

**STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE
SANTA ROSA GENERAL PLAN 2050
AND SPECIFIC PLAN AMENDMENTS**

**I.
INTRODUCTION**

The City of Santa Rosa (City), as lead agency, prepared an Environmental Impact Report (EIR) for the Santa Rosa General Plan 2050 which includes the Community-wide Greenhouse Gas Reduction Strategy (GHG Reduction Strategy), along with the associated Specific Plan amendments, herein referred to together or separately as the “Project.” In its entirety, the EIR consists of the October 2024 Draft EIR and the April 2025 Final EIR, including the Mitigation Monitoring and Reporting Program (State Clearinghouse No. 2023020166).

This Statement of Overriding Considerations has been prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code Sections 21000 et seq.) and its implementing guidelines (CEQA Guidelines) (California Code of Regulations Tit. 14, Sections 15000 et seq.).

**II.
STATEMENT OF OVERRIDING CONSIDERATIONS**

As set forth in the preceding sections, the City of Santa Rosa's approval of the Project will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures; and there are no feasible alternatives that would mitigate or substantially lessen the impacts. Despite the occurrence of these effects, however, the City approves of the Project because, in its view, the economic, social, and other benefits that the Project will provide will render the significant effects acceptable.

A. Significant and Unavoidable Impacts

As discussed in the EIR, the Project will result in the following potentially significant and unavoidable impact, even with the implementation of all feasible mitigation measures:

Agricultural Resources

- **Impact AG-1:** Implementation of the proposed project could result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland land (together referred to as “CEQA Important Farmland”) to non-agricultural land uses.
 - The mitigation measures considered (preserving agricultural uses in the EIR Study Area, replacement of agricultural resources by replacing lost agricultural uses to other areas of the city, and relocation of Prime Farmland topsoil to other areas) were found to be infeasible for mitigating or avoiding the impact of the conversion of agricultural lands to other uses, as the only way to fully avoid the agricultural impact from implementation of the Project is to not allow development on state-designated CEQA Important Farmland, which is not feasible or practical. Therefore, impacts would remain significant and unavoidable.

- **Impact AG-2:** Implementation of the proposed project could result in the loss of agricultural land under the Williamson Act.
 - The mitigation measure considered (the placement of other farmland under Williamson Act contract) was found to be infeasible for mitigating or avoiding the impact of the loss of agricultural land under the Williamson Act, as the individual and cumulative loss of agricultural land under the Williamson Act caused by the Project would still occur. Therefore, impacts would remain significant and unavoidable.

- **Impact AG-4:** The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in a significant cumulative impact with respect to the conversion of CEQA Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and Williamson Act properties to non-agricultural uses.
 - Although the Santa Rosa General Plan 2050 goals, policies, and actions would reduce and partially offset regional agricultural impacts, as well as consideration of mitigation measures to preserve agricultural lands, the only way to fully avoid the agricultural impact of the Project is to not allow development on state-designated CEQA Important Farmland or agricultural lands under the Williamson Act. However, this would be infeasible and inconsistent with City planning goals and objectives. Therefore, this cumulative impact would be significant and unavoidable.

Air Quality

- **Impact AIR-2b:** Buildout of the proposed project could generate operational emissions that could exceed the Bay Area Air District's (Air District) regional significance thresholds for reactive organic compounds (ROG), nitrogen oxides (NOX) and particulate matter (PM_{2.5} and PM₁₀).
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions to reduce these long-term regional criteria air pollutant emissions. However, due to the programmatic nature of the Project, no additional mitigating measures are available, and the impact is considered significant and unavoidable. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.

- **Impact AIR-3b:** Large industrial or warehouse development projects under the proposed project could expose air quality-sensitive receptors to substantial toxic air contaminants (TAC) and particulate matter (PM_{2.5}) concentrations and exceed the Bay Area Air District's (Air District) project-level and cumulative significance thresholds.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would serve to protect sensitive receptors from poor air quality in the EIR Study Area. However, future projects could contribute to significant cumulative risk in the Bay Area that could affect sensitive populations and Equity Priority Areas. As a result, the Project's contribution to cumulative health risk is considered significant and unavoidable. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.

- **Impact AIR-5:** The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative air quality impacts with respect to generation of criteria pollutant and exposure of substantial pollutant concentrations to sensitive receptors.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would help reduce project-related emissions to the extent feasible. However, due to the programmatic nature of the Project, no additional mitigation measures are available. Air pollutant emissions associated with the Project would result in a cumulatively considerable contribution to air quality impacts and remain significant and unavoidable at the program level.

Noise

- **Impact NOI-1a:** Construction activities associated with potential future development could expose sensitive receptors to excessive noise from construction equipment.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would minimize the effects of construction noise. However, because construction activities associated with any individual development may occur near noise-sensitive receptors and because—depending on the project type, equipment list, time of day, phasing, and overall construction durations—noise disturbances may occur for prolonged periods of time, during the more sensitive nighttime hours, or may exceed 80 dBA L_{eq} at residential land uses even with future project-level mitigation, construction noise impacts associated with implementation of the Project are considered significant and unavoidable. Due to the programmatic nature of the EIR, project-level conclusions of construction noise would be speculative; however, the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the noise thresholds.
- **Impact NOI-1b:** Operational vehicle traffic noise increases could exceed the City’s significance thresholds with implementation of the proposed project.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would help reduce transportation-related noise impacts. However, since project-specific details are unknown and future conditions of approval may not be feasible or reduce vehicle traffic noise below significance thresholds in all cases, this impact is conservatively considered significant and unavoidable. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the noise thresholds.
- **Impact NOI-4:** Implementation of the proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative noise impacts, with respect to generation of construction-and transportation related noise.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would help reduce noise impacts to the extent feasible. However, due to the programmatic nature of the Project, no additional mitigation measures are available. As such, the cumulative noise impact is considered significant and unavoidable at the program level.

Transportation

- **Impact TRAN-2a:** Implementation of the proposed project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would reduce the VMT generated by all development including residential uses. However, given the programmatic nature of the Project, uncertainties as to whether individual development projects will be able to successfully meet VMT standards even with mitigation, and uncertainties as to the availability of other mitigation strategies such as VMT exchanges or banks, the impact is considered significant and unavoidable. Note that this impact conclusion does not preclude the finding of less than significant at the project level for future projects over the 2050 buildout horizon.

- **Impact TRAN-2b:** Implementation of the proposed project could result in a significant roadway network vehicle miles traveled (VMT) impact associated with increasing the capacity of the arterial street network.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would improve the active transportation network, work with partner agencies to reduce VMT, encourage development in TPAs and PDA, amongst other to reduce VMT generated by all development. However, even with implementation of the General Plan 2050 goals, policies, and actions related to VMT reduction, the effectiveness of VMT-reduction strategies and availability of alternative mitigation strategies such as VMT exchanges or banks is not certain. As such, the impact on roadway network VMT is considered significant and unavoidable.

- **Impact TRAN-5:** The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impact with respect to vehicle miles traveled (VMT).
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would help reduce VMT impacts to the extent feasible. However, the effectiveness of VMT-reduction strategies is not certain. As such, the cumulative impact on VMT is considered significant and unavoidable.

Wildfire

- **Impact WF-2:** Potential future development over the buildout horizon of the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that provide the best wildfire hazard reduction measures available. The mitigation measure considered (prohibiting development in Very High Fire Hazard Severity Zones and the Wildland Urban Interface Fire Area) was found to be infeasible for mitigating or avoiding the impact of exacerbating wildfire risks, as the City has a responsibility to meet other, conflicting obligations, including increasing the number and type of housing available and allowing reconstruction of homes burned by wildfires. Due to potential unknown impacts from future development over the buildout horizon of the Project, impacts at the

programmatic level would remain significant and unavoidable. This conclusion does not preclude a finding of less-than-significant impacts at the project level.

- **Impact WF-5:** Potential development over the buildout horizon of the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas (SRA), Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface Fire Areas (WUIFA), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.
 - The Santa Rosa General Plan 2050 includes goals, policies, and actions that would help reduce wildfire impacts to the extent feasible. However, the only way to fully avoid the cumulative wildfire impact is to prohibit development in the SRA, Very High FHSZs, and WUIFA throughout the region. As a full prohibition of development in these areas is not feasible in the region, this impact is significant and unavoidable.

B. Findings

The City has considered all potentially feasible mitigation measures to substantially lessen or avoid the Project's significant and unavoidable impacts. Where feasible, the mitigating Santa Rosa General Plan 2050 policies and actions will be adopted as part of the Project. The imposition of these mitigating policies and actions will reduce the identified impacts, but not to a less-than-significant level. The City finds that it is not feasible to fully mitigate these impacts.

The City has also considered all potentially feasible alternatives to the Project. The City finds that there are no feasible alternatives that would reduce the above significant and unavoidable impacts to a less-than-significant level. While the Increased Density Alternative would reduce the above significant and unavoidable impacts when compared to the Project, it would not focus development in Areas of Change throughout the City, and would therefore not activate and create complete neighborhoods that are walkable/bikeable with access to nearby services and transit, as was expressed as a key priority during the extensive public engagement process (Objective No. 5, DEIR p. 3-9). It would not provide as broad a range of housing types throughout the city to meet the needs of all Santa Rosans (Objective No. 6, DEIR, p. 3-10). It would also not preserve community character and environmental, historic, and cultural resources to the same degree as the proposed project, as the city develops and becomes denser. It would not provide the same opportunity to creatively blend old and new development to create a cohesive urban fabric and public realm (Objective No. 9, DEIR page 3-10). Therefore, the Increased Density Alternative would not meet the Project objectives to the same extent as the Project, and it is not a feasible alternative.

The Project's impact discussed above therefore remains significant and unavoidable.

C. Overriding Considerations

It is hereby found, after consideration of the FEIR and evidence in the record, that each of the specific overriding economic, legal, social, technological benefits of the Project, as set out below, independently and collectively outweighs the significant and unavoidable impacts and is an overriding consideration warranting approval of the Project. The following statement identifies the specific reasons why, the benefits of the Project, if approved, outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City would be able to stand by a determination that

each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Exhibit B, and in the documents found in the Record of Proceedings as defined in the CEQA Findings of Fact.

The primary purpose of the Project is to plan for the growth and conservation of Santa Rosa over an approximately 25-year time horizon. This requires extending the State-required General Plan buildout horizon to year 2050 and updating goals, policies, and actions so that they meet current State requirements and community priorities.

Economic Benefits

The Project would promote a vibrant economy by supporting a diversity of business and employment opportunities. The Project also provides for the greatest and most balanced economic growth by creating 14,090 jobs, allowing the City greater opportunities to remain a competitive and innovative business destination in the regional development environment, which would support increased property and sales tax revenues.

Social Benefits

The Project plans for citywide equity by providing the greatest job and housing opportunities to support a greater balance of land uses in the city. The Project includes up to 24,090 new residential units, presenting significant new housing opportunities and including built-in incentives for affordable housing. The Project focuses on Areas of Change, the majority of which capitalize on infill opportunities in and around Priority Development Areas and Transit Oriented Communities. Development of infill sites near transit makes the most of existing infrastructure and allows for the streamlining of future development. The Project also includes goals, policies, and actions that encourage social (and health) benefits associated with improved multi-modal transportation enhancements. This includes making major improvements to the transportation network, which focuses on bridging east and west and enhancing multimodal connectivity and safety citywide and creating complete streets and complete neighborhoods to activate the Areas of Change. The Project also addresses environmental justice for disadvantaged communities that exist within the planning area of the General Plan.

Environmental Benefits

The Project is environmentally superior to the existing General Plan, as discussed in Chapter 5 (Alternatives) of the Draft EIR. The Project recognizes the importance of linking land use and transportation planning. The Project focuses on Areas of Change, concentrating growth in existing urbanized areas and thereby results in fewer impacts from the construction of new infrastructure. The Project maximizes use of existing impervious surfaces, provides multi-modal transportation opportunities, and reduces VMT, which translates into air quality and GHG emissions benefits and increases in resources and energy efficiency. The Project includes policies and actions that encourage conservation of water and energy resources in conformance with the City's sustainability goals. The Project includes mitigating policies and actions, enforceable through the Mitigation Monitoring and Reporting Program, that protect environmental resources. The Project conforms with the principles of planning sustainable communities by meeting both the present and future housing needs of the City, and is consistent with Plan Bay Area, which is the Bay Area's Regional Transportation Plan/Sustainable Community Strategy, as well as the Sustainable Communities and Climate Protection Act (Senate Bill 375). The Project includes actions to ensure the safety of residents and visitors to Santa Rosa by eliminating single access routes into

subdivisions, establishing designated evacuation zones, and requiring the preparation of fire protection plans for new development and major remodels in the City's highly vulnerable areas.

D. Determination and Adoption of Statement of Overriding Considerations

The City has weighed the economic, legal, social, technological, and other benefits of the Project, as set forth above, against the significant unavoidable impacts of the Project identified in the EIR.

The City hereby determines that those benefits, namely, supporting a diversity of businesses and employment opportunities, providing a range of housing types and opportunities within neighborhoods that are increasingly walkable/bikeable, and protecting environmental resources, outweigh the risks and adverse environmental impacts of the Project, and further determine that the Project's significant unavoidable impacts are acceptable.

Accordingly, the Planning Commission recommends that the City Council adopt the Statement of Overriding Considerations, recognizing that significant unavoidable impacts will result from implementation of the Project. Having (i) adopted all feasible mitigation measures, as discussed in the EIR; (ii) rejected alternatives to the Project, as discussed in the EIR; and (iii) recognized the significant unavoidable impacts of the Project, the City hereby finds that each of the separate benefits of the Project, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants approval of the Project and outweighs and overrides its significant unavoidable impacts, and thereby justifies the approval of the Project.