

4.9 LAND USE AND PLANNING

4.9.1 INTRODUCTION

This section addresses the consistency of the proposed Scott Ranch project with applicable local and regional land use policies, as well as other land use impacts. It also presents potential impacts to land use and planning from the construction and operation of a proposed regional park trail that would extend from the western boundary of the Scott Ranch project site to the existing Ridge Trail on Helen Putnam Regional Park (see **Section 4.9.4.4** below).

4.9.2 ENVIRONMENTAL SETTING

4.9.2.1 Existing Land Use

The Scott Ranch project site consists of two parcels of land: a 6.64-acre parcel on the north side of Windsor Drive (APN 019-120-040) and a 52.1-acre parcel on the south side of Windsor Drive and west of D Street (APN 019-120-041). The northern parcel is made up of portions of two knolls and ranges in elevation from 210 feet above mean sea level (amsl) at the northern property line to an elevation of 150 feet amsl near Windsor Drive. The parcel consists of undeveloped land covered by annual grasslands with a group of oak, bay, and buckeye trees along the northern property line.

The southern parcel is also largely undeveloped and is characterized by rolling hills that are utilized for grazing cattle. Elevations range from approximately 100 feet amsl at Kelly Creek to 380 feet amsl at the southwest corner of the parcel. A stock pond, several wetlands, and a section of Kelly Creek that drains from west to east through the site are located on the parcel. In addition, a barn complex, unoccupied mobile home, remnants of a collapsed farm house, an old dairy equipment cleaning shed, and three unused brick-lined hand dug wells are located in the eastern portion of this parcel adjacent to D Street. Finally, in addition to annual grasslands that occupy most of this parcel, there are approximately 500 trees and a rock outcropping present on this parcel.

4.9.2.2 Existing Adjacent Land Uses

Single-family homes are located to the northwest (Victoria subdivision), north (The Summit above Petaluma subdivision), and east (Pinnacle Heights subdivision) of the project site. Windsor Drive serves as the main thoroughfare for the Victoria subdivision. The land to the south of the project site is located in unincorporated Sonoma County and consists of agricultural uses and large lot residential uses. Helen Putnam Regional Park, maintained by the Sonoma County Regional Parks, is located to the west of the project site. McNear Elementary School is located approximately 0.5 mile northeast of the project site on Sunnyslope Avenue.

4.9.2.3 Existing Land Use Designation and Zoning

The City's General Plan Land Use map designates a majority of the project site as Very Low Density Residential (0.6 to 2.5 dwelling units per acre)¹ (**Figure 3.0-4, Putnam Park Extension Project Component Conceptual Plan**). A 300-foot band along the southern boundary of the project site is designated as an Urban Separator and the area surrounding Kelly Creek is designated as Open Space. In addition, the General Plan identifies a proposed city park on the eastern portion of project site. The project site is within the West Hills planning subarea as identified by the City's General Plan.

The project site is zoned Residential 1 (R1) on the City's Zoning Map, which is applied to areas of single-family developments, primarily in the western hillsides, with densities ranging from 0.6 to 2.5 units per acre, and larger lots required for sloped sites. The minimum lot size area is 20,000 square feet. The minimum parcel size is determined by a slope density formula described in Section 16.070(C) of the Implementing Zoning Ordinance if the slope of the site is 10 percent or greater.

4.9.3 REGULATORY CONSIDERATIONS

4.9.3.1 Regional Plans

Plan Bay Area

In July 2017, the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) adopted Plan Bay Area 2040 (Plan), which includes the region's Sustainable Communities Strategy (SCS) and the 2040 Regional Transportation Plan (RTP). The plan is an update to the 2013 Plan Bay Area which was the nine-county region's first long-range plan to meet the requirements of Senate Bill 375, which calls on each of the state's 18 metropolitan areas to develop a SCS to accommodate future population growth and reduce greenhouse gas emissions from cars and light trucks. The document discusses how the Bay Area will grow over the next two decades and identifies transportation and land use strategies to enable a more sustainable, equitable and economically vibrant future (ABAG, 2019).

MTC and ABAG developed a variety of land use and transportation scenarios and evaluated them against performance targets to measure how well they would address regional goals. Performance targets used in the evaluation included climate protection, transportation system effectiveness, economic vitality, and equitable access. Based upon performance and feedback, MTC and ABAG adopted the Final Preferred Scenario, which developed a regional pattern of household and employment growth and corresponding transportation investment strategy. The Plan does not mandate any changes to local zoning rules, general

¹ Based on net acreage which excludes public or private rights-of-way, public open space and floodways, but does not exclude the Urban Separator per General Plan Policy 1-P-19.

plans or processes for reviewing projects; nor is the Plan an enforceable direct or indirect cap on development locations or targets in the region. As is the case across California, the Bay Area's cities, towns and counties maintain control of all decisions to adopt plans and to permit or deny development projects. The MTC and ABAG have characterized the update as limited and focused (ABAG, 2017).

Plan Bay Area 2040's core strategy is "focused growth" in existing communities along the existing transportation network. This strategy builds upon existing community characteristics and leverages existing infrastructure to mitigate impacts on less developed areas. By promoting compact development in established communities with high-quality transportation access, there is less development pressure on the region's vast and varied open spaces and agricultural lands.

Key to implementing the focused growth strategy are Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs) identified, recommended and approved by local governments. The Plan Bay Area 2040 focuses growth and development in nearly 200 PDAs. These existing neighborhoods are served by public transit and have been identified as appropriate for additional, compact development. The Plan Bay Area 2040 helps preserve over 100 regionally significant open spaces which have a broad consensus for long-term protection but which face nearer-term development pressures. The project site is not located within a PDA or a PCA.

Bay Area 2017 Clean Air Plan

The California Clean Air Act (CAA) requires air districts within nonattainment areas to prepare triennial assessments and revisions to their Clean Air Plans (CAPs). The Bay Area Air Quality Management District (BAAQMD) has prepared a series of CAPs, the most recent of which was adopted in April of 2017 (BAAQMD 2017). The 2017 CAP continues the air pollution reduction strategy established by the 1991 CAP and represents the fifth triennial update to the 1991 CAP, following previous updates of 1994, 1997, 2000, and 2010. The 2017 CAP is designed to address attainment of the state standard for ozone, particulate matter, air toxics, and greenhouse gases. CAPs are intended to focus on the near-term actions through amendments of existing regulations and promulgation of new District regulations.

The Bay Area 2017 CAP provides a comprehensive plan to improve Bay Area air quality and protect public health. The 2017 CAP defines a control strategy that the District and its partners will implement to: (1) reduce emissions and decrease ambient concentrations of harmful pollutants; (2) safeguard public health by reducing exposure to air pollutants that poses the greatest health risk, with an emphasis on protecting the communities most heavily impacted by air pollution; and (3) reduce greenhouse gas emissions to protect the climate. State law required the CAP to include all feasible measures to reduce emissions of ozone precursors and to reduce transport of ozone precursors to neighboring air basins.

San Francisco Bay Regional Water Quality Control Plan

The San Francisco Regional Water Quality Control Board (San Francisco RWQCB) regulates water quality in the San Francisco Bay Area region. The San Francisco RWQCB regulates surface water quality in the Bay Area via the Regional Water Quality Control Plan (Basin Plan), which was last amended in May 2017. The Basin Plan lists the beneficial uses which the San Francisco RWQCB has identified for local aquifers, streams, marshes, rivers, and the Bay, as well as water quality objectives, and criteria that must be met to protect these uses. The San Francisco RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements to control water quality and protect beneficial uses. These can include permits for “point sources” such as wastewater treatment plants or “non-point sources” such as the urban runoff discharged by a City’s stormwater drainage system.

4.9.3.2 Local Plans

City of Petaluma General Plan 2025

The City of Petaluma General Plan 2025 was adopted by the City on May 19, 2008. The General Plan 2025 sets goals and policies concerning the community and gives direction to growth and development. In particular, the General Plan includes goals and policies for land use, community design, circulation, housing, public facilities, open space, recreation, conservation, noise, seismic and safety, sustainability, and historic preservation. These policies are designed to direct new development and redevelopment so that it meets City standards and is consistent with City goals. The City of Petaluma is a charter city under California law, and is generally exempt from the requirement that its land use and development decisions be consistent with its General Plan.

West Hills Planning Subarea

The General Plan 2025 established 14 planning subareas and provided policies specific to each. The project site is located in the West Hills planning subarea. This General Plan subarea is primarily defined by Petaluma’s Urban Growth Boundary (UGB) to the west and south. Although this area contains more vacant land than any of the other subareas, much of it is constrained by steep slopes. The West Hills planning subarea’s rural quality is emphasized by these tracts of open land, as well as older, narrow roads, wildlife corridors, grasslands naturally dotted with mature oak woodlands, remnant hedge/wind rows, agricultural plantings (e.g., walnut trees), and a wide range of home styles and sizes.

City of Petaluma Implementing Zoning Ordinance

The City of Petaluma's Implementing Zoning Ordinance (IZO) provides specific regulations governing permitted uses, lot areas, lot widths, yards, building heights, and other important features to guide development within the zoning districts. The IZO also includes Hillside Protection and Tree Preservation chapters. The Zoning Map for the City of Petaluma outlines specific zoning districts for residential, commercial, industrial, and mixed uses.

4.9.4 IMPACTS AND MITIGATION MEASURES

4.9.4.1 Standards of Significance

In accordance with Appendix G of the *California Environmental Quality Act (CEQA) Guidelines*, the impact of the proposed project related to land use and planning would be considered significant if it would:

- physically divide an established community; or
- 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.

4.9.4.2 Methodology

To determine the potential for the proposed project to result in conflicts with an applicable land use plan, policy, or regulation, adopted by an agency with jurisdiction over the project, for the purpose of avoiding or mitigating an environmental effect, the proposed project's consistency with the plan's goals and policies was evaluated.

4.9.4.3 Project Impacts and Mitigation Measures

**Impact LU-1: The proposed project would not physically divide an established community.
(No Impact)**

The proposed project involves the construction of the Davidon (28-lot) Residential Project component and a park extension component on a site that is mostly undeveloped grazing land with a few existing structures adjacent to a riparian corridor. Because the project site is mostly undeveloped, the proposed project would not cut off any existing or proposed transportation route that provides connectivity in the southwestern portion of the City of Petaluma and Sonoma County. Transportation improvements within Windsor Drive and D Street, such as a roundabout and sidewalks, that are proposed as part of the project would enhance connectivity and pedestrian and bicycle circulation within the project area and would not divide an existing community. No impact would occur.

Mitigation Measures: No mitigation measures are required.

Impact LU-2: **The proposed project could cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (*Less than Significant*)**

Plan Bay Area

The proposed project is not located within a PDA or PCA. Therefore, there is no density or land use requirement within the Plan Bay Area that applies to the project site. No conflicts with the Plan Bay Area would result, and the impact would be less than significant.

Bay Area 2017 Clean Air Plan

An analysis of the proposed project's consistency with the 2017 Clean Air Plan is provided in **Section 4.2, Air Quality**. Projects that result in operational air pollutant emissions below BAAQMD thresholds are considered not to conflict with the Clean Air Plan. As discussed in **Section 4.2**, the proposed project would not result in operational emissions of criteria pollutants that would exceed BAAQMD thresholds, and with mitigation to control fugitive dust and toxic air contaminant emissions, the proposed project would not have a significant impact on air quality during construction. Therefore, potential impacts would be reduced to less than significant levels.

San Francisco Bay Regional Water Quality Control Plan (Basin Plan)

A discussion of the proposed project's potential impacts on water quality is provided in **Section 4.8, Hydrology and Water Quality**. As discussed in **Section 4.8**, with the implementation of mitigation during construction and adherence to National Pollution Discharge Elimination System (NPDES) requirements during construction and operation, implementation of the proposed project would not have an adverse effect on water quality. Therefore, the proposed project would not conflict with the Basin Plan, and this impact would be less than significant.

City of Petaluma General Plan

Consistency with the General Plan Land Use Designations

The General Plan 2025 land use designation for the majority of the project site is "Very Low Density Residential". This classification is intended for residential development with densities ranging from 0.6 to

2.5 dwelling units per acre (du/ac) in rural parts of the City. In addition, a 300-foot band along the southern boundary of the project site is designated as an Urban Separator. The General Plan identifies a proposed city park on the eastern portion of the project site (**Figure 3.0-8, Land Use Designations in Section 3.0, Project Description**) and illustrates an open space designation adjacent to Kelly Creek on the project site.

The proposed project would develop 28 single-family homes at a density of 0.63 du/ac based on the net acreage of the project site of 45.15 acres.² The density of the proposed development would be within the approved density range for the “Very Low Density Residential” designation. The riparian corridor along Kelly Creek would be maintained as open space in accordance with the General Plan. A 300-foot band along the southern boundary of the project site would remain undeveloped and maintained as an Urban Separator. In addition, the proposed project would develop an extension to the existing Helen Putnam Regional Park on the approximately 44-acres that constitute most of the project site and lie on the southwest corner of the intersection of Windsor Drive and D Street, which would be in accordance with the City’s General Plan. The project would not conflict with the General Plan land use designations for the project site, and this impact would be less than significant.

Consistency with the City of Petaluma Implementing Zoning Ordinance

The IZO implements the policies of the City of Petaluma’s General Plan by classifying and regulating the uses of land and structures within the City, consistent with the General Plan. As part of the proposed project, the two parcels on the project site would be rezoned from R1 to Planned Unit District (PUD). The proposed PUD development standards for the proposed project are provided below in **Table 4.9-1, Proposed PUD Development Standards**.

According to Chapter 19, Planned Unit Development, of the IZO, a PUD is designed to allow inclusion within its boundaries a mixture of uses, or unusual density, building intensity, or design characteristics which would not normally be permitted in a single use district, as long as the overall density remains consistent with what is allowed under the General Plan land use designation. The proposed project would adhere to all development standards listed in **Table 4.9-1** and would follow all the procedures established by Chapter 19 of the IZO to establish a PUD for the project site. There would be no conflict with Chapter 19 of the IZO, and this impact would be less than significant.

² Excludes public or private rights-of-way, public open space and floodways, but does not exclude the Urban Separator, consistent with definition of net acreage for purposes of calculating residential density in the General Plan.

**Table 4.9-1
Proposed PUD Development Standards**

City Development Standards	Proposed PUD Zoning for Options A and B
Minimum Lot Area	10,000 sf
Minimum Lot Width	80 ft
Minimum Lot Depth	90 ft
Minimum Front Yard Setback	20 ft
Minimum One Side Yard Setback	5 ft
Minimum Aggregate Both Side Yards Setback	15 ft
Minimum Rear Yard Setback	20 ft
Maximum Building Height	20 ft

Chapter 16, Hillside Protection, of the IZO requires that grading follow the natural contours of the project site. The proposed project would adhere to this requirement and all proposed single-family homes would be constructed by conforming to the topography of the site (**Mitigation Measure AES-1a**). In addition, Chapter 16 also requires that the visual prominence of development be reduced and that buildings be sited to allow adequate space for tree plantings or other screening. As discussed in **Section 4.1, Aesthetics**, the proposed project includes mitigation, which requires that architectural elevations and materials of the subdivision include natural, terrain-neutral colors and that the proposed project undergo design review (**Mitigation Measure AES-1b**). Further, native trees, shrubs, and groundcover would be planted throughout the development areas. For these reasons, there would be no conflict with Chapter 16 of the IZO, and this impact would be less than significant.

Chapter 17, Tree Preservation, of the IZO requires the design of every development project (which requires a discretionary approval or other development permit) to recognize the desirability of preserving Protected Trees to the greatest extent possible. In the event that tree removal is proposed, the IZO requires that Protected Trees determined to be in good or excellent health shall be replaced at a one-to-one trunk diameter at breast height (dbh) ratio. Protected Trees determined to be in fair or marginal health shall be replaced on a two to one dbh ratio. The proposed project would comply with these requirements and has designed development on the project site to avoid the greatest amount of tree removal. Oak woodland cover along Kelly Creek, D Street tributary, and the southwestern portion of the project site would be preserved by design. A total of approximately 30 trees are proposed for removal as part of the proposed project. Replacement plantings required in compliance with the City's Tree Preservation Ordinance could be accommodated on-site. The Conceptual Plan for the Putnam Park Extension Project component (see **Figure 3.0-4, Putnam Park Extension Project Component Conceptual Plan**) shows a considerable amount of native tree plantings (159 Oak trees) for habitat enhancement purposes that would be substantially more

than required to meet the Tree Preservation replacement requirements. These include supplemental plantings along the margins of the Kelly Creek and D Street tributary corridors, around the stock pond, in scattered locations in grasslands, along the southern edge of the proposed residential use, and around the large detention basin that parallels the southside of Windsor Drive. There would be no conflict with Chapter 17 of the IZO, and this impact would be less than significant.

Consistency with General Plan Policies

The General Plan Policy 1-P-18 listed below is specifically applicable to the project site and therefore applicable to the proposed project.

Policy 1-P-18: Maintain a permanent open space around the city by the continuation of the Urban Separator and the use of an Urban Separator Pathway, as designated.

The proposed project would permanently protect the 300-foot Urban Separator along the southern boundary of the project site. In addition, the proposed project would dedicate approximately 44 acres of the project site to the Sonoma County Regional Parks to be retained as open space and protected habitat. Improvements within the dedicated open space and park extension area that is south of Kelly Creek would be limited to the trail south of Kelly Creek, pasture improvements and ephemeral drainages stabilization. No development or grading would occur within the 300-foot buffer. An Urban Separator Pathway will not be installed at this location due to sensitive habitat. However, the project meets the intent of this policy by maintaining the Urban Separator and additional lands as open space and providing public trails north and south of Kelly Creek. For these reasons, the proposed project would not conflict with General Plan Policy 1-P-8 and the impact would be less than significant.

The General Plan Policy 1-P-21 listed below is specifically applicable to the project site and therefore to the proposed project.

Policy 1-P-21: As development or annexation occurs, the Urban Separator and/or Urban Separator Pathway shall be dedicated to the City, at no cost for the City for the land or required interface improvements.

- A. Public access pathways and appropriate landscaping, scenic or overlook areas where appropriate, and fencing along the entire length of the urban separator shall be provided by the developer through the development review process, in concert with project design.
- B. Maintenance, in perpetuity, shall be the responsibility of the development through a guaranteed funding source, such as a Landscape Assessment District and/or a funded trust.

To protect critical California red-legged frog habitat and other natural resources in the Urban Separator, in lieu of an Urban Separator Pathway immediately adjacent to the Urban Growth Boundary, the project would provide a “Class I Off-Street-Proposed” trail in or near the-right-of-way at the eastern boundary of the project site, starting at the site’s southeast corner and connecting to the “Class I Off-Street-Proposed” (Kelly Creek) trail. The Off-Street-Proposed Trail along Kelly Creek would connect to the proposed regional park trail, thereby providing adequate connectivity to local and regional trails. For these reasons, the proposed project would not conflict with General Plan Policy 1-P-21 and the impact would be less than significant.

The General Plan Policy 2-P-68 listed below is specifically applicable to the project site and therefore to the proposed project.

Policy 2-P-68: Preserve the uniqueness of the property at the intersection of D Street and Windsor Drive (Scott Ranch) through incorporation of the following criteria in the future development process:

- Respect the gateway value with a minimum 100’-setback from D Street with no sound walls.
- Maintain a minimum of a 100’-setback along Kelly Creek and its tributaries.
- Preserve the red barns in place, designate them historic and encourage the incorporation of a nature study area.
- Preserve and maintain habitat areas and trees.
- Avoid slide areas and minimize grading.
- Provide a minimum 300’-wide Urban Separator.
- Provide a minimum of a 3-acre park site.
- Include the provision of trailhead facilities with restrooms and parking with a connection to Helen Putnam Regional Park.
- Respect City hillside regulations.

The project proposes changes to this policy as shown below. The text added to the policy is shown in underline format. If the requested General Plan amendment to revise this policy is approved, the proposed project would be in substantial compliance with the General Plan, as shown by the analysis below.

Policy 2-P-68: Preserve the uniqueness of the property at the intersection of D Street and Windsor Drive (Scott Ranch) through incorporation of the following criteria in the future development process:

- Respect the gateway value with a minimum 100' building setback from D Street with no sound walls, but allow small accessory structures as part of the public park amenities.
- Maintain a minimum of a 100' building setback from the centerline of along Kelly Creek and its tributaries, recognizing that existing barns may remain within the setback.
- Preserve the ~~red-barns~~ complex in place, designate ~~them~~ the complex historic, and encourage the incorporation of a nature study area. Relocation in the same general area for purposes of stabilization and preservation shall be allowed.
- Preserve and maintain habitat areas and trees.
- Avoid slide areas and minimize grading.
- Provide a minimum 300'-wide Urban Separator.
- Provide a minimum of a 3-acre park site.
- Include the provision of trailhead facilities with restrooms and parking with a connection to Helen Putnam Regional Park.
- Respect City hillside regulations.

As shown in **Figure 3.0-3, Davidon (28-Lot) Residential Project Component Site Plan**, there would be no single-family homes developed with a 100-foot building setback from D Street. In addition, as shown in **Figure 3.0-3**, the proposed development is set back 100 feet from the centerline of Kelly Creek. As proposed by the amendment of Policy 2-P-68, the park extension component would include improvements to the barn complex, a trail network, playground, picnic areas, parking, and restrooms that would be within the 100-foot setback from D Street.

As discussed in **Section 3.0, Project Description**, the proposed project would preserve the barn complex in the same general location and would create a barn center. The barn center would include the renovation of the existing barn complex and the cleaning shed (one of the barns would be converted into an agricultural museum), pathways between the structures (surfaced with ADA-compliant material), bike parking, information kiosks, vegetable gardens, demonstration and working corrals, antique farm equipment with a hand pump, and an amphitheater for outdoor learning activities. Restoration of the barn structures would most likely allow the barns to remain in their current location. However, if necessary, to ensure the

structural stability of the barns, provide a sound foundation, and/or prevent the barns from eventually collapsing into the creek, the barns may be relocated away from the creek bank. However, they would remain in the same general location. Therefore, development of the proposed project would comply with Policy 2-P-68 by preserving the barns and incorporating a nature study area with the proposed development of vegetable gardens, demonstration and working corrals, antique farm equipment with a hand pump, and an amphitheater for outdoor learning activities. In addition, the proposed amendment to the policy would allow for the further protection of the barn complex by relocating these structures, as needed, to prevent from damage. Therefore, the proposed amendment to Policy 2-P-68 would further protect the barn complex and would not conflict with overall purpose of this policy.

As discussed in **Section 3.0, Project Description**, the Putnam Park Extension Project component, covering approximately 44 acres of the project site, would preserve open space. The Putnam Park Extension Project component would preserve trees and California red-legged frog breeding habitat. The proposed project would minimize grading and avoid some landslide areas by not developing the project site south of Kelly Creek for residential purposes and improving this area as an open space.

The 300-foot band along the southern boundary of the project site that is designated Urban Separator on the General Plan Land Use map would be dedicated to the Sonoma County Regional Parks and retained as open space and protected habitat as part of the proposed project.

In addition, as discussed in **Section 3.0, Project Description**, the proposed project would include a connection to Helen Putnam Regional Park via a 0.35-mile section of the loop trail along the north side of Kelly Creek (north trail). The proposed project also would include trailhead facilities with restrooms and parking. As a result, development under the proposed project would meet the policy's requirements with regard to a connection to Helen Putnam Regional Park and trailhead facilities. Furthermore, the proposed Putnam Park Extension Project component would extend the existing Helen Putnam Regional Park eastward to D Street by developing a park area on the approximately 44-acres that constitute most of the project site. Therefore, the proposed project would meet and exceed the policy's requirement of providing a minimum 3.0-acre park.

The project would comply with the City's hillside regulations by preserving the subarea's rural quality and maintaining an open land with grasslands naturally and mature oak woodlands.

For these reasons, with mitigation set forth in other sections of this RDEIR, the proposed project would not conflict with amended General Plan Policy 2-P-68, and the impact would be less than significant.

Lastly, the General Plan also contains Figure 5-2, Bicycle Facilities. The project proposes to amend General Plan Figure 5-2 to delete "Recreational Trail Proposed" from the southern boundary of the Urban Separator

on Scott Ranch and to add "Class I Off-Street-Proposed" in the-right-of-way at the eastern boundary of Scott Ranch between the site's southeast corner and the "Class I Off-Street-Proposed" (Kelly Creek) trail. The Off-Street-Proposed Trail along Kelly Creek would connect to the proposed regional park trail, thereby providing adequate connectivity to local and regional trails. This change is not in conflict with the intent of the General Plan to establish a recreational trail along the periphery of the City.

Table 4.9-2, City of Petaluma General Plan Policy Consistency Analysis, below describes project consistency with above mentioned policies and other General Plan policies applicable to the proposed project.

**Table 4.9-2
City of Petaluma 2025 General Plan Policy Consistency Analysis**

Policy	Analysis
Chapter 1 Land Use, Growth Management, and the Built Environment	
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).	Consistent: The proposed project would promote residential, recreational, and open space land uses compatible to densities of surrounding residential uses and rural character of the area. The project's proposed density of development is consistent with the General Plan.
Policy 1-P-2 Use land efficiently by promoting infill development, at equal or higher density and intensity than surrounding uses.	Consistent: The proposed project would provide residential units at similar density to surrounding uses. 0.6 to 2.5 units per acre is allowed at the project site, which is comparable to surrounding densities of 0.6 to 2.5 units and 2.6 to 8.0 units. The proposed project would place the proposed residential component at 0.63 units per acre, near existing residential developments off Windsor Drive.
Policy 1-P-3 Preserve the overall scale and character of established residential neighborhoods.	Consistent: Development would be similar in character to nearby residential developments to the north, northwest, and east. The single-family homes would be a maximum of two stories and constructed in a variety of architectural styles, including Spanish, Craftsman, Farmhouse or California Ranch. Exterior materials would include a mix of stucco, hardboard siding, stone and masonry. Building colors would be selected to complement and blend with the project environment.
Policy 1-P-14 Require provision of street trees, landscaping, parking and access features to help integrate land uses and achieve an effective transition between uses of disparate intensities.	Consistent: The proposed project would introduce landscaping including planting of trees along Windsor Drive and new project streets, at the perimeter of the Davidon (28-lot) Residential Project component, around the infiltration basin, and at the new parking areas.
Policy 1-P-16 Allow development in hillside areas that preserve ridgelines and are site sensitive.	Consistent: The project site is located in the hills of Petaluma. Ridgelines and prominent hillsides, including the upper hillsides in the southern portion of the site would be retained as open space through clustering the single-family homes in two areas on the northern portion of the project site. This clustering would maximize the open space areas for wildlife protection and avoid construction of new homes on prominent ridgelines. Unique natural features, such as Kelly Creek, most of the trees lining the creek, and the stock pond, would also remain unchanged. Portions of the undeveloped hillsides on the northern portion of the project site would be replaced with single-family homes and associated landscaping and on-site roadways. Grading would be limited to the extent possible. Oak woodland would be preserved on the project site. The Putnam Park Extension Project component would occupy the majority of the project site (approximately 44 acres of the southern portion of the site) and no residential units. The 44 acres would be preserved for the Barn Center, multi-use trail (north and south of Kelly Creek), and the remainder as open space.
<p>A. Establish development and design standards related to residential development in hillside areas that address:</p> <ul style="list-style-type: none"> • Location of hillside residential units, including preserving ridgelines. • Specific provisions to preserve open space, natural assets (woodlands, creeks, etc.). • Standards for building height and massing. • Appropriate forms of clustered development, including amount of bonus, alternate development forms, common recreational facilities, phasing, etc. <p>B. Enhance the hillside development regulations in the Development Code to include:</p> <ul style="list-style-type: none"> • Regulating development density by degree of hillside slope. • Protecting unique natural features, including landforms, mature trees and their surrounding habitat, and ridge lines, by requiring location of structures away from these assets. • Requiring architectural design that reflects the natural form of the hillside setting, in order to minimize visual and environmental impacts. 	<p>Mitigation Measures BIO-2a through BIO-2e set criteria for detailed tree and habitat management and preservation, and require the replanting of native trees, shrubs and groundcover.</p> <p>The project would be required to comply with design recommendations as a result of Planning Commission review, which would ensure that the architectural design is visually unobtrusive and conform to site topography (Mitigation Measures AES-1a and AES-1b).</p>

Policy	Analysis
<ul style="list-style-type: none"> • Preventing the significant alteration of hillside topography through grading and paving. • Use of visually unobtrusive building materials. 	
<p>Policy 1-P-17 Retain ridgelines and prominent hillsides as open space through appropriate clustering and/or transfer of density to other parts of a development site (applies to Rural and Very Low Residential areas within the West Hills, South Hills and Petaluma Boulevard North subareas only).</p>	<p>Consistent: The proposed project is designed to minimize impacts to views of hillsides on the project site and the hills and ridgelines adjacent to the project site by clustering development near existing residential development to the north of the project site, not constructing homes south of Kelly Creek, and leaving about 44 acres of the site, including the Kelly Creek riparian area as open space. The proposed project would not change the views of the prominent hillside and would be integrated into the existing scenery.</p>
<p>Policy 1-P-18 Maintain a permanent open space around the city by the continuation of the Urban Separator and the use of an Urban Separator Pathway, as designated.</p>	<p>Consistent: The proposed project would permanently protect the 300-foot Urban Separator along the southern boundary of the project site, in addition to all land south of Kelly Creek, by dedicating approximately 44 acres to the Sonoma County Regional Parks to be retained as open space and protected habitat. No development or grading would occur within the 300-foot buffer. As described above, an Urban Separator Pathway will not be installed at this location due to sensitive habitat. However, the project meets the intent of this policy by maintaining the Urban Separator and additional lands as open space and providing public pathways north and south of Kelly Creek.</p>
<p>Policy 1-P-19 Ensure that the Urban Separator and Urban Separator Pathway function as an overlay, the intent of which is to provide property owners with the opportunity to request transfer of the development potential of land designated as urban separator to another portion of the same site.</p>	<p>Consistent: The proposed residential density of the project site (28 homes) based on the net acreage of the site (exclusive of existing public streets and other rights-of-way and parks and public open space) is within the permitted 0.6 to 2.5 units per acre on the project site's plan designations. A transfer of development potential from the Urban Separator to other parts of the site has not been requested by the applicant.</p>
<p>Policy 1-P-20 Maintain a standard width for the urban separator at a minimum of 300 feet except in those areas where it may be variable due to topography, physical or ownership constraints, or is already established at more or less than 300 feet.</p>	<p>Consistent: The proposed project would maintain the 300-foot Urban Separator along the southern boundary of the project site and dedicate it to the Sonoma County Regional Parks. No development or grading would occur within this 300-foot buffer.</p>
<p>Policy 1-P-21 As development or annexation occurs, the Urban Separator and/or Urban Separator Pathway shall be dedicated to the City, at no cost for the City for the land or required interface improvements.</p> <ol style="list-style-type: none"> A. Public access pathways and appropriate landscaping, scenic or overlook areas where appropriate, and fencing along the entire length of the urban separator shall be provided by the developer through the development review process, in concert with project design. B. Maintenance, in perpetuity, shall be the responsibility of the development through a guaranteed funding source, such as a Landscape Assessment District and/or a funded trust. 	<p>Consistent: To protect important California red-legged frog habitat and other natural resources in the Urban Separator, in lieu of an Urban Separator Pathway immediately adjacent to the Urban Growth Boundary, the project would provide a "Class I Off-Street-Proposed" trail in or near the-right-of-way at the eastern boundary of Scott Ranch starting at the site's southeast corner and connecting to the "Class I Off-Street-Proposed" (Kelly Creek) trail. The Off-Street-Proposed Trail along Kelly Creek would connect to the proposed regional park trail, thereby providing adequate connectivity to local and regional trails.</p>

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<p>Policy 1-P-23 Establish public scenic or overlook areas in appropriate locations within the Urban Separator concurrently with project design.</p>	<p>Not Applicable: The proposed project does not include a trail within the Urban Separator. Instead the project also includes a Class I trail that runs north/south parallel to D Street, constructed from the southeast corner of the project site along D Street to connect with a proposed sidewalk at the northeast corner of the site. Another proposed paved Class I trail would be constructed from the southeast corner of the project site along D Street but would travel through the park, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, and through the barn center. Therefore, there are no opportunities to provide public or scenic overlook areas within the Urban Separator.</p>
<p>Policy 1-P-29 It is the policy of the City to build within the agreed upon Urban Growth Boundary (UGB). No urban development shall be permitted beyond the UGB.</p>	<p>Consistent: The proposed project would not build outside of the Urban Growth Boundary.</p>
<p>Policy 1-P-35 Growth shall be contained within the boundaries of the Urban Growth Boundary; the necessary infrastructure for growth will be provided within the Urban Growth Boundary.</p>	<p>Consistent: The proposed project is on vacant land designated for residential development located within the Urban Growth Boundary.</p>
<p>Policy 1-P-36 For properties adjoining the Urban Growth Boundary, it is the intent of the City that projects developed in the City or requesting City services shall be of limited density (as shown on the General Plan Land Use Map), unless greater density is required to satisfy the requirements of state housing laws, and shall be designed to preserve the visual and physical openness and preserve the aesthetic and natural features of that portion of the property proximate to the rural areas outside of the designated Urban Growth Boundary.</p>	<p>Consistent: The proposed project, which consists of 28 single-family dwelling units, is consistent with the City of Petaluma General Plan Land Use designation of “Very Low Density Residential” which permits a density of 0.6 to 2.5 dwelling units per net acre. The net acreage of the project site is 45.15 acres (excludes public or private rights-of-way, public open space and floodways, but does not exclude the Urban Separator per Policy 1-P-19). As such, the number of units allowed to be developed on the project site ranges between 26-110 dwelling units. The proposed project falls within this range.</p>
<p>Policy 1-P-47 Ensure that the pace of growth does not create spikes that unduly strain City services.</p> <p>A. Monitor the availability of resources necessary to serve new development, prior to granting entitlements.</p>	<p>Consistent: As discussed in Section 4.14, Utilities and Service Systems of this RDEIR, impacts to wastewater and water infrastructure, water supply and solid waste demand would be less than significant (with mitigation for wastewater impacts). Furthermore, the project has committed to pay Development Impact Fees (DIFs) as currently adopted by the City. DIFs are imposed by the City in amounts sufficient to pay for the impacts of new development on a wide range of public services and infrastructure. Payment of all applicable DIFs will be a standard project condition of approval.</p>
<p>Policy 1-P-48 Ensure all new development provides necessary public facilities to support the development.</p> <p>B. Collect proportionate fair share of long term infrastructure improvement costs as entitlements are granted.</p>	<p>Consistent: As noted in Section 4.12, Public Services, and Section 4.14, Utilities and Service Systems, of this RDEIR, impacts to police services, fire protection, schools and libraries, and parks and recreation services, and utilities would be less than significant as a result of project development (with mitigation for wastewater impacts). The project has committed to pay DIFs as currently adopted by the City. DIFs are imposed by the City in amounts sufficient to pay for the impacts of new development on a wide range of public services and infrastructure. Payment of all applicable DIFs will be a project condition of approval.</p>
<p>Policy 1-P-49 Preserve existing tree resources and add to the inventory and diversity of native/indigenous species.</p>	<p>Consistent: As discussed in Section 4.3, Biological Resources, an estimated 509 trees are located on the project site, and of these 472 qualify as protected trees based on criteria from the City of Petaluma Tree Preservation Ordinance (Chapter 17). The project would preserve a majority of these trees and would require the removal of approximately 30 trees, all of which qualify as protected trees under the City of Petaluma Tree Protection Ordinance. The project would meet the requirements of the City of Petaluma Tree Protection Ordinance by planting 159 Oak trees of varying sizes. Thus, the proposed project would preserve approximately 94 percent of the protected trees on the project site and increase the number of trees on the site after replacement.</p>

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<p>Policy 1-P-50 Preserve and expand the inventory of trees on public property.</p>	<p>Consistent: The proposed Scott Ranch project would preserve 479 trees. The proposed project would remove 30 trees, out of which, 11 trees would be removed for the improvements of the park extension component. However, it would plant 159 Oak trees and other ornamental trees and shrubs. It would also preserve the rest of the trees at the project site.</p>
<p>Chapter 2 Community Design, Character, and Green Building</p>	
<p>Policy 2-P-1 As depicted on the Land Use Map allow for urban development at defined densities and intensities to prevent the need to extend outward beyond the Urban Growth Boundary.</p>	<p>Consistent: Proposed project density is within the range of density allowed by the “Very Low Density Residential” (0.6 to 2.5 units per acre) land use designation and the project is located within the designated Urban Growth Boundary.</p>
<p>Policy 2-P-2 For development adjacent to the Urban Growth Boundary, the intent of the designated land uses is to feather or reduce densities to provide a transition from urban to rural.</p>	<p>Consistent: Proposed project density is consistent with the “Very Low Density Residential” land use designation, which carries out this policy’s intent of feathering densities by providing a transition from urban to rural with the higher densities permitted in the central parts of Petaluma and lower densities feathering out toward the Urban Growth Boundaries.</p>
<p>Policy 2-P-3 Maintain landmarks and aspects of Petaluma’s heritage that foster its unique identity.</p>	<p>Consistent: The project site is associated with the late 19th and early 20th century diversified farming and ranching activities that shaped the rural landscape of Sonoma County. The proposed project would preserve the barn complex and may relocate it as needed for stabilization and preservation purposes; however, it would remain in the same area. Other structures and associated features at the project site do not meet the significance criteria for the California Register for the reasons stated in Section 4.4, Cultural Resources. Additionally, no known NRHP or other local, state, or federally-listed or recognized properties are known to exist in the immediate project area.</p>
<p>Policy 2-P-5 Strengthen the visual and aesthetic character of major arterial corridors.</p> <p>A. Improve key arterial corridors through:</p> <ul style="list-style-type: none"> • Intensification via infilling, orientation of facades toward the street, appropriate building height, and interior parking lot configuration on the parcel; • Prohibiting the use of soundwalls facing the roadway; • Sidewalk improvements including trees, lighting fixtures, planters, curbs, shading devices, public and commercial-related seating, and paving materials; • Streetscape improvements including use of planted medians, parking configuration, signage, and paving materials; and • Creating strong streetscape elements where deemed appropriate (for example, intensely planted tree corridors could draw attention to the street itself as a green passage). 	<p>Consistent: There would be no single-family homes developed along D Street. The renovated barn complex and development of a barn center, a trail network, playground, picnic areas, parking, and restrooms would be within the 100-foot setback from D Street but would strengthen the aesthetic character of the project site by providing public improvements and open space areas. The project would also include pasture improvements, new livestock fencing, riparian corridor enhancement for Kelly Creek and the D Street Tributary which all strengthen the aesthetic character of the site. Sidewalks proposed along Windsor Drive and D Street would include street trees to improve the aesthetic character of the project frontage.</p>

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<p>Policy 2-P-6 Create a strong sense of entry into the city at key locations, identified as Gateways. Each gateway should be considered individually with some requiring architectural and/or landscape treatments and others more simply protecting/ enhancing what already exists (e.g., cultural landscapes and ecological diversity) to provide a sense of transition or entry to Petaluma.</p>	<p>Consistent: D Street has been identified in the <i>2025 General Plan</i> as a gateway at the southwestern entrance to the City. The proposed project would be located at the D Street/Windsor Street intersection and would be the first visible development upon entering the City. The proposed project would preserve most of the project site as open space, retain and enhance the barn complex, and development of residential units would be limited approximately 15 acres north of Kelly Creek, proximate to existing subdivisions. To minimize adverse changes to views of the site from D Street, Section 4.1, Aesthetics, of this RDEIR sets forth mitigation measures that include restrictions on the design of the proposed project, and require that architectural materials of the subdivision include natural, terrain-neutral colors. Also see Policy 2-P-5 above.</p>
<p>Policy 2-P-8 Require single-loaded streets along the Urban Separator and riparian corridors to ensure the creation of linear open space corridors with maximum public accessibility, visibility, and opportunities for stewardship.</p> <p>Note: A single-loaded street is a street on which homes have been built along one side of the street only with no need for access to the front yard, rear yard, or parking on the other side.</p>	<p>Generally Consistent: The new street north of Windsor Drive (proposed “A” street) would be single loaded and the proposed design maximizes preservation and access to Kelly Creek and open space preservation by clustering the minimum required density to one edge of the site and maintaining approximately 44 acres for open space with public access. The new street proposed between Windsor Drive and Kelly Creek (proposed “B” street) would be double-loaded. Although the residential lots on the proposed “B” street would have rear yards toward the Kelly Creek corridor, a 100-foot buffer along both sides of Kelly Creek is proposed and a multi-use loop trail would be constructed on both sides of Kelly Creek within this buffer to provide public accessibility and visibility along the Kelly Creek corridor.</p>
<p>Policy 2-P-56 Preserve and enhance the oak woodland setting and integrate development to protect and enhance these resources.</p>	<p>Consistent: The proposed project would remove 30 trees from the project site, all of which qualify as protected trees under the City’s Tree Preservation Ordinance. The project would plant more than twice the number of trees removed (159 oak trees). Thus, the proposed project would preserve more than 94 percent of the protected trees on the project site and increase the number of trees on the site after replacement.</p>
<p>Policy 2-P-60 Provide a transition from the urban densities of Downtown to the rolling hills and agricultural lands beyond the UGB.</p>	<p>Consistent: At 0.63 du/ac, the density of the proposed development would be at the lower end of the approved densities for the “Very Low Density Residential designation” and would permanently protect approximately 44 acres at City limits adjacent to the UGB as open space.</p>
<p>Policy 2-P-61 Protect existing agricultural uses, wildlife, historic and cultural resources, and natural vegetation.</p>	<p>Consistent: Approximately 22 acres of the approximately 58-acre site would be disturbed, and the remainder would be undisturbed and permanently protected. The project would preserve about 94 percent of the existing trees on the site and maintain the existing barn complex.</p>
<p>Policy 2-P-62 Preserve the rural aspect of the area by maintaining the existing density (Rural, Very Low and Low Residential) and land use patterns. <i>A decrease in density through minimum lot sizes within the Development Code can achieve the desired transition.</i></p>	<p>Consistent: As discussed above, the City’s General Plan Land Use Map designates the majority of the project site “Very Low Density Residential,” and the density of development proposed would be within the approved densities for this designation.</p>
<p>Policy 2-P-63 Allow for clustering of residential units in the hills, permitting smaller lot sizes where clustering and common space is maintained and proposed development corresponds to stipulated density ranges. Also see Hillside/Ridgelines policies in Chapter 1.</p>	<p>Consistent: Development would be clustered near existing residential development to the north of the project site. Clustering the single-family homes in two areas on the northern portion of the project site would maximize the open space areas for wildlife protection and help avoid construction of the proposed new homes on prominent hillsides and ridgelines. During SPAR, all provisions of the Hillside policies will be reviewed and applied to ensure consistency (Mitigation Measures AES-1a and AES-1b).</p>

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<p>Policy 2-P-65 Require dedication of the Urban Separator and/or Urban Separator Pathway along the western and southern boundaries of the UGB.</p>	<p>Consistent: As discussed above, the project maintains the 300-foot Urban Separator along the southern boundary of the project site. Dedication of approximately 44 acres including lands within the Urban Separator to Sonoma County Regional Parks for open space preservation and the provisions of onsite trails north and south of Kelly Creek with connectivity to the adjacent Helen Putnam Regional Park meets the intent of this policy.</p>
<p>Policy 2-P-66 Develop gateways at City entrances on Bodega Avenue, Western Avenue and "D" Street that recognize the transition from a rural to urban area by enhancing existing natural to urban tree patterns.</p>	<p>Consistent: South of Kelly Creek and west of D Street, 44 acres of open space would be preserved along with a renovated barn complex. The 44 acres of open space would act as an extension of the urban separator from the south side of the project site up to Kelly Creek. This continuation of the urban separator would provide a smooth transition from rural to urban by preserving trees to the maximum extent possible, implementing pasture improvements, enhancing the riparian corridor for Kelly Creek and the D Street Tributary west of D Street, and incorporating a trail network. Single-family homes would be limited to north of Kelly Creek and there would be no single-family homes developed with a 100-foot building setback from D Street. The homes would be constructed at low density which would provide a fluid shift from rural uses. Also See Policies 2-P-5 and 2-P-6 above.</p>
<p>Policy 2-P-67 Create an open space network through residential areas by requiring integration of open space with public trails when properties are developed.</p>	<p>Consistent: A multi-use loop trail is proposed south of the 28 single-family homes along the north and south sides of Kelly Creek. The trail would provide residences of the 28 single-family homes and surrounding residences in adjacent communities a future connection to the Helen Putnam Regional Park trail system to the west. Another trail would travel through the park component, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, and through the barn center. The proposed project would also develop a Class I trail along the project frontage on D Street connecting to residences to the north.</p>
<p>Policy 2-P-68 Preserve the uniqueness of the property at the intersection of D Street and Windsor Drive (Scott Ranch) through incorporation of the following criteria in the future development process:</p> <ul style="list-style-type: none"> • Respect the gateway value with a minimum 100'-setback from D Street with no sound walls. • Maintain a minimum of a 100'-setback along Kelly Creek and its tributaries. • Preserve the red barns in place, designate them historic and encourage the incorporation of a nature study area. • Preserve and maintain habitat areas and trees. • Avoid slide areas and minimize grading. • Provide a minimum 300'-wide Urban Separator. • Provide a minimum of a 3-acre park site. • Include the provision of trailhead facilities with restrooms and parking with a connection to Helen Putnam Regional Park. • Respect City hillside regulations. 	<p>Consistent with Amended Policy: Analysis provided under Consistency with General Plan Policies section above.</p>
<p>Policy 2-P-88 Provide enhanced pedestrian and bicycle network connections between the industrial, commercial, and residential clusters.</p>	<p>Consistent: The project, proposed in an area served by existing roadways and infrastructure, would connect to the surrounding roadways, bicycle facilities, sidewalks and trails. Bicycle paths would connect the various project neighborhoods, Windsor Drive and D Street. The multi-use trail would provide for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site. The proposed project would include a multi-use loop trail along the north and south</p>

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	sides of Kelly Creek to connect the various project neighborhoods, Windsor Drive and D Street through the creek area. The multi-use loop trail would provide for future connections to the Helen Putnam Regional Park trail system at the western edge of the project site. The Off-Street-Proposed Trail along Kelley Creek would connect to the proposed Helen Putnam Park Trail extension. Proposed improvements within Windsor Drive and D Street, such as the roundabout and sidewalks, would enhance connectivity and pedestrian and bicycle circulation within the project area.
Policy 2-P-116 Street trees shall be preserved and their numbers increased as development/ redevelopment/remodeling occurs.	Consistent: The proposed project would not remove any street trees with the exception of a few trees that would require trimming or removal for the D Street off-site sidewalk improvement. However, sidewalks proposed along Windsor Drive and D Street would include the planting of street trees. The proposed project would include planting 159 Oak trees of various sizes.
Policy 2-P-122 Require development projects to prepare a Construction Phase Recycling Plan that would address the reuse and recycling of major waste materials (soil, vegetation, concrete, lumber, metal scraps, cardboard packaging, etc.) generated by any demolition activities and construction of the project.	Consistent: The 2019 CALGreen Code contains requirements for construction solid waste reduction. As noted in Section 4.14, Utilities and Service Systems , of this RDEIR, the proposed project would feature a sustainable design to comply with CALGreen, which would also result in the use of sustainable materials and recycled content that would reduce the amount of solid waste disposed at landfills during project construction.
Chapter 3 Historic Preservation	
Policy 3-P-1 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.	Consistent: Although associated with the late 19th and early 20th century diversified farming and ranching activities that shaped the rural landscape of Sonoma County, the project site structures and associated features do not meet the significance criteria for the California Register for the reasons stated in Section 4.4 of this RDEIR. Additionally, no known NRHP or other local, state, or federally-listed or recognized properties are known to exist in the immediate project area. Under the proposed project, the existing barns would remain in place or would be moved nearby to provide structural stability.
<ul style="list-style-type: none"> 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. 	As a prehistoric habitation site is located near the project site, previously unknown archaeological resources could be encountered on the site. Mitigation Measures CULT-2a through CULT-2c are included to minimize potential impacts to known and unknown archaeological resources.
Policy 3-P-6 Ensure that new development adjacent to eligible historic and cultural resources is compatible with the character of those resources.	Consistent: Although associated with the late 19th and early 20th century diversified farming and ranching activities that shaped the rural landscape of Sonoma County, the project site structures and associated features do not meet the significance criteria for the California Register. Nonetheless, the Red Barn is recognized as a distinctive feature that provides a sense of place and will be retained. Therefore, implementation of the proposed project would not result in significant impacts related to historic resources, and no mitigation measures are required.
Chapter 4 The Natural Environment	
Policy 4-P-1 Protect and enhance the Petaluma River and its tributaries through a comprehensive river management strategy of the following programs:	Consistent: The project is consistent with this policy because it provides for the protection and enhancement of Kelly Creek and its tributaries as follows:
<ul style="list-style-type: none"> C. Require design review to address the relationship and stewardship of that project to the river or creek for any development on sites with frontage along the river and creeks. 	<ul style="list-style-type: none"> C. The proposed project would undergo design review to address the relationship of the project to the creeks. D. See analysis of consistency with Policy 2-P-68 above for setback from Kelly Creek. The project includes a multi-use loop trail along Kelly Creek. No residential lots would be within the 50-foot buffer

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<p>D. Create setbacks for all tributaries to the Petaluma River 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 at time of adjacent development.</p> <p>E. Facilitate compliance with Phase II standards of the National Pollutant Discharge Elimination System (NPDES) to improve the water quality and aesthetics of the river and creeks.</p> <p>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.</p> <p>I. Develop a consistent design for site furniture, a wayfinding system, and educational signage in the PRC and along the creeks and tributaries leading to it to heighten the recognition and value of the river and its ecosystem.</p> <p>J. Utilize the Parks and Recreation, Water Resources & Conservation, Public Works departments, property owners (e.g., Landscape Assessment Districts) and/or other appropriate public agencies (e.g., Sonoma County Water Agency) to manage the long term operations, maintenance responsibilities, and stormwater capacity associated with the river and tributary greenways.</p> <p>K. Prohibit placement of impervious surfaces in the Floodway (i.e., parking lots, roadways, etc.) with the exception of pathways and emergency access improvements.</p> <p>L. Continue to implement, where appropriate, flood terrace improvements to reduce localized flooding in concert with habitat enhancement projects.</p>	<p>from the top of bank of Kelly Creek and D Street tributary. The 40-space trailhead parking lot would not be located within the 50-foot buffer of D Street tributary.</p> <p>E. As noted in Section 4.8, Hydrology and Water Quality, of this RDEIR, because project development would disturb more than one acre, the project would be required to obtain coverage under the NPDES general construction permit from the State Water Resources Control Board. To reduce the long-term accumulation of non-point source pollutants from the project within downstream surface waters, the applicant would incorporate source control and pre-discharge treatment measures into the SWPPP.</p> <p>G. The project retains a large number of trees along the Kelly Creek corridor and for the trees (5) that would be removed along Kelly Creek, the project would plant replacement trees in compliance with the City's tree ordinance.</p> <p>I. The proposed project would develop a barn center that would include the renovation of the existing barn complex and the cleaning shed (one of the barns would be converted into an agricultural museum). Interpretive signage providing information on the history of the site and agriculture in the area would be included. The proposed project would also construct an amphitheater for outdoor learning activities.</p> <p>J. Consistent with the City's policy, Mitigation Measure HYD-4b identified in Section 4.7, Hydrology and Water Quality, would ensure that maintenance of all detention facilities would be provided as necessary to manage stormwater at the project site. The measure also requires a financing mechanism acceptable to the City Engineer to ensure that the required maintenance would be performed.</p> <p>K. Other than the multi-use trail which would be ADA compliant and therefore impervious, no other impervious surfaces would be built near Kelly Creek, or within the creek's floodway.</p> <p>L. By providing adequate detention, the proposed project would not increase flooding and no flood terrace improvements are needed.</p>
<p>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.</p>	<p>Consistent: As noted in Section 4.3, Biological Resources, aspects of the proposed project have the potential to adversely affect wildlife ecosystems and sensitive habitat areas, and the applicant has proposed measures to address these impacts. Approximately 44 acres of the project site would be preserved as open space. The proposed project has been significantly reduced in size, from two previous proposals that included 104 to 93 single-family residences and 63 to 66 single-family residences, respectively. The current project under review would have 28 single-family residences in addition to the Putnam Park Extension Project component. This reduction in residential density was proposed by the Applicants to preserve the CRLF habitat around the existing stock pond and to provide greater preservation of open space. Mitigation Measures BIO-2a through BIO-2d Sensitive Natural Communities, BIO-3a Wetlands, and BIO-4a through BIO-4d Wildlife Movement and Habitat Connectivity would ensure impacts on wildlife ecosystems and sensitive habitat areas would be less than significant.</p>

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<p>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.</p> <p>A. As part of the development review process, site-specific biological resource assessments may be 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 shall be imposed on a project-by-project basis according to Petaluma's environmental review process.</p>	<p>Consistent: As described in Section 4.3, Biological Resources, site-specific biological resource studies and mapping have been prepared for the proposed project. Mitigation Measures BIO-2a through BIO-2d Sensitive Natural Communities, BIO-3a Wetlands, and BIO-4a through BIO-4d Wildlife Movement and Habitat Connectivity ensure that project's impacts on special status species and their habitat would be less than significant.</p>
<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Encourage the use of trees which provide biogenic benefits to air quality and are suitable to the local environment. 	<p>Consistent: The project site contains a total of 509 trees that are four-inches in diameter or greater, 30 of which would be removed to accommodate development. From the 30 trees, 11 trees would be removed to accommodate the park extension component. The proposed project would include planting 159 oak trees of various sizes distributed throughout the site. In addition, Mitigation Measures BIO-2c and BIO-2d require the project to replace the removed trees, and maintain the new trees for a five-year period, consistent with set criteria and a landscape and vegetation management plan approved by the City. The increased number of trees at the project site would provide air quality benefits.</p>
<p>Policy 4-P-7 Reduce motor vehicle related air pollution.</p> <p>A. 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.</p>	<p>Consistent: The project, proposed in an area served by existing roadways and infrastructure, would connect to the surrounding roadways, bicycle facilities, sidewalks and trails. Furthermore, as noted in Section 4.13, Transportation, of this RDEIR, the existing transportation network in the project area is comprised of several facility types in addition to roadways, including sidewalks, bicycle facilities, and transit routes and stops. The proposed project would include a multi-use loop trail along the north and south sides of Kelly Creek and accessible from Windsor Drive and D Street. The multi-use loop trail would connect to a future segment of the Helen Putnam Regional Park trail system at the western edge of the project site, thereby providing adequate connectivity to local and regional trails. Proposed improvements within Windsor Drive and D Street, such as the roundabout and sidewalks, would enhance connectivity and pedestrian and bicycle circulation.</p>
<p>Policy 4-P-13 Require development of traffic roundabouts, where feasible, as an alternative to a traffic signal, to reduce idling vehicles.</p>	<p>Consistent: The proposed project would include roundabout adjacent to the project site, on City right-of-way at the intersection of D Street and Windsor Drive. It would include single-lane approaches to slow traffic along this portion of D Street and minimize pedestrian crossing distances. The roundabout would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB).</p>
<p>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., wood-burning fireplaces & gas powered lawn mowers) which cumulatively emit large quantities of emissions.</p> <p>A. Continue to work with the Bay Area Air Quality Management District to achieve emissions reductions for non-attainment</p>	<p>Consistent: The proposed project does not include any stationary sources. Operational emissions would result primarily from increased vehicular trips to and from the residential development and the public park. Other sources of emissions associated with the proposed project would include area source emissions, such as the use of natural gas for water heaters and cooking appliances. As the analysis in Section 4.2, Air Quality, shows, the operational emissions from the proposed project would not exceed any of the thresholds put forth by the BAAQMD for criteria air pollutants.</p>

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<p>pollutants; including carbon monoxide, ozone, and PM-10, by implementation of air pollution control measures as required by State and federal statutes.</p> <p>B. 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.</p> <p>C. Continue to require development projects to abide by the standard construction dust abatement measures included in BAAQMD’s CEQA Guidelines. These measures would reduce exhaust and particulate emissions from construction and grading activities.</p> <p>D. Reduce emissions from residential and commercial uses by requiring the following:</p> <ul style="list-style-type: none"> • Use of high efficiency heating and other appliances, such as cooking equipment, refrigerators, and furnaces, and low NOx water heaters in new and existing residential units; • Compliance with or exceed requirements of CCR Title 24 for new residential and commercial buildings; • Incorporation of passive solar building design and landscaping conducive to passive solar energy use for both residential and commercial uses, i.e., building orientation in a south to southeast direction, encourage planting of deciduous trees on west sides of structures, landscaping with drought resistant species, and use of groundcovers rather than pavement to reduce heat reflection; • Provide natural gas hookups to fireplaces or require residential use of EPA-certified wood stoves, pellet stoves, or fireplace inserts. 	<p>Appliances that are purchased for the project would be consistent with existing energy efficiency standards. The project would be required to comply with the updated Title 24 standards for building construction, including exterior lighting. New standards include requirements for indoor lighting efficiency, cool roof coating, duct insulation, and efficient space conditioning.</p> <p>The project would comply with the City’s adopted CalGreen Building Standards Code which includes CalGreen Tier One measures. The proposed project would retain a majority of the existing trees onsite and would introduce landscaping including new native trees, ornamental trees, shrubs and groundcover. A majority of the property would be undisturbed and would be preserved as open space.</p> <p>As noted in Mitigation Measure AIR-2, the project would comply with the BAAQMD Best Management Practices with regards to construction dust and abatement measures.</p> <p>Current building code standards generally ban the installation of open-hearth, woodburning fireplaces and wood stoves in new construction. However, they allow for the use of low-polluting wood stoves and inserts in fireplaces approved by the federal Environmental Protection Agency, as well as fireplaces fueled by natural gas. Project residences would incorporate sustainable design features, including solar energy generation, in compliance with the new Building Energy Efficiency Standards of California Building Code Title 24, which require zero net electricity residences effective January 1, 2020. A net zero electricity residence generates enough energy from renewable sources to offset all on site electricity use. This would be accomplished through a combination of highly efficient building systems and solar power generation at each residence. California is the first state in the U.S. to require zero net electricity residences. The residences would use natural gas for furnaces, water heaters, cooktops and fireplace inserts.</p>
<p>Policy 4-P-16 To reduce combustion emissions during construction and demolition phases, the contractor of future individual projects shall encourage the inclusion in construction contracts of the following requirements or measures shown to be equally effective:</p> <ul style="list-style-type: none"> • 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; 	<p>Consistent: As stated in Section 4.2, Air Quality, Mitigation Measure AIR-2, which is set forth by the BAAQMD, would be implemented to minimize dust and exhaust emissions during construction. In addition, Mitigation Measure AIR-3 would be implemented to control diesel particulate emissions from construction equipment. Those mitigation measures are consistent with the measures identified in this General Plan policy, and would reduce construction-phase criteria pollutant, TAC and GHG emissions to be below levels considered significant.</p>

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<ul style="list-style-type: none"> • 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. 	
<p>Policy 4-P-19 Encourage use and development of renewable or nontraditional sources of energy.</p>	<p>Consistent: The Project includes 230 volt electric vehicle chargers all residential garages and rooftop solar panels on all single-family homes, in compliance with California’s 2019 Green Building Standards.</p>
<p>Policy 4-P-20 Continue to participate in the undergrounding of public utility lines; whenever appropriate, require conversion of overhead utility lines to underground in conjunction with public and private projects.</p>	<p>Consistent: As noted in Section 3.0, Project Description, new electric, gas and communication facilities would be installed underground within the project site.</p>
<p>Policy 4-P-21 Reduce solid waste and increase recycling, in compliance with the Countywide Integrated Waste Management Plan (CoIWMP).</p> <p>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.</p>	<p>Consistent: As noted in Section 3.0, Project Description, and Section 4.14, Utilities and Services Systems, the City is committed to continuing to reduce waste by implementing recycling, composting, and waste minimization programs. Therefore, similar to other residents, the residents of the proposed project would participate in the programs set up by the City and would divert solid waste as required by the City. Waste and recycling receptacles would be located on the proposed surface parking lots, trailheads, and with the public park at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.</p>
<p>Policy 4-P-24 Comply with AB-32 and its governing regulations to the full extent of the City’s jurisdictional authority.</p>	<p>Consistent: As noted in Section 4.7, Greenhouse Gas Emissions, the BAAQMD adopted the GHG significance thresholds specifically to meet AB 32’s 2020 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32. The project’s operational GHG emissions would not exceed applicable threshold, and therefore the project would comply with AB 32. The proposed project would also be required to comply with SB 32, which requires statewide GHG emissions to reach 40 percent below 1990 levels by 2030. The BAAQMD has not established a threshold to meet the requirements of SB 32. However, as shown in Section 4.7, Greenhouse Gas, a 2030 threshold was calculated in order to demonstrate project consistency with SB 32. The proposed project was below the calculated 2030 threshold and is therefore consistent with SB 32.</p>
<p>Chapter 5 Mobility</p>	
<p>Policy 5-P-1 Develop an interconnected mobility system that allows travel on multiple routes by multiple modes.</p>	<p>Consistent: The proposed project provides multi-modal access by introducing a roundabout at Windsor Drive and D street, installing sidewalks along the site frontages and along D Street, and constructing an internal loop trail system with connectivity to the future trail at Helen Putnam Regional Park.</p>
<p>Policy 5-P-4 New development and/or major expansion or change of use may require construction of off-site mobility improvements to complete appropriate links in the network necessary for connecting the proposed development with existing neighborhoods and land uses.</p>	<p>Consistent: The project site would be accessible externally and internally by vehicle. In addition, pedestrian and bicycle paths would connect the various project neighborhoods, Windsor Drive and D Street. The multi-use loop trail would provide for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site. The two proposed internal roads would be developed with curbs, gutters, and five-foot sidewalks on both sides. Five-foot sidewalks would also be provided along the project frontages along Windsor Drive and D Street. A high-visibility crosswalk would also be provided on the east leg of the intersection of Windsor Drive with the proposed A and B Streets. The roundabout proposed at the intersection of Windsor Drive and D Street would include single-lane approaches to slow traffic along this portion of D Street and minimize pedestrian crossing distances.</p>

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	<p>The roundabout would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB).</p> <p>In addition, the proposed project would include an off-site sidewalk improvement along the east side of D Street between Windsor Drive and Sunnyslope Avenue, for a distance of approximately 800 feet, to connect with the existing sidewalk.</p>
<p>Policy 5-P-5 Consider impacts on overall mobility and travel by multiple travel modes when evaluating transportation impacts.</p>	<p>Consistent: As presented in Section 4.13, Transportation, multiple modes of travel have been considered in this analysis including the project’s impacts to transit services, and bicycle and pedestrian facilities in addition to vehicular travel.</p>
<p>Policy 5-P-6 Ensure new streets are connected into the existing street system and encourage a grid-based network of streets.</p>	<p>Consistent: The project site would have internal streets and would be accessible externally and internally by vehicle at two locations on Windsor Drive and D Street. The grid-based provisions of the policy are not applicable to the project site and surrounding existing streets. The project appropriately ties into the existing street system.</p>
<p>Policy 5-P-7 Where aesthetic, safety, and emergency access can be addressed, allow narrower streets in residential development to create a pedestrian scaled street environment.</p>	<p>Consistent: The <i>2025 General Plan</i> indicates that narrower streets have a width of 34 to 36 feet (page number 5-5). The roadways shown on the site plan are 50 feet wide and 36 feet curb to curb, with curb, gutter and sidewalks on both sides. This street width includes parking lanes on both sides that provide streets with at least one guest parking space per home as required by the City of Petaluma. Cul-de-sacs would have a 50-foot radius at face of curb to allow emergency vehicles to turn around. Sidewalks with landscape strips behind the sidewalk are proposed on both sides of the streets.</p>
<p>Policy 5-P-8 The priority of mobility is the movement of people within the community including the preservation of quality of life and community character.</p>	<p>Consistent: The project introduces new public sidewalks on Windsor Drive and D street, two new public streets, and provides pedestrian trails internally through the site that connects to a future offsite trail at Helen Putnam Regional Park. People utilizing the on-site trails and sidewalks would have views of the 44 acres of open space preserved on the project site south of Kelly Creek. Improvements also include a new roundabout at Windsor Drive and D Street, which would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB).</p>
<p>Policy 5-P-10 Maintain an intersection level of service (LOS) standard for motor vehicle circulation that ensures efficient traffic flow and supports multi-modal mobility goals. LOS should be maintained at Level D or better for motor vehicles due to traffic from any development project.</p>	<p>Consistent: As noted for informational purposes in Section 4.13, Transportation, the proposed project would maintain an LOS D or better at project intersections.</p>
<p>Policy 5-P-15 Implement the bikeway system as outlined in the Bicycle and Pedestrian Plan, and expand and improve the bikeway system wherever the opportunity arises.</p> <p>Bike Plan (General Plan 2025 Figure 5-2) shows the following bike paths:</p> <ul style="list-style-type: none"> • D Street – Existing Class II • Windsor Drive – Proposed Class II • Kelly Creek – Proposed Class I • Urban Growth Boundary – Proposed Recreational Trail 	<p>Consistent: The project proposes to amend General Plan Figure 5-2, Bicycle Facilities, to delete “Recreational Trail Proposed” from the southern boundary of the Urban Separator on Scott Ranch (Figure 3.0-9, Proposed Amendments to General Plan Figure 5-2, Bicycle Facilities). The project would add “Class I Off-Street-Proposed” in or near the right-of-way at the eastern boundary of Scott Ranch starting at the site’s southeast corner and connecting to the “Class I Off-Street-Proposed” (Kelly Creek) trail. The proposed trail along Kelly Creek would connect to the proposed offsite regional trail at Helen Putnam Regional Park, thereby providing adequate connectivity to local and regional trails even with removal of the “Recreational Trail Proposed” within the Urban Separator as contemplated by the General Plan.</p> <p>As noted in Section 4.13, Transportation, Class II bicycle lanes are currently provided on D Street (between downtown Petaluma and Sunnyslope Road) and on Windsor Drive (between D Street and Windsor Court). The southbound section of D Street between Sunnyslope Road and Windsor Drive does not have a bicycle lane and instead functions as a Class III bicycle route. No additional pedestrian</p>

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	<p>and bicycle facilities are planned in the area. In addition, the proposed project would develop a Class I bicycle route along the project frontage of D Street.</p> <p>As noted in Section 3.0, Project Description, the project would include pedestrian and bicycle paths that would connect the project to existing neighborhoods, Windsor Drive and D Street. Five-foot sidewalks would be provided along the project frontages at the new intersection of proposed A and B Streets with Windsor Drive, and along new public streets. The roundabout proposed at the intersection of Windsor Drive and D Street would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB). In addition, the proposed project would include an off-site sidewalk improvement along the east side of D Street between Windsor Drive and Sunnyslope Avenue, for a distance of approximately 800 feet, to connect with the existing sidewalk.</p>
<p>Policy 5-P-18 The City shall require Class II bike lanes on all new arterial and collector streets.</p>	<p>The project would not include a new arterial or collector streets. However, the following improvement would be part of the proposed project:</p> <p>A Class I trail would be constructed from the southeast corner of the project site along D Street to connect with a proposed sidewalk at the northeast corner of the site. The trail would transition to a Class II facility at the existing crossing over Kelly Creek</p>
<p>Policy 5-P-19 All new and redesigned streets shall be bicycle and pedestrian friendly in design.</p>	<p>Consistent: The two proposed internal roads would be developed with five-foot sidewalks on both sides and Windsor Drive and D Street would be improved with sidewalks. Internal pathways would connect to bicycle and pedestrian facilities. Crosswalks would be provided at the new intersection of A and B Streets with Windsor Drive. The new roundabout at the intersection of Windsor Drive and D Street would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB).</p>
<p>Policy 5-P-20 Ensure that new development provides connections to and does not interfere with existing and proposed bicycle facilities.</p>	<p>Consistent: The multi-use loop trail would provide for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site, thereby providing adequate connectivity to local and regional trails. A proposed paved Class I trail would be constructed from the southeast corner of the project site along D Street but would travel through the park, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, and through the barn center.</p>
<p>Policy 5-P-22 Preserve and enhance pedestrian connectivity in existing neighborhoods and require a well-connected pedestrian network linking new and existing developments to adjacent land uses.</p> <p>A. Improve the pedestrian experience through streetscape enhancements, focusing improvements where there is the greatest need, and by orienting development toward the street.</p> <p>B. Improve street crossings and complete gaps in the sidewalk system through development review and capital improvement projects.</p>	<p>Consistent: Pedestrian and bicycle paths would connect the project to existing neighborhoods, upgrade facilities along Windsor Drive and D Street, and provide public access to new onsite trails and future trails at Helena Putnam Regional Park. The two proposed internal roads would be developed with and five-foot sidewalks on both sides and sidewalks would be introduced along the project frontages to Windsor Drive and D Street. A high-visibility crosswalk would also be provided on the east leg of the intersection of Windsor Drive with the proposed A and B Streets. Pedestrian crossings would be provided at the new Windsor Drive and D Street roundabout. In addition, the proposed project would include an off-site sidewalk improvement along the east side of D Street between Windsor Drive and Sunnyslope Avenue, for a distance of approximately 800 feet, to connect with the existing sidewalk.</p>
<p>Policy 5-P-23 Require the provision of pedestrian site access for all new development.</p>	<p>Consistent: Pedestrian access is provided by the project through the introduction of sidewalks along Windsor Drive, D Street, and on both sides of the new residential streets that connect with the loop trail system to be developed on both North and South of Kelley creek and tiering into a future trail connection to the west at Helen Putnam Regional Park.</p>

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<p>Policy 5-P-25 Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel. At the minimum, Class I standards shall be applied unless otherwise specified.</p>	<p>Consistent: The multi-use loop trail would provide for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site, thereby providing adequate connectivity to local and regional trails. The project would include a Class I trail that runs north/south parallel to D Street, constructed from the southeast corner of the project site along D Street to connect with a proposed sidewalk at the northeast corner of the site. Another proposed paved Class I trail would be constructed from the southeast corner of the project site along D Street but would travel through the park, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, and through the barn center. See Policy 5-P-15.</p>
<p>Policy 5-P-26 Require all new development and those requiring new city entitlements with “frontage” along creeks and the river to permit through travel adjacent to creeks and the river with access points from parallel corridors spaced at minimum intervals of 500–1,000 feet.</p>	<p>Consistent: Proposed development would front Kelly Creek. The project would maintain a 200-foot-wide corridor along Kelly Creek and would include a multi-use loop trail along the north and south sides of Kelly Creek to allow continuous travel adjacent to the creek and connect the various project neighborhoods, Windsor Drive and D Street through the creek area. Another proposed paved Class I trail would be constructed from the southeast corner of the project site along D Street but would travel through the park, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, and through the barn center to connect to the multi-use loop trail.</p>
<p>Policy 5-P-28 Allow bicyclists and pedestrians use of all emergency access routes required of existing and new developments.</p>	<p>Consistent: Bicyclists and pedestrians would have use of the emergency vehicle access route leading to the barn complex from D Street.</p>
<p>Policy 5-P-30 Require all new development abutting any public trail to provide access to the trail.</p>	<p>Consistent: There are no existing public trails onsite or in the immediate vicinity. Helen Putnam Regional Park abuts the property to the west but there are no public trails currently accessible from the site. The project would introduce new paths and trails onsite with multiple points of public access and provides for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site. Additionally, this RDEIR analyzes a new 0.5 mile segment Helen Putnam Regional Park trail system as a related project.</p>
<p>Policy 5-P-31 Make bicycling and walking more desirable by providing or requiring development to provide necessary support facilities throughout the city.</p> <p>D. Require projects subject to discretionary approval to install public benches where appropriate.</p>	<p>Consistent: The two proposed internal roads would be developed with five-foot sidewalks on both sides and Windsor Drive and D Street would be improved with sidewalks. Internal pathways would connect to bicycle and pedestrian facilities. A high-visibility crosswalk would also be provided on the east leg of the intersection of Windsor Drive with the proposed A and B Streets. The new roundabout at the intersection of Windsor Drive and D Street would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB). Public benches would be installed at appropriate locations along Windsor Drive subject to the approval of the City through Site Plan and Architectural Review. A rest stop with maps and a boulder seatwall would be provided along the northern portion of the multi-use loop trail.</p>
<p>Policy 5-P-48 The City should not assume public responsibility for maintenance of private streets not built consistent with current public street standards.</p> <p>B. Require private streets to be consistent with public street standards where deemed necessary and appropriate by the City (e.g., for utilities, street lights, sidewalks, street trees, parking) as well as to include traffic calming measures where appropriate.</p>	<p>Consistent: The project proposes right-of-way for public roadway improvements. The streets would include parking lanes on both sides that provide at least one guest parking space per home as required by the City. Cul-de-sacs would have a 50-foot radius at face of curb to allow emergency vehicles to turn around. Sidewalks would be provided along the project frontages along Windsor Drive and D Street. The front yards would be more traditional, with street trees, sidewalk and a landscape strip behind the sidewalk. All such improvements would be required to conform to applicable city standards.</p>

Policy	Analysis
Chapter 6 Recreation, Music, Parks, and the Arts	
<p>Policy 6-P-1 Develop additional parkland and recreational facilities in the city, particularly in areas lacking these facilities and where new growth is proposed, to meet the standards of required park acreage.</p> <p>F. Require land development along designated trails and pathway corridors to provide sufficient right-of-way for trails and amenities and to ensure that adjacent new development does not detract from the scenic and aesthetic qualities of the corridor.</p>	<p>Consistent. The project would preserve 44 acres of open space and would introduce public recreation facilities including the public barn complex and a multi-use loop trail along the north and south sides of Kelly Creek with connectivity to various project elements. In addition the project would provide for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site, thereby providing adequate connectivity to local and regional trails. The proposed project would be landscaped with both existing and proposed native trees, shrubs and groundcover and would retain all oak woodlands on the site and oak/bay riparian woodland along Kelly Creek and would also involve the replanting of various other native trees, shrubs and groundcover.</p>
<p>Policy 6-P-2 Provide a comprehensive and integrated network of parks and open space and improve access to existing facilities where feasible.</p> <p>B. Identify missing links to connect parks and open spaces with neighborhoods and community destinations. Develop prioritization and funding to complete these links.</p>	<p>Consistent. The proposed project includes a park component that would integrate into Helen Putnam Regional Park on the west side of the project site to D Street connecting to various project neighborhoods. Additionally, the project includes a multi-use loop trail would provide for future connection to the Helen Putnam Regional Park trail system at the western edge of the project site, thereby providing adequate connectivity and would also close the gap in the pedestrian network to local and regional trails. The project includes a Class I trail that runs north/south parallel to D Street, constructed from the southeast corner of the project site along D Street to create a continuous linkage with a proposed sidewalk at the northeast corner of the site. Another proposed paved Class I trail would be constructed from the southeast corner of the project site along D Street but would travel through the park, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, through the barn center and would connect to the multi-use loop trail.</p>
<p>Policy 6-P-3 Connect city parks with other public facilities, open spaces, employment centers, and residential neighborhoods by locating new recreation facilities in proximity to these uses and by fully integrating the parks system with the city's pedestrian, bicycle, and transportation systems.</p>	<p>Consistent: The Putnam Park Extension Project component would include picnic tables and benches, an agricultural museum, vegetable gardens, demonstration and working corrals, antique farm equipment with a hand pump, and an amphitheater for outdoor learning activities. The multi-use loop trail would provide public access and a future connection to the Helen Putnam Regional Park trail system at the western edge of the project site. A proposed paved Class I trail would be constructed from the southeast corner of the project site along D Street and would travel through the park, along the west side of the main parking lot, through a proposed playground area, over a footbridge above Kelly Creek, and through the barn center.</p>
<p>Policy 6-P-4 Proposed parks, and proposed expansion of existing parks, as designated on the General Plan Land Use Map, are parcel-specific, and shall be dedicated as a condition of development entitlements, consistent with federal, state and local law. Dedication requirements for development subject to the Quimby Act (Government Code Sec. 66477) shall be consistent with the requirements of that Act.</p>	<p>Consistent: The General Plan Land Use Map shows a "Proposed Public Park" on the site. In the General Plan 2025 Final EIR, Figure 3.3-1 and Table 3.3-7 as revised indicates a 3-acre passive park for the site. As noted in Section 4.12, Public Services and Recreation, 44 acres of the project site would be preserved as open space and would include a public access to trail and amenities associated with the barn complex.</p>
<p>Policy 6-P-5 New parkland or recreation facilities, beyond those identified in the General Plan, may be required as part of any development review and entitlement process.</p>	<p>Consistent: The Putnam Park Extension Project component, would preserve approximately 44 acres of open space on the project site and would include access to a loop trail north and south of Kelly Creek and public amenities. Features of the Putnam Park Extension Project component would include picnic tables and benches, an agricultural museum, vegetable gardens, demonstration and working corrals, antique farm equipment with a hand pump, and an amphitheater for outdoor learning activities.</p>

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<p>Policy 6-P-6 Achieve and maintain a park standard of 5 acres per 1,000 residents (community park land at 3 acres per 1,000 population and neighborhood park land at 2 acres per 1,000 population) and an open space/urban separator standard of 10 acres per 1,000 population, in order to enhance the physical environment of the city and to meet the recreation needs of the community.</p>	<p>Consistent: Implementation of the proposed project would result in the development of 28 single-family homes and an anticipated net increase in the total permanent population of 77 persons. The Putnam Park Extension Project component, covering approximately 44 acres of the project site, would extend the Helen Putnam Regional Park and preserve open space. Therefore, the proposed project contribution to the recreation needs of the community would substantially exceed the required community park land or neighbor park land with respect to the project population.</p>
<p>Policy 6-P-7 Neighborhood parks are donated, constructed, and maintained within the developing property(ies). The formation of landscape assessment districts to offset costs associated with developing, upgrading, and maintaining community parks may be imposed as a condition of development. Transfer of density within a project site from donated acreage in excess of dedication/in lieu requirements may be considered where deemed appropriate by the City Council. Park impact fees shall also be required prior to issuance of building permits in all cases where they can be legally imposed pursuant to City ordinance.</p>	<p>Consistent: All required development impact fees would be paid prior to issuance of building permits unless otherwise satisfied by project improvements.</p>
<p>Policy 6-P-8 In designing park and recreational facilities, recognize that accessibility will vary depending on the location and purpose of the facility, consistent with State and Federal guidelines.</p>	<p>Consistent: The approximately 44-acre Putnam Park Extension Project component would include parking lots, public restrooms, and multi-use trail consistent with state and federal accessibility guidelines.</p>
<p>Policy 6-P-18 Development that occurs adjacent to designated trails and pathway corridors shall be required to install and maintain the publicly owned and accessible trail, in perpetuity.</p>	<p>Consistent: The proposed project would permanently protect the 300-foot Urban Separator along the southern boundary of the project site, in addition to all land south of Kelly Creek, by dedicating approximately 44 acres to the Sonoma County Regional Parks to be retained as open space and protected habitat, in perpetuity.</p>
<p>Policy 6-P-19 Support efforts by the City's Tree Advisory Committee to disseminate current information to the public advocating the use of Best Management Practices for the care and perpetuation of the urban forest, including issues such as strategic tree planting that considers site conditions as well as shading in selection and placement of trees, proper planting and pruning techniques, and the importance of using Integrated Pest Management practices in order to minimize the use of chemicals harmful to the environment.</p> <p>C. Development plans shall be reviewed to ensure adequate growing space and conditions for trees and other vegetation is provided, and that plant species choices are adaptable to the proposed planting environment.</p>	<p>Consistent: Development plans would be reviewed to ensure adequate growing space and conditions for trees and other vegetation provided on the site. The proposed project would be landscaped with both ornamental and native trees, shrubs and groundcover. The project would retain oak woodlands on the site and oak/bay riparian woodland along Kelly Creek and would also involve the replanting of various other native trees, shrubs and groundcover.</p>
<p>Policy 6-P-20 Where trees larger than 8" in diameter must be removed to accommodate development, they shall be replaced at a ratio established in the Development Code. Replacement trees may be planted on, or in the vicinity of, the development of the site, subject to approval by the Community Development Department or through the discretionary approval process.</p>	<p>Consistent: The proposed project would remove approximately 30 trees on the project site, all of which are protected trees. Mitigation Measure BIO-2a through 2c sets forth criteria for detailed tree and habitat management and preservation, and require the replacement of trees at ratios consistent with the Implement Zoning Ordinance tree standards. The project also would be required to maintain replaced trees for a five-year period.</p>

Policy	Analysis
Chapter 7 Community Facilities, Services, and Education	
<p>Policy 7-P-6 Design public places to reflect the needs of children, youth, families, seniors, persons with disability, and as appropriate animals, to protect their safety.</p>	<p>Consistent: Features of the Putnam Park Extension Project component would be accessible for use by all population groups and would include picnic tables and benches, an agricultural museum, vegetable gardens, demonstration and working corrals, antique farm equipment with a hand pump, and an amphitheater for outdoor learning activities. The project would also include a multi-use loop trail along the north and south sides of Kelly Creek to connect the various project neighborhoods, Windsor Drive and D Street through the creek area. The project also includes north and south trails along and parallel to D Street. The parking lots would include ADA compliance spaces and the multi-use trails would be ADA compliant.</p>
<p>Policy 7-P-15 Improve and expand safe pedestrian, bicycle, and transit access to all school sites and campuses.</p> <p>A. Implement the City Pedestrian and Bike Plan.</p> <p>C. Utilize the development review process to complete gaps in existing routes serving the proposed development.</p>	<p>Consistent: The proposed project would improve and expand safe pedestrian, bicycle, and transit access to all school sites and campuses by implementing the Bicycle and Pedestrian Plan (see Policy 5-P-15 above). The project would expand the pedestrian and bicycle network within the two new streets of the proposed project and northerly along D Street into town and schools nearby the project site such as McNear Elementary School (605 Sunnyslope Avenue), Valley Vista Elementary School (730 North Webster Street), Petaluma Junior High School (700 Bantam Way), and Petaluma High School (201 Fair Street).</p>
<p>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.</p> <p>A. Fund additional staff to insure minimum ratio is maintained as population increases occur.</p>	<p>Consistent: As noted in Section 4.11, Population and Housing, implementation of the proposed project would result in an increase in permanent population of approximately 77 residents. According to the Petaluma Fire Department (PFD), as discussed in Section 4.12, Public Services, including Recreation, of this RDEIR, the PFD currently has a service ratio of 0.77 firefighter for every 1,000 residents which is slightly below the service standard of 1 firefighter per 1,000 residents. With the increase in population, the service ratio would decrease negligibly, remaining at approximately 0.77 firefighter for every 1,000 residents. However, the PFD has indicated that any increase in demand would be within the demand analyzed in the General Plan 2025 EIR and development impact fees would pay for any necessary expansions.</p>
<p>Policy 7-P-18 Ensure facilities, equipment and personnel are adequate to maintain quality of service demands of the community, including but not limited to: fire suppression, Advanced Life Support (ALS), rescue, fire prevention, education, CUPA, and disaster preparedness and management.</p> <p>C. Maintain and modernize emergency response facilities, including fire stations, as needed to accommodate population growth.</p>	<p>Consistent: See Policy 7-P-17 above.</p>
<p>Policy 7-P-19 Maintain a four minute travel time for a total of 6-minute response time for emergencies within the city.</p> <p>A. Require that properties outside of the four minute (travel) response radii utilize fire resistant materials and maintain fire breaks surrounding residences.</p> <p>B. Ensure that transportation improvements are provided for additional development so as not to adversely impact emergency response times.</p>	<p>Consistent: The proposed project is within the 1.0 mile radius of Station 1 of the Petaluma Fire Department, located at 198 D Street, and therefore is located within the four minute travel response time. As described in detail, in Section 4.12, Public Services, including Recreation, cul-de-sacs would have a 50-foot radius at face of curb to allow emergency vehicles to turn around. Additionally, as the project is within the wildland urban interface, the project would be required to utilize fire resistant materials and maintain fire breaks.</p>
<p>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.</p>	<p>Consistent: As discussed in Section 4.12, Public Services, including Recreation, the Petaluma Police Department employs a total of 72 sworn police officers. The PPD currently has a service ratio of 1.16 officers per 1,000 residents which is below their service standard of 1.3 police officers per 1,000 residents. However, the PPD has indicated that the additional increase in population associated with the proposed project would not in and of itself result in the need for expansion of police facilities.</p>

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<p>Policy 7-P-35 Incorporate, into new development to the extent deemed appropriate and feasible, the Development Code Urban Design Standards for crime prevention.</p>	<p>Consistent: The proposed project would comply with all local, state, and federal regulations, including incorporating all appropriate and feasible Development Code Urban Design Standards for crime prevention pursuant to the City of Petaluma regulations.</p>
<p>Policy 7-P-36 Ensure adequate police staff to provide rapid and timely response to all emergencies and maintain the capability to have minimum average response times. Actions that could be taken to ensure rapid and timely response to all emergencies include:</p> <p>A. Analyze and monitor factors affecting response time (population growth, police staffing, and community policing programs) and average response times as guidelines based on past experience.</p>	<p>Consistent: Although the proposed project would increase the number of persons and level of activity on the project site, given the type of use and its similarity to the surrounding area, the project would not result in a meaningful increase in the amount of crime in the project area. Furthermore, the project has committed to pay the current law enforcement facilities impact fee, and the City has determined by legislation that this fee is sufficient to pay for the impacts of each new development law enforcement facilities. See also Policy 7-P-31.</p>
<p>Policy 7-P-42 Recognize the health benefit of a "walkable" community with neighborhood access to parks and trails.</p> <p>A. As development occurs, ensure that connectivity is established to recreational amenities and retail opportunities.</p>	<p>Consistent: The proposed project would improve walkability by constructing five-foot sidewalks along the project frontages along Windsor Drive and D Street. A high-visibility crosswalk would also be provided on the east leg of the intersection of Windsor Drive with the proposed A and B Streets. In addition, the proposed project would also include a new off-site sidewalk along the east side of D Street between Windsor Drive and Sunnyslope Avenue to connect with the existing sidewalk. This would improve connectivity of the project site to the City's pedestrian network and increase access for neighboring communities to walk to the proposed multi-use trails and barn center on the project site.</p> <p>The roundabout proposed at the intersection of Windsor Drive and D Street would include single-lane approaches to slow traffic along this portion of D Street and minimize pedestrian crossing distances to promote a walkable community. The roundabout would provide crosswalks on all approaches with Rectangular Rapid Flash Beacons (RRFB).</p>
<p>Chapter 8 Water Resources</p>	
<p>Policy 8-P-1 Optimize the use of imported water from the SCWA to provide adequate water for present and future uses.</p>	<p>Consistent: As noted in Section 3.0, Project Description, the project would incorporate a series of water conservation devices and measures to increase water conservation. The proposed project is subject to the City's Landscape Water Conservation Regulations, Petaluma Municipal Code Chapter 15.17, which specify the types of landscaping that may be installed at the project site. The project would be landscaped with water-efficient and native trees, shrubs and groundcover. As evaluated in Section, 4.14, Utilities and Service Systems, project site water demand was included in the total projected water demand for the City. Based on the City of Petaluma 2015 UWMP, there is an adequate water supply provided by SCWA, under normal and multiple-dry year scenarios, available to serve the City of Petaluma through 2040, including development of the project. During the single-dry year, the SCWA would need to reduce its diversions from the Russian River by 30 percent and the City including the proposed project would be subject to water conservation efforts.</p>
<p>Policy 8-P-4 The City shall routinely assess its ability to meet demand for potable water.</p> <p>A. The City shall continue to monitor the demand for water for projected growth against actual use, and ensure that adequate water supply is in place prior to, or in conjunction with, project entitlements.</p>	<p>Consistent: See Policies 8-P-1 and 8-P-2.</p>
<p>Policy 8-P-5 Develop alternative sources of water to supplement imported supply.</p>	<p>Consistent: See Policies 8-P-1 and 8-P-2. The project is subject to the City's current water and wastewater capacity fees for new development which the City has determined to be sufficient to pay for the impacts of each new development on City water and wastewater facilities.</p>

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Policy 8-P-9 Provide tertiary recycled water for irrigation of parks, playfields, schools, golf courses and other landscape areas to reduce potable water demand.	Consistent: Recycled water is currently provided to the City of Petaluma by the Ellis Creek Water Recycling Facility (ECWRF). The City's 2015 UWMP includes the current tertiary recycled water production and use and outlines methods to expand future recycled water use.
Policy 8-P-10 The City may require the use of recycled water through the City development review process. A. New development may be required to install a separate recycled water system as deemed necessary and appropriate by the City to offset potable demand.	Consistent: The City would proceed with implementation of the City of Petaluma's adopted <i>Recycled Water Master Plan</i> , including the provision of tertiary recycled water in various areas of the City. It is not feasible for the project site to utilize tertiary recycled water, however, as evaluated in Section 4.14, Utilities and Service Systems , project site water demand was included in the total projected water demand for the City, and water supply is adequate to serve the project and other City needs.
Policy 8-P-16 Comply with the current Statewide General Waste Discharge Requirements concerning the operation and maintenance of the City's sanitary sewer collection system.	Consistent: As noted in Section 4.14, Utilities and Service Systems the project is serviced by the Ellis Creek Water Recycling Facility, which operates under the conditions set forth in the Regional Water Quality Control Board operating permit.
Policy 8-P-18 Reduce potable water demand through conservation measures.	Consistent: See Policy 8-P-1.
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: <ul style="list-style-type: none">• Restrict coverage by impervious materials;• Limit building or parking footprints;• Require construction of percolation ponds on site;• Require surface drainage swales.	Consistent: As noted in Section 4.8, Hydrology and Water Quality , the proposed project site is not located within an area of either confirmed or potential groundwater recharge, as shown on the City's map of Groundwater Resources. Furthermore, approximately 75 percent of the 58.6-acre project site would remain undeveloped and would be preserved as open space without affecting existing infiltration. Stormwater treatment measures for impervious surfaces would be designed to maximize infiltration in order to reduce runoff and minimize potential impacts to groundwater recharge. Additionally, the project proposes two separate detention/bio-infiltration facilities to collect runoff from impervious surfaces and provide water quality treatment functions per NPDES requirements.
Policy 8-P-22 Invest in the maintenance, repair and replacement of the water utility infrastructure.	Consistent: The project is subject to the City's current water and wastewater capacity fees for new development which the City has determined to be sufficient to pay for the impacts of each new development on City water and wastewater facilities.
Policy 8-P-24 Water quality shall be maintained to meet local, State, and Federal standards.	Consistent: As noted in Section 4.8, Hydrology and Water Quality because project development would disturb more than one acre, the project would be required to obtain coverage under the National Pollution Discharge Elimination System (NPDES) general construction permit from the State Water Resources Control Board (SWRCB) and implement a Storm Water Pollution Prevention Plan to minimize impacts to water quality during construction.
Policy 8-P-35 Protect private and public properties and capital investments including those designed to minimize flooding potential. A. Work with SCWA, regulatory agencies, and/ or property owners, as appropriate given maintenance authority, to insure maintenance of the engineered channels, natural creeks, and enclosed surface water system.	Consistent: As noted in greater detail in Section 4.8, Hydrology and Water Quality , according to FEMA's Flood Insurance Rate Maps, no portion of the project site is located within a 100-year flood zone; flood zones in the project vicinity and along all downstream reaches of Kelly Creek and Thompson Creek are confined within the stream banks.
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.	Consistent: As noted in Section 4.8, Hydrology and Water Quality , the project would comply with NPDES requirements and not result in an increase in peak flows from the project site.

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<p>Policy 8-P-37 No new inhabited structure or development shall be permitted within that portion of properties containing areas of water depths exceeding one foot as illustrated in Figure 8-2, unless mitigation and/or on-site or off-site improvements are constructed to reduce the 100-year flood depth to less than one foot.</p> <p>F. Until remapping of the regulatory floodplain occurs, new residential development in the 100-year flood boundary area as illustrated in Figure 8-1, with depths of less than one foot of water during a 100-year storm event will be required to elevate the lowest floor two feet (2') above the BFE as determined by the City 2-D model.</p>	<p>Consistent: See Policy 8-P-35.</p>
<p>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.</p> <p>A. The Public Works and Utilities Department shall review, and have the authority to conditionally approve, all development permits to insure compliance with NPDES Phase 2 requirements.</p>	<p>Consistent: As noted in Section 3.0, Project Description, and Section 4.8, Hydrology and Water Quality, because project development would disturb more than one acre, the project would be required to obtain coverage under the National Pollution Discharge Elimination System (NPDES) general construction permit from the State Water Resources Control Board (SWRCB). In accordance with NPDES regulations, the applicant is required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for implementation throughout project construction. In addition, to help reduce the discharge of non-point source pollutants from the project site in surface waters, the applicant is required to incorporate long-term source control and pre-discharge treatment measures into the SWPPP, in accordance with the City's Phase II NPDES Storm Water Management Plan.</p>
<p>Policy 8-P-39 Consider, to the extent practicable, requiring sustainable site design practices as outlined in the 'Sustainable Site Planning' text box contained herein. All development activities shall be constructed and maintained in accordance with Phase 2 National Pollutant Discharge Elimination System permit requirements.</p> <p>The Sustainable Site Planning measures listed in the General Plan text box that would apply to evaluation of the proposed project's impact on hydrology and storm drainage can be summarized as follows:</p> <ul style="list-style-type: none"> • Limit the amount of impervious surface on development sites by reducing building footprints, clustering development, minimizing street widths and utilizing permeable paving materials; • Maximize natural filtration and enhance infiltration opportunities by routing storm water runoff across lawns, through vegetated swales or into pervious storage facilities before discharging to the storm drain system; 	<p>Consistent: Development under the proposed project would be clustered in the areas north of Kelly Creek to minimize disturbance to oak woodland, Kelly Creek, and open space within the southern portion of the site and the Urban Separator. Approximately 44 acres of the project site would be preserved as open space. Narrow streets would be used for internal circulation. See Policy 8-P-38.</p>
<p>Chapter 10 Health & Safety</p>	
<p>Policy 10-P-1 Minimize risks of property damage and personal injury posed by natural hazards.</p> <p>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.</p>	<p>Consistent: As noted in Section 4.6, Geology and Soils, of this RDEIR, geotechnical studies of the project site were conducted in order to inform the project design. The proposed project is required to follow all relevant geologic and seismic design parameters from the California Building Code (CBC).</p> <p>Development would be clustered on land to avoid slopes less than 30 percent where possible (Figure 3.0-4).</p>

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<p><i>Critical structures are those most needed following a disaster or those that could pose hazards on their own if damaged. They include utility centers and substations, water reservoirs, hospitals, fire stations, police and emergency communications facilities, and bridges and overpasses.</i></p> <p>B. On sites with slopes greater than 30 percent require all development to be clustered outside of the 30 percent slope areas (and preferably on land less than 15 percent in slope) where possible.</p> <p>C. Regulate the grading and development of hillside areas for new urban land uses, by instituting a Hillside Overlay or other similar mechanism in the Development Code. Ensure that new development on hillsides is constructed to reduce erosion and landslide hazards and in compliance with any City hillside regulations, including but not limited to:</p> <ul style="list-style-type: none"> • Limit cut slopes to 3:1, except where an engineering geologist can establish that a steeper slope would perform satisfactorily over the long term. • Encourage the use of retaining walls or rock-filled crib walls as an alternative to high cut slopes. • Ensure revegetation of cut-and-fill slopes to control erosion. Plant materials for revegetation should not be limited to hydro-seeding and mulching with annual grasses. Trees add structure to the soil and take up moisture while adding color and diversity. • Ensure blending of cut-and-fill slopes within existing contours, and provision of horizontal variation, in order to mitigate the artificial appearance of engineered slopes. • Ensure structural integrity on sites previously filled before approving redevelopment. 	<p>In compliance with Mitigation Measures GEO-1a and GEO-2b, all cut slopes would be inspected at the time of construction by an engineering geologist focusing on evidence of potential instability and be constructed at gradients no steeper than 3H:1V.</p> <p>Retaining walls are included in the project as an alternative to high cut slopes. All cut and fill slopes would be blended with existing contours and revegetated to control erosion.</p>
<p>Policy 10-P-2 Protect the community from risks associated with seismically induced surface ruptures, ground-shaking, ground failure, slope instability leading to mudslides and landslides, subsidence, liquefaction, and other seismic, geologic, and fire hazards.</p>	<p>Consistent: As noted in Section 4.6, Geology and Soils, the project is required to implement all required recommendations contained within the project-specific Geotechnical Reports, including, but not limited to, those pertaining to site preparation, excavation, fill placement and compaction; foundations; pavement design; lateral earth pressures and resistance; and surface drainage control. Furthermore, the project would comply with the state earthquake protection law (California Health and Safety Code 19100 et seq.), which requires that structures be designed to resist stresses produced by lateral forces caused by earthquakes. See Policy 7-P-19.</p>
<p>Policy 10-P-3 Protect public health and welfare by eliminating or minimizing the effects of existing noise problems, and by minimizing the increase of noise levels in the future.</p> <p>B. Discourage location of new noise sensitive uses, primarily homes, in areas with projected noise levels greater than 65dB CNEL. Where such uses are permitted, require incorporation of</p>	<p>Consistent: As noted in Section 4.10, Noise, future exterior and interior noise levels associated with roadway traffic would not exceed City standards at the project site. No sound walls are required or proposed. Furthermore, heating, ventilation, and air conditioning (HVAC) systems would be installed for the new buildings within the project site and these noise levels would not exceed the City's exterior noise standards.</p>

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<p>mitigation measures to ensure that interior noise levels do not exceed 45 dB CNEL.</p> <p>C. Ensure that the City’s Noise Ordinance and other regulations:</p> <ul style="list-style-type: none"> • Require that applications for new noise-sensitive development in areas subject to noise levels greater than 65 dB CNEL obtain the services of a professional acoustical engineer to provide technical analysis and design of mitigation measures. • Require placement of fixed equipment, such as air conditioning units and condensers, inside the walls of new buildings or on roof tops of central units to reduce noise impacts on any nearby sensitive receptors. <p>D. Continue to require control of noise or mitigation measures for any noise-emitting construction equipment or activity. The City’s Noise Ordinance establishes controls on construction-related noise.</p> <p>E. As part of development review, use Figure 10-2: Land Use Compatibility Standards to determine acceptable uses and installation requirements in noise-impacted areas. <i>(shown as Table 4.9-4, Land Use Compatibility Standards for the City of Petaluma, in Section 4.9, Noise, of this RDEIR)</i></p> <p>F. Discourage the use of sound walls anywhere except along Highway 101 and/or along the NWPRA corridor, without findings that such walls will not be detrimental to community character. When sound walls are deemed necessary, integrate them into the streetscape.</p> <p>G. In making a determination under the California Environmental Quality Act, (CEQA), consider an increase of four or more dBA to be “significant” if the resulting noise level would exceed that described as normally acceptable for the affected land use in Figure 10-2: Land Use Compatibility Standards.</p>	<p>The traffic generated by the proposed project would increase local roadway noise levels by a maximum of 0.1 dBA, which would be imperceptible to most people and would not exceed the identified thresholds of significance.</p> <p>Also identified in Section 4.10, Noise, construction noise could affect existing residences and other sensitive receptors located adjacent to the project site with direct line-of-sight to construction. However, the increase in noise levels at the nearby locations during construction at the project site would be temporary in nature and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. Furthermore, implementation of Mitigation Measure NOISE-1 would reduce noise impacts during the construction phase of the proposed project.</p>
Housing Element 2015-2023	
<p>Policy 1.1 Promote residential development within the Urban Growth Boundary.</p>	<p>Consistent: The proposed project is located within the Urban Growth Boundary.</p>
<p>Policy 1-2 Encourage the development of housing on under-utilized land that is appropriately zoned.</p>	<p>Consistent: The proposed project is on vacant land designated for residential development located within the Urban Growth Boundary.</p>
<p>Policy 2.1 Encourage a mix of housing design types.</p>	<p>Consistent: The purpose of this policy is to provide opportunities for development at a variety of densities that allows a variety of product types. The General Plan provides 8 residential land use categories providing opportunities for a mix of housing types within the City. The proposed project is located within the “Very Low Density Residential” zoning designation, which allows a density range of 0.6 to 2.5 units per acre. The Applicants are proposing market rate housing, which would contribute</p>

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	<p>to the City’s fair share of the Regional Housing Needs Allocation for the above Moderate Income groups.</p> <p>Additionally, the single-family homes would be at most 2 stories and constructed in a variety of architectural styles, including Spanish, Craftsman, Farmhouse or California Ranch. Exterior materials would include a mix of stucco, hardboard siding, stone and masonry. In addition, implementation of Mitigation Measure AES-1a would place restrictions on the design of the proposed project and Mitigation Measure AES-1b would require that architectural materials of the subdivision include natural, terrain-neutral colors to complement and blend with the project environment.</p>
<p>Policy 4.2 Assign a share of the responsibility for providing affordable housing to the developers of market-rate housing and non-residential projects.</p>	<p>Consistent: The project would provide its fair share of affordable housing pursuant to the requirements of the City through payment of the City’s in-lieu fees.</p>
<p>Policy 10.1 Promote the use of energy conservation features in the design of residential development.</p>	<p>Consistent: As noted in Section 3.0, Project Description, the project would comply with the energy efficiency standards of Title 24 of the California Code of Regulations. Furthermore, the project includes alternatives to automobile use such as trails and street design for all types of mobility. The project would also include energy conservation design features, including dual paned windows, south facing balconies, energy-efficient street lights and lighting, light-colored roofs, insulation exceeding Title 24 requirements, solar generation at each residence, and Energy Star rated dishwashers.</p>

Source: City of Petaluma General Plan, 2025, Adopted May 2008.

In summary, although the project is not consistent with the current General Plan Policy 2-P-68, the project applicant has requested an amendment to Policy-2-P-68 as part of the development application. If the amendment is approved by the City and mitigation measures set forth in this EIR are implemented, the project would be consistent with the revised policy.

The project is generally consistent with Policy 2-P-8 which requires single-loaded streets along riparian corridors in order to ensure the creation of linear open space corridors with maximum public accessibility, visibility, and opportunities for stewardship. Although the residential lots on the proposed "B" Street would be double-loaded and have rear yards toward the Kelly Creek corridor, a 100-foot buffer along both sides of Kelly Creek is proposed and a multi-use loop trail would be constructed on both sides of Kelly Creek within this buffer to provide public accessibility and visibility along the Kelly Creek corridor. Improvement Measure LU-2 is set forth below to further reduce the less than significant impact.

Improvement Measure:

IM LU-2 Rear fences of all residential lots that back on to Kelly Creek shall be open wire fences so that views of the riparian corridor continue to be available from the streets within the subdivision. This requirement will be included in the CC&Rs for the subdivision.

Significance after Improvement Measure: Implementation of **Improvement Measure LU-2** would further reduce the less than significant impact related to project's consistency with Policy 2-P-8.

Impact LU-3: **The proposed project would not result in development of land uses that are substantially incompatible with existing adjacent land uses or with planned uses. (*Less than Significant*)**

As discussed in **Section 3.0, Project Description**, of this RDEIR, the project site is located in an urbanized area surrounded by existing residential developments, a regional park, and unincorporated lands of Sonoma County that consist of agricultural and large lot residential uses. The Summit above Petaluma subdivision to the north and the Victoria subdivision to the northwest are both designated "Low Density Residential" (2.6 to 8.0 dwelling units per acre [du/ac]) in the City's General Plan while the Pinnacle Heights subdivision to the east is designated "Very Low Density Residential" (0.6 to 2.5 du/ac) in the City's General Plan. The residential nature of the proposed project would be compatible with the existing residential subdivisions that are located adjacent to the project site, and in addition, at a density of 0.63 du/ac, the proposed project would have a density similar to that of the Pinnacle Heights subdivision to the east. The proposed 300-foot-wide Urban Separator proposed along the southern boundary of the project site would

provide a buffer between the proposed project and agricultural land to the south in unincorporated Sonoma County while the approximately 44-acre Putnam Park Extension Project component in the southern portion of the project site would be compatible with the open space within Helen Putnam Regional Park to the west. For these reasons, the proposed project would not result in development of land uses that are substantially incompatible with existing adjacent land uses or with planned uses, and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.4.4 Regional Park Trail Impacts and Mitigation Measures

Environmental Setting

Helen Putnam Regional Park is part of the Sonoma County regional open space network and is owned and operated by the Sonoma County Regional Parks Department (City of Petaluma 2008). The area of the proposed regional park trail is designated “Regional Park” in the City’s General Plan.

Impacts and Mitigation Measures

RPT Impact LU-1: **The implementation of the proposed regional park trail project would not physically divide an established community, conflict with applicable land use or habitat conservation plans, or be incompatible with surrounding land uses.**
(Less than Significant)

Divide an Established Community

The proposed regional park trail would not divide an established community but would provide pedestrian access from the multi-use trail of the proposed Scott Ranch project to the existing Ridge Trail within Helen Putnam Regional Park. No impact would occur.

Conflict with Applicable Plans

The proposed regional park trail would not conflict with existing land use plans as construction of trails is permitted within the land use designation of the regional park. No impact would occur.

Compatibility with Surrounding Land Uses

Addition of the proposed regional park trail would be consistent with the surrounding land uses which are a regional park and single-family residential developments. Therefore, impacts related to land use compatibility from the development of the regional park trail would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.4.5 Cumulative Impacts and Mitigation Measures

The geographic area for the evaluation of cumulative land use and planning impacts is the City of Petaluma. As with the proposed Scott Ranch project, this area is subject to the policies contained in the City's General Plan. To the extent that the proposed project or regional park trail project would result in any cumulative land use and planning impacts, they would occur within the City of Petaluma.

Cumulative Impact LU-1: **The proposed Scott Ranch project and the regional park trail project, in conjunction with other past, present and reasonably foreseeable future development, would not result in significant cumulative impacts related to land use and planning. (*Less than Significant*)**

As with past and present development that exists in the vicinity of the proposed Scott Ranch project and the regional park trail project, future development in the City of Petaluma would be reviewed for consistency with the General Plan designations and policies by the City of Petaluma, in accordance with the requirements of CEQA, the state Zoning and Planning Law, and the state Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. For this reason, impacts associated with inconsistency of future development in the City with adopted plans and policies would not be significant. As shown in the analysis above, with mitigation the proposed Scott Ranch project would not conflict with any local or regional plans adopted for avoiding environmental impacts. As mentioned above under **RPT Impact LU-1**, the regional park trail project would also not conflict with local land use plans. The proposed Scott Ranch project and park trail project would not result in any cumulative land use impacts, and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.5 REFERENCES

- Arborwell. 2016a. Tree Preservation Plan, Scott Ranch Property, Option A. January 15
- Arborwell. 2016b. Tree Preservation Plan, Scott Ranch Property, Option B. January 15.
- Arborwell, 2018. Arborist Letter for 28 Lot Revised Plan. Memorandum to Steve Abbs, Davidon Homes. July 16.
- Association of Bay Area Governments. 2017. *Plan Bay Area 2040*. http://2040.planbayarea.org/cdn/ff/buje2Q801oUV3Vpib-FoJ6mkOfWC9S9sgrSgJrwFBgo/1510696833/public/2017-11/Final_Plan_Bay_Area_2040.pdf, accessed October 10, 2019.
- Association of Bay Area Governments. 2019. *What is Plan Bay Area 2040*. <http://2040.planbayarea.org/about>. Accessed October 10, 2019.
- Bay Area Air Quality Management District (BAAQMD). 2017. *Spare the Air – Cool the Climate: Final 2017 Clean Air Plan*. April.
- BKF Engineers. 2020. *Scott Ranch General Plan Minimum Density*. Memorandum to Steve Abbs, Davidon Homes. June 15.
- City of Petaluma. 2008. Implementing Zoning Ordinance. June.
- City of Petaluma. 2008. *Petaluma General Plan 2025*. June.
- Prunuske Chatham, Inc., 2019a. Tree Removal for Helen Putnam Park Extension. March 20.
- San Francisco Regional Water Quality Control Board. 1995. *San Francisco Bay Regional Water Quality Control Plan*, as amended 2010.