

EXHIBIT A

FINDINGS OF FACT FOR THE SANTA ROSA DOWNTOWN STATION AREA SPECIFIC PLAN UPDATE

I. INTRODUCTION

The City of Santa Rosa ("City"), as lead agency, prepared a Subsequent Environmental Impact Report ("SEIR") for the proposed update to the Downtown Station Area Specific Plan (DSASP), originally published in 2007 (the "Plan"). In its entirety, the SEIR consists of the July 2020 Draft Subsequent EIR ("Draft SEIR" or "SEIR") and the September 2020 Final SEIR ("Final SEIR"), (State Clearinghouse No. 2006072104).

These findings have been prepared in accordance with the California Environmental Quality Act ("CEQA") (Cal. Pub. Resources Code § 21000 et seq.) and its implementing guidelines ("CEQA Guidelines") (Cal. Code Regs. Tit. 14, § 15000 et seq.).

II. PROJECT DESCRIPTION

A. Planning Area

Santa Rosa is located in central Sonoma County, in the north-western part of the nine-county San Francisco Bay Area. Santa Rosa is about 55 miles north of San Francisco and 70 miles southwest of Sacramento. The Downtown Station Area (Planning Area) covers approximately 720 acres surrounding the Downtown Station SMART site in the heart of Santa Rosa. The 2007 DSASP was roughly bounded by College Avenue to the north, Sebastopol Road to the south, Santa Rosa Avenue and E Street to the east, and North Dutton Avenue to the west. As part of the Proposed Plan, the eastern boundary of the Planning Area has been expanded to Brookwood Avenue to be consistent with the General Plan's definition of the downtown core.

B. Background

The Downtown Station Area is one of five Priority Development Areas (PDA) in Santa Rosa established by the City to provide opportunities for compact, infill development in proximity to transit, jobs, schools, shopping and services. PDAs are an integral part of Plan Bay Area 2040, the regional sustainable growth strategy that coordinates housing plans, open space conservation efforts, economic development strategies, and transportation investments to further statewide goals for climate action. PDAs are eligible for capital infrastructure funding, planning grants, and technical assistance from the Metropolitan Transportation Commission (MTC).

In September 2005, the City of Santa Rosa received a planning grant to support community- and transportation-oriented development around the then-proposed SMART Station, culminating in the 2007 DSASP. A key purpose of the 2007 DSASP was to increase the number of residents and employees within walking distance of the Sonoma Marin Area Rail Transit (SMART) site through the intensification of land uses in the planning area. However, halfway through the planning period, only 100 out of an envisioned 3,400 housing units have been developed, with an additional 275 housing units. Of the 494,000 square feet of non-residential uses envisioned, approximately 194,000 square feet have been developed. Successful downtown development is an essential part of addressing the urgent housing need created by the housing crisis and loss of homes to the 2017 wildfires. As such, in 2018 with a grant from MTC, the City of Santa Rosa initiated an update to the 2007 DSASP to explore options for addressing the community's unmet housing needs as well as land use, transportation, economic development, and historic preservation issues associated with the intensification of housing development downtown.

The Proposed Plan would replace the existing 2007 Specific Plan in all elements. The existing 2007 Specific Plan has a horizon year of 2035. The Proposed Plan would establish a planning and policy framework that would extend to horizon year 2040.

C. Project Objectives

The Proposed Plan provides the basis for the City's land use and development policy and represents the basic community values, ideals, and aspirations that will govern development and conservation. Specific objectives established for the Proposed Plan include the following:

- Enhance the role of Downtown Santa Rosa as an energetic commercial and cultural center with a range of housing, employment, retail and restaurant options in a vibrant, walkable environment;
- Facilitate the production of housing that provides a range of options for people of all incomes, abilities, and stages of life;
- Enhance connectivity for pedestrians, cyclists, and transit users within in the Planning Area and to/from key destinations;
- Increase the number of residents and employees within one half mile of high frequency transit options;
- Strengthen sense of place by providing welcoming civic spaces, public art, and uses and design that promote day and nighttime vitality;
- Leverage City-owned properties in the planning area to catalyze redevelopment that can provide for the community's unmet housing needs within the Planning Area.
- Reduce vehicle miles traveled (VMT) through improved jobs-housing balance within the Planning Area.

D. Discretionary Approvals

Approval of the Proposed Plan requires the City, as lead agency, as well as certain "responsible agencies," to take discrete planning and regulatory actions to approve the overall Plan. Described below are the discretionary actions necessary to fully carry out the Plan. In addition to

certifying the Final SEIR and adopting these Findings and the associated Mitigation Monitoring and Reporting Program (CEQA requirements), the City itself must take the following actions:

The Proposed Plan would require the following approvals and discretionary and ministerial actions by the City of Santa Rosa:

- Planning Commission
 - Recommendation to certify the SEIR pursuant to CEQA
 - Recommendation to adopt the Proposed Plan and associated General Plan, zoning, and specific plan amendments to the Santa Rosa Avenue Corridor Plan and Roseland Area/Sebastopol Road Specific Plan
- City Council
 - Certification of the SEIR pursuant to CEQA
 - Adoption of the Proposed Plan and associated General Plan and zoning amendments
- Design Review Board/Cultural Heritage Board and Other City Boards and Commissions
 - Adoption of programs or other actions that implement the Proposed Plan

Future activity that could occur following certification of the SEIR includes, but is not limited to, the following, provided they are consistent with the General Plan and Zoning Ordinance and comply with CEQA:

- Public and private development project approvals (e.g., tentative maps, variances, use permits).
- Development agreements.
- Funding approval of capital projects.
- Issuance of permits and other approvals necessary for implementation of the proposed project.

Responsible and Trustee Agencies

State law requires that all EIRs (and SEIRs) be reviewed by Responsible and Trustee Agencies. A Responsible Agency, defined pursuant to State CEQA Guidelines Section 15381, includes all public agencies other than the Lead Agency which have discretionary approval power over actions taken as a result of implementing the Proposed Plan. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. Implementation of the Proposed Plan would require subsequent actions or consultation from Responsible or Trustee Agencies.

- Bay Area Air Quality Management District (BAAQMD)
- California Department of Transportation (Caltrans)
- California Department of Fish and Wildlife (CDFW)
- North Coast Regional Water Quality Control Board (RWQCB)
- California Office of Historic Preservation
- Federal Emergency Management Agency (FEMA)

- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- Municipal Transportation Commission and Association of Bay Area Governments (MTC/ABAG)
- Sonoma County Transit
- Sonoma County Regional Parks

III. **ENVIRONMENTAL REVIEW PROCESS**

In accordance with section 15082 of the CEQA Guidelines, the City prepared an Initial Study (IS) and Notice of Preparation ("NOP") of a Supplemental Environmental Impact Report ("SEIR") on December 19, 2019. Pursuant to CEQA Guidelines sections 15023, subdivision (c), and 15087, subdivision (f), the State Clearinghouse in the Office of Planning and Research was responsible for distributing environmental documents to State agencies, departments, boards, and commissions for review and comment. The City followed required procedures with regard to distribution of the appropriate notices and environmental documents to the State Clearinghouse. The State Clearinghouse was obligated to make, and did make, that information available to interested agencies for review and comment. The NOP was received by the State Clearinghouse (SCH # 2006072104) and a 30-day public review period ended on January 17, 2020. The City also held a scoping meeting on January 15, 2020 to receive comments on the NOP. The NOP and all comments received on the NOP are presented in Appendix A of the Draft SEIR.

Pursuant to CEQA Guidelines Section 15163(b), an SEIR “need contain only the information necessary to make the previous EIR adequate for the Proposed Plan as revised.” Many of impacts of the Proposed Plan will be the same or similar to those previously evaluated and do not require further study. An Initial Study (IS) conducted in December 2019 provides the basis for the topics to be evaluated is included in Appendix A of the Draft SEIR. The IS “scoped out” the following environmental impact categories from subsequent environmental analysis on the basis that they would not result in new or substantially more severe environmental impacts:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Geology and Soils
- Mineral Resources
- Hazards, Hazardous Materials, and Wildfires
- Land Use, Population, and Housing

The City and its consultants concluded that new or substantially more adverse significant impacts in several issue areas may arise due to changes in the Plan or changes in circumstances or information since the time the 2007 EIR was certified. This SEIR analyzes the following areas of concern:

- Air Quality
- Cultural and Tribal Cultural Resources
- Energy, Greenhouse Gases, and Climate Change
- Hydrology and Water Quality
- Noise
- Public Services and Recreation
- Traffic and Transportation
- Utilities

The City published the Draft SEIR (SCH# 2006072104) for public and agency review on July 15, 2020. A public review period of 45 days was provided on the Draft SEIR, which period ended on August 31, 2020. This period satisfied the requirement for a 45-day public review period as set forth in Section 15105 of the CEQA Guidelines. On Thursday August 13, 2020, a public hearing before the Planning Commission was held on the Draft SEIR during the official public review period. The meeting was held virtually, consistent with Governor's Executive Orders N-25-20 and N-29-20 to prevent the spread of the coronavirus, from 4:00 to 9:00 p.m. Following the August 13, 2020 closing of the public review period, staff and the consultant team prepared responses to comments, as set forth in the Final SEIR.

The Final SEIR was issued for public review on September 14, 2020. In accordance with CEQA Guidelines Section 15088, the Final SEIR provided responses to all comments received by the City of Santa Rosa on the Draft SEIR.

On September 24, 2020, the Planning Commission held a public meeting to consider the Proposed Plan and Final SEIR and recommended that the City Council certify the SEIR and adopt the Proposed Plan, findings of fact and mitigation and monitoring program.

On ____, the City Council held a public meeting to consider the Proposed Plan and Final SEIR, findings of fact and mitigation and monitoring program.

IV.

RECORD OF PROCEEDINGS

In accordance with Public Resources Code section 21167.6, subdivision (e), the record of proceedings for the City's decision on the Plan includes the following documents:

- The NOP and all other public notices issued by the City in conjunction with the Plan;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- The Draft SEIR for the Plan and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Draft SEIR;
- The Final SEIR for the Plan, including comments received on the Draft SEIR and responses to those comments, and appendices;
- Documents cited or referenced in the Draft SEIR and Final SEIR;

- The Mitigation Monitoring and Reporting Program for the Plan;
- All findings and resolutions adopted by the City Council in connection with the Plan and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Plan prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Plan;
- All documents submitted to the City by other public agencies or members of the public in connection with the Plan, up through the close of the City Council public hearing on _____;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the Plan;
- Any documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings;
- The City of Santa Rosa General Plan and all environmental documents prepared in connection with the adoption of the General Plan;
- The City of Santa Rosa Zoning Ordinance and all other City Code provisions cited in materials prepared by or submitted to the City;
- Any and all resolutions adopted by the City regarding the Plan, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

The official custodian of the record is Amy Lyle, Supervising Planner, City of Santa Rosa, Planning and Economic Development, Room 3, 100 Santa Rosa Avenue, Santa Rosa, CA 95404.

V.

FINDINGS REQUIRED UNDER CEQA

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same statute provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of Projects (or Plans) and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving

projects for which EIRs (and SEIRs) are required. For each significant environmental effect identified in an EIR (or SEIR) for a Plan, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. The second permissible finding is that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. The third potential conclusion is that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (CEQA Guidelines, § 15091.)

As explained elsewhere in these findings, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*); *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1509 [court upholds CEQA findings rejecting alternatives in reliance on applicant's project objectives]; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 (CNPS) ["an alternative 'may be found infeasible on the ground it is inconsistent with the project objectives as long as the finding is supported by substantial evidence in the record'"] (quoting *Kostka & Zischke, Practice Under the Cal. Environmental Quality Act* [Cont.Ed.Bar 2d ed. 2009] (*Kostka*), § 17.39, p. 825); *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165, 1166 (*Bay-Delta*) ["[i]n the CALFED program, feasibility is strongly linked to achievement of each of the primary project objectives"; "a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"].) Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*); see also CNPS, *supra*, 177 Cal.App.4th at p. 1001 ["an alternative that 'is impractical or undesirable from a policy standpoint' may be rejected as infeasible"] [quoting *Kostka, supra*, § 17.29, p. 824]; *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 17.)

For purposes of these findings (including the Mitigation Monitoring and Reporting Program and the attached Table A to these findings), the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less than significant level.

CEQA requires that the lead agency adopt feasible mitigation measures or, in some instances, feasible alternatives to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes

are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, § 15091, subd. (a), (b).)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons that the agency found the project's benefits outweigh its unavoidable adverse environmental effects. (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).) The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Goleta II*, *supra*, 52 Cal.3d at p. 576.)

Analysis conducted in the Draft SEIR concluded that implementation of the Plan would not result in any significant and unavoidable impacts. Therefore, a Statement of Overriding Considerations is not required.

VI.

LEGAL EFFECT OF FINDINGS

These findings constitute the City’s best efforts to set forth the evidentiary and policy bases for its decision to approve the Plan in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the FEIR are feasible and have not been modified, superseded or withdrawn, the City hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City adopts a resolution approving the Plan.

VII.

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program has been prepared for the Plan and is being approved by the same Resolution that has adopted these findings. The City will use the Mitigation Monitoring and Reporting Program to track compliance with Plan mitigation measures. The Mitigation Monitoring and Reporting Program will remain available for public review during the compliance period. The final Mitigation Monitoring and Reporting Program is attached to and incorporated into the environmental document approval resolution and is approved in conjunction with certification of the SEIR and adoption of these Findings of Fact.

VIII.

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The Draft SEIR evaluated, through an initial study, the potential for implementation of the Proposed Plan to result in new or substantially more adverse environmental effects in comparison to

the analysis contained in the 2007 EIR. On that basis, the Draft SEIR identified a number of significant and potentially significant environmental effects (or impacts) that the Plan will cause or to which it will contribute. All of these significant effects can be fully avoided through the adoption of feasible mitigation measures. The City Council's findings with respect to the Project's significant effects and mitigation measures are set forth in "Table A" attached to these findings. The findings set forth in Table A are hereby incorporated by reference.

Section 15091 of the CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as having "no impact" or a "less than significant" impact. However, these findings account for all resource categories where new or substantially more adverse environmental effects could potentially result. Table A does not attempt to describe the full analysis of each environmental impact contained in the Final SEIR. Instead, the Table provides a summary description of each impact, describes the applicable mitigation measures identified in the Final SEIR and adopted by the City Council, and states the City Council's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final SEIR, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the Final SEIR's determinations regarding the Project's impacts and mitigation measures designed to address those impacts. In addition, the Planning Commission and City Council Staff Reports for certification or recommendation on certification of the SEIR and approval or recommendation on approval of the Plan, and City Council Resolution No. _____ and Planning Commission Resolution No. _____ include discussions supporting the Final SEIR's determinations; therefore, those documents are hereby incorporated by reference into these findings. In making these findings, the City Council ratifies, adopts, and incorporates into these findings the analysis and explanation in the Draft SEIR and Final SEIR, the Planning Commission and City Council Staff Reports for certification of the SEIR and approval of the Plan, and Resolution No. _____ and Planning Commission Resolution No. _____ and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Final SEIR, the Planning Commission and City Council Staff Reports for certification of the Final SEIR and approval of the Plan, and Resolution No. _____ and Planning Commission Resolution No. _____ relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

IX.

GROWTH INDUCEMENT

CEQA Guidelines require that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly" (CEQA Guidelines Section 15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

The Proposed Plan allows for new residential and non-residential development that could result in an increase in population, housing, and jobs, compared to existing conditions. Given the Planning Area's central importance to economic life in Santa Rosa and Santa Rosa's relatively large population compared to Sonoma County as a whole, it is possible that growth within the Planning Area will cause pressure for growth elsewhere in the City and County. However, while the

Planning Area's jobs-to-housing ratio would decline under implementation of the Proposed Plan, it would be reduced to slightly above 1.0, indicating that jobs and housing would be relatively well-balanced. Excessive commuting in or out of the Planning Area is thus unlikely. Growth under the Proposed Plan would primarily serve the local community and would accommodate existing and projected demand. Growth within the Planning Area would increase available housing, jobs, retail and entertainment opportunities, and access to transit options.

X.

X.SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guideline section 1526(c) requires an EIR to discuss significant irreversible environmental changes which would be involved if the proposed Project is implemented. A resource commitment is considered irretrievable when the use or consumption of the resource is neither renewable nor recoverable for use by future generations. Irreversible changes and irretrievable commitments of non-renewable resources anticipated by the Proposed Plan include the following issues. The Proposed Plan would involve two types of resources: (1) general industrial resources including fuels and construction materials; and (2) project-specific resources such as land, biotic and cultural resources at the building sites.

Implementation of the Proposed Plan could result in the long-term commitment of various resources to urban development. While the Proposed Plan itself would not directly entitle or result in any new development, it is reasonably foreseeable that the Proposed Plan, which acts as a blueprint for growth and development in the Planning Area over the next 20 years, could result in significant irreversible impacts related to the commitment of non-renewable and/or slowly renewable natural and energy resources.

XI.

Plan ALTERNATIVES

A. Basis for Alternatives-Feasibility Analysis

1. Significant, Unavoidable Impacts of the Plan

All of the potential environmental impacts associated with adoption and implementation of the Proposed Plan were found to be either *less than significant* without mitigation or *less than significant with mitigation*. No impacts were determined to be *significant and unavoidable*.

Under CEQA, where a significant impact can be substantially lessened (i.e., mitigated to an "acceptable level") solely by the adoption of mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of alternatives with respect to that impact, even if an alternative would mitigate the impact to a greater degree than the Proposed Plan. (Cal. Pub. Resources Code, § 21002; *Laurel Hills Homeowners Association v. City Council*, 83 Cal.App.3d 515, 521 (1978) ("*Laurel Hills*"); *see also Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 730-731 (1990); *Laurel Heights Improvement Association v. Regents of the University of California*, 47 Cal.3d 376, 400-403 (1988).)

2. Scope of Necessary Findings and Considerations for Plan Alternatives

As noted above, these findings address whether the various alternatives substantially lessen or avoid any of the significant impacts associated with the Plan and (though not legally necessary) also consider the feasibility of each alternative. Under CEQA, "(f)feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines § 15364.) As explained earlier, the concept of feasibility permits agency decision makers to consider the extent to which an alternative is able to meet some or all of a Plan's objectives. In addition, the definition of feasibility encompasses "desirability" to the extent that an agency's determination of infeasibility represents a reasonable balancing of competing economic, environmental, social, and technological factors supported by substantial evidence.

In identifying potentially feasible alternatives to the Plan, the following Plan objectives were considered:

- Enhance the role of Downtown Santa Rosa as an energetic commercial and cultural center with a range of housing, employment, retail and restaurant options in a vibrant, walkable environment;
- Facilitate the production of housing that provides a range of options for people of all incomes, abilities, and stages of life;
- Enhance connectivity for pedestrians, cyclists, and transit users within in the Planning Area and to/from key destinations;
- Increase the number of residents and employees within one half mile of high frequency transit options;
- Strengthen sense of place by providing welcoming civic spaces, public art, and uses and design that promote day and nighttime vitality;
- Leverage City-owned properties in the planning area to catalyze redevelopment that can provide for the community's unmet housing needs within the Planning Area.
- Reduce vehicle miles traveled (VMT) through improved jobs-housing balance within the Planning Area.

Under CEQA Guidelines section 15126.6, as noted earlier, the alternatives to be discussed in detail in an EIR should be able to "feasibly attain most of the basic objectives of the project[.]" For this reason, the objectives described above provided the framework for evaluating possible alternatives.

The Draft SEIR evaluated two Plan alternatives in accordance with the parameters set forth by CEQA Guidelines Section 15126.6. In addition, four other alternatives were initially considered but determined to be infeasible and were ultimately rejected from further consideration: three alternatives evaluated in the 2007 Draft EIR (No Project Alternative, Reduced Growth Alternative, and Reallocated Growth Alternative) and a new Reduced Growth Alternative. Both Plan alternatives were initially evaluated on their ability to meet Plan objectives, feasibility, and whether they would avoid or substantially reduce the Proposed Plan's significant environmental impacts. Based on this initial evaluation, the 2007 No Project Alternative no longer represented a true No Project Scenario as required under CEQA, the 2007 Reduced Growth Alternative and 2007 Reallocated Growth

Alternative would not be feasible and did not meet project objectives, and the new Reduced Growth Alternative would not avoid the significant impacts of the Proposed Plan.

Based on the requirements of CEQA Guidelines §15126.6 and the project objectives, the following alternatives to the Plan were identified:

- No Project Alternative, and
- Redistributed Growth Alternative.

The City Council finds that the range of alternatives studied in the SEIR reflects a reasonable attempt to identify and evaluate various types of alternatives that would potentially be capable of reducing the Plan's environmental effects, while accomplishing most but not all of the Plan's objectives. The City Council finds that the alternatives analysis is sufficient to inform the City Council and the public regarding the tradeoffs between the degree to which alternatives to the Plan could reduce environmental impacts and the corresponding degree to which the alternatives would hinder the City's ability to achieve the Plan objectives.

B. Analysis of Plan Alternatives

The Draft SEIR identified and compared environmental effects of the two alternatives listed below with environmental impacts resulting from the Plan.

1. No Project Alternative

(a) Description

Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, the No Project Alternative represents what would be reasonably expected to occur in the foreseeable future if the Proposed Plan were not adopted and the 2007 DSASP was left unchanged and in use. This alternative would retain all current land use designations and policies from the 2007 DSASP as amended to date. There would be no changes to the current Land Use map and building height limitations would remain in force; the new Core Mixed Use, Station Mixed Use, Maker Mixed Use, and Neighborhood Mixed Use land designations and Active Ground Floor Overlay would not be applied. Key elements of several circulation improvements would occur under the No Project Alternative, including the Donahue Street roadway extension, the Roberts Avenue roadway connection, and construction of a multimodal connector street at the SMART site. Pedestrian and bicycle improvements included in the 2007 DSASP and 2018 Bicycle and Master Plan would occur. Roadway reconfigurations and certain improvements to the pedestrian and bicycle network, including the West Third Street-West Sixth Street Connection and new pedestrian crossings, included in the Proposed Plan would not occur under the No Project Alternative.

The No Project Alternative was projected to result in approximately 8,125 new residents and 3,250 new housing units. The 2007 Plan anticipated a net loss of 206,100 non-residential square feet in the Planning Area by 2040, attributed to a larger loss of industrial square footage than addition of office and retail square footage. Additionally, 194,000 square feet was developed between 2007 and 2018 and is thus included in existing square footage. Overall, the No Project Alternative results in

8,675 fewer residents, 3,750 fewer housing units, and a net loss of 400,100 non-residential square feet compared to the Proposed Plan.

(b) **Analysis of the No Project Alternative's Ability to Reduce Significant Unavoidable Plan Impacts**

Because no conditions would change and less development would occur as a result of selecting the No Project Alternative, the overall impacts under the majority of environmental topic areas would be *less* than those of the proposed project. However, air quality impacts to sensitive receptors would be significant and unavoidable under the No Project Alternative as it does not include proposed mitigation measures that would address these impacts.

(c) **Analysis of the No Project Alternative's Ability to Meet the Plan Objectives**

Under the No Project Alternative, the Proposed Plan would not be implemented and therefore, this alternative does not meet any of the project objectives.

In summary, the No Project Alternative would avoid some of the Proposed Plan's significant impacts but would not advance any of the Plan objectives and would create a new significant and unavoidable impact.

(d) **Feasibility of the No Project Alternative**

Because the No Project alternative would not meet the Plan objectives, and because the No Project alternative would not provide the same benefits as the Proposed Plan, it is not a feasible alternative.

2. **Redistributed Growth Alternative**

(a) **Description**

Under the Redistributed Growth Alternative, the land use framework would be revised to redistribute more growth away from potentially historic properties and away from major sources of toxic air contaminants and noise, including US 101 and SR 12. Specifically, the Maxwell Court area would not be designated Maker Mixed Use as under the Proposed Plan, but would instead be redesignated Light Industry, which allows for light industrial, warehousing, and heavy commercial uses. The Light Industry designation does not allow for professional office buildings or sensitive uses such as homes and schools. This would avoid development of new sensitive uses in the Maxwell Court area in proximity to two major stationary sources of particulate matter emissions, thus minimizing impacts to the health of new sensitive receptors.

Additionally, the maximum base FAR allowed in the East End area would be increased from 4.0 to 6.0 in order to incentivize more residential growth in this part of the Planning Area, which is less impacted by toxic air contaminants and noise and has proportionally fewer age-eligible properties. As a larger opportunity site that can accommodate new development, the Public Safety

Building, located at the northwest corner of Sonoma and Brookwood, would be redeveloped with high density multi-family residential uses under this alternative. This would avoid a high concentration of new residential development near US 101 and SR 12, thus reducing the number of sensitive receptors exposed to noise and toxic air contaminants generated by highway traffic. Additionally, this alternative would avoid demolition of potentially historic properties and densification of established historic districts by incentivizing development in the East End area rather than in proximity to historic resources.

The land use designations and maximum allowable FAR under this alternative are shown on Figure 4.2-2 of the Draft SEIR. Overall, this alternative would result in 15,420 new residents, 6,430 new housing units, and a net gain of 838,831 non-residential square feet in the Planning Area in 2040. This is 1,380 fewer residents, 570 fewer housing units, and a net gain of 10,351 non-residential square feet compared to under the Proposed Plan.

(b) **Analysis of the Redistributed Growth Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

Because a similar, though slightly lower, level of development would occur as a result of selecting the Redistributed Growth Alternative, impacts under most of the environmental topic areas would be *similar* to those of the proposed Plan.

(c) **Analysis of the Redistributed Growth Alternative's Ability to Meet the Project Objectives**

The Redistributed Growth Alternative would generally comply with the project objectives as it would implement all Plan policies and mitigation and a similar land use framework. However, the Redistributed Growth Alternative would concentrate less development along key mixed-use corridors and in downtown. The Redistributed Growth Alternative would also result in fewer multi-family housing units, which would provide a less broad range of housing options and would not reduce the risk of displacement. Additionally, the Redistributed Growth Alternative would not be as successful as the Plan in achieving the objectives of the DSASP update process including facilitating the production of housing and increasing the number of residents and employees within one half mile of high frequency transit options. Therefore, this alternative would not meet all of the project objectives.

(d) **Feasibility of Redistributed Growth Alternative**

While the Redistributed Growth Alternative would see slightly more non-residential development than the Proposed Plan, it would result in 1,380 fewer residents and 570 fewer housing units compared to under the Proposed Plan. In recognition of the urgent need for housing in Santa Rosa -- and particularly for affordable housing -- a principle project objective is to facilitate the production of housing that provides a range of options for people of all incomes, abilities, and stages of life. This objective reflects the City Council's annual goals and priorities and the goals of the City's 2016 Housing Action Plan. While the Redistributed Growth Alternative would provide opportunities for higher-density residential land uses, it would do so in a more limited manner, and not up to the development potential of the Proposed Project. Further, the Redistributed Growth

Alternative would result in fewer residents within a half-mile of transit facilities and as such would not satisfy the project objectives to the same degree.

Additionally, under the Redistributed Growth Alternative more growth would be located at the edges of the Planning Area, farther from the Core Area, the Downtown SMART Station, and the Downtown Transit Mall. By contrast, the Proposed Plan would locate more new development at the center of the Planning Area, where goods and services, transit, and job opportunities are clustered. As such, the Redistributed Growth Alternative would not support of the project objective of enhancing the role of Downtown Santa Rosa as an energetic commercial and cultural center to the same extent as the Proposed Plan.

The Redistributed Growth Alternative would also require more distributed infrastructure and increasing the cost of producing the projected housing units. As the cost of housing is one of the primary obstacles to growth it is incongruent with the goals of the DSASP update, therefore the Redistributed Growth Alternative is not feasible.

Overall, because the Redistributed Growth Alternative would not allow for the same level of high-density residential development opportunities and benefits as the Proposed Plan, would not locate as many people within a half-mile of high-frequency transit options, and would not concentrate as much future development at the center of the Planning Area as the Proposed Plan, it is not a feasible alternative.

3. **The Environmentally Superior Alternative**

The qualitative environmental effects of each alternative in relation to the proposed Plan are summarized in the table below.

Table 1: Summary of Impacts for Alternatives

<i>Impact</i>	<i>Level of Significance</i>			
	<i>Proposed Plan</i>	<i>No Project Alternative</i>	<i>Redistributed Growth Alternative</i>	<i>Superior Alternative</i>
Air Quality				
Air Quality Plan	LTS	LTS	LTS	Equivalent
Criteria Pollutants	LTS	LTS	LTS	Equivalent
Sensitive Receptors	LTSM	SU	LTSM	RG
Odors	LTS	LTS	LTS	RG
Historic and Cultural Resources				
Historical Resources	LTSM	LTSM	LTSM	RG
Archaeological Resources	LTS	LTS	LTS	NP
Tribal Cultural Resources	LTS	LTS	LTS	NP
Energy, Greenhouse Gases, and Climate Change				
Wasteful Energy Consumption	LTS	LTS	LTS	Equivalent
Energy Efficiency Standards	LTS	LTS	LTS	Equivalent
Impact on Environment	LTS	LTS	LTS	PP
Plan, Policy, or Regulation	LTS	LTS	LTS	PP
Hydrology and Water Quality				
Groundwater	LTS	LTS	LTS	RG
Noise				
Noise Standards	LTS	LTS	LTS	NP
Public Services				
Construction or Expansion of Parks	LTS	LTS	LTS	NP
Transportation				
Congestion Management Plan	LTS	LTS	LTS	PP
CEQA Guidelines Section 15064.3, Subdivision (b)	LTS	LTS	LTS	PP
Traffic Hazards	LTS	LTS	LTS	NP
Emergency Access	LTS	LTS	LTS	Equivalent

Impact	Level of Significance			Superior Alternative
	Proposed Plan	No Project Alternative	Redistributed Growth Alternative	
Utilities				
Construction of New Facilities	LTS	LTS	LTS	NP
Water Supply	LTS	LTS	LTS	NP
Notes:				
LTS = Less than Significant				
LTSM = Less than Significant with Mitigation				
NI = No Impact				
SU = Significant and Unavoidable				
PP = Proposed Plan				
NP = No Project Alternative				
RG = Redistributed Growth Alternative				

CEQA Guidelines (Section 15126.6) require the identification of an environmentally superior alternative among the alternatives analyzed. If the alternative with the least environmental impact is the No Project Alternative, then the SEIR must also identify the next most environmentally superior alternative.

For the Proposed Plan and Redistributed Growth Alternative, two impacts were expected to be less than significant with mitigation, and 18 impacts were expected to be less than significant. For the No Project Alternative, one impact was expected to be significant and unavoidable, one impact was expected to be less than significant with mitigation, and 18 impacts were expected to be less than significant. In five cases, the difference in anticipated environmental impact between the three alternatives was determined to be insignificant. The Proposed Plan was found to be environmentally superior in four cases and the Redistributed Growth Alternative was found to be environmentally superior in four cases. The No Project Alternative was found to be environmentally superior in seven cases, making it the environmentally superior alternative. However, per the CEQA Guidelines, if the No Project is determined to be the environmentally superior alternative, another environmentally superior alternative must be identified.

Overall, the Proposed Plan was found to have a similar impact profile as the Redistributed Growth Alternative. However, as the Proposed Plan would concentrate development along key mixed-use corridors and in downtown, it would result in both more growth and a more compact pattern of growth than the Redistributed Growth Alternative. The Proposed Plan would also result in more multi-family housing units, which would provide a broader range of housing options, potentially reducing the risk of displacement. While the Redistributed Growth Alternative would reduce impacts associated with historic resources, development would still occur in areas containing designated historic and age-eligible buildings. By designating the Maxwell Court area as Light Industry, the Redistributed Growth Alternative ensures that no sensitive uses would be developed in this area and result in exposure to toxic air contaminants. By contrast, the Proposed Plan designates

this area as Maker Mixed Use, allowing a larger variety of lower-emissions uses, and would also restrict residential development in this area with the implementation of Mitigation Measures AQ-2 (which would be nullified after one stationary source relocates) and AQ-3 (which prohibits residential development in only a small portion of the area). Additionally, the Proposed Plan would ultimately be more successful in achieving the objectives of the DSASP update process including facilitating the production of housing and increasing the number of residents and employees within one half mile of high frequency transit options. Given that the Proposed Plan would be more successful in achieving these objectives, the Proposed Plan is determined to be the environmentally superior alternative.

4. Alternatives Rejected from Further Consideration

Section 15126.6(c) of the State CEQA Guidelines requires EIRs (and SEIRs) to identify any alternatives that were considered by the lead agency, but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in and EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The prior EIR analyzed three alternatives to reduce or avoid the significant impacts of the 2007 DSASP. Each of these prior alternatives is summarized below; however, as described below none would avoid significant impacts of the Proposed Plan and as such were not evaluated in detail.

The No Project Alternative, which is required under CEQA, represents what would be reasonably expected to occur in the foreseeable future if the 2007 DSASP were not approved and the 2002 General Plan was left unchanged and in effect. The No Project Alternative would result in 2,349 fewer housing units and a net gain of 616,283 non-residential square feet compared to the 2007 DSASP. Given that the 2007 DSASP has been adopted, the No Project Alternative analyzed in the prior EIR no longer represents a true No Project scenario as required under CEQA.

The Reduced Growth Alternative would decrease the number of attached residential units that would be developed, to a mid-point between what would occur under the 2007 DSASP and under the No Project Alternative (2002 General Plan). In addition, the amount of light industrial uses would be increased from the 2007 DSASP to replace some of the lost residential units; however, the amount of industrial uses would still be less than what would occur under the No Project Alternative. As a result, the majority of development change would occur within the Railroad Corridor and the Courthouse Square Sub-Areas. The portion of Imwalle Gardens that is designated for agricultural use in the 2007 DSASP would remain designated for agriculture. The goals, policies, and guidelines included in the 2007 DSASP would still apply, as would the mitigation measures included in the prior EIR. The Reduced Growth Alternative would result in 1,174 fewer housing units and a net gain of 130,000 non-residential square feet compared to the 2007 DSASP. While the prior EIR determined that the Reduced Growth Alternative would be the environmentally superior alternative in comparison to the 2007 DSASP, it would not be preclude the potential for significant impacts to historic resources under the Proposed Plan, nor would it avoid significant impacts related to air quality and noise. The significant impacts of the Proposed Plan are primarily linked to the location of

development and as such while reducing the amount of development may reduce the number of people exposed to excessive noise and air pollution, it would not reduce the severity of the impact on those who would be exposed. Therefore, the Reduced Growth Alternative is not feasible. Additionally, because the Reduced Development Alternative would result in fewer housing units, less development and more restrictions than the 2007 DSASP, it would not fully satisfy the project objectives.

The Reallocated Growth Alternative would result in the same level of development anticipated under the 2007 DSASP but would address some concerns from the community about new development adjacent to existing residential communities. In order to minimize the amount of density increases adjacent to the Residential Historic Sub-Areas, some of the attached residential units along the edges of the Railroad Corridor, Railroad Square and Courthouse Square Sub-Areas would be reallocated to the Imwalle Gardens site and the agricultural designation would be deleted. The Alternative would also be designed to focus more of the residential units into the core of the Courthouse Square Sub-Area. The goals, policies, and guidelines included in the 2007 DSASP would still apply, as would the mitigation measures included in this SEIR. Buildout under the Reallocated Growth Alternative would be the same as under the 2007 DSASP. While the concept of the Reallocated Growth Alternative would be feasible in principle, implementation would not be realistic given existing conditions and short-term growth. The Reallocated Growth would not preclude the potential for significant impacts to historic resources under the Proposed Plan, nor would it avoid significant impacts related to air quality and noise. Like the Proposed Plan, the Reallocated Growth Alternative also proposes new development in locations that are close to sources of toxic air contaminants and noise and include potentially historic resources. Additionally, the Reallocated Growth Alternative is similar to the Proposed Plan in its concentration of development in the core of the Planning Area. Therefore, the Reallocated Growth Alternative would not feasibly avoid or reduce the significant impacts of the Proposed Plan.

The City also considered a Reduced Growth Alternative that would represent both less residential and nonresidential growth than the No Project Alternative or Proposed Plan. Land use designations under the Reduced Growth Alternative would reflect those under the Proposed Plan and the maximum allowable Floor Area Ratio (FAR) would be reduced. However, this Alternative was ultimately deemed infeasible because it would not meet many of the project objectives identified in Section 2.3, Purpose and Objectives of the Proposed Plan, of Chapter 3, Project Description, of this Draft SEIR. Most notably, a reduced growth alternative would not achieve the project objectives to facilitate the production of housing, increase the number of residents and employees within one half mile of high frequency transit options, and leverage City-owned properties in the Planning Area to catalyze redevelopment that can provide for the community's unmet housing needs in the way that the Redistributed Growth Alternative would. Additionally, reducing growth throughout the Planning Area under this Alternative would not avoid the significant impacts of the Proposed Plan to historic resources, noise levels, and the health of sensitive receptors. Impacts of the Proposed Plan are directly related to the location of new development rather than the level of growth. Therefore, this Alternative was not carried through the impact analysis.

CEQA FINDINGS OF FACT, TABLE “A”
SANTA ROSA DOWNTOWN STATION AREA SPECIFIC PLAN UPDATE
CITY OF SANTA ROSA, CALIFORNIA

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
Chapter 3.1: Air Quality			
Impact 3.1-1: Development under the Proposed Plan would not conflict with or obstruct the implementation of the applicable air quality plan.	No mitigation is necessary.	Less Than Significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The primary goals of the 2017 Clean Air Plan are to attain air quality standards; to reduce population exposure and protect public health in the Bay Area; and to reduce GHG emissions and protect the climate. In line with the Clean Air Plan, the primary objectives of the Proposed Plan include enhancing connectivity for pedestrians, cyclists, and transit users within the Planning Area and to/from key destinations and increasing the number of residents and employees within one half mile of high frequency transit options, thus reducing mobile emissions of criteria air pollutants and GHGs. In support of these objectives, implementation of the Proposed Plan is intended to support regional goals of integrating transit and land use policies to create opportunities for transit-oriented development around the SMART station and other transit nodes throughout Santa Rosa; alleviate traffic congestion on SR-101 and SR-12; improve air quality;</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>and reduce GHGs and other emissions associated with automobile use. Through implementation of specific policies in line with these objectives and goals, the Proposed Plan would reduce per capita emissions and support regional attainment of the California Ambient Air Quality Standard and National Ambient Air Quality Standard. Additionally, the Proposed Plan has incorporated many of the control measures identified in the 2017 Clean Air Plan related to the transportation, building, energy, waste, and water sectors into its policies for implementation. (Draft SEIR, p. 3.1-33)</p>
<p>Impact 3.1-2: Development under the Proposed Plan would not result in a cumulatively considerable net increase of criteria pollutants for which the Proposed Plan region is in non-attainment under an applicable federal or state ambient air quality standard.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation (Construction Emissions):</u> The Proposed Plan includes several policies that require development projects to manage emissions during construction, including preparation of a loading plan, implementation of best practices such as alternative fueled vehicles and management of dust, and providing adequate ventilation. These policies would ensure that the construction-related emissions would be reduced to the maximum extent practicable. (Draft SEIR, p. 3.1-40)</p> <p><u>Explanation (Operational Emissions):</u> The Proposed Plan would reduce the severity of growth-oriented criteria pollutants by locating uses in</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			proximity to transit, fostering bicycle and pedestrian infrastructure, and supporting sustainable land use patterns, including mixed-use design and increased density near transit. Implementation of the Proposed Plan land uses, circulation network, and policies would ensure that individual projects would not generate emissions in excess of BAAQMD's project-level thresholds. Therefore, implementation of the Proposed Plan would have a less than significant impact with respect to an increase in criteria pollutants for which the region is in non-attainment. (Draft SEIR, p. 3.1-42)
<p>Impact 3.1-3: Development under the Proposed Plan would expose sensitive receptors to substantial pollutant concentrations.</p>	<p>MM-AQ-1. Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in Downtown Santa Rosa within 1,000 feet of a major source of toxic air contaminants (TACs) identified by BAAQMD (Facility IDs 1486, 13584, 15449, 110978, and 111751) shall reduce health risks to BAAQMD project-level threshold levels for cancer risk, hazard index, and PM2.5 concentration by installing indoor air filtration systems with a minimum efficiency reporting value of 14 or better.</p> <p>MM-AQ-2. Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) shall not build within a buffer of 1,000 feet of the BoDean Company site</p>	Less Than Significant	<p><u>Finding:</u> Implementation of required Mitigation Measures AQ-1, AQ-2, and AQ-3, which have been required or incorporated into the Plan, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council, therefore, finds that changes or alterations have been required in the Plan that avoid the significant environmental effect, as identified in the Final SEIR.</p> <p><u>Explanation:</u> While the Proposed Plan would allow residential development within 1,000 feet of 13 permitted stationary sources and could expose existing and new sensitive receptors to substantial pollutant concentrations, proposed Policy PSS-5.2 would require projects that would locate sensitive receptors within high risk zones to reduce health risks by either installing indoor air filtration systems with a minimum</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>boundaries as identified in Figure 3.1-1. Applicants for such projects may receive an exemption to build within this buffer zone by demonstrating by way of a human health risk assessment completed by a certified professional that incorporation of appropriate measures into the project will reduce health risk impacts below BAAQMD thresholds (incremental cancer risk below 10 in one million, the appropriate noncancer hazard index below 1.0, and PM2.5 concentrations below 0.3 µg/m3). This buffer shall be required until such time as the BoDean Company relocates.</p> <p>MM-AQ-3. Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) shall not build within a buffer of 1,000 feet of the Superior Supplies, Inc. site boundaries as identified in Figure 3.1-1. Applicants for such projects may receive an exemption to build within this buffer zone by demonstrating by way of a human health risk assessment completed by a certified professional that incorporation of appropriate measures into the project will reduce health risk impacts below BAAQMD thresholds (incremental cancer risk below 10 in one</p>		<p>efficiency reporting value (MERV) or 12 or better, or by incorporating appropriate measures into the project to meet required standards, as demonstrated through a human health risk assessment completed by a certified professional. Compliance with Policy PSS 5-2, Policy PSS-5.3, and applicable BAAQMD regulations would reduce health risk impacts associated with the majority of stationary and roadway sources in the Planning Area. Mitigation Measure AQ-1 would require projects involving sensitive receptors in high risk areas to install MERV-14 filters, which would reduce health risks associated with three stationary sources to a less than significant level. Mitigation Measures AQ-2 and AQ-3 are required establish a buffer of 1,000 feet around two stationary sources of substantial pollutant concentrations in which development of sensitive receptors is prohibited unless it can be demonstrated by way of a human health risk assessment completed by a certified professional that incorporation of appropriate measures into the project will reduce health risk impacts below BAAQMD thresholds. Therefore, this impact is considered less than significant with mitigation. (Draft SEIR, p. 3.1-47)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	million, the appropriate noncancer hazard index below 1.0, and PM2.5 concentrations below 0.3 µg/m3).		
Impact 3.1-4: Implementation of the Proposed Plan would not result in other emissions (such as those leading to odors adversely affecting a substantial number of people).:	No mitigation is necessary.	Less Than Significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Proposed Plan would result in new uses associated with the Maker Mixed Use designation that could potentially generate odor in proximity to sensitive residential receptors. Under the Proposed Plan, odor-generating uses would be limited to areas currently zoned as Industrial and Light Industrial in the northwest and southwest portions of the Planning Area and no impacts are expected to occur beyond those that would occur under existing conditions. Future development would be required to comply with City Code provisions that address noxious odors, BAAQMD rules, and Proposed Policy PSS 4-5 that requires provision of adequate ventilation. (Draft SEIR, p. 3.1-53)</p>
Chapter 3.2: Cultural, Historic, and Tribal Cultural Resources			
Impact 3.2-1: Implementation of the Proposed Plan could cause a substantial adverse change in the significance of a historical resource, as defined as physical	MM CUL-1a: Evaluate Age-Eligible Properties That Have Not Previously Been Evaluated Prior to Development Projects to Identify Historic Resources If a development project is proposed on a	Less Than Significant	<p><u>Finding:</u> Implementation of required Mitigation Measures CUL-1a and CUL-1b will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired (Guidelines Section 15064.5).</p>	<p>parcel within the Planning Area that includes a building, structure, or landscape more than 45 years old (typical age threshold applied by the California Office of Historic Preservation) and has not previously been evaluated for potential historic significance, the project sponsor shall retain a professional who meets the Secretary of the Interior's Professional Qualifications Standards for architectural history or history (as appropriate), to conduct an evaluation of historic significance and eligibility for listing on local, state, or national registers.</p> <p>Evaluation shall include a field survey, archival research, and preparation of a historic resource evaluation report. The report shall include documentation of methodology and the findings of the historic evaluation. Proposed development projects shall then be evaluated for potential direct and/or indirect effects on the identified historic resource(s) per CEQA Guidelines Section 15364, and Mitigation Measure CUL-1b shall be implemented as appropriate.</p> <p>MM CUL-1b: Avoidance or Minimization of Effects on Identified</p>		<p>Council, therefore, finds that changes or alterations have been required in, or incorporated into, the Plan that avoid the significant environmental effect, as identified in the Final SEIR.</p> <p><u>Explanation:</u> While there are several designated historic resources within the Opportunity Areas, where the Plan seeks to focus new development, there is minimal overlap between the Opportunity Areas and established Preservation Districts. However, there are a number of age-eligible properties (i.e. any property over 45 years old) within the Opportunity Areas that have not been surveyed and evaluated to determine their potential for historic significance. The Proposed Plan itself would not result in direct physical changes to existing historical resources, but subsequent individual development projects allowed under the Proposed Plan could result in adverse physical effects to historical resources, including destruction and/or adverse alteration.</p> <p>Therefore, implementation of Mitigation Measure CUL-1a, which requires a historic resource evaluation report, is required for age-eligible properties that have not previously been evaluated. Further, any surveyed properties that are found to be eligible for historic designation will also be required to comply with Mitigation Measure CUL-1b to avoid or minimize impacts on identified historic resources. Mitigation Measure CUL-1b requires that projects involving</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>Historic Resources</p> <p>The project sponsor shall consult with the City of Santa Rosa Planning Division staff to determine whether a project can be feasibly redesigned or revised to avoid significant adverse impacts on listed and identified eligible historic resource(s), including historic districts. If a local landmark or preservation district is part of a proposed project, the standard review procedure involving the Santa Rosa Cultural Heritage Board will be followed. If avoidance of historic resource(s) is not feasible, where feasibility is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors,” the project sponsor shall seek to reduce the effect on historic resource(s) to a less-than-significant level pursuant to CEQA Guidelines Section 15364. Projects that conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties are considered to have a less-than-significant effect on historic architectural resources.</p>		<p>identified historic resources avoid significant adverse impacts through compliance with Secretary of the Interior’s Standards for the Treatment of Historic Properties. As such, with implementation of Mitigation Measure MM CUL-1a and CUL-1b impacts to potentially historic resources in the Planning Area would be reduced or avoided to the maximum extent practicable and would be less than significant. (Draft SEIR, p. 3.2-32)</p>
Impact 3.2-2: Implementation of	No mitigation is necessary.	Less Than Significant	Under CEQA, no mitigation measures are required for

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
the Proposed Plan could cause an adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.			<p>impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Planning Area contains several prehistoric and new historic archaeological resources and areas that are sensitive for archaeological resources. Although implementation of the Proposed Plan may result in actions that could adversely affect archaeological resources, compliance with existing General Plan policies, the Secretary of the Interior’s Standards for Identification (Standards I and II), and the Public Resources Code would minimize or avoid impacts by requiring the protection and preservation of such resources. (Draft SEIR, p. 3.2-34)</p>
<p>Impact 3.2-3: Implementation of the Proposed Plan could cause an adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:</p> <p>(a) Listed or eligible for listing in the California Register of Historical Resources, or in a local</p>	No mitigation is necessary.	Less Than Significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> While no tribal cultural resources were identified through the tribal consultation process, ground disturbing activities could result in the discovery of additional, unrecorded tribal cultural resources. In the event of the discovery of human remains, significant artifacts, or cultural resources in the course of construction activities pursuant to implementation of the Proposed Plan, the CNAHCSSA and Santa Rosa General Plan 2035 Policies HP-A-2 and HP-A-3</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p> <p>(b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>			<p>require proper notification of experts upon for proper assessment and to determine the necessity for construction or excavation activity to cease. In addition, policies in the Proposed Plan would minimize or avoid potential impacts on currently known or unknown tribal cultural resources that may be encountered in the future and would promote coordination with Native American tribes. (Draft SEIR, p. 3.2-36)</p>
Chapter 3.3: Energy, Greenhouse Gases, and Climate Change			
<p>Impact 3.3-1: Development under the Proposed Plan would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Proposed Plan policies and implementing actions aim to reduce vehicular travel and consequently would all help decrease GHG emissions. While many of the policies and implementing actions within the Proposed Plan do not set specific and quantifiable goals, they do address general concepts locating uses in proximity to transit (i.e., the Downtown SMART station), fostering</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			bicycle and pedestrian infrastructure, and supporting sustainable land use patterns, including mixed-use design and increased density. When implemented, these actions would further decrease energy consumption from natural gas, electricity, and gasoline and diesel fuels. (Draft SEIR, p. 3.3-35)
<p>Impact 3.3-2: Development under the Proposed Plan would not generate conflict or obstruct a State or local plan for renewable energy or energy efficiency.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Proposed Plan seeks to concentrate significant new residential and non-residential development within a half-mile of the Downtown SMART station and high-frequency bus transit, reducing VMT and associated energy consumption. All future development under the Proposed Plan would be required to comply with the latest California Building Code (CBC) requirements, including CBC Energy Efficiency Standards, as well as all federal, State, and local rules and regulations pertaining to energy consumption and conservation.</p> <p>Within the Planning Area, the Proposed Plan would reduce per capita VMT by eight percent and per service population VMT by 24 percent. The Proposed Plan includes multiple policies aimed at reducing vehicular emissions of GHGs by increasing walkability, promoting the use of transit, and discouraging single-occupant vehicle trips.</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>Implementation of the Proposed Plan would decrease per capita emissions within the Planning Area, resulting in mobile emissions of 1.21 MTCO₂e per capita for the Planning Area in 2040. This represents a reduction of 73 percent per capita mobile GHG emissions relative to 2007. Through implementation of proposed policies aimed at reducing VMT and GHG, implementation of the Proposed Plan would not introduce any conflicts or obstruct state or local plans for renewable energy or energy efficiency, including the CBC Energy Efficiency Standards, Pavley emission standards, the RPS, and CARB passenger vehicle GHG emission reduction targets under SB 375. (Draft SEIR, p. 3.3-36)</p>
<p>Impact 3.3-3: Development under the Proposed Plan would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Net and per service population emissions under the Proposed Plan would decrease compared to existing conditions (2019) due to the implementation of Proposed Plan policies, compact development patterns, and mixed use development. These development patterns are designed to reduce emissions in accordance with the Sustainable Communities Strategy and are superior to existing conditions. Therefore, the Proposed Plan would be consistent with this target as well as CARB Scoping Plan per capita reduction targets designed to be consistent with SB 32, which are</p>

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			6 metric tons CO2e per capita by 2030 and 2 metric tons CO2e per capita by 2050. As such, operational GHG emissions from full buildout of the Proposed Plan in 2040 would not conflict with the GHG emissions reduction trajectory for 2050 under SB 32 and EO S-3-05. (Draft SEIR, p. 3.3-41)
Impact 3.3-4: The Proposed Plan would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No mitigation necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Proposed Plan policies includes policies supportive of goals established in the City of Santa Rosa Climate Action Plan, SB 375, Plan Bay Area, and 2017 CARB Climate Change Scoping Plan, and would generate GHG emissions consistent with the statewide GHG emissions reduction trajectory goals. Therefore, the Proposed Plan would not conflict with any applicable plans adopted for the purpose of reducing GHG emissions and this impact is considered less than significant. (Draft SEIR, p. 3.3-52)</p>
Chapter 3.4: Hydrology and Water Quality			
Impact 3.4-1: Development under the Proposed Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in	No mitigation necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u></p>

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<p>aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).</p>			<p>Based on a water supply assessment conducted by the City in 2020, the City's existing groundwater supply of 2,300 AFY, in combination with the City's other supplies, is adequate to serve future development under the Proposed Plan under normal, dry year, and multiple dry year conditions. Compliance with the SGMA legislation ensures that the groundwater draws will be carefully managed and sustainably used, and that the Proposed Plan will not substantially deplete groundwater supplies from increased demand.</p> <p>As development/redevelopment occurs within the Planning Area, projects will be required to implement on-site stormwater treatments and hydromodifications which facilitate groundwater recharge. Additionally, new development will be subject to water conservation, stormwater retention, and water quality preservation policies as specified in the General Plan, CalGreen development standards, and on the statewide level. Therefore, compliance with existing federal, State and local programs and regulations and implementation of Best Management Practices would ensure that impacts related to substantial decreases in groundwater supply or substantial interference with groundwater recharge from implementation of the Proposed Plan would be less than significant. (Draft SEIR, p. 3.4-13)</p>
Chapter 3.5: Noise			
Impact 3.5-1: Implementation of the Proposed Plan would not result	No mitigation is necessary.	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub.

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in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.			<p>Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The primary contributor to new exterior noise within the Planning Area would be increased levels of noise from higher levels of traffic. As demonstrated from the traffic noise analysis, while traffic noise along major roadways is projected to increase, none of the projected increases would exceed the 3 DBA significance threshold. As much of these increases in ambient noise level result from higher levels of traffic under the Proposed Plan, adherence to General Plan Policy NS-B-8 would ensure that ambient noise levels do not exceed acceptable levels in areas where development already exists. Additionally, Proposed Plan Policy PSS 4-5 would mitigate any potential noise disturbances associated with Maker Mixed Use District uses by requiring that new noise-generating commercial uses be designed to minimize impacts. Compliance with the Santa Rosa City Code, existing General Plan policies, and Proposed Plan policies would minimize noise impacts from other sources. (Draft SEIR, p. 3.5-20)</p>
Chapter 3.6: Public Facilities			
Impact 3.6-1: Implementation of the Proposed Plan would not result in substantial adverse physical impacts associated with the provision of new or physically	MM-PF-1: The City of Santa Rosa shall update the General Plan to identify potential locations for new neighborhood and community parks as needed to satisfy projected demand and complete	Less than significant	<p><u>Finding:</u> Implementation of Mitigation Measure PF-1 will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds</p>

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altered park facilities, or need for new or physically altered park facilities, construction of which could cause significant environmental impacts.	environmental review within 36 months of adoption of the Santa Rosa Downtown Specific Plan Update.		<p>that changes or alterations have been required in, or incorporated into, the Plan that avoid the significant environmental effect, as identified in the Final SEIR.</p> <p><u>Explanation:</u> Policy PSF-A-3 of the General Plan establishes a standard of 3.5 acres of City parks per thousand residents, traditionally calculated on the basis of neighborhood and community park facilities. The City currently has a city park land ratio of 3.68 acres per thousand residents, which exceeds the established city park land standard. Buildout of the Proposed Plan would increase the demand for parks and recreational facilities. Given the relatively small amount of vacant land within the Planning Area and the relatively higher cost of land acquisition as compared to other parts of the city, much of the additional parkland required to meet the standard in the future would likely be constructed outside of the Planning Area; however, the precise location and design of the new parks facilities has not been determined at this time. Therefore, in order to plan for additional neighborhood and community parks citywide and ensure appropriate environmental review, mitigation measure MM PF-1 is recommended. Implementation of mitigation measure MM PF-1 would reduce this impact to a less than significant level. (Draft SEIR, p. 3.6-10)</p>
Chapter 3.7: Transportation			
Impact 3.7-1: Implementation of the Proposed Plan would not	No mitigation is required.	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub.

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conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.			<p>Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091</p> <p><u>Explanation:</u> Implementation of the Proposed Plan would not conflict with programs, policies, or plans that addressing the transit, roadway, bicycle and pedestrian facilities. The Proposed Plan would, by nature, enhance and support non-auto modes including transit, bicyclists, and pedestrians. The Plan would be consistent with (and includes improvements that would expand upon) the Bicycle & Pedestrian Master Plan Update 2018. The Proposed Plan would also comply with the City's traffic operation policies and includes new roadway network components intended to effectively balance roadway and auto circulation needs with a robust multimodal circulation network. The Proposed Plan is therefore considered to have a less than significant impact as it would not conflict with established programs, policies, or plans addressing the circulation system. (Draft SEIR, p. 3.7-47)</p>
<p>Impact 3.7-2: Implementation of the Proposed Plan would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).</p>	No mitigation is required.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091</p> <p><u>Explanation:</u> The amount of vehicle travel generated by residents within the Planning Area would be more than 15 percent below current citywide levels, and the amount of vehicle travel generated by employees within the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>Planning Area would be more than 15 percent below the countywide average. The total VMT per service population (residents plus employees) within the Planning Area would also be more than 15 percent below the countywide average. The VMT analysis supports the premise that focusing development in a transit-supportive, mixed-use environment such as downtown Santa Rosa reduces the effects of automobile travel on the environment. The Proposed Plan also includes several TDM components that should effectively reduce VMT. (Draft SEIR, p. 3.7-47)</p>
<p>Impact 3.7-3: Implementation of the Proposed Plan would not substantially increase hazards due to a geometric design feature or incompatible uses.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant impact.</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Proposed Plan covers a geographic area that is already predominantly built out, with much of the future development potential occurring through redevelopment of existing developed sites. Vehicular access to projects within the Planning Area would generally take place via existing streets. Where new roads or access points are required, specific access schemes would be determined during project design, and would undergo review for compliance with safety and design standards by the City of Santa Rosa as required. Any new transportation facilities would be designed and constructed to local, regional, and federal standards, and as such, would not be expected to</p>

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			<p>introduce any hazardous design features.</p> <p>The existing City street network within and surrounding the Planning Area has generally been developed over time in compliance with adopted design standards. Based on the circulation analysis, the circulation network is anticipated to perform adequately upon the addition of future traffic, and no impacts associated with geometric design features are anticipated. Based on the results of the queuing analysis, off-ramp queues are projected to remain within the available ramp storage capacities and not extend onto the mainline freeways, and would therefore not create a potential safety hazard. (Draft SEIR, p. 3.7-49)</p>
<p>Impact 3.7-4: Implementation of the Proposed Plan would not result in inadequate emergency access.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant impact.</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Future development under the Proposed Plan would be subject to the requirements contained in the City's Design and Construction Standards, which include requirements for emergency access, and would be reviewed by public safety officials as part of the City's entitlement process. In addition, Santa Rosa City Code Chapter 18-44, Fire Code, requires that roads be maintained to provide adequate space for emergency vehicle access. Roadway improvements included in the Proposed Plan have been oriented to balance the</p>

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			<p>mobility needs of all users, maintaining the flow of traffic at regulated speeds, which in turn generally leads to less severe collisions (when collisions do occur). Roadways within the Planning Area are also oriented in an extensive grid network, providing multiple routes of ingress and egress for both emergency responders and evacuation needs. Finally, as discussed above under Impact 3.7-1, the roadways and intersections within the Planning Area are projected to function effectively as buildout of the Plan occurs. For these reasons, implementation of the Proposed Plan would be expected to result in a less than significant impact with respect to emergency access. (Draft SEIR, p. 3.7-50)</p>
Chapter 3.8: Utilities and Service Systems			
<p>Impact 3.8-1: Implementation of the Proposed Plan would not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, solid waste, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Based on a Utility Assessment conducted by BKF, included in Appendix D of the Draft SEIR, increases in residential and employment densities under the Proposed Plan would be expected to increase sewer flows, stormwater runoff, wastewater flows, solid waste, and demand for natural gas, electrical, and telecommunications facilities. However, the City's current infrastructure serving the Planning Area has capacity to support full buildout of the Plan and this</p>

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			increase in population and jobs would not necessitate improvements in the City's utility infrastructure, including sewer, water, and storm drain services. Construction of new utility infrastructure would be subject to existing General Plan policies and Citywide standards, ensuring that impacts on the environment would be less than significant (Draft SEIR, p. 3.8-31)
Impact 3.8-2: Implementation of the Proposed Plan would have sufficient water supplies available to serve the Plan and reasonably foreseeable future development during normal, dry, and multiple dry years.	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The WSA determined that the City's current and future planned water supplies would be adequate to serve the Planning Area and reasonably foreseeable cumulative development through 2040 under both single-dry year and multiple-dry year conditions, provided that water conservation measures would be implemented in accordance with the City's Shortage Plan should a shortfall occur. If the City were to experience a water shortage or catastrophic supply interruption in the future for any reason, the City will enact more stringent water conservation efforts and/or the appropriate stage of the City's Shortage Plan across the entire service area, including the Planning Area, to manage and meet demands.</p> <p>Development under the Proposed Plan would be subject to State, federal, and local policies pertaining to water conservation, provision, and quality assurance. conservation measures, and encourage</p>

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			exploration of opportunities for water re-use. The Proposed Plan builds on this regulatory framework by promoting the use of rainwater harvesting systems in policy PSS 3-6 and encouraging continued improvement and investment in water and stormwater infrastructure in policies PSS 3-1 and PSS 3-7. Thus, there are sufficient water supplies to support implementation of the Proposed Plan under both normal and dry year conditions. (Draft SEIR, p. 3.8-44)

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