CHECKLIST FOR STREAMLINED REVIEW

PURSUANT TO CALIFORNIA PUBLIC RESOURCES CODE SECTION 21083.3 AND CEQA GUIDELINES SECTION 15183

LABCON NORTH AMERICA PROJECT
3200 LAKEVILLE HIGHWAY & 1677 FISHER DRIVE

Prepared By:
City of Petaluma
11 English Street
Petaluma, CA 94952

January 24, 2023

Project Title:	Labcon North America
Application Number:	PLSR-2022-0025 & PLZA-2022-0006
Lead Agency:	City of Petaluma 11 English Street Petaluma, CA 94952
Contact Person(s):	Olivia Ervin, Principal Environmental Planner Phone: 707-778-4556 Email: oervin@cityofpetaluma.org
Project Location:	3200 Lakeville Highway & 1677 Fisher Drive City of Petaluma Sonoma County, California
Applicant	Greg LeDoux 48 West Sierra Avenue Cotati, CA 94931 707-795-8855 greg@gledoux.com
Property Owner	Labcon North America, Attn: Jim Happ 3700 Lakeville Highway, Suite 200 Petaluma, CA 94954 707-766-2100 jhapp@labcon.com
Existing General Plan/Zoning Designation:	General Plan Designation: Business Park (BP) Zoning Designation: Planned Community Development (PCD) & Business Park (BP)
Proposed General Plan/Zoning Designation:	General Plan Designation: Business Park (BP) Zoning Designation: Business Park (BP)
Description of Project:	The project would rezone 6.51 acres along Fisher Drive from Lakeville Business Park Planned Community Development (PCD) to Business Park (BP) to be consistent with the existing BP zoning designation of the 9.82-acre portion of the site along Lakeville Highway and the construction of a new 176,657 square foot building for warehouse and manufacturing operations. Post construction, the parcel would include 288,209 square feet of total floor area, with Labcon North America using 247,941 square feet as a manufacturing, warehousing and distribution facility, and Steris Corporation's existing 40,268 square foot sterilization facility, on the 16.33 acre site.
Surrounding land uses and setting; briefly describe the Project's surroundings:	The project site is bounded by Lakeville Highway and Adobe Creek to the north, South McDowell Boulevard to the west, Fisher Drive to the south, and Cader Lane to the east. The surrounding land uses consist of retail/commercial, residential, food & wine production, light industrial, laboratories, offices, and personal services.
Other public agencies whose approval is required (e.g., permits, financial, or participation agreements):	Regional Water Quality Control Board (SWPPP), Sonoma Water (Stormwater Management Plan), and Bay Area Air Quality Management District (Demolition Permit).

Have California Native American tribes requested consultation pursuant to Public Resources Code Section 21080.3.1?	Notice was delivered to the Federated Indians of Graton Rancheria on August 26, 2022. The Federated Indians of Graton Rancheria requested formal consultation on September 7, 2022, and the City met with the Federated Indians of Graton Rancheria on October 17, 2022. Consultation concluded with agreement to impose Tribal monitoring as a project condition of approval (see Environmental Condition of Approval 8).

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ACRONMYMS/ABBREVIATIONS

APN	ASSESSOR PARCEL NUMBER
BAAQMD	BAY AREA AIR QUALITY MANAGEMENT DISTRICT
BMP	BEST MANAGEMENT PRACTICE
CCR	CALIFORNIA CODE OF REGULATIONS
CDFW	CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
CEQA	CALIFORNIA ENVIRONMENTAL QUALITY ACT
CNEL	COMMUNITY NOISE EQUIVALENT LEVEL
CNPS	CALIFORNIA NATIVE PLANT SOCIETY
CRHR	CALIFORNIA REGISTER OF HISTORICAL RESOURCES
DBA	A-WEIGHTED DECIBEL
DPM	DIESEL PARTICULATE MATTER
DPR	DEPARTMENT OF PARKS AND RECREATION
DTSC	DEPARTMENT OF TOXIC SUBSTANCE CONTROL
EIR	ENVIRONMENTAL IMPACT REPORT
GHG	GREENHOUSE GAS
GPD	GALLONS PER DAY
LID	LOW IMPACT DEVELOPMENT
LOS	LEVEL OF SERVICE
MBTA	MIGRATORY BIRD TREATY ACT
NPDES	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
NAHC	NATIVE AMERICAN HERITAGE COMMISSION
NHPA	NATIONAL HISTORIC PRESERVATION ACT
NRHP	NATIONAL REGISTER OF HISTORIC PLACES
NWIC	NORTHWEST INFORMATION CENTER
OEHHA	CALIFORNIA OFFICE OF ENVIRONMENTAL HEALTH HAZARDS ASSESSMENT
PPV	PEAK PARTICLE VELOCITY
PRC	PUBLIC RESOURCES CODE
RCPA	REGIONAL CLIMATE PROTECTION AGENCY
ROG	REACTIVE ORGANIC GAS
RWQCB	REGIONAL WATER QUALITY CONTROL BOARD
SCH	STATE CLEARINGHOUSE
SWPPP	STORM WATER POLLUTION PREVENTION PLAN
SWRCB	STATE WATER RESOURCES CONTROL BOARD
UST	UNDERGROUND STORAGE TANK
UWMP	URBAN WATER MANAGEMENT PLAN
$\mu G/M^3$	MICROGRAMS PER CUBIC METER
VMT	VEHICLE MILES TRAVELED

1. INTRODUCTION

This California Environmental Quality Act (CEQA) Analysis evaluates environmental impacts from the proposed Labcon North America project at 3200 Lakeville Highway and 1677 Fisher Drive (hereinafter referred to as the "Project").

1.1. OVERVIEW OF CEQA ANALYSIS

Documentation herein has been prepared by the City of Petaluma as lead agency in full accordance with the procedural and substantive requirements of CEQA, the 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 General Plan and its Environmental Impact Report (EIR).

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

1.2. PUBLIC REVIEW PROCESS

The Project has been analyzed pursuant to CEQA Guidelines Section 15183 and does not require circulation for public review and comment. Nonetheless, the city will make this CEQA Analysis available as part of the public hearing process.

1.3. PURPOSE AND SUMMARY OF THIS CEQA DOCUMENT

The purpose of this document is to evaluate environmental effects of the Project under CEQA. This document considers the specific environmental effects of the Project as proposed and considers whether such impacts were adequately addressed in prior environmental analyses in the City of Petaluma General Plan EIR. The Project is required to incorporate or comply with all applicable mitigation measures identified in the General Plan EIR, uniformly applied development standards, and applicable conditions of approval. Section 6 of this document contains environmental conditions of approval that will be imposed on the project to ensure implementation of mitigation measures from the General Plan EIR identified to avoid, reduce, or offset potential environmental impacts. As presented herein, the Project is consistent with the General Plan and qualifies for a General Plan Exemption pursuant to provisions of CEQA (15183).

General Plan Consistency Exemption

Development of the Project site at the proposed intensity has been planned for and analyzed in the EIR certified for the City of Petaluma General Plan. As such, the analyses in the General Plan program-level EIR are applicable to the Project and provide the basis for use of the General Plan Exemption (California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183).

2. PROJECT DESCRIPTION

This section of the CEQA Analysis provides a characterization of the Labcon North America project including the environmental setting, location, description of construction activities and operational uses, and the required entitlements. The Project Description section concludes with a statement regarding the Project Applicant's commitment to implement the applicable mitigation measures from the General Plan EIR.

2.1. ENVIRONMENTAL SETTING

Regional Setting

Petaluma is located in the southern portion of Sonoma County along the Highway 101 corridor approximately 15 miles south of Santa Rosa and 20 miles north of San Rafael. The city is situated at the northernmost navigable end of the Petaluma River, a tidal estuary that drains to 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 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 and formally adopted as the UGB in 1998 via Measure I. The UGB expires in 2025. The General Plan and EIR evaluated potential impacts associated with existing development and buildout of all land use within the UGB.

Vicinity Setting

The Project is located along the northern boundary of the Lakeville Highway subarea of the General Plan in southeast Petaluma, about two miles east of downtown Petaluma. The Project site is bounded by Lakeville Highway and Adobe Creek to the north, South McDowell Boulevard to the west, Fisher Drive to the South, and Cader Lane to the east. Across Cader Lane to the east are existing buildings that are occupied by Scott Laboratories, Petaluma Poultry, Clover, Cowgirl Creamy, and other business park uses. Across Fisher Drive to the south is BioMarin Pharmaceutical, and across South McDowell Boulevard is a business park multi-tenant building currently occupied by Terminix, Red Bull, and other uses. Across Adobe Creek is a creekside path and a shopping center within the Lakeville Business Park with frontage along Lakeville Highway and South McDowell Boulevard. Low-density residential uses dominate the region north of Lakeville Highway, including the Casa Del Oro and Southgate Planned Unit Developments (PUDs). Public recreation opportunities in the vicinity are accessible via Cader Lane and a sidewalk along the roadway to Shollenberger Park approximately 1,000 feet to the south of the site. Adobe Creek abuts the west and north property line.

Project Site

The 16.33-acre Project site abuts Lakeville Highway, South McDowell Boulevard, Fisher Drive, and Cader Lane. A 9.82-acre portion of the site at 3200 Lakeville Highway is developed with 111,552 square feet of gross floor area and paved surfaces and a 6.51-acre portion of the site along Fisher Drive is undeveloped except for a 23,110 square foot parking and landscape area at the frontage of South McDowell Blvd. Ext and Fisher Drive. The existing building at 3200 Lakeville Highway is occupied by Labcon North America (40,000 square feet), PRS Stainless Fabrication (23,484 square feet), and Steris Corporation (40,268 square feet). Other existing site improvements include asphalt pavement for drive aisles and parking, accessible parking spaces, truck loading docks and concrete paving for truck traffic areas, and concrete flatwork for pedestrian paths toward Lakeville Highway and Cader Lane from the existing building. The undeveloped portion of the site has been previously cleared and graded slightly to the south and is improved with curb, gutters, and storm drains along Fisher Drive and Cader Lane. Approximately 91 trees are located on the Project site, located primarily in developed portions of the Project site within and along the 9.82-acre portion of the site, the 23,110 square foot landscape and parking area at the western end of the Project site, and adjacent to Adobe Creek.

2.2. PROJECT LOCATION

The Project is located at 3200 Lakeville Highway in the southeastern portion of the City of Petaluma, in the County of Sonoma (**Figure 1: Regional Location**).

As seen in **Figure 2: Vicinity Map**, the Project site is in the southeastern portion of the city, east of the Petaluma River and U.S. Highway 101. The General Plan Land Use designations abutting or surrounding the site include Business Park, Open Space, Public/Semi-Public, and Low-Density Residential. The surrounding area includes commercial and business park uses, the Adobe Creek corridor, a shopping

center, and low-density residential uses north of Lakeville Highway. The Project site is entirely located within the FEMA Flood Hazard Area Zone X, identified as areas of minimal flood hazard. As such, the site is not within a 100-year floodplain as identified on the Flood Insurance Rate Map produced by FEMA.

The Project site has a General Plan land use designation of Business Park (**Figure 3: General Plan Land** Use) and is zoned Business Park and Lakeville Business Park PCD (**Figure 3: General Plan Land Use**).

2.3. PROJECT DESCRIPTION

The Project would rezone an undeveloped area along Fisher Drive in the southern portion of the Project site (Figure 5: Proposed Zoning Map), change the use within portions of the existing buildings, and construct a new light manufacturing/processing facility for Labcon North America. More specifically, the Project consists of the following components:

1. Zoning Map Amendment to change the zoning designation of 6.51 acres of area along Fisher Drive from Lakeville Business Park Planned Community Development (PCD) to Business Park (BP);
2. Convert 23,484 square feet of the existing 103,752 square foot building at 3200 Lakeville Highway for use by Labcon as a tool room and machine shop;
3. Change the use of the 7,800-square-foot accessory building from storage to mechanical uses to support the storage and handling of raw materials for Labcon;
4. Construct 176,657 gross square feet within a two-story building, with an average height of approximately 33 feet, to include 82,802 square feet of manufacturing and processing floor area, 51,330 square feet of ancillary offices, and 42,525 square feet of warehousing, and the installation of six 40-foot tall, 10-foot diameter silos to store raw materials for Labcon;
5. Create 132 new paved parking spaces;
6. Create 138 new landscaped parking reserve spaces;
7. Provide 28 exterior short-term bicycle parking spaces and 31 interior long-term bicycle parking spaces for a total of 59 bicycle parking spaces;
8. Create five full-size loading berths and one smaller loading berth for a total of 18 full-size and seven smaller loading berths; and
9. Expand existing employment of 45 employees to 315 employees, operating 24 hours per day, seven days per week. Over the next five years, Labcon expects total employment will increase to approximately 410 employees.

Post construction, the 16.33-acre parcel would include 288,209 square feet of total floor area, with Labcon North America using 247,941 square feet as a manufacturing, warehousing, and distribution facility and Steris Corporation using 40,268 square feet as a sterilization facility (Figure 6: Site Plan).

Site Access and Parking

Of the existing 176 paved parking spaces on the Project site, 157 spaces are proposed to remain, and an additional 132 parking spaces are proposed to be installed for a total of 289 parking spaces on the Project site. Of the existing 174 parking spaces held in a landscape reserve (to be put into use when needed to support potential future parking demand), 135 spaces are proposed to remain, and an additional 138 spaces are proposed, for a total of 273 spaces held in a landscape reserve. Total parking capacity planned for this site is 562 spaces, and of these, 49 parking spaces would be reserved for clean air vehicles (fuel-efficient (FE) vehicles, high-occupancy vehicles (HOV), and electric vehicles (EV)). Also, approximately 22 charging stations will be provided. Four proposed accessible parking spaces in addition to eight existing accessible parking spaces would result in twelve cumulative accessible parking spaces.

Proposed bicycle parking includes installation of 14 exterior short-term bicycle parking spaces, retaining 14 existing exterior short-term bicycle parking spaces, installation of 10 interior long-term bicycle spaces, and retaining 21 interior long-term bicycle parking spaces for a total of 28 exterior short-term bicycle parking spaces and 31 interior long-term bicycle parking spaces. 59 bicycle parking spaces would be provided in total.

Access to the site is provided via two existing driveways along Cader Lane and the project would add two driveways along Fisher Drive. Loading and truck maneuvering areas in the central portion of the site would be accessed via Cader Lane between the existing and proposed buildings.

Pedestrian access would be provided from Lakeville Highway, South McDowell Boulevard, Fisher Drive, and Cader Lane via existing sidewalks. The Project would install new sidewalks along the site frontage of Cader Lane and Fisher Drive to connect to the existing sidewalks on Cader Lane and South McDowell Boulevard. An existing Class II bicycle path runs along South McDowell Boulevard; the project will extend the existing Class II bicycle lane south along Cader Lane to connect to the existing bike lane at Fisher Drive. To support the use of bicycles and to comply with the Petaluma Implementing Zoning Ordinance (IZO), the project would include four employee showers within the ground floor of the new building.

Site Preparation and Construction

Construction would include grubbing to remove grasses and vegetation and grading activities in the undeveloped portions of the Project site. During site preparation and grading, 56 trees would be removed, including 5 protected trees, fill would be added and compacted, and soil would be removed. Fill areas are located primarily beneath the proposed building footprint, with cut taking place primarily at the periphery of fill areas for stormwater treatment areas, landscaping, and pedestrian walkways. The maximum fill height would be approximately seven feet and the maximum cut depth would be approximately six feet. Approximately 4,340 cubic yards of excavation and approximately 28,260 cubic yards of fill are proposed to achieve Project grades.

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

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

The overall construction time is expected to be approximately 18 months and would occur in a single phase.

Landscaping and Lighting

New landscaping would be installed in concentrated areas at the Project site along the perimeter, adjacent to the proposed building, within parking areas, and in landscape parking reserves. More specifically, landscaping would be installed at front entrances of the proposed building, native plantings and trees would be planted along the Adobe Creek frontage to enhance the riparian corridor, new landscaping would be planted along roadway frontages for screening and visual softening of the new building, stormwater runoff filtration facilities would be planted throughout the Project site, and new trees would be planted in parking lot areas for shading. Landscaping would consist of trees, shrubs, grasses, perennials, and vines. Irrigation would comply with the city of Petaluma landscaping and irrigation standards and would include the use of volume drip sprinklers, automatic controllers, and rainwater harvesting system. The irrigation system will also include pre-installed purple pipe for potential future connection to a non-potable recycled water source.

All landscaping will include trees and plants that are low water use to include a mix of native and non-native species. The landscaped areas will include five California native tree species: California Buckeye, California Sycamore, Valley Oak, Coast Live Oak, Western Redbud, and one non-native: Chitalpa ‘Pink Dawn’. The landscaping will also include a mixture of shrubs, perennials, vines, and grasses.

Within a new landscaped area abutting Adobe Creek, an employee break area would be created and would include tables and seating.

New wall, pole-mounted, and bollard lighting would provide exterior lighting for the new building and parking spaces in the southern portion of the site and along the Cader Lane and Fisher Drive frontages. All exterior lighting would be provided consistent with the city of Petaluma standards to have all wall-mounted lights be below the height of the proposed building, pole-mounted lights to be no higher than 20 feet above grade, and all lights to be shielded to limit glare or spill-over lighting. In addition, to limit off-site glare and reduce energy use, all exterior lighting will be on timers and/or motion sensors to provide nighttime lighting as needed.

Utilities

Utilities are provided to the site via connections within the public right-of-way and within the onsite public utility easements, including a 10-foot-wide private storm drain easement through the middle of the site, 10-foot-wide public utility easements along Cader Lane and Fisher Drive, and existing electrical connections along Lakeville Highway. On-site energy consumption would be offset by 4,685 roof-mounted solar panels and would comply with Ordinance 2775 N.C.S., which added an "All-Electric Construction in New Constructed Buildings" Chapter to the Petaluma Municipal Code (PMC) to preclude the use natural gas in new construction. Water service would be provided via a new 12-inch diameter pipe to connect to an existing 12-inch diameter main located within the Cader Lane and Fisher Drive public right-of-way. The site is served by 10 existing fire hydrants on site or along the project frontage; the project would add three fire hydrants to connect to the existing water line within the public right-of-way to serve the proposed building. New sewer lines to connect to the existing 8-inch diameter sanitary sewer line within Fisher Drive and Cader Lane would be installed using new 4-inch and 6-inch diameter pipes (all sewer lines convey flows to the municipal wastewater plant for treatment).

Impervious surfaces including building rooftops and hardscapes (sidewalk, loading, and parking areas) would drain to bioretention stormwater treatment facilities within seven Drainage Management Areas (DMAs) for treatment and eventual discharge as infiltration or overflow into the existing storm drain system. Water runoff from the roof of the proposed building would be directed through downspouts to a subsurface rain harvesting system capable of supplying approximately 1,793,305 gallons of water for landscape irrigation annually. New storm drainage infrastructure to accommodate impervious surfaces that would result from the development would be installed to include bio-retention facilities and landscaping. Onsite improvements would capture stormwater runoff and convey flows to one of seven DMAs throughout the southern portion of the site containing a total of 22 bioretention facilities.

Existing development would continue to utilize existing utilities including drainage infrastructure, water service, sewer service, and electric service in the northern portions of the site.

2.4. CITY ENTITLEMENTS

The Project is undergoing Site Plan and Architectural Review (SPAR), which is subject to review and approval by the Planning Commission, and a Zoning Map Amendment (Rezoning), which is subject to review and adoption by the City Council. Pursuant to IZO Section 24.050, SPAR is at the discretion of the Planning Commission and pursuant to IZO Chapter 25, Rezoning is at the discretion of City Council following recommendation of the Planning Commission.

2.5. OUTSIDE AGENCY APPROVALS REQUIRED

The Project will require approval from the Regional Water Quality Control Board (RWQCB) for the Project's Stormwater Pollution Prevention Plan (SWPPP) and Sonoma Water for review, approval, and acceptance of the Project's Stormwater Management Plan.

2.6. ENVIRONMENTAL CONDITIONS OF APPROVAL

The Project must incorporate all applicable mitigation measures set forth in the findings of fact for the certified City of Petaluma General Plan Environmental Impact Report (EIR) (SCH Number 2004-8-2065).

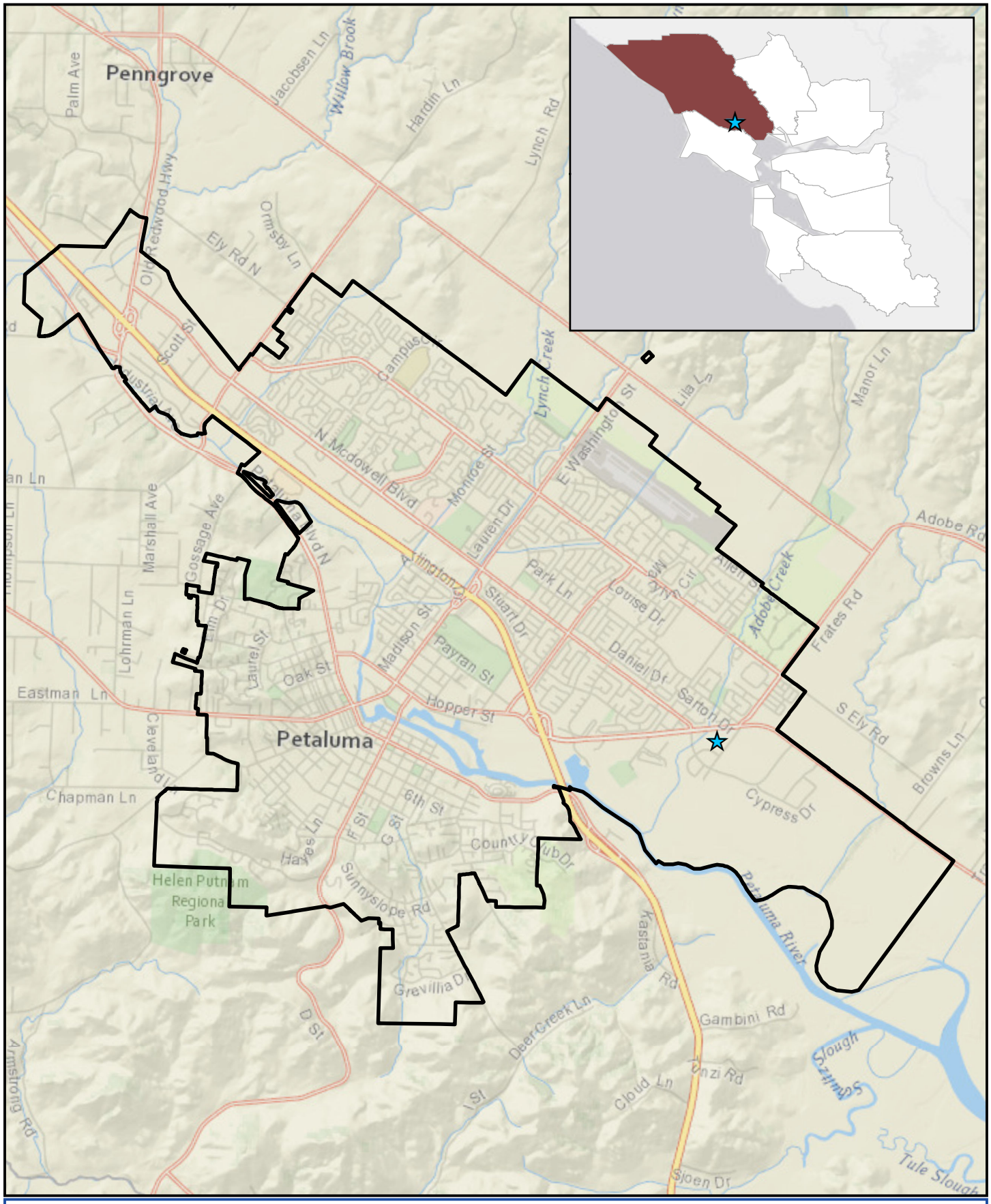
In each impact section of the Evaluation of Environmental Impacts, applicable mitigation measures from the findings of fact for the certified EIR are identified. Section 6 of this CEQA Analysis identifies relevant conditions of approval for the Project derived from mitigation measures, policies and implementing programs established in the City's General Plan and its corresponding EIR.

The Project applicant has reviewed the conditions identified in Section 6 and as signed below is committed to implementing all conditional of approval as part of the Project.

_____ _____

Signature: Project Applicant **Date**

FIGURE 1



LABCON NORTH AMERICA: REGIONAL LOCATION

0 0.5 1 2 Miles

Data source: City of Petaluma; Sonoma County GIS; ESRI Basemap

PROJECT SITE
CITY OF PETALUMA
SONOMA COUNTY

FIGURE 2

LABCON NORTH AMERICA: PROJECT VICINITY

0 250 500 1,000 Feet

Data source: City of Petaluma; Sonoma County GIS; ESRI Basemap

PROJECT SITE
PARCELS
STREAM_CENTERLINES

FIGURE 3

LABCON NORTH AMERICA: GENERAL PLAN LAND USE

0 250 500 1,000 Feet

Data source: City of Petaluma; Sonoma County GIS; ESRI Basemap

PROJECT SITE
PARCELS
ADOBE CREEK

FIGURE 4

LABCON NORTH AMERICA: EXISTING ZONING

0 250 500 1,000 Feet

Data source: City of Petaluma; Sonoma County GIS; ESRI Basemap

PROJECT SITE
PARCELS
ADOBE CREEK

FIGURE 5

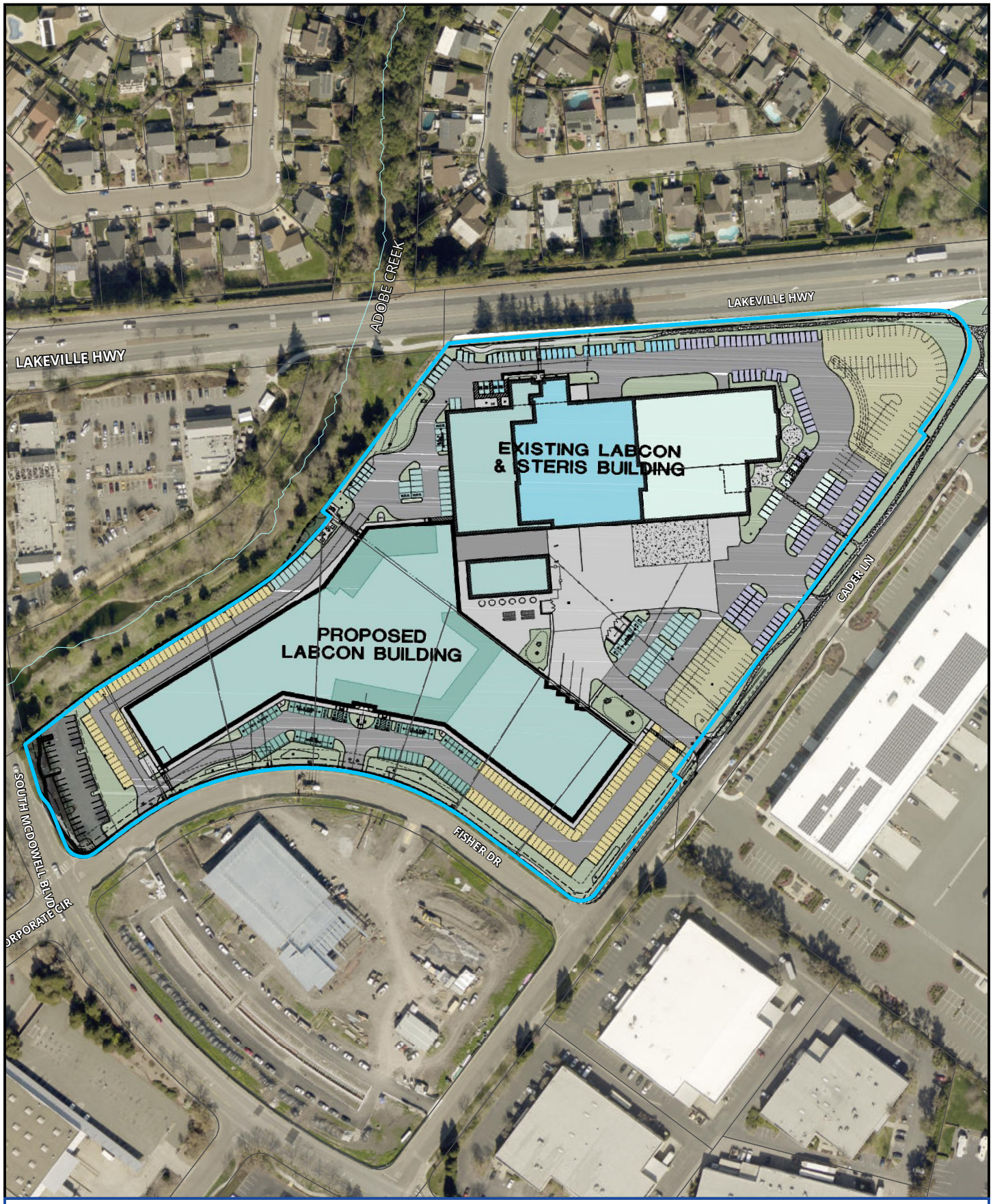
LABCON NORTH AMERICA: PROPOSED ZONING

0 250 500 1,000 Feet

Data source: City of Petaluma; Sonoma County GIS; ESRI Basemap

PROJECT SITE
PARCELS
ADOBE CREEK

FIGURE 6



LABCON NORTH AMERICA: SITE PLAN

0 155 310 620 Feet

PROJECT SITE
PARCELS
ADOBE CREEK

Data source: City of Petaluma; Sonoma County GIS; ESRI Basemap; Labcon North America Project Plans prepared by Greg LeDoux & Associates July 26, 2022

3. APPLICABLE CEQA PROVISIONS AND FINDINGS

The following discussion presents the relevant provisions of CEQA to which the proposed Labcon North America Project complies and provides a determination of consistency with the General Plan EIR. A description of how the Project complies with the General Plan EIR is also provided. This section concludes with the CEQA finding and determination that the Project is exempt from further environmental review.

3.1. 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) of the CEQA Guidelines specifies that "in approving a project meeting the requirements of Section 15183, examination of environmental effects shall be limited to those that:

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 impacts which are not peculiar to the project site which have been addressed as a significant effect in the prior EIR or can be substantially mitigated by applying uniformly applied development standards and policies shall not require preparation of an additional EIR on the basis of that impact. As such, the Project is required to implement all applicable mitigation measures set forth in the General Plan EIR to avoid, reduce, or offset environmental impacts. Section 6 Environmental Conditions of Approval of this CEQA Analysis identifies the relevant conditions of approval that will be applied to the Project to demonstrate compliance with mitigation measures set forth in the program level EIR, and policies, programs, and goals of the General Plan.

Applicability of the Labcon North America Project to 15183

The proposed Labcon North America Project is consistent with the General Plan land use designation and zoning for the site, as outlined above, and meets the streamlining provisions under CEQA Guidelines Section 15183(d)(1)(C) as follows:

- 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 contemplated an additional 6.1 million square feet of non-residential space above the 2008 baseline conditions, which could result in approximately 23 million square feet of non-residential floor area in Petaluma at buildout of the General Plan, whereas approximately 2 million square feet of new non-residential floor area has been or is being constructed in Petaluma since 2008 and the Project proposes a new 176,657 square foot non-residential building.
- The Petaluma General Plan 2025 designates the Project site land use as Business Park, which is intended for business and professional offices, technology park clusters, research and development, light industrial operations, and visitor service establishments with retail only as a secondary use; and provides a maximum floor area ratio (FAR) of 1.5. The Project is consistent

with the Business Park land use designation in that it provides a light industrial facility with a FAR of 0.41 FAR.[1]

- The Project is consistent with General Plan Policies which promote a range of land uses and employment opportunities, seek to use land efficiently through promoting infill development, and encourage efficient use of resources. The proposed Project is consistent with applicable General Plan Policies including, but not limited to:

  Policy 1-P-1: Promote a range of land uses at densities and intensities to serve the community needs within the Urban Growth Boundary (UGB).

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

  Policy 4-P-2: Conserve wildlife ecosystems and sensitive habitat areas in the following order of protection preference: 1) avoidance, 2) on-site mitigation, and 3) off-site mitigation.

  Policy 4-P-19: Encourage use and development of renewable or nontraditional sources of energy.

  Policy 5-P-13: Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.

  Policy 5-P-31: Make bicycling and walking more desirable by providing or requiring development to provide necessary support facilities throughout the city.

  Policy 8-P-5: Develop alternative sources of water to supplement imported supply.

  Policy 8-P-20: Manage groundwater as a valuable and limited shared resource by protecting potential groundwater recharge areas and stream sides from urban encroachment within the Petaluma watershed.

  Policy 8-P-36: Require development on sites greater than 1/4 acre in size to demonstrate no net increase in peak day stormwater runoff, to the extent deemed practical and feasible.

  Policy 8-P-38: All development activities shall be constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System (NPDES) permit requirements.

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

[1] 16.33-acre site / 288,209 square feet of gross floor area = FAR of 0.41

- 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
  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 4.3 Air Quality and 4.8 Greenhouse Gas Emissions.)
- A possible cumulatively considerable incremental contribution from General Plan development to the significant impact of global climate change.

As of July 2020, Senate Bill 743 amended CEQA Guidelines Section 15064.3 to require lead agencies to analyze transportation impacts of discretionary projects using the VMT metric instead of level of service (LOS). In July 2021, the City adopted VMT Implementation Guidelines that provide thresholds of significance, screening criteria, and mitigation options.

Impacts to vehicle miles traveled (VMT) were not analyzed under the General Plan EIR. However, as impacts related to greenhouse gas emissions, air quality, and transportation were analyzed, impacts to VMT were indirectly considered. Compliance with the approved Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines and the intent and applicable policies of the General Plan would ensure that new development under the General Plan does not contribute to additional significant and unavoidable impacts related to VMT.

3.2. CEQA DETERMINATION AND SUMMARY OF FINDINGS

As summarized above and presented herein, the Labcon North America Project is eligible for the following CEQA provisions:

Consistency with Program EIR

The City of Petaluma General Plan EIR provides for streamlining and/or tiering provisions under CEQA Guidelines Section 15183 and California Public Resources Code Section 21083.3. This CEQA Analysis demonstrates that the Labcon North America 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 EIR for the General Plan, and furthermore, the Project does not contain elements that are peculiar to the Project or Project site that would result in new or more severe environmental impacts relative to the General Plan EIR. As such, no further environmental review is required.

As described herein, the proposed Project is within the scope of development projected under the General Plan and analyzed in the General Plan EIR. The proposed Labcon North America Project will implement applicable mitigation measures identified in the General Plan EIR to address potential environmental impact and these have been incorporated as environmental conditions of Project approval. In addition, the Project would be required to comply with conditions of approval from planning, building, public works, fire, police, and other City departments as applicable. With implementation of identified conditions of approval, the Project would not result in a substantial increase in the severity or significant impacts that were previously identified in the program level EIR, 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 General Plan EIR.

I hereby certify that the above determination has been made pursuant to State and Local requirements.

Signature: Olivia Ervin, Principal Environmental Planner **Date**

4. EVALUATION OF ENVIRONMENTAL EFFECTS

This section examines the Labcon North America Project's potential environmental effects within the parameters outlined in CEQA Guidelines Section 15183(b). The "Prior EIR" (as defined in CEQA Guidelines Section 15183(b)(3), is the City of Petaluma General Plan EIR, inclusive of all impact determinations, significance thresholds and mitigation measures identified therein.

This 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.
>
> **Substantial Increase in Severity of Previously Identified Significant Impact in GP EIR –** The proposed Project's specific impact would be substantially greater than the specific impact described in the General Plan EIR.
>
> **Substantial Change Relative to GP EIR –** The proposed Project would involve a substantial change from analysis conducted in the General Plan EIR.
>
> **Equal or Less Severity of Impact than Previously Identified in GP 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.

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, the checkbox for "Equal or Less Severity of Impact Previously Identified in GP EIR" is checked. Where the checkbox for "Substantial Increase in Severity of Previously Identified Significant Impact in GP EIR" or "New Significant Impact" is checked, there are significant impacts that are:

> Peculiar to the 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, as evaluated in the General Plan EIR, are described. Next, the potential Project-specific environmental effects of the proposed project, including the Project's consistency with the General Plan EIR, are discussed. Last, applicable General Plan EIR mitigation measures, as well as General Plan 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 EIR.

This evaluation hereby incorporates by reference the Petaluma General Plan EIR discussion and analysis of all environmental topics. The General Plan 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 EIR.

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

4.1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; Site Plan and Architectural Review Submittal, prepared by Greg LeDoux and Associates, dated July 26, 2022; Preliminary Landscape Plans, prepared by Steve LaFranchi and Associates, dated July 15, 2022; and California Scenic Highway Mapping System, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed September 2022.

Petaluma General Plan 2025 EIR Findings

The General Plan 2025 EIR (Figure 3.11-1) identifies hills to the west and south of the city, vistas of Sonoma Mountain, and land along the Petaluma River as local scenic resources. The General Plan 2025 EIR utilizes three public viewpoints to determine potential adverse effects upon these vistas: the Washington Street overpass, the McNear Peninsula, and the Rocky Memorial Dog Park. The following impacts to visual resources were identified in the General Plan EIR:

Impact 3.11-1: New development may block views of Sonoma Mountain and ridgelines and/or alter the visual character of the hillsides. (Less than Significant)

Impact 3.11-2: New development and intensification along the Petaluma River could adversely affect the visual character of this natural resource. (Less than Significant)

Impact 3.11-3: New development and redevelopment activities may potentially degrade the existing visual quality of the city through incompatibilities with existing development in scale and/or character. (Less than Significant)

To address potential impacts related to visual resources, the General Plan 2025 EIR identifies General Plan Policy 2-P-14, Policy 2-P-15, Policy 3-P-63, and Policy 10-P-3 which direct the City to protect hillside areas and ridgelines by establishing hillside development and design standards, clustering and transfer of density provisions for non-hillside development, extension of the Urban Separator along hillside areas, and regulating grading of hillside development; Policies 2-P-36 through 2-P-39, Policy 3-P-32, Policy 3-P-35, Policy 3-P-36, and Policies 3-P-50 through 3-P-53 which direct the City to improve the Petaluma River

Corridor as a focal point for Downtown development with increased accessibility using the Petaluma River Enhancement Plan as a guide, while ensuring that natural resources present within the corridor are maintained and preserved; and Policy 2-P-3, Policy 3-P-42, Policy 3-P-56, 3-P-99, Policy 3-P-99, and Policy 6-P-6 which direct the City to preserve scale and character of established residential neighborhoods and rural areas and consider transfer of density provisions from park areas donated by new residential developments.

The General Plan 2025 EIR concluded that infill development or redevelopment of existing sites would not have a significant impact on the visual quality of the city, including the river, because new development would be similar in scale and character to existing surrounding development. Furthermore, implementation of the General Plan would result in less than significant impacts due to new sources of light and glare. The Implementing Zoning Ordinance (IZO) regulates lighting levels, and the Site Plan and Architecture Review (SPAR) process requires review of new lighting introduced onsite on building exteriors, parking areas and landscaping.

Project Consistency with the General Plan 2025 EIR

The Project is not readily visible from the McNear Peninsula or the Washington Street overpass public viewpoints. The Project would not be visible from Rocky Memorial Dog Park (located approximately 2,200 linear feet from the site) due to intervening existing urban development, landscaping, and natural features. The Project's proposed building setbacks and heights are consistent with adopted City policy documents (i.e., Petaluma General Plan and IZO). The scale and character of the Project is similar to that of the surrounding business park development. The proposed architectural details and landscaping serve to reduce the overall massing of the structure and incorporate features that relate to the surrounding business park character of the Lakeville Highway subarea. Additionally, the proposed Zoning Map Amendment to rezone Lakeville Business Park PCD designated areas of the Project site to Business Park (BP) would allow undeveloped portions of the Project site to be built out under the same development standards as existing development on the site.

The Project site is flat and excludes any features, including rock outcroppings, or historic buildings that may be considered a scenic resource. Five redwood trees are proposed to be removed, which are protected under Chapter 17 of the Implementing Zoning Ordinance, in addition to removal of 51 unprotected ornamental trees located at the former boundary of the 9.82-acre developed portion of the Project site and the southwestern portion of the site. However, the Project is required to provide replacement species in applicable ratios as a uniformly applied development standard for removal of protected trees. No nearby or adjacent roadways, including the nearby US Highway 101 are eligible or designated as a scenic highway within the City of Petaluma. Therefore, the Project would have no impact on scenic resources, including those within a designated State Scenic Highway.

The Project is located in an urban area surrounded by business park uses, roadways, and various sources of lighting including streetlights, traffic signals, buildings, parking and landscape lighting, and headlights from vehicles. The proposed Project will not substantially increase light levels relative to existing conditions. The Project proposes outdoor lighting, consisting of lighting for parking areas, exterior building lighting, and accent lighting, which is proposed in conformance with City standards by being shielded downward and when attached to a building would not exceed the height of the building, or when free-standing, not exceed a height of 20 feet. Furthermore, lighting detail and design will be considered through the SPAR process to ensure compliance with IZO Section 21.040.D to address glare and will be confirmed by Planning staff prior to building permit approval. As lighting associated with new development was anticipated by the General Plan EIR and the Project site is located in a business park area with existing sources of lighting, the Project would have no greater impacts to lighting relative to what was analyzed in the program level EIR.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

No General Plan Policies identified in the General Plan 2025 EIR are applicable to the Project.

Conclusion

The proposed Project would increase the intensity of use on the project site from an underdeveloped/vacant condition to a light industrial manufacturing facility consistent with the City's General Plan. As the proposed Project is within the scope of development projected under the General Plan, there would be no additional

impacts to aesthetic and visual resources beyond those analyzed in the General Plan EIR. No environmental conditions of approval are included to ensure consistency with the previous analysis for aesthetic resources provided in the General Plan EIR.

4.2. AGRICULTURAL AND FORESTRY RESOURCES

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; and California Department of Conservation Farmland Mapping and Monitoring Program, https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx, accessed September 2022.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that implementation of policies set forth in the General Plan would ensure that impacts to agricultural and forestry resources would be less than significant. The following impact to agricultural resources was identified in the General Plan EIR:

Impact 3.1-1: The proposed General Plan may result in the conversion of some farmland to non-agricultural uses. (Less than Significant)

The General Plan EIR concluded that implementation of the General Plan would not result in the conversion of any prime farmlands, and although most farmland of local importance within the UGB is designated by the General Plan 2025 to non-agricultural use, the majority of these lands are vacant and not used for agricultural purposes and CEQA does not consider conversion of farmland of local importance to be a significant impact. The General Plan 2025 EIR identifies General Plan Policies 2-P-1, Policy 2-P-2, Policy 2-P-16, Policy 2-P-23, and Policy 2-P-25 which direct the City to efficiently promote a range of land uses and intensities within the UGB and maintaining an Urban Separator or Urban Separator Pathway as permanent open space leading up to the UGB.

Project Consistency with the General Plan 2025 EIR

The Project site consists of one 16.33-acre parcel at 3200 Lakeville Highway, including 111,552 square feet of gross floor area, paved surfaces for vehicular parking and circulation, and intermittent landscape planting areas. The site is developed at 16 percent lot coverage and 0.16 FAR and would increase to 36

percent lot coverage and 0.41 FAR, maintaining the sites use in an urban environment. The area to be developed does not contain farmland or forest land pursuant to Section 12220(g) of the Public Resources Code and timberland pursuant to Public Resources Code Section 4526.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 1-P-1 (GP EIR Policy 2-P-1):

Promote a range of land uses at densities and intensities to serve the community needs within the Urban Growth Boundary (UGB).

Status: The Project proposes a new light industrial manufacturing facility within the City's Urban Growth Boundary. The Project is consistent with this Policy.

Policy 1-P-2 (GP EIR Policy 2-P-2):

Use land efficiently by promoting infill development, at equal or higher density and intensity than surrounding uses.

Status: The Project proposes expansion of existing industrial operations on a site which is partially developed with an existing industrial facility and principally vacant. As a new ~176,657 square foot building to be used for manufacturing, the intensity of the proposed land use is greater than the existing 103,752 square foot building at 3200 Lakeville Highway. The Project is consistent with this Policy.

Conclusion

As the Project is within the scope of development projected under the General Plan and does not contain farmland, forest, or timberland, there would be no new or more severe impacts to agricultural and forestry resources beyond those analyzed in the General Plan EIR.

4.3. AIR QUALITY

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Exposure of sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; BAAQMD 2017 Bay Area Clean Air Plan, prepared by the Bay Area Air Quality Management District, April 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en; Labcon Construction Air Quality and Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, Inc, prepared October 3, 2022; and California Environmental Quality Act Air Quality Guidelines, prepared by the Bay Area Air Quality Management Quality District, May 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that with policies set forth in the General Plan construction-related air quality impacts would be less than significant. The following impacts to air quality were identified in the General Plan EIR:

Impact 3.10-1: Buildout of the proposed General Plan would result in population levels that could conflict with the Bay Area 2005 Ozone Strategy. (Significant)

Impact 3.10-2: Implementation of the proposed General Plan may contribute substantially to an existing air quality violation. (Less than Significant)

Impact 3.10-3: Implementation of the proposed General Plan may result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable national or State ambient air quality standard. (Less than Significant)

To address potential impacts related to air quality, the General Plan EIR identifies General Plan Policy 4-P-8, Policy 4-P-11, and Policy 5-P-13 which direct the City to reduce vehicular air pollution, reduce stationary point sources of air pollution and encourage major employers to develop Transportation Demand Management programs; Policy 4-P-12 which directs the City to require construction and demolition phase BMPs to reduce combustion emissions; and Policy 4-P-13 which directs the City to locate new stationary sources of air pollutants sufficient distance from residential areas and facilities that serve sensitive receptors.

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-7, 4-P-15, 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 in Impact 3.10-1, even with the

implementation of the policies in the General Plan, long-term air quality impacts were determined to be significant and unavoidable.

Bay Area Air Quality Management District 2017 Clean Air Plan and CEQA Guidelines

The air quality analyses in the General Plan EIR relied on prior BAAQMD screening criteria and clean air plans. After adoption of the General Plan EIR, in 2017 the BAAQMD adopted the 2017 Bay Area Clean Air Plan (CAP) 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.

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 PM_{10} and $PM_{2.5}$ state standards, which require an annual arithmetic mean (AAM) of less than 20 $\mu g/m^3$ for PM_{10} and less than 12 $\mu g/m^3$ 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.[2]

Project Consistency with the General Plan 2025 EIR

The Project was reviewed to determine 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 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 a light industrial building on an infill site in proximity to transit, cycling, and pedestrian facilities, and is not adjacent to residential uses or other sensitive receptors; b) includes control measures to protect air quality during construction and during operation; and c) the Project would generate air quality emissions below the BAAQMD criteria pollutant thresholds (see Air Quality Analysis below). Therefore, the Project will not result in impacts to air quality due to a conflict with the regional clean air plan beyond those analyzed in the General Plan EIR.

Air Quality Analysis

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 "warehouse," "office park," and "manufacturing" are shown below in Table 1: BAAQMD Screening Criteria.

Table 1: BAAQMD Screening Criteria

Land Use Type	Operational	Construction
Warehouse	864 ksf (NO_X)	259 ksf (ROG)
Office Park	323 ksf (NO_X)	277 ksf (ROG)
Manufacturing	992 ksf (NO_X)	259 ksf (NO_X)

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

[2] BAAQMD 2017 Bay Area Clean Air Plan, prepared by the Bay Area Air Quality Management District, April 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en.

Construction

The Project would generate temporary air quality emissions associated with site preparation and demolition, 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.

An Air Quality and Greenhouse Gas Assessment prepared by Illingworth and Rodkin on October 3, 2022 summarized construction period emissions using the California Emissions Estimator Model (CalEEMod). Using an input of 130 construction workdays in 2023 and 259 construction workdays in 2024, the assessment concluded that construction period emissions in the form of ROG, NOx, PM_{10}, and $PM_{2.5}$ would not exceed BAAQMD significance thresholds during any year of construction activity.

The table above shows that the screening level from the construction of "warehouse" is 259,000 square feet, from the construction of "office park" is 277,000 square feet, and from the construction of "manufacturing" is 259,000 square feet. The Project proposes 41,152 square feet of warehouse area, 52,703 square feet of office area, and 82,802 square feet of manufacturing area, which are well 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. General Plan Policy 4-P-15 outlines compliance with BAAQMD's CEQA guidelines, and furthermore, General Plan Policy 4-P-16 provides instructions to reduce combustion emission during construction and demolition phases of a project. The Project will be conditioned to require implementation of the BAAQMD CEQA Air Quality Guidelines, consistent with General Plan policies. Therefore, there would be no new or more severe impacts to air quality from Project construction beyond those analyzed in the General Plan EIR.

Operation

The Project will result in both stationary and mobile sources of emissions during operation. Although there are no new stationary source emitters proposed, the Project will result in area source emissions from use of 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 employees, delivery services, and visitors, traveling to and from the Project site.

Table 1: BAAQMD Screening Criteria above shows that the operational project-level screening size for "warehouse" is 864,000 square feet, from the operation of "office park" is 323,000 square feet, and from operation of "manufacturing" is 992,000 square feet. The Project proposes 41,152 square feet of warehouse area, 52,703 square feet of office area, and 82,802 square feet of manufacturing area, which are well below the screening thresholds for criteria pollutants at operation. Therefore, the Project will not result in new or more severe air quality impacts at operation relative to what was analyzed in the General Plan EIR.

Sensitive Receptors

The Project site is surrounded by existing urban business park uses including research and development facilities, business offices, light industrial uses, laboratories, and a commercial plaza. The closest sensitive receptors to the Project site include single family dwellings that are approximately 370 feet to the north. The Project does not propose a new stationary source emitter and would not generate air quality emissions during construction or operation phases that would affect nearby sensitive receptors.[3] As set forth in Section 6 Environmental Conditions of Approval, the Project will implement General Plan Policy 4-P-16 to limit emissions related to the demolition and construction phase of the Project. As such, the Project will not increase the exposure of sensitive receptors to toxic air contaminant and fine particulate matter relative to what was analyzed in the General Plan EIR.

[3] Labcon Construction Air Quality and Greenhouse Gas Assessment, Table 7, prepared by Illingworth & Rodkin, Inc, received August 10, 2022.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 4-P-6:

Improve air quality through required planting of trees along streets and within park and urban separators, and retaining tree and plant resources along the river and creek corridors:

A. Require planting of trees for every significant tree removed at a project site. Replacement planting may occur on the project site or on a publicly owned area, with long-term maintenance assured.

Status: As part of the development review process, the Project will be required to comply with the requirements of IZO Section 17.065, which implements this Policy. The Project is consistent with this Policy.

Policy 4-P-7:

Reduce motor vehicle related air pollution.

B. Enforce land use and transportation strategies described in Chapter 1: Land Use and Chapter 5: Mobility that promote use of alternatives to the automobile for transportation, including walking, bicycling, bus transit, and carpooling.

Status: The Project proposes reserved parking spaces for electric vehicles, fuel-efficient vehicles, and high occupancy vehicles. Consistent with the City's Bicycle and Pedestrian Plan, the Project proposes secure bicycle parking for 59 bicycles, including 31 interior bicycle parking spaces, four employee showers within the ground floor of the new building to encourage bicycle transit, extension of the existing Class II bike lane along Cader Lane to the south to connect to the existing bike lane at Fisher Drive, and installation of sidewalks abutting the site frontage along Fisher Drive and Cader Lane to connect to existing sidewalks. The Project is consistent with this Policy.

Policy 4-P-15:

Improve air quality by reducing emissions from stationary point sources of air pollution (e.g. equipment at commercial and industrial facilities) and stationary area sources (e.g. woodburning fireplaces & gas powered lawnmowers) which cumulatively emit large quantities of emissions:

C. Continue to use Petaluma's development review process and the California Environmental Quality Act (CEQA) regulations to evaluate and mitigate the local and cumulative effects of new development on air quality.

D. Continue to require development projects to abide by the standard construction dust abatement measures included in BAAQMD's CEQA Guidelines.

Status: The Project is required to comply with all requirements for development review as part of the Site Plan and Architecture Review and Zoning Map Amendment procedures for the City of Petaluma. This document identifies applicable policies and mitigations set forth in the General Plan 2025 EIR to reduce impacts to air quality resulting from implementation of the General Plan to less than significant levels, including standard dust abatement measures included in the BAAQMD CEQA Guidelines. The Project is consistent with this Policy.

Policy 4-P-16:

To reduce combustion emissions during construction and demolition phases, the contractor of future individual projects shall include in construction contracts the following requirements or measures shown to be equally effective:

- Maintain construction equipment engines in good condition and in proper tune per manufacturer's specification for the duration of construction;
- Minimize idling time of construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment;
- Use alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline);
- Use add-on control devices such as diesel oxidation catalysts or particulate filters;
- Use diesel equipment that meets the ARB's 2000 or newer certification standard for off-road heavy-duty diesel engines;
- Phase construction of the project;
- Limit the hours of operation of heavy duty equipment.

Status: As a standard condition of approval, the Project is required to incorporate the latest BAAQMD BMPs during construction activity as standard conditions of approval. The Project is consistent with this Policy.

Policy 5-P-13:

Encourage existing major employers to develop and implement Transportation Demand Management (TDM) programs to reduce peak-period trip generation.

Status: The Project has prepared a draft TDM program to reduce vehicle miles traveled (VMT) and associated emissions. As part of the City's development review process, the TDM will be finalized prior to Project issuance of occupancy in order to meet City standards, including goals outlined in the Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines approved by the City in July 2021. With implementation of environmental conditions of approval requiring the applicant to finalize a TDM program to the satisfaction of City staff, the Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

The Project is consistent with the City of Petaluma General Plan as it is within the scope of development projected and no additional impacts to air quality beyond those analyzed in the General Plan EIR would result from the Project. While 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, implementation of General Plan Policies 4-P-7, 4-P-15, and 5-P-13 strive to reduce emissions from stationary point sources and reduce peak-period trip generation.

Implementation of General Plan Air Quality Goals and Policies and the Petaluma SB 743 VMT Implementation Guidelines, as presented in Section 6 Environmental Conditions of Approval to reflect the most recent BMPs set forth by BAAQMD, will ensure that construction-related air quality emissions do not result in significant impacts to air quality and that nearby sensitive receptors are not exposed to elevated air quality emissions during construction activities. Operational emissions will not exceed established BAAQMD thresholds and will not result in any more severe or new impacts to air quality not previously analyzed in the General Plan EIR.

4.4. BIOLOGICAL RESOURCES

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Sources: Petaluma General Plan and EIR; Biological Resources Report Labcon – Fisher Drive Petaluma Development Project, prepared by Huffman-Broadway Group, Inc., June 2022; Adobe Creek Riparian Enhancement: Willow Plantings Tree Mitigation Option, prepared by Huffman-Broadway Group, September 29, 2022; and Technical Study Review Response Memorandum, prepared by Huffman-Broadway Group, Inc., November 5, 2022.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that with implementation of the policies set forth in the General Plan, impacts to biological resources would be less than significant. The following impacts to biological resources were identified in the General Plan EIR:

Impact 3.8-1: Implementation of the proposed General Plan could result in substantial adverse effects on special status fish species or their habitat. (Less than Significant)

Impact 3.8-2: Implementation of the proposed General Plan could result in substantial adverse effects on California Brackishwater Snail or its habitat. (Less than Significant)

Impact 3.8-3: Implementation of the proposed General Plan could result in substantial adverse effects on the salt marsh harvest mouse or its habitat. (Less than Significant)

Impact 3.8-4: Implementation of the proposed General Plan could result in substantial adverse effects on special status bat species or their habitat. (Less than Significant)

Impact 3.8-5: Implementation of the proposed General Plan could result in substantial adverse effects on American badger or its habitat. (Less than Significant)

Impact 3.8-6: Implementation of the proposed General Plan could result in substantial adverse effects on western pond turtle, California tiger salamander, foothill yellow-legged frog, California red-legged frog, or their habitat. (Less than Significant)

Impact 3.8-7: Implementation of the proposed General Plan could result in substantial adverse effects on nesting raptor species or their habitat. (Less than Significant)

Impact 3.8-8: Implementation of the proposed General Plan could result in substantial adverse effects on California black rail bird, San Pablo song sparrow, Saltmarsh common yellow throat or other special status bird species. (Less than Significant)

Impact 3.8-9: Implementation of the proposed General Plan could result in substantial adverse effects on oak woodland and special status plant species or their habitat. (Less than Significant)

Impact 3.8-10: Implementation of the General Plan could adversely affect riparian areas, wetlands and/or "other waters of the United States." (Less than Significant)

Impact 3.8-11: Implementation of the proposed General Plan would not interfere with the movement of fish or wildlife species. (Less than Significant)

Impact 3.8-12: Implementation of the proposed General Plan may conflict with the provisions of the Draft Santa Rosa Plain Conservation Strategy. (Less than Significant)

To address potential impacts related to biological resources, the General Plan EIR identifies General Plan Policy 4-P-1 and Policies 4-P-3 through 4-P-5 which direct the City to provide protections and enhancements for the Petaluma River and tributaries, a 50-foot setback from top of each bank, wildlife ecosystem and sensitive habitat conservation measures, special status species and supporting habitat protections, and support rural land use designations; and Policies 6-P-20 and 4-P-6 which directs the City to require tree planting along streets and within park and urban separators, retain tree and plant resources along the Petaluma River and creek corridors, and require planting of trees for every significant tree removed at a project site as implemented by IZO Section 17.065.

Project Consistency with the General Plan 2025 EIR

The Project site consists of 103,752 square feet of gross floor area and 7,800 square feet of paved surfaces on the parcel located at 3200 Lakeville Highway, and ruderal vacant land which has already been graded for future development where vegetation is maintained for fire abatement. The site is located adjacent to Adobe Creek and over 3,200 feet to the east of the Petaluma River corridor. A Biological Resources Report prepared by Huffman-Broadway Group in June 2022 concluded that since the Project site is located in an urbanized area, is dominated by non-native plant species, lacks remnant habitat that would support special status plant and animal species, and lacks wetlands or other waters subject to regulatory jurisdiction, suitable habitat for native flora and special status plant and animal species is not present. Therefore, of the special status species documented within a 10-mile radius of the Project site, none have the potential to occur at the Project site.

Removal of vegetation between February 1 and August 31 could result in mortality of nesting bird species protected by the federal Migratory Bird Treaty Act or California Fish and Game Code. As such, the Biological Resources Report provides recommendations which will be conditioned as set forth below in Section 6 Environmental Conditions of Approval to ensure compliance with applicable federal and state avian protections.

The Project would not have impacts on Adobe Creek beyond what was previously analyzed in the General Plan 2025 EIR, as no work is proposed within any significant habitat area, including within the 50-foot setback from the top of bank from Abode Creek along the northeastern edge of the Project site, consistent with General Plan Policy 4-P-1(E). Grading activity would not result in filling of any federally protected wetlands as defined by Section 404 of the Clean Water Act.

To accommodate proposed improvements, the Project would remove 51 unprotected ornamental trees and five protected trees. In compliance with the tree removal mitigation requirements specified in IZO Section 17.065, replacement trees and landscaping are proposed in landscape planters within parking areas and street frontages and at the edge of the existing riparian corridor adjacent to Adobe Creek, with tree spacing, species and size to be determined by the City. Trees proposed on the City-owned parcel adjacent to Adobe Creek would consist of willow trees planted outside of the top of bank.[4] As set forth below in Section 6 Environmental Conditions of Approval, the Project is required to comply with the City's Tree preservation ordinance.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 4-P-1:

Protect and enhance the Petaluma River and its tributaries through a comprehensive river management strategy of the following programs:

D. Create setbacks for tributaries extending a minimum of 50 feet outward from the top of each bank, with extended buffers where significant habitat areas, vernal pools, or wetlands exist. Development shall not occur within this setback, except as part of greenway enhancement (for example, trails and bikeways). Where there is degradation within the zone, restoration of the natural creek channels and riparian vegetation is mandatory.

G. Expand the planting and retention of trees along the upper banks of the river and creeks to reduce ambient water temperature and shade out invasive, non-native species

Status: The Project proposes no development within an area measured 50 feet from the top of the bank at Adobe Creek. Landscaping improvements are proposed proximate to the 50-foot setback, providing a natural barrier to the watercourse, as well as within the 50-foot setback in order to stabilize the bank, reduce erosion, and improve the riparian habitat. The Project is consistent with this Policy.

Policy 4-P-2:

Conserve wildlife ecosystems and sensitive habitat areas in the following order of protection preference: 1) avoidance, 2) on-site mitigation, and 3) off-site mitigation

Status: The Project proposes protection preference 1 by adhering to the required 50-foot setback buffer from the top of bank of Adobe Creek. The Project is consistent with this Policy.

[4] Adobe Creek Riparian Enhancement: Willow Plantings Tree Mitigation Option, prepared by Huffman-Broadway Group, September 29, 2022.

Policy 4-P-3:

Protect special status species and supporting habitats within Petaluma, including species that are State or Federal listed as endangered, threatened, or rare (shown in Table 4.1-1 of the General Plan).

A. As part of the development review process, site-specific biological resource assessments are required to consider the impacts on riparian and aquatic resources and the habitats they provide for invertebrates, fish, amphibians, reptiles, birds, mammals, and plants. If development is located outside these ecologically sensitive regions, no site-specific assessment of biological resources may be necessary. Appropriate mitigation measures to reduce impacts to sensitive habitats and special status species would be imposed on a project-by-project basis according to Petaluma's environmental review process.

Status: A Biological Resources Report was prepared for the Project which considered potential impacts on riparian resources and determined no significant impacts would occur. Recommendations for tree protection and preconstruction surveys, as provided in the Biological Resources Report have been imposed as environmental conditions of approval. The Project is consistent with this Policy.

Policy 4-P-4:

Continue to support rural land use designations and Agricultural Best Management Practices within the Sonoma County General Plan.

B. Work with County, State and federal agencies to ensure that development within the Planning Referral Area does not substantially affect State or federally listed rare, endangered, or threatened species or their habitats. Require assessments of biological resources prior to approval of any development in or within 300 feet of ecologically sensitive areas.

Status: A Biological Resources Report was prepared for the Project which considered its potential impacts on special status species and determined no significant impacts would occur. The Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

The proposed Project is within the scope of development projected under the General Plan and is located within an urbanized area with existing paved surfaces. With implementation of environmental conditions of approval as set forth below in Section 6 Environmental Conditions of Approval, the Project would not result in any new or more severe impacts to biological resources relative to what was analyzed in the General Plan EIR.

4.5. CULTURAL RESOURCES

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Sources: City of Petaluma General Plan EIR; Cultural Resources Study for the Labcon Project, prepared by Tom Origer & Associates, April 6, 2022; Sacred Lands File findings letter, prepared by Cameron Vela, Native American Heritage Commission, May 17, 2022.

Petaluma General Plan 2025 EIR Findings

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. The following impacts to cultural resources were identified in the General Plan EIR:

Impact 3.12-1: New development proposed under the General Plan has the potential to disrupt undiscovered archaeological resources. (Less than Significant)

Impact 3.12-2: New infill development within previously built up areas in the City has the potential to impact sites of local historic importance and the overall historic setting of downtown. (Less than Significant)

To address potential impacts related to cultural resources, the General Plan EIR identifies General Plan Policy 3-P-7 which directs the City to implement a series of measures that protect significant historic and archaeological resources, including requiring a resource mitigation plan and monitoring program to be prepared by a qualified archaeologist in the event that archaeological remains are discovered, and historic preservation measures for the Oak Hill-Brewster Historic District, the “A” Street Historic District, and the Petaluma Historic Commercial District.

Project Consistency with the General Plan 2025 EIR

The Project site is not located within any of the historic districts identified in the General Plan or Implementing Zoning Ordinance, does not contain historic resources within the Project boundaries, and is not adjacent to any historic resources. A Cultural Resources Study, prepared by Tom Origer & Associates on April 6, 2022, summarized that a field survey conducted for the study on March 31, 2022 did not encounter archaeological site indicators in the surface survey or in three auger holes dug in the western portions of the Project site.

While hardscape and building improvements are not present at the Project site, the underlying soil has been previously disturbed by prior grading and no culturally significant artifacts were located during previous disturbance. Nonetheless, due to the adjacent creek, there is potential that buried archeological resources may be encountered during construction. The Project is subject to General Plan EIR Policy 3-P-1(K), which

requires the preparation of a resource mitigation plan and monitoring program by a qualified archaeologist should archaeological deposits or human remains be discovered. As provided in Section 6 Environmental Conditions of Approval, the Project is required to retain a qualified archeologist to conduct preconstruction training and to implement a resource mitigation plan in the event that resources are discovered. Therefore, the project is consistent with General Plan policies that provide protection of archeological resources and human remains.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 3-P-1 (GP EIR Policy 3-P-7):

Protect historic and archaeological resources for the aesthetic, cultural, educational, environmental, economic, and scientific contribution they make to maintaining and enhancing Petaluma's character, identity and quality of life.

J. Ensure the protection of known and unrecorded archaeological resources in the city by requiring a records review for any development proposed in areas that are considered archeologically sensitive for Native American and/or historic remains.

K. In accordance with CEQA and the State Public Resources Code, require the preparation of a resource mitigation plan and monitoring program by a qualified archaeologist in the event that archaeological remains are discovered.

Status: The Project applicant submitted a Cultural Resources Study which included a records review and a request to the Native American Heritage Commission (NAHC) was made to request a search of the Sacred Lands File (SLF), which returned no results for known cultural resources at the Project site as confirmed in a letter dated May 17, 2022 from the NAHC. Environmental conditions of approval for the protection of archaeological and tribal cultural resources in the event of discovery were developed in consultation with the Federated Indians of Graton Rancheria and will be imposed on the project. Therefore, the Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

As the Project is within the scope of development projected under the General Plan, there would be no additional impacts to historic or archaeological resources beyond those analyzed in the General Plan EIR. Compliance with General Plan EIR Policy 3-P-1(K) as set forth below in Section 6 Environmental Conditions of Approval, will ensure that potential impacts to archaeological resources would not exceed those anticipated by the General Plan 2025 EIR. The Project would not conflict with any General Plan policies that provide for the protection and preservation of archeological resources. As such, the Project will not result in any new or more severe impacts to cultural resources beyond what was identified in the General Plan EIR.

4.6. ENERGY

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Sources: City of Petaluma General Plan EIR; Climate Emergency Framework, prepared by the City of Petaluma, January 11, 2021.

Petaluma General Plan 2025 EIR Findings

The General Plan contains policies that directly and indirectly support a reduction in energy consumption. These include policies related to reducing GHG emissions and traffic congestion within the city as well as policies that promote water conservation, solid waste reduction, and green building practices. 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. The following impacts to energy were identified in the General Plan EIR:

Impact 3.5-3: The proposed General Plan could result in wasteful, inefficient, or unnecessary consumption of energy by residential, commercial, industrial, or public uses. (Less than Significant)

Impact 3.5-4: The proposed General Plan could require the need for additional energy facilities, the construction of which could have significant environmental impacts. (Less than Significant)

Impact 3.5-5: The proposed General Plan could cause a substantial increase in transportation energy consumption due to the projected increases in trips associated with future population and employment growth. (Less than Significant)

To address potential impacts related to energy, the General Plan EIR identifies Policies 4-P-15 and 4-P-15 which direct the City to develop local energy standards that would result in less energy consumption than standards set by Title 24 (energy code referred to as Building Energy Efficiency Standards, updated by The California Energy Commission [CEC] and designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings), and to encourage the use and development of renewable or nontraditional sources of energy; and Policy 5-P-13 which encourages major employers to develop and implement Transportation Demand Management (TDM) programs to reduce peak-period trip generation as well as using TDM strategies citywide to reduce existing vehicle trips.

Title 24 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.).

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, water and

wastewater treatment and conveyance, 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, respectively[5].

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.

Petaluma City Council Energy Resolutions

On May 6, 2019, the City of Petaluma adopted a Climate Emergency Resolution through Resolution No. 2019-055 N.C.S. The Resolution elevates climate issues to the highest priority, makes a commitment to achieving carbon neutrality as quickly as possible and no later than 2045, and establishes a climate commission to guide policy direction on climate action. On January 11, 2021, the City Council adopted the Climate Emergency Framework which directs the City to achieve carbon neutrality by 2030, guides the City's ongoing response to and discussion about the climate crisis, and guides and informs subsequent policies and implementation strategies. On March 1, 2021, the City of Petaluma adopted Ordinance 2764 N.C.S. and Ordinance 2765 N.C.S. prohibiting construction of new petroleum fueling stations to promote alternative energy sources in vehicular use. In addition, on May 3, 2021, the City of Petaluma adopted Ordinance 2775 N.C.S to add an "All-Electric Construction in New Constructed Buildings" Chapter to the Petaluma Municipal Code (PMC) to preclude the use natural gas in new construction.

Project Consistency with the General Plan 2025 EIR

The Project would result in the efficient use of energy by meeting or exceeding California Green Building Standards Code (CALGreen) standards for energy efficiency in building design and proposes an all-electric design that would comply with current all-electric building requirements. The Project would also utilize renewable energy by including on-site solar generation via 4,685 roof-mounted solar occupying a majority of the proposed building roof.[6] The Project would promote bicycling as a zero-energy alternative mode of transportation by including bicycle parking spaces in excess of what is required in the Implementing Zoning Ordinance and extending the existing Class II bicycle lane south along Cader Lane to connect with the existing Class II bicycle lane at Fisher Drive. The Project would promote walking as a mode of transportation through installation of sidewalks abutting the site frontage along Fisher Drive and Cader Lane to connect to existing sidewalks. Furthermore, the Project would install water efficient landscaping (in compliance with Petaluma Municipal Code Chapter 15.17), which minimizes water demands and associated energy expenditure from treatment and conveyance. Therefore, the Project is consistent with the General Plan and its EIR.

[5] Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan, prepared by Sonoma County Regional Climate Protection Authority, July 2016, https://rcpa.ca.gov/wp-content/uploads/2016/07/CA2020_Plan_7-7-16_web.pdf.

[6] Sheet A11 of Site Plan and Architectural Review Submittal prepared by Greg LeDoux and Associates, dated July 26, 2022

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 5-P-13:

Encourage existing major employers to develop and implement Transportation Demand Management programs to reduce peak-period trip generation.

Status: The Project has prepared a draft TDM program to reduce vehicle miles traveled (VMT) and associated emissions. As part of the City's development review process, the TDM will be finalized prior to Project issuance of occupancy in order to meet City standards, including goals outlined in the Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines approved by the City in July 2021. With implementation of environmental conditions of approval requiring the applicant to finalize a TDM program to the satisfaction of City staff, the Project is consistent with this Policy.

Policy 4-P-19:

Encourage use and development of renewable or nontraditional sources of energy.

Status: The Project proposes a solar array which would cover a majority of the roof of the proposed building. The Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

As the proposed Project is within the scope of development projected under the General Plan, there would be no additional impacts to energy consumption beyond those analyzed in the General Plan EIR. Therefore, there would be not new or more severe impacts related to energy consumption relative to what was analyzed in the General Plan EIR. With implementation of environmental conditions of approval as set forth below in Section 6 Environmental Conditions of Approval, the Project would not result in any new or more severe impacts to energy consumption relative to what was analyzed in the General Plan EIR.

4.7. GEOLOGY AND SOILS

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan 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.	☐	☐	☐	☒
ii. Strong seismic ground shaking?				
iii. Seismic-related ground failure, including liquefaction				
iv. Landslides?				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; and Geotechnical Study Report, prepared by RGH Consultants November 4, 2022.

Petaluma General Plan 2025 EIR Findings

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. Furthermore, the General Plan EIR concludes that implementation of the provisions of the City's Building Code, the National Pollution Discharge Elimination System (NPDES) permit requirements, and General Plan Policies would ensure that potential site-specific geotechnical conditions would be addressed fully during review of projects implementing buildout of the General Plan and that potential impacts would be maintained at less than significant levels. The following impacts to geology, seismicity, and soils were identified in the General Plan EIR:

Impact 3.7-1: Buildout of the proposed General Plan would expose people or structures to strong seismic groundshaking or seismic-related ground failure. (Less than Significant)

Impact 3.7-2: Development under the proposed General Plan would be subject to risk from settlement and/or subsidence of land, lateral spreading, or expansive soils, creating substantial risks to life or property. (Less than significant)

Impact 3.7-3: Buildout of the proposed General Plan would result in soil erosion. (Less than Significant)

To address potential impacts related to geology, seismicity, and soils, the General Plan EIR identifies General Plan Policy 10-P-1, Policy 10-P-4, and Policy 10-P-5 which directs the City to require geotechnical studies prior to development approval in geologic or seismic hazard areas, adopt and amend California Building Code updates for the most recent earthquake protection standards, and explore efforts to assist or encourage property owners to retrofit buildings for seismic safety; and Policy 10-P-2 and Policy 10-P-3 which direct the City to require clustering of development on sites with slopes greater than 30 percent where possible, and to regulate grading and development on hillside area for new urban land uses.

Project Consistency with the General Plan 2025 EIR

A Geotechnical Study Report was prepared for the Project by RGH Consultants on April 7, 2022, and revised November 4, 2022, which identified expansive surface soil, soils susceptible to densification and liquefaction, uncontrolled surface runoff over long periods of time, and strong seismic shaking as the primary geotechnical concerns. The report determined that development at the site was feasible from a geotechnical perspective provided that the recommendations included in the report were incorporated into the design and construction of the Project. As set forth below in Section 6 Environmental Conditions of Approval, the recommendations from the site-specific geotechnical report will be incorporated into construction contract specifications.

The Project is required to comply with the City's Building Code and the NDPES permit requirements as a standard requirement of project review. Implementation of recommendations provided in the April 7, 2022, Geotechnical Study Report would ensure that site-specific geotechnical concerns would be addressed, as set forth in the General Plan 2025 EIR.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 10-P-1:

Minimize risks of property damage and personal injury posed by natural hazards.

A. Require geotechnical studies prior to development approval in geologic and/or seismic hazard areas. Require or undertake comprehensive geologic and engineering studies for critical structures regardless of location.

Status: The Project applicant has submitted a geotechnical study report which summarizes and provides recommendations for primary geotechnical concerns at the Project site, and recommendations have been imposed as environmental conditions of approval. The Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

As the proposed Project is within the scope of development projected under the General Plan and has undergone a site-specific geotechnical investigation and will be subject to standard conditions of approval and uniformly applied development standards, such as compliance with the NPDES, no additional impacts to geology and soils beyond those analyzed in the General Plan EIR will result from implementation of the Project. Compliance with recommendations outlined in the April 7, 2022 Geotechnical Study Report, as set forth below in Section 6 Environmental Conditions of Approval, will ensure that potential impacts to geology and soils would not exceed those anticipated by the General Plan 2025 EIR.

4.8. GREENHOUSE GAS EMISSIONS

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Sources: City of Petaluma General Plan EIR; Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan, prepared by Sonoma County Regional Climate Protection Authority, July 2016, https://rcpa.ca.gov/wp-content/uploads/2016/07/CA2020_Plan_7-7-16_web.pdf; California Environmental Quality Act Air Quality Guidelines, prepared by the Bay Area Air Quality Management District, May 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en; CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans, prepared by the Bay Area Air Quality Management District, April 2022; Labcon Construction Air Quality and Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, Inc, received August 10, 2022; and Transportation Demand Management (TDM) Traffic Response Technical Memorandum, prepared by TJKM, November 7, 2022.

Petaluma General Plan 2025 EIR Findings

Greenhouse gases (GHGs) are generated from natural geological and biological processes and through human activities including the combustion of fossil fuels and industrial and agricultural processes. GHGs include carbon dioxide (CO2), nitrous oxide (N2O), methane (CH3), chlorofluorocarbons, hydrofluorocarbons and perfluorocarbons. While GHGs are emitted locally impacts are on a global scale. GHGs trap heat in the atmosphere, which heats up the surface of the Earth. This concept is known as the greenhouse effect and is contributing to global climate change. Changing climatic conditions pose several potential adverse impacts including sea level rise, increased risk of wildfires, degraded ecological systems, deteriorated public health, and decreased water supplies.

The General Plan EIR did not analyze GHG emissions, and thus no impacts were identified. However, the General Plan EIR contains policies which directly and indirectly serve to reduce 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 greenhouse gas emissions. Policies that promote water conservation, energy conservation, and green building practices also reduce greenhouse gas emissions

State Legislation

To address GHG's at the State level, the California legislature passed the California Global Warming Solutions Act in 2006 (Assembly Bill 32), which requires that statewide GHG emissions be reduced to 1990 levels by 2020. Executive Order EO-B-30-15 (2015) and SB 32 GHG Reduction Targets, which was passed in 2016, established a 2030 GHG emissions reduction target of 40 percent below 1990 levels. Executive Order S-3-05 provides the California Environmental Protection Agency with the regulatory authority to coordinate the State's effort to achieve GHG reduction targets. S-3-05 goes beyond AB 32 and calls for an 80 percent reduction below 1990 levels by 2050. Senate Bill 375 and SB 743 have also been adopted, which seeks to curb GHGs by reducing urban sprawl and vehicle miles traveled.

Petaluma City Council Greenhouse Gas Resolutions

The City of Petaluma has taken steps at the local level to address GHG emissions within its city limits. The City adopted Resolutions 2002-117 N.C.S., 2005-118 N.C.S., and 2018-009 N.C.S. (incorporated herein by reference), which calls for the City's participation in the Cities for Climate Project effort and established

GHG emission reduction targets of 25% below 1990 levels by 2015 for community emissions and 20% below 2000 levels by 2010 for municipal operations.

On January 22, 2018, the City of Petaluma adopted Resolution No. 2018-009 N.C.S. reaffirming the City's intent to reduce greenhouse gas emissions as part of a coordinated effort through the Sonoma County Regional Climate Protection Authority. The City's Climate Emergency Resolution further recognizes scientific findings and social implications related to global warming while calling for citywide emergency actions to reduce greenhouse gas emissions. A Climate Action Commission was appointed to help craft policies for recommendations to the City Council, coordinate workshops with experts on climate change, encourage community involvement, and identify best practices to address climate change that can be applied in Petaluma.

As stated above in Section 4.6 Energy, the City Council adopted Resolution No. 2019-055 N.C.S. on May 6, 2019, declaring a climate emergency and elevating climate issues to the highest priority in its goal setting. On January 11, 2021, the City Council adopted the Climate Emergency Framework which directs the City to achieve carbon neutrality by 2030, guides the City's ongoing response to and discussion about the climate crisis, and guides and informs subsequent policies and implementation strategies. The Climate Emergency Framework provides policies and implementation strategies toward this goal in four sections: equity and climate justice, mitigation and sequestration, adaptation and social resilience, and community engagement. The principles identified in the Framework establish Petaluma's shared vision of a healthy, sustainable, and equitable community. By setting the shared intention of this framework and working from the framework in subsequent planning efforts to create policy and implementation, the City will actively work to avoid catastrophic climate change and adapt to its expected impacts. As the Climate Emergency Framework sets broad goals, it will guide future policy development for future planning efforts while providing guidance for City staff and decision makers.[7]

In February 2020, the City Council adopted by reference the 2019 California Building Code, which contains the mandatory California Green Building Standards Code (CALGreen). All new development within the City of Petaluma must comply with the latest CalGreen standards, which generally achieve energy efficiency beyond Title 24 requirements as well as higher construction waste reduction rates. As such, new development is expected to be more energy efficient, use fewer resources and emit fewer GHGs. In addition, on May 3, 2021, the City of Petaluma adopted Ordinance 2775 N.C.S to add an "All-Electric Construction in New Constructed Buildings" Chapter to the Petaluma Municipal Code (PMC) to preclude the use natural gas in new construction.

Sonoma County Regional Climate Action Plan

In addition to these Petaluma-specific initiatives to reduce GHG emissions in the City, in 2016 the Climate Action Plan 2020 and Beyond (CAP 2020) was prepared by the Sonoma County Regional Climate Protection Authority on behalf of Sonoma County municipalities including the City of Petaluma and serves as an advisory document to assist in achieving GHG emission reductions. This effort implements General Plan Policy 4-P-27. As stated in CAP 2020, state, regional and local measures combined can achieve a GHG reduction of 166,350 $MTCO_2e$ within Petaluma. Under a business-as-usual approach (i.e., without state, regional or local GHG reduction measures), the City of Petaluma is projected to emit 542,970 $MTCO_2e$ by 2020. With implementation of reduction measures, GHG emissions would be reduced to 376,620 $MTCO_2e$. This represents a 31% reduction of GHG emissions relative to the 1990 per capita emission levels.

[7] Climate Emergency Framework, prepared by the City of Petaluma, January 11, 2021.

Bay Area Management District 2022 Greenhouse Gas Thresholds

On April 20, 2022, the Air District Board of Directors adopted CEQA Thresholds for Evaluation the Significance of Climate Impacts from Land Use Projects and Plans. Thresholds for land use projects include the following:

1. Buildings will not include natural gas appliances or plumbing and 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
2. Projects shall 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, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA.
3. Alternatively, land use projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Project Consistency with the General Plan 2025 EIR

Greenhouse gas (GHG) emissions associated with the Project would result from short-term construction activities and ongoing operation. As discussed above in Section 4.3 Air Quality, the Project would have a less than significant impact related to a potential conflict with the 2017 Clean Air Plan. The Project is required to comply with the CalGreen Building standards and the latest Building and Energy Efficiency Standards.

The Project proposes the installation of 4,685 rooftop-mounted solar photovoltaic panels and consistent with CalGreen standards, reservation of 49 parking spaces onsite for clean air vehicles, including electric vehicles (EV), high occupancy vehicles (HOV), and fuel efficient (FE) vehicles on an infill site. The Project also includes secure bicycle parking for 59 bicycles, including 31 interior bicycle parking spaces, four employee showers within the ground floor of the new building, and extension of the existing Class II bike lane along Cader Lane to the south to connect to the existing bike lane at Fisher Drive to encourage bicycle transit, and installation of sidewalks abutting the site frontage along Fisher Drive and Cader Lane to connect to existing sidewalks. Truck delivery, drop off, and loading activities are expected to be minimal relative to existing conditions, with approximately 40 trips expected to be eliminated between existing manufacturing facilities at 3700 Lakeville Highway being delivered to the Project site at 3200 Lakeville Highway for sterilization. Approximately nine truck deliveries per day are currently received at 3700 Lakeville Highway which would be moved to a central location at the Project site, and therefore reduce GHG emissions resulting from transportation relative to existing operations. A Traffic Impact Report (TIR) prepared by TJKM on September 28, 2022 determined that the Project would contribute to Vehicle Miles Traveled (VMT) below the adopted significance thresholds established by the Senate Bill 743 VMT Implementation Guidelines adopted by the City in July 2021.A Transportation Demand Management (TDM) Traffic Response Technical Memorandum prepared by TJKM November 7, 2022, summarizes these emissions reduction measures in compliance with General Plan Policy 5-P-13. Additionally, the Project includes water efficient landscaping, which complies with the maximum applied water allowance and the City's water conservation regulations under Petaluma Municipal Code Chapter 15.17. As a condition of Project approval, the Project will develop a Construction Phase Recycling Plan pursuant to General Plan Policy 2-P-122 to address the disposal of materials from demolition and construction, which ensures that the waste stream to landfills is minimized, thereby reducing GHG emissions from landfill off gassing. As such, the proposed Project is consistent with applicable GHG regulations and General Plan policies.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 5-P-13:

Encourage existing major employers to develop and implement Transportation Demand Management (TDM) programs to reduce peak-period trip generation.

Status: The Project has prepared a draft TDM program to reduce vehicle miles traveled (VMT) and associated emissions. As part of the City's development review process, the TDM will be finalized prior to Project issuance of occupancy in order to meet City standards, including goals outlined in the Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines approved by the City in July 2021. With implementation of environmental conditions of approval requiring the applicant to finalize a TDM program to the satisfaction of City staff, the Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

The proposed Project is consistent with applicable regulations and General Plan policies which directly and indirectly serve to reduce GHG emissions within the City of Petaluma. The Project implements the Climate Action Framework goal to reduce transportation emissions as an infill project which would promote use of electric and fuel efficient vehicles non-automobile modes of transportation (and thus lessen GHG impacts that can be associated with new development) by providing bike parking in excess of City standards and enhancing the pedestrian environment by installing new sidewalks and landscaping within the public right-of-way along the Fisher Drive and Cader Lane frontages. Furthermore, the Project is required to comply with the CALGreen Building standards and the latest Building & Energy Efficiency Standards which further minimize GHG emissions at operation. Additionally, the Project includes water efficient landscaping, which complies with the maximum applied water allowance and the City's water conservation regulations to reduce GHG emissions. As a standard part of the building permit process, the Project will develop a Construction Phase Recycling Plan pursuant to General Plan Policy 2-P-122 to address the disposal of materials from demolition and construction. As proposed, the Project is consistent with relevant General Plan policies, the General Plan EIR and GHG regulations. Therefore, with implementation of environmental conditions of approval as set forth below in Section 6 Environmental Conditions of Approval, the Project does not introduce a new significant impact from GHG emissions beyond what was identified in the General Plan EIR.

4.9. HAZARDS/HAZARDOUS MATERIALS

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Be 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, and result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; City of Petaluma Local Hazard Mitigation Plan, prepared by Wood Environment and Infrastructure Solutions, Inc., November 2020; Phase I Environmental Site Assessment, prepared by ERAS Environmental, Inc, March 25, 2016; Petaluma Municipal Airport Section of the Sonoma County Comprehensive Airport Land Use Plan, 2001; Sonoma County Airport Master Plan, prepared by Mead and Hunt, July 2011; GeoTracker, managed by the State Water Resources Control Board, accessed September 2022; and EnviroStor, managed by the Department of Toxic Substances Control, accessed September 2022.

Petaluma General Plan 2025 EIR Findings

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. The following impacts to geology, seismicity, and soils were identified in the General Plan EIR:

Impact 13.3-1: Buildout of the proposed General Plan could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than significant)

Impact 3.13-2: Buildout of the proposed General Plan could create a significant hazard to the public or the environment through reasonably foreseeable accidental release of hazardous materials into the environment. (Less than significant)

To address potential impacts related to hazardous material, the General Plan EIR identifies General Plan Policy 10-P-14 and 10-P-15 which direct the City to maintain an inventory of environmentally contaminated sites, work with property owners in the cleanup of contaminated sites and establish zoning designations and environmental review processes which limit the location of facilities which use hazardous materials.

General Plan Policy 10-P-4 requires compliance with the Sonoma County's Integrated Waste Management Plan (ColWMP) as well as the Consolidated Unified Protection Agency (CUPA) program elements. The Petaluma CUPA manages the acquisition, maintenance and control of hazardous materials and waste generated by industrial and commercial business under the Petaluma Fire Department. Under CUPA, projects that intend to store, transport, or generate hazardous waste must apply for and obtain a permit and submit a Hazardous Materials Release Response Plan and Inventory on an annual basis. Facilities that use or store potentially hazardous materials in quantities that are above reporting thresholds must prepare and implement a Hazardous Materials Business Plan (HMBP).

City of Petaluma Local Hazard Mitigation Plan

The Disaster Mitigation Act of 2000 (Federal Public Law 106-390) requires local governments to develop and adopt pre-disaster mitigation plans in order to minimize property damage and the risk to public health and safety that might result from the effects of a natural or man-made disaster. The City Council adopted a Local Hazard Mitigation Plan (LHMP) on November 2, 2020, in accordance with the Disaster Mitigation Act. The LHMP assesses risk and vulnerabilities and identifies and prioritizes mitigation projects. According to the Governor's Office of Emergency Services, the intent of a LHMP is three-fold:

1. To gather hazard, vulnerability, and mitigation information from the local level for use in state-level planning;
2. To ensure that state and local hazard mitigation planning is coordinated to the greatest extent practical;
3. To ensure that local jurisdictions are made aware of the hazards and vulnerabilities within their jurisdiction and to develop strategies to reduce those vulnerabilities.

The City Council adopted Resolution No. 2021-113 N.C.S. on June 21, 2021, approving a General Plan Amendment to add Section 10.4 (Local Hazard Mitigation Plan) to the Health and Safety Element of the General Plan to include language stating the City of Petaluma has adopted a LHMP, implementing General Plan Policy 10-P-2 and incorporating the LHMP by reference to the General Plan.

Project Consistency with the General Plan 2025 EIR

Site preparation, construction activities and material delivery may result in the temporary presence of potentially hazardous materials including, but not limited to gasoline, diesel fuels, lubricants, paints, solvents, insulation, and electrical wiring. Although there may be potentially hazardous materials onsite during construction, the applicant will comply with all existing federal, state, and local safety regulations governing the transportation, use, handling, storage, and disposal of potentially hazardous materials.

A Phase 1 Environmental Site Assessment (ESA), prepared by ERAS Environmental on March 25, 2016, located two groundwater monitoring wells of unknown origin, ownership, or purpose. The report determined that no hazardous materials, septic systems, drywells, or evidence of subsurface investigators are located on the Project site. Additionally, no evidence was found that underground storage tanks (UST) or

aboveground storage tanks (AST) were potentially present. The report recommended obtaining a permit for proper destruction of the monitoring wells, included in Section 6 Environmental Conditions of Approval. Additionally, the Phase 1 ESA concluded that no recognized environmental conditions (REC), controlled recognized environmental conditions (CREC), historic recognized environmental conditions (HREC), or de minimis conditions are located on the Project site.

The applicant shall comply with all federal and state regulations as overseen by the Petaluma CUPA. If and when construction activities involve the on-site storage of potentially hazardous materials, a declaration form will be filed with the City Fire Marshal's office and a hazardous materials storage permit must be obtained. Compliance with Federal, State and Local regulations will ensure that hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials will remain less than significant as concluded in the General Plan EIR.

The Project site has been previously developed and is not identified as an environmentally contaminated site in the City's inventory of contaminated sites. There is one Cortese site (Government Code Section 65962.5) within 0.25 miles of the Project site, consisting of a leaking underground storage tank (LUST) cleanup site, which received a case closure letter from Sonoma County Local Oversight Program (LOP) on April 15, 1997, and no further action is required. The Project site is not located within 0.25 miles of an existing or proposed school.

The Project site is not located within an airport land use plan or in the vicinity of a private air strip. The Project site is located approximately 1.5 miles south of the Petaluma airport. The Project would not create a safety hazard due to the runway orientation and flight path of aircraft. Furthermore, the Project site is also located outside any airport safety zone and the proposed building heights and associated lighting, which be glare-free and downcast, would not create hazards for aircraft utilizing the airport.

The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan nor will the Project alter any emergency response or evacuation routes. The Petaluma Fire Department has indicated that site access adequately accommodates emergency vehicles and provides connectivity to the existing circulation and street system. Therefore, the proposed Project will have no impact on the emergency response plan or emergency evacuation plan.

Wildland fires are of concern particularly in expansive areas of native vegetation of brush, woodland, and grassland. The Project site is located within a developed urban area of Petaluma, surrounded by roadways, urban uses, and the Adobe Creek corridor. Therefore, there are no impacts related to the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

No General Plan Policies identified in the General Plan 2025 EIR are applicable to the Project.

Conclusion and Environmental Conditions of Approval

As the Project is within the scope of development projected under the General Plan, there would be no new or more severe impacts to hazards and hazardous materials beyond those analyzed in the General Plan EIR. Compliance with ColWMP and CUPA programs, as set forth below in Section 6 Environmental Conditions of Approval, will ensure that potential impacts to hazards and hazardous materials resources would not exceed those anticipated by the General Plan 2025 EIR.

4.10. HYDROLOGY AND WATER QUALITY

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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:	☐	☐	☐	☒
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
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	☐	☐	☐	☒
iv. impede or redirect flood flows?	☐	☐	☐	☒
d) Result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☐	☒
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; Site Plan and Architectural Review Submittal prepared by Greg LeDoux and Associates, dated July 26, 2022; Preliminary Stormwater Control Plan for a Regulated Project, prepared by Steven J Lafranchi & Associates, Inc, July 11, 2022; and Preliminary Rain Harvesting Report, prepared by Andrea Chapman, July 13, 2022.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that with the 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. The following impacts to hydrology were identified in the General Plan EIR:

Impact 3.6-1: Buildout of the General Plan 2025 may degrade water quality. (Less than Significant)

Impact 3.6-2: Buildout of the General Plan 2025 may increase depletion of groundwater supply or substantially interfere with groundwater recharge. (Less than Significant)

Impact 3.6-3: Buildout of the proposed General Plan may increase drainage flows as a result of impervious surfaces, thereby altering the existing drainage patterns. (Significant)

Impact 3.6-4: New development may overload storm drain system capacity or require expansion of existing or construction of new facilities. (Significant)

Impact 3.6-5: Buildout of the proposed General Plan 2025 may expose people or structures to risk of existing flooding hazards or may place structures which could impede or redirect flood flows. (Significant)

Impact 3.6-6: Buildout of the General Plan 2025 may require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)

To address potential impacts related to hydrology, the General Plan EIR identifies General Plan Policy 8-P-37 which requires all new development to be constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System (NDPES) permit requirements and to maintain and implement the City Storm Water Management Plan to retain a current storm water discharge permit with the California Regional Water Quality Control Board; Policy 8-P-20 which directs the City to protect groundwater recharge areas and stream sides from urban encroachment within the Petaluma watershed and use discretionary permits to control impervious surface construction in groundwater recharge areas; Policies 8-P-28 through 8-P-32 which direct the City to implement a flood terrace system, coordinate with Sonoma Water (formerly SCWA) and Sonoma County Board of supervisors to identify necessary waterway setbacks, maintain a 200-foot setback from the centerline of the Petaluma River, and preserve areas known to have periodic surface water inundation; and Policies 8-P-33 through 8-P-36 which direct the City to coordinate with outside agencies to maintain engineered waterways including dredging the Petaluma River, maintain the 100-year designed conveyance capacity, encourage preservation and enhancement of the natural corridor, and promote public education and stewardship of the riparian corridor.

The General Plan EIR provides three mitigation measures to reduce impacts to hydrology. Mitigation Measure 3.6(a) requires flood terracing in the Corona and Denman Reaches, surface water drainage swales and backflow protections along Highway 101, increase berm heights near residential areas, and incrementally enhance the Petaluma River corridor to increase capacity. Mitigation Measure 3.6(b) requires continuation of zero-net fill and zero-net runoff within the development code to assess and identify mitigations associated with storm pipe capacities on a site-specific basis, while calling for the creation of flood terrace improvements. Mitigation Measure 3.6(c), which prohibits any new inhabited structure or development from being entitled within the 100-year General Plan buildout flood boundary until new data provides a 100-year base flood elevation.

Project Consistency with the General Plan 2025 EIR

The mandatory requirements of the NPDES General Permit apply to 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 of soils and materials, 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. The SWPPP must also identify 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 Resolution No. 2008-0030, "Requiring Sustainable Water Resources Management". These require that all new construction match pre-development hydrology to ensure that the physical and biological integrity of aquatic ecosystems are sustained. This 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, runoff sheet flows south generally toward surrounding the intersection of Fisher Drive and McDowell Boulevard South Ext. to existing curb, gutter and storm drain facilities, with western portions of the site flowing toward an outfall into Adobe Creek. The preliminary stormwater mitigation plan drawing for the proposed Labcon North America Project presented in Sheet C-14 of the Project plans, submitted July 26, 2022, supplements the Preliminary Stormwater Control Plan prepared by Steven J. Lafranchi & Associates, Inc. on July 11, 2022, as summarized below.

The Project proposes new storm drainage infrastructure onsite to accommodate the increase in impervious surfaces that will result from development. Onsite improvements will capture storm water runoff and convey flows to bioretention facilities and subsurface infiltration systems which overflow to a stormwater storage pipe network to be used as a passive cooling system and irrigation supply. Storm water runoff in subsurface systems exceeding the 85th percentile will overflow into bioretention basins, overflow from which will be routed to the on-site private storm drain system conveying flows to the existing public storm drain systems under Cader Lane and Fisher Drive. A total of 7 drainage management areas with 22 bioretention basins would be located on the Project site. Bioretention areas will be located in the surface parking area, adjacent to Project frontages along Fisher Drive and Cader Lane, and along the western frontage at the Adobe Creek corridor.

As proposed, the preliminary stormwater control 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 areas, and paved areas to subsurface detention systems and bioretention areas for pretreatment prior to conveyance via drainage swales entering the City's storm drain system. Existing drainage patterns will be preserved within the required 50-foot setback area of Adobe Creek and surface runoff will be conveyed to the Petaluma River via the existing storm drain system.

A Preliminary Rain Harvesting Report, prepared by Andrea Chapman on July 13, 2022, details the proposed rainwater detention system. Rainwater collected from the building rooftop will be directed via downspouts to an underground system of cisterns, which will be used in dry seasons for landscaping to offset potable water usage and recharge natural underground water systems. Approximately 1,793,305 gallons of water is estimated to be supplied by the system throughout the year. The system would maintain a maximum water storage capacity of 173,430 gallons at any time.

Source Control Measures prepared in the Preliminary Stormwater Control Plan outline site activities and potential sources of water runoff and identify BMPs for each source. The Project proposes to incorporate measures to reduce stormwater runoff and remove pollutants prior to discharging to existing storm water infrastructure. Post-construction LID measures include bio-retention filtration and subsurface chambers that would treat the stormwater prior to discharging to City storm drain infrastructure and use of pervious pavements for all parking except accessible parking spaces. As set forth in Section 6 Environmental Conditions of Approval below, the Project applicant shall prepare and implement a Final Stormwater Control Plan with the standards adopted by the BASMAA for review and acceptance by the City prior to issuance of occupancy.

As provided in the 2020 Urban Water Management Plan (UWMP), the City has adequate water supply resources to accommodate the proposed development without depleting, degrading, or altering groundwater supplies or interfering substantially with groundwater recharge. The Project would not result in the lowering of the aquifer or the local groundwater table. The Project's water demands are consistent with water demands evaluated in the UWMP, which found sufficient water supplies are available to meet existing and planned future development within the UGB.[8] Groundwater reserves will not be depleted due to the proposed development as the City's water supply is largely dependent on surface water flows from Sonoma Water. There are no groundwater wells proposed as part of the Project and the Project will be served by the City's municipal water supply. Furthermore, the site will be served by purple pipe, which conveys recycled water that can be used for landscaping irrigation, thus reducing water use and storage demands.

The site is not located in an identified flood hazard area and is not located within an inundation area of a levee or dam, nor is the site expected to be impacted by inundation by seiche, tsunami or mudflow.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 8-P-20:

Manage groundwater as a valuable and limited shared resource by protecting potential groundwater recharge areas and stream sides from urban encroachment within the Petaluma watershed.

A. Control construction of impervious surfaces in groundwater recharge areas. Potential recharge area protection measures at sites in groundwater recharge areas include, but are not limited to:

- Restrict coverage by impervious materials;
- Limit building or parking footprints;
- Require construction of percolation ponds on site;
- Require surface drainage swales.

Status: The Project proposes rainwater harvesting, use of purple pipe recycled water, bioretention consistent with BASMAA standards, pervious parking spaces, and minimal modifications to natural drainage near Adobe Creek. The Project is consistent with this Policy.

Policy 8-P-36:

Require development on sites greater than 1/4 acre in size to demonstrate no net increase in peak day stormwater runoff, to the extent deemed practical and feasible.

Status: The Project proposes 7 drainage management areas utilizing a rooftop rainwater harvesting system, 22 bioretention basins, pervious parking spaces, and natural infiltration for overflow, with remaining surface flows conveyed to existing storm water facilities. The Project is consistent with this Policy.

Policy 8-P-38:

All development activities shall be constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System (NPDES) permit requirements.

Status: As described above in Section 4.7 , the Project applicant is required to file for coverage under SWRCB, Order No. 99–08–DWQ, NPDES General Permit No. CAS000002. A SWPPP is required at the time of construction to ensure compliance. The Project is consistent with this Policy.

[8] Petaluma 2020 Urban Water Management Plan, prepared by West Yost Associates, June 2021 https://cityofpetaluma.org/documents/2020-urban-water-management-plan-2/, accessed September, 2022.

Policy 8-P-39:

Consider, to the extent practicable, requiring sustainable site design practices as outlined in the 'Sustainable Site Planning' text box[9] contained herein.

Status: The Project proposes permeable pavements in parking areas, trees and other vegetation as part of bioretention basins and riparian corridor enhancements, a rainwater harvesting system to reduce storm water runoff and use of City water, and maintains natural drainage patterns to preserve existing creek flow volumes. The Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan. As outlined in Section 6 Environmental Conditions of Approval of this report, the Project is required 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 General Plan EIR.

9 City of Petaluma General Plan, page 8-21.

4.11. LAND USE AND PLANNING

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Sources: City of Petaluma General Plan EIR; Zoning Amendment and Site Plan and Architecture Review Submittal prepared by Greg LeDoux and Associates, dated July 26, 2022, Petaluma 2020 Urban Water Management Plan, prepared by West Yost Associates, June 2021 https://cityofpetaluma.org/documents/2020-urban-water-management-plan-2/, accessed September, 2022.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that with the policies set forth in the General Plan, land use and planning impacts would be less than significant. Impact 3.1-1, as discussed in Section 4.2 Agricultural and Forestry Resources, is the sole impact identified by the General Plan EIR relative to land use. See discussion above.

General Plan policy 2-P-1 promotes a range of land uses to serve the community needs within the UGB and promote infill development. Policy 2-P-28 supports infill and intensification of business park/light industrial uses at the eastern end of the Lakeville Highway Subarea. The General Plan contains policies for commercial development including Policy 9-P-2 (net positive impact for new commercial development), Policy 9-P-3 (provide an array of employment opportunities), and 9-P-6 (realize adequate City revenue from its economic base).

A number of General Plan policies provide the implementation of the bikeway system and pedestrian connectivity, including Policy 5-P-22 (preserve and enhance pedestrian connectivity) and Policy 5-P-31(A) (provide secure, protected bicycle parking facilities).

Project Consistency with the General Plan 2025 EIR

The proposed Labcon North America Project is consistent with the General Plan policies adopted for the purposes of avoiding or mitigating an environmental effect and will promote the foregoing policies with the Project's implementation in that the Project proposes an infill development in the northeastern portion of the Lakeville Highway subarea; will provide on-site bicycle parking facilities and pedestrian connectivity; and will add to the diversity of employment opportunities in the City.

The Project site is designated Business Park on the City's General Plan Land Use map. The Business Park Land Use Designation is intended for business and professional offices, technology park clusters, research and development, light industrial operations, and visitor service establishments with retail only as a secondary use. The maximum floor area ratio (FAR) is 1.5. In the BP land use designation, an FAR of 3.0 is attainable if all required parking is structured, however as parking is provided at ground level, the expanded FAR is not granted. Further, the proposed FAR of 0.41 does not require the additional FAR that structured parking would permit. The surrounding General Plan Land Use designation is Business Park with the exception of the property located immediately to the southwest of the Project site, which has a designation of Public/Semi-Public and contains a US Postal Service Facility; and properties located across Lakeville Highway from the Project site, which are designated Public/Semi-Public and Low Density Residential. Surrounding lands uses are primarily uses found in business park-style developments including laboratories, research and development facilities, business offices, and light industrial uses. The Adobe Creek corridor is located immediately to the west of the Project site.

The Project proposes rezoning undeveloped portions of the Project site located within the Planned Commercial District (PCD) zone to Business Park (BP) zone. This would render one zone designation for the entire site. As the underlying General Plan Land Use map designates the entire site as Business Park, the proposed rezoning would continue to implement the General Plan Land Use Map as analyzed in the General Plan 2025 EIR. The Project is consistent with Business Park General Plan Land Use Designation in that it provides an industrial facility with a FAR of less than 1.5 at 0.4 FAR. As such, the Project is consistent with the Implementing Zoning Ordinance, and the proposed Business Park zoning for the site. Applicable development standards such as buildings setbacks and heights, parking, loading, and landscaping are consistent with adopted city policy documents (i.e., Petaluma General Plan, the Implementing Zoning Ordinance, and the Business Park zoning district development standards).

Development of the proposed Project would not introduce new physical features that would remove mobility or divide an established community in that it will provide a land use and development that is similar to existing developments and land uses in the area by constructing a new building for light industrial use that is consistent with applicable development standards. The Project proposes light industrial manufacturing, warehousing, and ancillary office uses at intensities planned by the General Plan. As such, the Project is consistent with applicable land use regulations outlined in the General Plan and the General Plan EIR.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 1-P-1 (GP EIR Policy 2-P-1):

Promote a range of land uses at densities and intensities to serve the community needs within the Urban Growth Boundary (UGB).

Status: As discussed above in Section 4.2 Agricultural and Forestry Resources, the Project proposes a new light industrial manufacturing facility within the City's Urban Growth Boundary. The Project is consistent with this mitigation measure.

Conclusion

The Project is within the scope of development projected under the General Plan and is consistent with land use planning, zoning, and City policies. Therefore, there are no additional impacts to potential land use and planning conflict beyond those analyzed in the General Plan EIR.

4.12. MINERAL RESOURCES

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that no mineral resources would be affected from implementation of the General Plan. As the Project proposes development anticipated by the General Plan on an existing parcel of land within the City of Petaluma, the Project is consistent with the General Plan and would not result in any impacts related to mineral resources.

4.13. NOISE

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Cause the 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?	☐	☐	☐	☒
b) Cause the generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) Be 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, and as a result, expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Sources: City of Petaluma General Plan EIR; Transportation and Construction Vibration Guidance Manual, prepared by Caltrans, April 2020, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf; Labcon II Project Noise and Vibration Assessment, prepared by Illingworth & Rodkin, Inc., July 26, 2022; and Petaluma Municipal Airport Section of the Sonoma County Comprehensive Airport Land Use Plan, 2001.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that even with the policies set forth in the General Plan, noise generated from increased local traffic volumes at buildout would be considered significant and unavoidable. The following impacts to noise were identified in the General Plan EIR:

Impact 3.9-1: At buildout, implementation of the proposed General Plan would generate increased local traffic volumes in the Planning Area that would result in a substantial increase to existing exterior noise levels that are currently above the City standards. (Significant)

Impact 3.9-2: Implementation of the proposed General Plan would add new stationary sources of noise, but would not exceed the City noise standards. (Less than Significant)

Impact 3.9-3: Construction activities associated with implementation of the proposed General Plan would generate and expose persons nearby to excessive groundborne vibration or groundborne noise levels. (Less than significant)

Impact 3.9-4: Construction activities associated with implementation of the proposed General Plan could generate noise levels that exceed the City standards. (Less than significant)

To address potential impacts related to noise, the General Plan EIR identifies General Plan Policy 10-P-6, Policy 10-P-7, and Policies 10-P-9 through 10-P-12 which direct the City to discourage new noise sensitive uses in areas with noise levels projected over 65 dB CNEL; General Plan Figure 10-2 and Figure 10-3 to determine acceptable noise exposure in noise-impacted areas and consider an increase of four or more dBA above normally acceptable levels to be significant under CEQA; and Policy 10-P-8 which directs the City to reduce noise from stationary sources by requiring applicants for new noise sensitive development in areas subject to noise levels greater than 65 dB CNEL to submit an acoustical study and

recommendations to reduce noise impacts, requiring placement of fixed mechanical equipment centrally on rooftops, and establishing noise emission standards for City vehicles. Additionally, the General Plan EIR identifies Mitigation Measure 3.9(a), which requires project developers to utilize construction BMPs to reduce construction noise levels.

Project Consistency with the General Plan 2025 EIR

The Project site is located in the Lakeville Highway General Plan subarea of the City of Petaluma bounded by Adobe Creek, South McDowell Boulevard, Fisher Drive, Cader Lane, and Lakeville Highway. The ambient noise environment is influenced by roadway noise from Highway 101, Lakeville Highway local arterials, and industrial and commercial activities in the area. As a project proposing light industrial, office, and warehouse uses located within the 60 dB CNEL noise contour provided in General Plan Figure 10-1, the Project site is within the normally acceptable range for these uses of up to 70 dBA CNEL pursuant to General Plan Figure 10-2 and General Plan Policy 10-P-3(B). The nearest sensitive receptors include single family dwellings that are located approximately 370 feet to the north of the Project site.

Construction Vibration[10]

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. Construction techniques that generate the highest vibration levels, such as impact or vibratory pile driving, are not proposed.

For vibration damage potential in modern industrial/commercial buildings, the California Department of Transportation (Caltrans) uses a vibration threshold of 2.0 inches/second, peak particle velocity (in/sec, PPV) for transient sources and 0.5 for continuous/frequent intermittent sources. New residential structures use a 1.0 in/sec PPV for transient sources and 0.5 PPV for continuous/frequent intermittent sources.

The California Department of Transportation provides the vibration source levels at 25 feet for various types of construction equipment as shown in the following table.

Table 2: 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

Sources: Federal Transit Administration 2018 (except Hanson 2001 for vibratory rollers) and Caltrans 2000 for crack-and seat-operations.

The only potentially significant source of groundborne vibration resulting from the Project would be generated by the short-term construction activities. Vibratory rollers have the potential to generate the greatest vibratory noise levels. As shown above, at a distance of 25 feet, vibration levels have the potential to reach 0.210 in/sec PPV. Vibration levels are greatest at the source and begin to attenuate with increasing distance from the source. The structure located closest to the Project site is the BioMarin research and development facility to the south, which was constructed in 2021, is approximately 100 feet to the south of the footprint of the proposed building and is not expected to be exposed to potentially significant vibration levels generated by project construction.

The nearest sensitive receptor is located approximately 370 feet from proposed construction activity. At a distance of 370 feet, vibration levels have the potential to reach 0.011 in/sec PPV. Whereas impacts to structures begin at 0.25 in/sec PPV, vibration sensitive uses nearest the Project site are located far enough from the Project site that temporary groundborne vibration during construction would be less than significant. Additionally, the nearest structure to proposed construction activity is located approximately 70

[10] Transportation and Construction Vibration Guidance Manual, prepared by Caltrans, April 2020, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

feet to the south and would experience up to 0.068 in/sec PPV, which remains under the threshold of 0.5 in/sec PPV for structurally sound buildings[11]. Therefore, impacts related to exposure of groundborne vibration resulting from construction of the Project 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 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 roadways serving the site. Construction noise levels would vary by stage based on the amount of equipment in operation and the location where the equipment is operating. Typically, construction noise is in the range of 80 to 90 dBA at a distance of 50 feet from the source.

Noise sensitive uses nearest the Project site include single-family dwellings located approximately 370 feet from the closest Project construction activities. Construction noise impacts do not generally occur when the nosiest construction activities do not exceed the ambient noise environment by 5 dBA L_{eq} (Equivalent Continuous Sound Pressure Level) for a period greater than one year. The overall construction duration for the Project is anticipated to last for a period of approximately 18 months. Additionally, as construction activities move away from the site margins and interior construction work proceeds, noise levels in the Project site vicinity will be reduced. Horizontal separation between construction activity and the closest noise-sensitive uses, intervening buildings, and the ambient noise created by vehicles using adjacent roadways including Lakeville Highway will ensure that temporary construction noise impacts will be less than significant.

In addition, pursuant to IZO Section 21.040, construction activities are restricted to the hours of 7:00 AM to 10:00 PM, Monday through Friday, and 9:00 AM to 10:00 PM on Saturday, Sunday, and state, federal and local holidays. The project would be required to comply with the foregoing construction times as part of compliance with the Petaluma IZO. Furthermore, with incorporation of standard noise control measures, such as locating stationary noise-generating equipment as far as possible from adjacent residential receivers and storing heavy equipment on-site to minimize the need for extra heavy truck trips, noise generated during the project construction would be reduced further.

Operation

The Project would place a new light industrial manufacturing, warehousing, and ancillary office uses in an area where ambient noise levels are in the citywide noise contour area of 60 dB CNEL (decibel community noise equivalent level). Based on the City of Petaluma's Land Use Compatibility Standards, the proposed use 70 dB CNEL as per the standards of General Plan Policy 10-P-3(G). The Project proposes a new building located on a parcel of land containing similar business park and light manufacturing uses, the noise impacts of which have been reviewed under previous environmental review. As such, the Project will not introduce new workers to ambient noise levels that are unacceptable, nor would it conflict with established land use compatibility standards for noise and would not contribute to the ambient noise environment beyond that analyzed in the General Plan EIR. Rather, the Project would introduce new land uses within compatible ambient noise levels identified in the General Plan.

At operation, new development onsite will contribute to the ambient noise environment. The new building will generate noise in the parking area (engine starts, radio, car doors closing, etc.), along the access drive aisles (people talking, loading/unloading personal items, idling engines, etc.), mechanical equipment (HVAC, refrigeration, etc.) and in the loading area (truck engine starts, idling, doors, etc.) throughout operation of the Project, which will maintain shifts 24 hours a day, seven days per week. Noise from these sources is typical of noise levels generated within the Project vicinity and consistent with the type of uses is the vicinity. As such, the Project will not result in perceptible changes to the ambient noise environment at operation.

The Project site is not located within two miles of a private airstrip; however, it is located approximately 1.5 miles from the Petaluma Airport. The operations of the Petaluma Airport will not expose any workers at the

[11] $PPV_{Equipment} = PPV_{Ref} (25/D)^n$ (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

Project site to excessive noise as the Project site is located over one mile away from any airport-related noise contours.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts and EIR Mitigation Measures

Policy 10-P-3(D) (GP EIR Policy 10-P-9):

> Continue to require control of noise or mitigation measures for any noise-emitting construction equipment or activity.

Status: As a standard condition of approval, construction activity is limited to hours and noise levels as codified in Chapter 21 of the Petaluma Implementing Zoning Ordinance. Compliance with Mitigation Measure 3.9(a) as provided in Section 6 Environmental Conditions of Approval of this report will ensure application of adequate construction noise control measures. The Project is consistent with this Policy.

General Plan 2025 EIR Mitigation Measure 3.9(a):

> Project developers shall require by contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:
>
> - Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;
> - Ensure that construction equipment is properly muffled according to industry standards;
> - Place noise-generating construction equipment and locate construction staging areas away from residences, where feasible;
> - Schedule high noise-producing activities between the hours of 8 a.m. and 5 p.m. to minimize disruption on sensitive uses; and
> - Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers or noise blankets.

Status: Section 6 Environmental Conditions of Approval imposes these BMPs during Project construction. The Project is consistent with this mitigation measure.

Conclusion and Environmental Conditions of Approval

The Project is within the scope of development projected under the General Plan, which found that noise generated from increased local traffic volumes at buildout would be considered significant and unavoidable. The City adopted a statement of overriding considerations, which balances the merits of approving the General Plan despite the potential environmental impacts. As outlined in Section 6 Environmental Conditions of Approval of this report, the Project is required to implement construction noise BMPs and control measures as required by Mitigation Measure 3.9(a). Thus, there would be no additional impacts to noise beyond those analyzed in the General Plan EIR.

4.14. POPULATION AND HOUSING

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; Site Plan and Architectural Review Submittal prepared by Greg LeDoux and Associates, dated July 26, 2022; and 2015-2023 City of Petaluma Housing Element, revised November 19, 2018.

Petaluma General Plan 2025 EIR Findings

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, sub-regional, 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. No Impacts to population and housing were identified in the General Plan EIR.

Project Consistency with the General Plan 2025 EIR

The Project proposes the development of 82,802 square feet of manufacturing and processing floor area, 57,112 square feet of office floor area, and 148,295 square feet of warehouse floor area within a 176,657 square foot building with approximately 95 new employees anticipated over the next five years. The projected population associated with approximately 95 additional employees does not constitute a substantial increase and remains sufficiently below the General Plan population projections.

The Project site is located in an area of the City that is largely built out and is well served by existing utilities and infrastructure. 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.

As the Project site is not zoned for residential use and does not contain any dwelling units, the Project will not displace any existing housing units or people necessitating the construction of replacement housing. Therefore, 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 there would be no additional impacts to population and housing beyond those analyzed in the General Plan EIR.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

No General Plan Policies identified in the General Plan 2025 EIR are applicable to the Project.

Conclusion

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

4.15. PUBLIC SERVICES

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
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?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

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

Petaluma General Plan 2025 EIR Findings

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. Impact fees are used to fund the construction or expansion of capital improvements 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 General Plan EIR concluded that with policies set forth in the General Plan, impacts to public services would be less than significant. The following impacts to energy were identified in the General Plan EIR:

Impact 3.4-1: New development may generate additional elementary and secondary school enrollment within all the school districts serving Petaluma. (Less than Significant)

Impact 3.4-2: New development under the proposed General Plan requires police and fire protection that exceeds current staffing and facilities. (Less than Significant)

Impact 3.4-3 New development under the proposed General Plan requires emergency preparedness that may exceed the capabilities of the existing programs. (Less than Significant)

To address potential impacts related to public services, the General Plan EIR identifies General Plan Policies 7-P-12 and 7-P-16 which directs the City to make school sites a priority if the UGB is expanded to accommodate increasing enrollment and to work with school districts to ensure school capacity is adequate; Policies 7-P-17 through 7-19, and Policy 7-P-31 which direct the City to maintain a ratio of 1.3 police officers per 1,000 residents, 1 firefighter per 1,000 residents, and maintain six-minute response times for emergency services while maintaining adequate service and staff training; Policies 7-P-21, Policy 7-P-25,

and Policies 7-P-32 through 7-P-36 which direct the City to maintain these service goals through various funding, modernization, and planning efforts; Policies 7-P-22 through 7-P-24 which direct the City to update and enforce the Emergency Operations Plan, use the Emergency Operations Center (EOC) to provide early warnings for life-threatening hazards, and ensure that emergency facilities and services such as hospitals remain operative during emergencies; and Policy 7-P-28 which directs the City to expand the capability of the Fire Department to respond to emergencies related to the Petaluma River as Downtown and the Petaluma River corridor are revitalized and uses intensify.

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's planned public facilities and service improvements identified to accommodate buildout of the General Plan.

Project Consistency with the General Plan 2025 EIR

The Project is not anticipated to induce substantial growth in the area, either directly or indirectly beyond what was anticipated by the General Plan. The Project will incrementally increase demands for fire and police services, schools, and parks but not to a level that would be considered potentially significant. As a standard condition of Project approval, the applicant shall pay all development impact fees applicable to an industrial project, including a facilities fee for identified fire/police facility improvements, statutory school impact fees, and parkland fees.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 7-P-17:
Achieve and maintain a minimum ratio of one fire suppression personnel per 1,000 population served or a similar level of response service to meet increased call volumes.

Policy 7-P-31:
Maintain a minimum standard of 1.3 police officers per 1,000 population or a similar level of coverage to meet increased service calls.

Status: The Project will be required to pay development impact fees including facilities fees, which would be used to fund necessary police and fire facility improvements at the time that additional service personnel are needed to maintain acceptable service ratios. The Project is consistent with this Policy.

Conclusion

As the proposed Project is within the scope of development projected under the General Plan there would be no new or more severe impacts to public services beyond those analyzed in the General Plan EIR.

4.16. RECREATION

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) 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?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that with policies set forth in the General Plan, parkland impacts would be less than significant. The following impact to recreation was identified in the General Plan EIR:

Impact 3.3-1: Future development may result in a decrease of parkland per 1,000 residents. (Less than Significant)

At the time of certification of the General Plan EIR, Petaluma had an average of 5.2 acres of community and neighborhood parkland per 1,000 residents. The General Plan estimated that 80 additional acres of parkland would be necessary to maintain the minimum parkland ratio due to the increase in population anticipated with buildout under the General Plan. The General Plan contemplated a total of 89 acres of parkland, expected to result in a ratio of 5.3 acres of parkland for every 1,000 residents under General Plan buildout. The General Plan EIR identifies General Plan Policies 6-P-1 through 6-P-3, Policy 6-P-5, Policy 6-P-6, Policy 6-P-9, and Policy 6-P-12 through 6-P-17 which direct the City to support the health, education, social activities, and well-being of citizens by providing additional safe and accessible parkland in areas where new growth is proposed and where parkland is sparse, develop and implement a Parks Master Plan, and use park impact fees to offset park development and maintenance fees.

Project Consistency with the General Plan 2025 EIR

The increase in employees introduced by the Project will have a negligible increase in demand for parks and recreational facilities. New demands on parks and recreational facilities generated by the Project have been anticipated as part of the General Plan. As a standard condition of Project approval, the applicant is required to pay all development impact fees applicable to an industrial project, including parkland and open space acquisition impact fees.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

No General Plan Policies identified in the General Plan 2025 EIR are applicable to the Project.

Conclusion

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

4.17. TRANSPORTATION

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; Technical Advisory on Evaluating Transportation Impacts in CEQA, prepared by the California Office of Planning and Research, December 2018, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf; City of Petaluma Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines, prepared by Fehr & Peers, July 2021, https://cityofpetaluma.org/documents/vmt-implementation-guidelines-sb-743/; Traffic Analysis Report, prepared by TJKM, September 28, 2022; and Transportation Demand Management (TDM) Traffic Response Technical Memorandum, prepared by TJKM, November 7, 2022.

Petaluma General Plan 2025 EIR Findings

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.

Level of service (LOS) was historically used as a standard measure of traffic service within the City of Petaluma and the city established a goal of maintaining a LOS 'D' or better (General Plan Policy 5-P-10). However, as of July 2020, CEQA Guidelines Section 15064.3 requires that lead agencies analyze transportation impacts of discretionary projects using the vehicle miles traveled (VMT) metric instead of LOS. In July 2021, the City adopted VMT Implementation Guidelines that provide thresholds of significance, screening criteria, and mitigation options. The following impacts to transportation were identified in the General Plan EIR:

Impact 3.2-1: Increased motor vehicle traffic would result in unacceptable level of service (LOS) at study intersections. (Significant and Unavoidable)

Impact 3.2-2: Implementation of the proposed General Plan could cause increased demand for transit service. (Less than Significant)

Impact 3.2-3: Provision of secure and safe bicycle parking may be inadequate. (Less than Significant)

Impact 3.2-4: Implementation of the proposed General Plan could result in increased demand for motor vehicle parking. (Less than Significant)

To address potential impacts related to transportation, the General Plan EIR identifies General Plan Policies 5-P-1 through 5-P-8, Policy 5-P-10, Policy 5-P-11, and Policy 5-P-13 which direct the City to develop

mobility systems to meet the needs of new transportation demands resulting from implementation of the General Plan in a timely manner using multiple travel modes, requiring off-site mobility improvements for projects which require linkages, and encouraging major employers to develop TDM programs to maintain a LOS of D or better; Policies 5-P-40 through 5-P-44 which direct the City to expand bus transit service, supports transit-oriented development, maintains nominal ridership costs, and coordinate and consolidate transit service agencies for efficiency; Policy 5-P-31 which calls on the City to make bicycling and walking more desirable by providing or requiring new development to provide facilities for pedestrians and cyclists, such as protected bicycle parking; and Policy 5-P-14 which directs the City to maximize shared parking opportunities and support new structured parking in Central Petaluma as well as TDM and parking management strategies in the General Plan.

Project Consistency with the General Plan 2025 EIR

A Draft Traffic Impact Report (TIR) prepared by TJKM on June 29, 2022 determined that based on standard trip generation rates, the Project would generate an average of 903 daily trips, with 124 trips during the AM peak hour (102 in, 22 out) and 126 trips during the PM peak hour (29 in, 97 out). The study area for the Project includes the intersections of US 101 Southbound/Lakeville Highway, US 101 Northbound/Lakeville Highway, Lakeville Highway/Baywood Drive, Lakeville Highway/Casa Grande Road, Lakeville Highway/McDowell Boulevard, and Lakeville Highway/Cader Lane/Frates Road.

The TIR concluded that with signal timing optimization at six locations, all six of the study intersections analyzed in the report would continue to operate at LOS D or better under future conditions. Under existing conditions, five of the six study intersections operate within acceptable LOS, and the US 101 Northbound/Lakeville Highway intersection operates at a LOS E during the PM peak hour. As part of the development review process, the Department of Public Works will ensure that recommendations provided in the TIR are applied in compliance with General Plan Policy 5-P-10.

Level of service (LOS) was historically used as a standard measure of traffic service within the City of Petaluma and the city established a goal of maintaining a LOS ‘D’ or better (General Plan Policy 5-P-10). However, as of July 2020, CEQA Guidelines Section 15064.3 requires that lead agencies analyze transportation impacts of discretionary projects using the vehicle miles traveled (VMT) metric instead of LOS. In July 2021, the City adopted VMT Implementation Guidelines that provide thresholds of significance, screening criteria, and mitigation options.

VMT for the Project were calculated to add 8.84 daily home-based VMT per employee using the Sonoma County Transportation Authority (SCTA) travel demand model. The City of Petaluma Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines provide a significance threshold for project generated VMT of 16.8 percent below the regional average VMT. As the regional average VMT is 22.7, the threshold is 18.9 VMT, and the base year VMT of 7.35 would increase to 16.2 VMT, the Project would contribute to VMT below the adopted significance threshold. In addition, a draft Transportation Demand Management (TDM) Traffic Response Technical Memorandum prepared by TJKM November 7, 2022 summarizes emissions reduction measures as discussed in Section 4.8 Greenhouse Gas Emissions above in compliance with General Plan Policy 5-P-13.

The draft TDM program to reduce vehicle miles traveled (VMT) and associated emissions highlights reduction measures including reservation of parking spaces for electric vehicles, fuel-efficient vehicles, and high occupancy vehicles, parking for 59 bicycles, including 31 interior bicycle parking spaces, and previous contributions of the applicant towards an adjacent bus transit stop along Lakeville Highway and pedestrian bridge crossing Adobe Creek, and other ancillary programs. Without mention in the TDM include other measures, such as four employee showers within the ground floor of the new building to encourage bicycle transit, extension of the existing Class II bike lane along Cader Lane to the south to connect to the existing bike lane at Fisher Drive, and installation of sidewalks abutting the site frontage along Fisher Drive and Cader Lane to connect to existing sidewalks.

Pursuant to Public Resources Code Section 21099, the criteria for determining the significance of transportation impacts related to VMT must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” As previously outlined in Section 4.8 Greenhouse Gas Emissions, the Project is consistent with applicable vehicular GHG regulations and General Plan policies with the reservation of 49 parking spaces onsite for clean air vehicles, including

electric vehicles (EV), high occupancy vehicles (HOV), and fuel efficient (FE) vehicles, and both interior and exterior bicycle parking facilities to promote the reduction of greenhouse gas emissions via alternative modes of transportation and multimodal transportation networks. Additionally, the Project adds to the diversity of land uses at an urban infill site that is near multiple bus lines and bicycling routes. Based on a qualitative assessment of the Project's VMT analysis as allowed by the CEQA Guidelines, and that the Project site is located within the UGB and the General Plan indirectly considered VMT, the Project would not result in new impacts related to VMT that were not analyzed in the General Plan EIR and would be consistent with applicable transportation-related General Plan policies.

The Project is consistent with City plans, ordinances, and policies to integrate alternative modes of travel into the transportation and circulation system. The Project includes the installation of a Class II bicycle facility along the Project site's Cader Lane frontage and provides sidewalks abutting the site frontage along Fisher Drive and Cader Lane to connect to the existing sidewalks consistent with the City's Bicycle and Pedestrian Plan.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 5-P-31:

Make bicycling and walking more desirable by providing or requiring development to provide necessary support facilities throughout the city.

Status: The Project proposes extending the existing Class II bike lane south along Cader Lane to connect with the existing Class II bike lane at Fisher Drive, 59 bicycle parking spaces including 31 interior spaces, and new sidewalks along Fisher Drive and Cader Lane to connect with existing sidewalks. The Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

VMT was not analyzed under the General Plan EIR. However, as the Project proposes expansion of an existing use at a location zoned for similar use under the same General Plan land use designation, and impacts related to greenhouse gas emissions, air quality, and transportation were analyzed, impacts to VMT were indirectly considered. As the Project is within the scope of development projected under the General Plan, screens out of VMT impacts pursuant to the approved Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines, and is consistent with the intent of the General Plan and applicable policies, there would be no new or more severe transportation or circulation impacts beyond those analyzed in the General Plan EIR with implementation of environmental conditions of approval as set forth below in Section 6 Environmental Conditions of Approval,.

4.18. TRIBAL CULTURAL RESOURCES

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
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:				
a) 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	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c). In applying the criteria set forth in Public Resource Code Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; Cultural Resources Study for the Labcon Project, prepared by Tom Origer & Associates, April 6, 2022; Sacred Lands File findings letter, prepared by Cameron Vela, Native American Heritage Commission, May 17, 2022; and AB 52 FIGR Consultation, October 17, 2022.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR discusses Native American archaeological sites as having a high potential within the planning area. Impact 3.12-1 as discussed in Section 4.5 Cultural Resources above provides that new development proposed under the General Plan may disrupt undiscovered archaeological resources, including unidentified tribal cultural resources.

With Implementation of General Plan Policy 3-P-1 (GP EIR Policy 3-P-7), the General Plan EIR concluded that impacts to undiscovered archaeological resources including tribal cultural resources would be less than significant.

Project Consistency with the General Plan 2025 EIR

The City of Petaluma provided notice to Federated Indians of Graton Rancheria (FIGR) on August 26, 2022, as required by Public Resources Code Section 21080.3.1(d). On September 7, 2022, the City received a request for consultation, within the 30-day statutory timeframe provided by Public Resources Code Section 21080.3.1(b). In the September 7 letter, FIGR requested consultation on Project alternatives, any recommended mitigation measures, significant effects of the Project, and discretionary topics including type of environmental review necessary, significance of tribal cultural resources and policies used to determine

significance, and results of tribal cultural resource reports prepared for the Project. The City met with FIGR on October 17, 2022 for consultation, concluding with an agreement to implement environmental conditions of Approval as outlined in Section 6. This section incorporates by reference all text included within Section 4.5 Cultural Resources discussion above. Given the development of the surrounding area and conditions of Project approval under the Cultural/Tribal Resources category in Section 6 Environmental Conditions of Approval, development of the Project would not impact tribal cultural resources beyond what was analyzed in the General Plan EIR.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

See Section 4.5 Cultural Resources discussion of General Plan Policy 3-P-1 and Section 6 Environmental Conditions of Approval.

Conclusion and Environmental Conditions of Approval

As the proposed Project is within the scope of development projected under the General Plan, there would be no additional impacts to tribal cultural resources beyond those analyzed in the General Plan EIR. As such, with implementation of environmental conditions of approval as set forth below in Section 6 Environmental Conditions of Approval, the Project will not result in any new or more severe impacts to tribal cultural resources beyond what was identified in the General Plan EIR.

4.19. UTILITIES AND SERVICE SYSTEMS

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan 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?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; Site Plan and Architectural Review Submittal prepared by Greg LeDoux and Associates, dated July 26, 2022; City of Petaluma 2020 Urban Water Management Plan, prepared by West Yost Associates, June 2021 https://cityofpetaluma.org/documents/2020-urban-water-management-plan-2/.

Petaluma General Plan 2025 EIR Findings

The General Plan EIR concluded that with the policies set forth in the General Plan, utilities and service systems impacts would be less than significant. The following impacts to public utilities were identified in the General Plan EIR:

Impact 3.5-1: New development that would result from the proposed General Plan could increase water demand that may exceed available supply. (Less than Significant)

Impact 3.5-2: New development may result in the need to expand new wastewater treatment facilities, the construction of which may cause significant environmental effects. (Less than Significant)

Impact 3.5-6: New development may result in increased demand for solid waste disposal. (Less than Significant)

To address potential impacts related to public utilities, the General Plan EIR identifies Policies 8-P-1 through 8-P-7 which direct the City to reduce wasteful, inefficient, or unnecessary use of potable water supplies by coordinating and long-term planning with Sonoma Water (formerly SCWA), conducting routine monitoring of water use and infrastructure, developing alternative sources of water to supplement imported supply, discussing water supply with project applicants to inform Water Resources staff of upcoming water demands, and reducing potable water demand through conservation measures; Policies 8-P-9 through 8-P-17 which direct the City to reduce the potential for significant environmental effects resulting from expansion of existing facilities by requiring use of recycled water in appropriate new development, including tertiary recycled water at the Ellis Creek Water Recycling Facility, and updating facilities as necessary to meet water demand and comply with State and Federal permit requirements; and Policies 4-P-16 through 4-P-21 which direct the City to reduce the demand for increased landfill capacity by requiring new or remodeled multifamily residential and non-residential development to include interior and exterior storage areas for recyclable materials, work with Sonoma County to identify how to meet demand for solid waste disposal, and comply with solid waste and recycling goals in compliance with the Countywide Integrated Waste Management Plan (ColWMP).

City of Petaluma Urban Water Management Plan

In 2021, the City updated the UWMP, to include a baseline and target demand analysis, a water service reliability and drought risk assessment, projected urban water use to 2045, 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.[12] Based on regional water supply availability and use, the UWMP expects to be able to increase annual water deliveries to Petaluma from approximately 9,487 acre-feet (AF) in 2020 to 12,117 AF by 2045. In 2020, the City's average per capita water usage rate was 102 gallons per capita per day (GPCD). As presented in the City's UWMP the SB X7-7 GPCD target for the City of Petaluma, was 141 for the year 2020. The results of that comparison find that potable water demand is well within the available Sonoma Water supply, both for the proposed Project, and for cumulative demand through 2045 as set forth in the 2021 UWMP.

Project Consistency with the General Plan 2025 EIR

The Project would increase demands for water supplies, wastewater treatment, energy, 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 to connect the Project to existing utility lines that are located within the public right-of-way along Fisher Drive and Cader Lane. The extension and connection of water and wastewater services to the Project will not require infrastructure improvements or enhancements beyond what was identified in the General Plan. The Project would be required to 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 indoors and use of pre-installed purple pipe recycled water to be used for landscape irrigation and other non-potable water demands, consistent with requirements established by the latest CALGreen Building Code. Energy usage onsite would be offset via the installation of 4,685 roof-mounted solar panels. Further, the Project applicant will be required to pay development impact fees to accommodate new development's fair share of the costs of future public utility and facility expansion, repair, and improvements identified to accommodate buildout of the General Plan.

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 (compost), 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. The Project is required to comply with CALGreen Section 4.410.2 with regard to accessibility of recycling

[12] State Water Resources Control Board: Decision No. 1610, http://www.waterboards.ca.gov/waterrights.

non-hazardous materials and will be required to coordinate with Recology to provide pre-sorting for recyclable materials and green waste and ensure that trash enclosures are adequately sized. Therefore, impacts related to the generation and disposal of solid waste would not exceed those analyzed in the General Plan EIR.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

Policy 8-P-5:

Develop alternative sources of water to supplement imported supply.

Status: The Project proposes a rainwater harvesting system which will convey runoff from the building rooftop via downspouts to an underground system of cisterns, which will be used in the dry season for landscaping to offset potable water usage and recharge natural underground water systems. Approximately 1,793,305 gallons of water is estimated to be supplied by the system throughout the year

Policy 4-P-21 (GP EIR Policy 4-P-16):

Reduce solid waste and increase reduction, reuse and/or recycling, in compliance with the Countywide Integrated Waste Management Plan (CoIWMP).

B. Require new or remodeled residential and all non-residential development to incorporate sufficient, attractive, and convenient interior and exterior storage areas for recyclables and green waste.

Status: As provided above in Section 4.8 Greenhouse Gas Emissions, General Plan Policy 2-P-122 requires preparation of a Construction Phase Recycling Plan to address recycling of major waste generated by demolition and construction activities, required as a standard condition of approval. Additionally, two centrally located refuse enclosures are proposed to increase capacity and convenience for exterior storage of recyclable and non-recyclable waste material. The Project is consistent with this Policy.

Conclusion and Environmental Conditions of Approval

As set forth below in Section 6 Environmental Conditions of Approval, the Project would be compliant with City standards for water use efficiency and would include preparation of a Construction Site Waste Management Plan, onsite recycling facilities, and strategic waste diversion. As the proposed Project is within the scope of development projected under the General Plan there would be no additional impacts to utilities and service systems beyond those analyzed in the General Plan EIR.

4.20. WILDFIRE

Would the Project:	New Significant Impact Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR; City of Petaluma Local Hazard Mitigation Plan, prepared by Wood Environment and Infrastructure Solutions, Inc., November 2020; and CalFire Sonoma County.

Petaluma General Plan 2025 EIR Findings

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 structures, 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 reduced visibility.

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 within Petaluma that are most susceptible to fire hazards are located near the wildland urban interface (WUI) 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.

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 1.5 miles from the City Core. The following impact to wild land fires was identified in the General Plan EIR:

Impact 3.4-4: Development near the Urban Growth Boundary may increase risk from wild land fires due to the proximity of development to open areas of grassland or chaparral.

Wildfire hazards would be exacerbated as a result of new residential construction, with focused hazard in the western and southern portions of the City where development is proposed adjacent to open space and outside of the Petaluma Fire Division's four-minute travel radii for a six-minute response time. The General Plan EIR identifies General Plan Policy 7-P-19 that requires properties outside of the four-minute travel radii to utilize fire-resistant materials and maintain fire breaks surrounding residences as well as ensuring transportation improvements for new development do not adversely impact emergency response times.

Project Consistency with the General Plan 2025 EIR

The Project site is located within a developed area and is surrounded by roadways and 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 building will 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 that are fire resistant.

Applicable Petaluma General Plan 2025 Policies that Reduce Impacts

No General Plan Policies identified in the General Plan 2025 EIR are applicable to the Project.

Conclusion

As the Project is not closer than one mile from a state responsibility area, is not within an area that is classified as a very high fire hazard severity zone, and does not propose changes that would affect these factors, there would be no additional impacts of the Project associated with wildfire risks beyond those analyzed in the General Plan EIR.

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 Relative to General Plan EIR	More Severe Impact Relative to General Plan EIR	No Substantial Change Relative to General Plan EIR	No Change Relative to General Plan EIR
a) 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 important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) 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) Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Sources: City of Petaluma General Plan and EIR.

The Project does not have the potential to substantially reduce the habitat for wildlife species as the site is surrounded by urban uses and maintains a 50-foot setback from the Adobe Creek corridor. The Project is consistent with the General Plan and supports the goals, policies, and programs outlined therein.

The Project is consistent with the surrounding land uses and implements the intent of the UGB through the redevelopment of an underutilized parcel in the existing urbanized area (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 General Plan EIR but will not result in any new or more severe cumulative impacts not previously considered.

Consistent with the policies and programs of the General Plan and the mitigation measures set forth in the General Plan EIR, the Project is subject to conditions of approval relating to air quality, biological resources, cultural/tribal cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services and recreation, and public utilities. As the proposed Project is within the scope of development projected under the General Plan, there would be no new or more severe impacts beyond those analyzed in the 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. Arborist's Report, prepared by Becky Duckles, July 14, 2022.

B. Adobe Creek Riparian Enhancement: Willow Plantings Tree Mitigation Option, prepared by Huffman-Broadway Group, September 29, 2022.

C. Biological Resources Report Labcon – Fisher Drive Petaluma Development Project, prepared by Huffman-Broadway Group, Inc., June 2022.

D. Cultural Resources Study for the Labcon Project, prepared by Tom Origer & Associates, April 6, 2022.

E. Traffic Impact Analysis Report, prepared by TJKM, June 29, 2022, revised September 28, 2022.

F. Geotechnical Study Report, prepared by RGH Consultants April 7, 2022, revised November 4, 2022.

G. Labcon Construction Air Quality and Greenhouse Gas Assessment, prepared by Illingworth & Rodkin, Inc., July 29, 2022, revised October 3, 2022.

H. Labcon II Project Noise and Vibration Assessment, prepared by Illingworth & Rodkin, Inc., July 26, 2022.

I. Phase I Environmental Site Assessment, prepared by ERAS Environmental, Inc, March 25, 2016.

J. Preliminary Landscape Plans, prepared by Steve LaFranchi and Associates, July 15, 2022.

K. Preliminary Rain Harvesting Report, prepared by Andrea Chapman, July 13, 2022, revised August 29, 2022.

L. Preliminary Stormwater Control Plan for a Regulated Project, prepared by Steven J Lafranchi & Associates, Inc, July 11, 2022.

M. Rainwater Harvesting Areas Memorandum, prepared by RGH Consultants, October 6, 2022.

N. Sacred Lands File findings letter, prepared by Cameron Vela, Native American Heritage Commission, May 17, 2022.

O. Technical Study Review Response Memorandum, prepared by Huffman-Broadway Group, Inc., November 5, 2022.

P. Transportation Demand Management (TDM) Traffic Response Technical Memorandum, prepared by TJKM, November 7, 2022.

5.2. OTHER DOCUMENTS REFERENCED

1. *2008 Energy Action Plan Update*, prepared by the California Energy Commission, https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy_-_electricity_and_natural_gas/2008-energy-action-plan-update.pdf, accessed January, 2022.
2. *2011 Energy Efficiency Strategic Plan*, prepared by the California Energy Commission, https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/c/5303-caenergyefficiencystrategicplan-jan2011.pdf, accessed January 2022.
3. *2015-2023 City of Petaluma Housing Element*, revised November 19, 2018.
4. *2019 California Green Building Standards Code (CALGreen)*, Effective January 1, 2020.
5. *BAAQMD 2017 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en.

6. *California Department of Conservation Farmland Mapping and Monitoring Program*, https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx, accessed August 2022.
7. *California Environmental Quality Act Air Quality Guidelines*, prepared by the Bay Area Air Quality Management Quality District, May 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.
8. *California Environmental Quality Act Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans Justification Report*, prepared by the Bay Area Air Quality Management District, April 2022, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines
9. *California Scenic Highway Mapping System,* https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed August 2022.
10. *City of Petaluma 2020 Urban Water Management Plan*, prepared by West Yost Associates, June 2021.
11. *City of Petaluma Local Hazard Mitigation Plan*, prepared by Wood Environment and Infrastructure Solutions, Inc., November 2020.
12. *City of Petaluma Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines*, prepared by Fehr & Peers, July 2021, https://cityofpetaluma.org/documents/vmt-implementation-guidelines-sb-743/.
13. *City of Petaluma, General Plan 2025 Draft EIR*, 2008 https://docs.google.com/viewerng/viewer?url=https://storage.googleapis.com/proudcity/petalumaca/uploads/2019/12/DEIR-General-Plan.pdf.
14. *City of Petaluma, General Plan 2025,* 2008 https://docs.google.com/viewerng/viewer?url=https://storage.googleapis.com/proudcity/petalumaca/uploads/2019/05/General-Plan-2025.pdf.
15. *City of Petaluma Municipal Code and Implementation Zoning Ordinance*.
16. *City of Petaluma 2020 Urban Water Management Plan*, prepared by West Yost Associates, June 2021, https://cityofpetaluma.org/documents/2020-urban-water-management-plan-2/.
17. *Climate Action 2020 and Beyond: Sonoma County Regional Climate Action Plan*, Prepared by Sonoma County Regional Climate Protection Authority, July 2016, https://rcpa.ca.gov/wp-content/uploads/2016/07/CA2020_Plan_7-7-16_web.pdf.
18. *Climate Emergency Framework*, prepared by the City of Petaluma, January 11, 2021.
19. *EnviroStor*, managed by the Department of Toxic Substances Control, accessed September 2022.
20. *GeoTracker*, managed by the State Water Resources Control Board, accessed September 2022.
21. *Sonoma County Airport Master Plan*, prepared by Mead and Hunt, July 2011.
22. *Sonoma County Comprehensive Airport Land Use Plan*, 2001.
23. *Technical Advisory on Evaluating Transportation Impacts in CEQA*, prepared by the California Office of Planning and Research, December 2018, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
24. *Transportation and Construction Vibration Guidance Manual*, prepared by Caltrans, April 2020, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.
25. *Zoning Amendment and Site Plan and Architecture Review Submittal,* prepared by Greg LeDoux and Associates, dated July 26, 2022

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 General Plan and its EIR and include standard conditions of approval imposed on development projects and uniformly applied development standards.

AIR QUALITY

1. The latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all 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. If construction is to be conducted during the bird nesting season (February 1 to August 31), a qualified biologist shall conduct a pre-construction breeding bird survey in areas of suitable habitat within 7 days prior to the onset of construction activity. Nesting bird surveys shall cover the Project footprint and adjacent riparian areas within Adobe Creek. If bird nests are found, appropriate buffer zones shall be established around all active nests to protect nesting adults and their young from direct or indirect impacts related to Project construction disturbance. Size of buffer zones shall be determined per recommendations of the qualified biologist based on site conditions and species involved. Buffer zones shall be maintained until it can be documented that either the nest has failed, or the young have fledged.
3. Prior to any tree removal or alteration, the applicant shall obtain approval from the City of Petaluma to implement a plan for tree preservation and replacement in accordance with the City's Tree Preservation Ordinance. Replacement of the five protected trees onsite, shall be replaced at a one-to-one trunk diameter basis. Replacement trees shall be at the minimum a 24-inch box size. Replacement trees shall be planted within the Project boundaries to the extent feasible, except as approved by the City based on the September 29, 2022, Adobe Creek Riparian Enhancement recommendations prepared by Huffman-Broadway Group Inc., and the applicant shall pay in lieu fees to cover the cost of labor and materials for offsite replacement.

4. To protect existing trees that will be preserved, the project applicant shall implement the following measures as set forth in Zoning Ordinance 17.050, Preservation of Existing Trees in Development Proposals:

    a. Plastic or chain link tree protection fencing shall be installed at the driplines of trees to be preserved;

    b. A pre-construction meeting shall occur with the tree service to perform pruning in consultation with the arborist to agree on the extent of pruning as warranted;

    c. Pruning shall be to the minimum extent necessary for hazard reduction and access, vertical clearance and crown restoration and shall be conducted in accordance with ISA pruning guidelines and SNASI 300 standards;

    d. The Project arborist shall be notified 48 hours in advance to be present when grading or trenching will occur within the driplines of trees to be preserved;

    e. No parking, storage of materials, disposal of waste, operation of equipment, or other construction activity shall occur within the dripline of trees to be preserved; and

    f. Four inches of arbor mulch shall be applied to the soil surface within the dripline of trees to be preserved. No arbor mulch shall be introduced within the riparian corridor.

CULTURAL/TRIBAL CULTURAL RESOURCES

5. Prior to commencement of ground-disturbing activities, a professional archaeologist shall conduct a preconstruction training for construction personnel. The training shall familiarize individuals with the potential to encounter prehistoric artifacts or historic-era archaeological deposits and the types of archaeological material that could be encountered within the Project area.

6. 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, the Federated Indians of Graton Rancheria shall be notified and 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 pursuant to Section 106 of the National Historic Preservation Act (36CFR60.4).

7. 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).

8. Pursuant to CEQA Guidelines Section 15064.5(d), 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 shall apply:

    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

9. As determined by the City Engineer and/or Chief Building Official, all recommendations provided in the April 7, 2022 Geotechnical Study Report shall be implemented, including those related to seismic design, grading activity including site preparation, stripping, excavations, fill quality, select fill, lime stabilization, fill placement, permanent cut and fill slopes, and wet weather grading, foundation support including spread footing, bearing pressures, and lateral pressures, retaining walls and loading docks including foundation support and wall drainage and backfill, slab on grade, utility trenches, pavements including parking lot drainage and wet weather paving, Geotechnical drainage including slab underdrains, and maintenance. Final grading plan, construction plans, and building plans shall demonstrate that recommendations set forth in the geotechnical report 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.

10. 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.

HAZARDS AND HAZARDOUS MATERIALS

11. Compliance with Sonoma's Countywide Integrated Waste Management Plan (CoIWMP) as well as all of the Consolidated Unified Protection Agency (CUPA) program elements shall be demonstrated to the satisfaction of the Fire Department prior to the issuance of the first building permit.

12. Apply for a permit with the City to properly destroy the two monitoring wells on the project site.

HYDROLOGY AND WATER QUALITY

13. 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.

14. 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 Sonoma Water.

15. 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.

16. 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.

NOISE

17. Construction Hours/Scheduling: The following are required in order to implement the allowed hours of construction as outlined in the Petaluma Implementing Zoning Ordinance:

    a. 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 10:00 p.m. Monday through Friday and between 9:00 a.m. to 10:00 p.m. on Saturdays, and State, Federal, and local holidays. Construction activities shall not occur on Sundays.

    b. 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.

    c. Construction Equipment Mufflers and Maintenance: All construction equipment powered by internal combustion engines shall be properly muffled and maintained.

    d. Idling Prohibitions: All equipment and vehicles shall be turned off when not in use. Unnecessary idling of internal combustion engines is prohibited.

    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. Equipment Location and Shielding: All stationary noise-generating construction equipment, such as air compressors, shall be located as far as practical from the adjacent homes. Acoustically shield such equipment when it must be located near adjacent residences.

    g. Staging and Equipment Storage: The equipment storage location shall be sited as far as possible from nearby sensitive receptors. 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. 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 reasonable implementation measures to correct the problem. 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 at least two weeks prior to commencement of construction.

PUBLIC SERVICES AND RECREATION

18. Prior to issuance of occupancy of the buildings and prior to issuance of building permits for non-residential development, the applicant shall be subject to the City's most recent Park Land Acquisition and City Facilities Development Impact Fees per the amounts adopted by resolution, and updated annually, and per the payment schedule adopted by resolution.

TRANSPORTATION

19. The Project applicant shall finalize a Transportation Demand Management Plan (TDM) to the satisfaction of City staff prior to Project issuance of occupancy in order to meet City standards, including goals outlined in the Senate Bill 743 Vehicle Miles Traveled Implementation Guidelines approved by the City in July 2021.

PUBLIC UTILITIES

20. 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.

21. A Construction Waste Management Plan shall be prepared and implemented during all stages of construction to address the disposal, recycling, and reuse of major waste materials from demolition and construction activities. The Construction Waste Management Plan will be reviewed upon submittal of a building permit and shall meet the minimum requirements of the CALGreen code for residential and commercial development.
22. 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.
23. 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 green waste for compostable and organic material.