

# 1.0 INTRODUCTION AND EXECUTIVE SUMMARY

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## 1.1 PURPOSE OF THE FINAL EIR

This Environmental Impact Report (EIR) is an informational document prepared by the City of Petaluma as Lead Agency, containing environmental analysis for public review and for City decision-makers to use in their consideration of approvals for discretionary actions needed on the proposed Scott Ranch Project (proposed project).

On December 31, 2020, the City of Petaluma released a Revised Draft EIR (RDEIR) for the project. The public review and comment period on the RDEIR ended on March 8, 2021, although public comments were accepted through the City Council meeting of March 15, 2021. During the public review and comment period, the City of Petaluma held the following public hearings:

- A Public Hearing before the City of Petaluma Planning Commission, held on February 9, 2021, and
- A Public Hearing before the City of Petaluma City Council, held on March 15, 2021.

The purpose of these hearings was to inform the public about the contents of the RDEIR and to receive oral comments about the adequacy and accuracy of the RDEIR.

This Response to Comments document, together with the RDEIR and its appendices, constitute the Final EIR for the proposed project. Due to its length, the full text of the RDEIR is not included within this Response to Comments document, but is included by reference as part of the Final EIR. The RDEIR is available for review at the City Planning Division offices at 11 English Street in Petaluma, and on the City's website at: <https://cityofpetaluma.org/scott-ranch/>

Following the required 10-day agency review of this Response to Comments document, the City of Petaluma Planning Commission will hold a public hearing to consider making a recommendation to the City Council regarding certification of the Final EIR. The City Council will then hold a separate hearing to consider the Planning Commission's recommendations and to determine whether to certify that the Final EIR adequately discloses the environmental effects of the proposed project and that the Final EIR has been completed in conformance with the California Environmental Quality Act (CEQA). Before the Planning Commission makes any recommendations regarding the approvals needed for the proposed project to the City Council, and before the City Council considers approval of the discretionary actions requested as part of the proposed project, both the Commission and the Council must independently review and consider the information contained in the Final EIR.

## 1.2 REQUIRED CONTENTS OF THE FINAL EIR

The City of Petaluma has prepared this document pursuant to *CEQA Guidelines* Section 15132, which specifies that the Final EIR shall consist of the following:

- The Draft EIR or a revision of that Draft EIR
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- Comments and recommendations received on the Draft EIR (either verbatim or in summary)
- The response of the Lead Agency to significant environmental points raised in the environmental review process
- Any other information added by the Lead Agency as part of its environmental review of the Project

This Final EIR incorporates comments from public agencies and the public. It also contains the Lead Agency's response to those comments.

## 1.3 AREAS OF PUBLIC CONCERN

Main concerns related to environmental topics that were raised during the public review period include:

- Loss of critical habitat and impacts on biological resources at the project site including impacts on California red-legged frog, grasslands, and wildlife movement. Concerns related to biological resources also included adequacy and thoroughness of biological surveys and studies.
- Project's emissions of greenhouse gases and compliance with the City's Climate Emergency Framework, released in January 2021.
- Project's traffic impacts on local traffic circulation, related new vehicle trips, and the vehicle miles traveled (VMT) impacts identified for the proposed project in the RDEIR. Concerns related to transportation also included the safety and accessibility of people walking or biking and impact on the availability and use of parking in the vicinity of the project site.
- Estimated number of evacuation vehicles per household during a major wildfire event.
- Runoff generated by the proposed project and adequacy of the project's drainage design plan to maintain existing drainage patterns and discharge similar to predevelopment conditions.
- Project's grading activities and the site geological conditions.

## 1.4 NO NEW SIGNIFICANT INFORMATION

### Revised Project

In response to public, Planning Commission, and City Council comments made following the December 2020 release of the RDEIR, Davidon Homes has made further revisions to the Davidon (28-Lot) Residential Project Component. With these revisions, the residential component would continue to provide 28 single-family residences, but would reduce the acreage of residential lots and associated streets from approximately 11.7 acres to 6.4 acres, would provide 5 acres of private open space, and would increase the acreage of the Putnam Park Extension Project from approximately 44 acres to 47 acres. This would be accomplished by reducing residential lot size and residence size, locating more residential lots north of Windsor Drive, and eliminating residential lots south of the proposed "B" Street. These changes would also increase the distance between residential development and Kelly Creek, reduce impacts to California red-legged frog habitat and native grasslands, reduce total grading area and volume, and reduce total energy and water use for the Residential Project. Project description revisions reflecting this revised proposal are provided in **Chapter 2.0, Revised Project Description**, of this document.

### Recirculation Not Required

In compliance with *CEQA Guidelines*, if significant new information is added to a Draft EIR after notice of public review has been given, but before certification of the Final EIR, the lead agency must issue a new notice and recirculate a Draft EIR for further comments and consultation. Although this Response to Comments document contains new information specific to the revised project as now proposed and includes certain corrections and clarifications to information presented in the RDEIR, none of this new information, corrections or clarifications constitutes significant new information as defined under Section 15088.5 of the *CEQA Guidelines*. More specifically:

- No new significant environmental impacts have been identified as resulting from the revised project.
- No substantial increase in the severity of the previously identified environmental impact has been identified as resulting from the revised project and no additional mitigation measures are necessary to reduce such impacts to a level of insignificance.
- There is no feasible alternative or mitigation measures considerably different from others previously analyzed in the RDEIR that would clearly lessen significant environmental impacts
- The RDEIR was not fundamentally inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Information presented in the RDEIR and in this Response to Comments document supports the City's determination that recirculation of a Draft EIR is not required.

## **Impacts and Mitigation Measures**

Revisions to the proposed project have resulted in the reduction of the footprints of the residential component and the expansion of the park extension component. As documented in this Response to Comments document, these revisions have resulted in the reduction in impacts to biological resources including estimated acreage of potential impacts on native grasslands and occupied habitat for California red-legged frog. In addition, further surveys and analysis conducted after the publication of the RDEIR served to confirm the findings of the RDEIR and address the concerns raised during the public review period. Revisions to the proposed project have also resulted in reduced grading and associated impacts related to geology and soils.

Changes made to the proposed projects and results of updated studies made after the publication of the RDEIR did not change the findings of the RDEIR analysis. In addition, no new impacts or mitigation measures have been identified. Modifications and updates to the analysis and mitigation measures of the RDEIR are presented in **Chapter 5.0, Revisions to the RDEIR**. New text is shown in underline format, and deleted text is shown in ~~strikeout~~ format.

## **1.5 ORGANIZATION OF THIS DOCUMENT**

This Response to Comments document contains information about the revised project, master responses to those issues that were frequently raised in comment letters and during oral comments at public hearings, responses to individual comments, and revisions to the RDEIR based on the concerns raised and updates to the project description. Following this Introduction chapter, the document is organized as follows:

### **Chapter 2.0 – Revised Project Description**

This chapter provides a description of the revisions to the proposed project that the Applicants now propose to address the environmental issues raised in the RDEIR, concerns presented in the public comments on the RDEIR, as well as City Planning Commission and City Council concerns.

### **Chapter 3.0 – Master Responses to Frequent Comments on the RDEIR**

This chapter provides comprehensive master responses to environmental concerns that were frequently raised in comment letters and during oral comments at public hearings.

## Chapter 4.0 – Responses to Comments on the RDEIR

This chapter contains each comment letter or correspondence received by the City on the RDEIR, and provides individual responses to each CEQA-related comment. This chapter includes a list of all agencies, organizations, and individuals that submitted written comments on the RDEIR during the public review period.

## Chapter 5.0 – Revisions to the Revised Draft EIR

This chapter contains text changes and corrections to the RDEIR as initiated by the Lead Agency in response to changes made pursuant to the revised project, or resulting from comments received on the RDEIR.

### 1.6 INTENDED USE OF THIS DOCUMENT

Pursuant to CEQA, the Final EIR is a public information document for use by governmental agencies and the public. The information contained in the Final EIR is subject to review and consideration by the City of Petaluma, prior to its decision to approve, reject or modify the project. The City of Petaluma City Council must independently certify that they have reviewed and considered the information in the Final EIR and that the Final EIR has been completed in conformity with the requirements of CEQA before making any decision regarding the Project.

### City of Petaluma Project Approvals

#### *Discretionary Actions*

This City of Petaluma City Council will make findings regarding certification of the Final EIR, and the Council or its designated body will make final decisions about the project's proposed entitlements and discretionary approvals, including:

- General Plan Amendment to modify and clarify General Plan Policy 2-P-68;
- General Plan Amendment to modify General Plan Figure 5-2, Bicycle Facilities;
- Rezoning from Residential 1 (R1) to a Planned Unit District (PUD);
- Adoption of Planned Unit Development Plan and Guidelines;
- Vesting Tentative Map to subdivide the project parcels into residential, open space, public access, and parking lots; and

- Future Site Plan and Architectural Review (not requested at this time but will be required prior to development).

### *Other Regulatory Agency Approvals*

The project also requires certain permits and/or approvals from other outside regulatory agencies. These other agencies (or responsible agencies), which will rely on this EIR for their decision-making process include, but not limited to, the following:

- U.S. Army Corps of Engineers (Corps)
- State Water Resources Control Board and the Regional Water Quality Control Board (RWQCB)
- U.S. Fish and Wildlife Service (USFWS)
- California Department of Fish and Wildlife (CDFW)
- Sonoma Water (formerly Sonoma County Water Agency)
- Sonoma County Permit and Resource Management Department
- Sonoma County Regional Park