



MEMORANDUM

TO:	Ross Campbell, Materials Division Manager The Dutra Group	FROM:	Geoff Reilly, Sr. Environmental Planner WRA, Inc.
DATE:	January 12, 2023		
SUBJECT:	Haystack Landing Project – Reduced Footprint Layout 3355 Petaluma Boulevard South, Petaluma Assessor's Parcels 019-320-023 PLP04-0046		

This memo has been prepared in response to your request for an independent analysis of the minor changes to the Haystack project as a result of the regulatory permitting process. I was retained by the County as the independent Project Manager for the Dutra Haystack Landing Asphalt and Recycling Facility Project Environmental Impact Report (EIR) that was prepared pursuant to the California Environmental Quality Act (CEQA). The Final EIR was certified by the County of Sonoma in 2010. I have reviewed the January 26, 2021 Reduced Footprint Project submittal which includes January 2020 Reduced Project Footprint Improvement Plans and the January 2021 Wetland Enhancement Plan (WEP) prepared for the Project in comparison to the 2010 Final EIR for the purpose of determining if any additional analysis under CEQA is warranted for the Reduced Project Footprint and WEP.

In comparison to the Project analyzed in the 2010 Final EIR, the Reduced Project Footprint and WEP avoid impacts to all on-site jurisdictional wetlands and therefore the Project no longer requires authorizations under Sections 401 and 404 of the Clean Water Act. The WEP is an update to the Wetland Mitigation and Monitoring Plan (WMMP) included in the 2010 Final EIR and enhances and restores 23 acres of wetlands compared to 19 acres proposed by the WMMP.

The Reduced Project Footprint does not change the asphalt batch plant's maximum production capacity of 225,000 tons per year, or the aggregate and sand distribution facility's maximum annual export capacity of 345,425 tons, as analyzed in the 2010 Final EIR. Since the certification of the Final EIR in 2010 Caltrans built a new US101 interchange adjacent to the Project site which included the removal of a heron rookery at the site; the on-site residences along the Petaluma River were also removed. As the annual maximum production and export capacity would not change under the Reduced Project Footprint, and certain background conditions have changed, it would not result in any new Project traffic impacts, nor associated air quality, greenhouse gas, and noise emissions related to transportation. The Reduced Project Footprint would not result in any new ingress or egress impacts compared to those analyzed in the 2010 Final EIR and therefore would not impact the new interchange. Project impacts related to biological resources would be reduced as there would be no impacts to the rookery, and no noise impacts would occur to on-site residences as the residences have been removed.

The Reduced Project Footprint and WEP are consistent with the mitigation measures required by the 2010 Final EIR and would not result in any new significant impacts that would require any new mitigation measures. Overall, the Reduced Project Footprint and WEP result in a reduction in the impacts analyzed in the 2010 Final EIR, and would therefore not require any new or additional environmental analysis under CEQA.

