (and well in evidence)* it's a fallacy to state - as the staff report does that, "the overall 30-month construction period can accommodate seasonal restrictions". This is patently untrue.

Per the Rainier DEIR, the bridge construction alone would result in 8.6 ACRES of "impervious surfaces" (and this is before "future connections", houses, commercial retail buildings, sidewalks, driveways, other hardscape, etc). Cementing in the river floodplain renders it useless for flood storage capacity, and would thusly greatly increase our flood risk (at a minimum to Midtown and surrounds), but also the historic downtown and other neighborhoods would be greatly at risk. *When* the flood waters overtop the Corps flood wall (not if), the floodwaters will return to the river via the McNear Channel, flooding and destroying infrastructure in their wake. Per the US Fish & Wildlife Service, at full buildout (of the Corona Reach), > 10 acres of wetlands and 100 acres of the river floodplain would be cemented in (!); this is a catastrophic loss of flood and ecological functions of our river watershed. An eco-crime. And one that would cost us \$ hundreds of millions in infrastructure and potential lives lost. We are in a period of catastrophic climate change, and facing ecological collapse. Where Petaluma is built on a river watershed, and has a long history of flooding, this simply cannot be allowed to happen. All flood models show more severe and more frequent storms, in addition to sea-level rise and king tides, etc. We must therefore maintain the flood storage capacity of our floodplain. The claims in the Rainier staff report that, "No measurable change in water surface elevation would be introduced as a result of the new impervious surfaces" is profoundly unscientific, indefensible, and a farce.

The damage to the river and her ecosystems from construction of the Rainier connector would be catastrophic. The connector would destroy what *several* of our major policy documents (General Plan and River Plan) state is, "the largest and most environmentally-sensitive segment of the Petaluma River" (Petaluma's River Plan was funded by the State Coastal Conservancy and vetted by 25 scientific agencies). This reach of the river includes the last remaining matrix of wet meadow, vernal pools, mature forest, and instream habitat of the main stem Petaluma River. JUST to build the bridge portion of the connector, three hundred (300) 60' steel pipes, driven 50 feet deep, are needed. These are expansive, unstable wetland soils and the staff report/EIR allude to this (Impact GEO-6 & 7 of EIR); that the "project would be located on a geological unit or soil that is unstable or that may become unstable as a result of the project". We also know, where the outlet mall and auto malls flood regularly, including *last October* during our atmospheric storm, that these are unstable, wetland soils. And the Sid Commons EIR clearly lays out the fact that these are expansive, unstable soils. And thusly, no further "geotechnical report" is needed to discern this regards the Rainier connector location.

Per the Rainier EIR, the river would be *diverted*. There would be staging areas on either side of the bank and the river would be "DEWATERED". The river banks would be completely *denuded*, including protected trees, and entails work WITHIN the river channel itself - which will kill numerous species, including many special status species. Incidentally, staging areas are omitted in the DEIR (!). If needed, the river channel would be terraced and widened; this destroys the functionality of a river as habitat and the staff report says this would, "greatly

lengthen the impacts on biological resources". No kidding! The construction period is just shy of 3 YEARS (30 months); there will be 8,000 truck trips. *Wetlands will be filled* (per the SF Estuary Institute, 98% of the Petaluma Valley Watershed's wetlands are gone, therefore any further loss of wetlands is absolutely a SIGNIFICANT impact, and could never be anything but that). And cumulatively, the already-approved Sid Commons site fills wetlands. You cannot consider these impacts separately. This is nothing more than a shell game.

The EIR/Staff report claims that, "with mitigation, impacts to protected trees will be less than significant". We just lost 900 trees in the Corona Reach from the 101 freeway widening (!) so the cumulative impacts on our tree canopy at this project site *are significant*. And, per the USDA tree canopy maps, Petaluma has "sparse tree canopy cover" as is. Our Petaluma River Access and Enhancement Plan, which constitutes major City of Petaluma policy, calls for restoring and enhancing the riparian woodland and oak savannah - not chopping it down ("denuding the river banks"), and chopping down "protected trees" such as our valley oaks, which are critical for biodiversity. Governor Newsom, in his 30 x 30 executive order, has called for preserving waterways such as rivers, creeks and wetlands for our native biodiversity, which are imperiled due to climate change impacts. The Corona Reach - where the Rainier Connector would be situated - is precisely the type of ecosystem that *must* be protected.

Thusly, the Rainier EIR and staff reports repeated declarations that impacts - to air quality, biological resources, hydrology/water quality, traffic, etc, "will be less than significant", *are entirely bogus*. The public is being woefully deceived, and the public good is in no way being served. This is **unacceptable** from our city leadership. Please **decertify** this environmental monstrosity Rainier Connector post-haste, and work to restore this "environmentally-sensitive" segment of our river as a sensitive river park, for heat island relief, to sequester carbon, as critical wildlife habitat/refugia, and to maintain the flood storage capacity of our floodplain.

Sincerely,

Moiria Sullivan

Petaluma resident and State of CA Scientist