

**CEQA FINDINGS OF FACT FOR THE
SANTA ROSA GENERAL PLAN 2050 AND
SPECIFIC PLAN AMENDMENTS**

**I.
INTRODUCTION**

The City of Santa Rosa (City), as lead agency, prepared an Environmental Impact Report (EIR) for the Santa Rosa General Plan 2050 and Specific Plan amendments, herein referred to together or separately as the “Project.” In its entirety, the Final EIR consists of the October 2024 Draft EIR, the April 2025 Final EIR including the Responses to Comments, Revisions to the Draft EIR, and the Mitigation Monitoring and Reporting Program (MMRP). (State Clearinghouse No. 2023020166).

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

**II.
PROJECT DESCRIPTION**

A. Planning Area

Santa Rosa is approximately 55 miles north of San Francisco, in the south-central part of Sonoma County. The Santa Rosa Planning Area encompasses approximately 31,555 acres (about 49 square miles), and includes the lands within the city limit, the Urban Growth Boundary (UGB), and the Sphere of Influence (SOI). The city limit encompasses approximately 26,500 acres (about 42 square miles). The city limit extends below Mark West Spring Road to the north, is generally bound by agricultural lands to the west, State Parks to the east, and extends to Bellevue Avenue to the south. The UGB covers approximately 29,252 acres (about 45 square miles) and encompasses all incorporated city land plus some unincorporated land expected to be annexed to receive City services at some point in the future. The SOI is approximately 3,677 acres (about 6 square miles) and was approved by Sonoma Local Agency Formation Commission in May 2024.

B. Background and Overview

The existing General Plan was adopted in 2009 and included a horizon year of 2035. While this horizon year is still approximately 10 years away, in the years between 2009 and 2022, Santa Rosa experienced low housing production and increased homelessness, the destruction of housing and displacement of residents by wildfires between 2017 and 2020 (e.g., the Tubbs and Glass fires,) the impact of cannabis business activity on industrial and commercial land, and the annexation of the Roseland community into the city. A number of State and federal laws guiding general plan policies have also been updated during this time. As such, there is a need to take stock of the existing situation and plan for sustainable development in line with a vision. The Santa Rosa General Plan 2050 focuses on meeting current community requirements and future needs. The City determined that the current General Plan 2035 provided a good foundation for General Plan 2050. The current General Plan 2035 included a comprehensive review process, resulting in a broad range of community goals and policies. Many of the

community issues vetted in the current General Plan 2035 are still relevant, well addressed, and do not require major change. Therefore, the approach to the General Plan 2050 is not a comprehensive update, rather, it builds off of the current General Plan 2035 by incorporating the topics that are now required by State mandate and revises relevant policies and programs to meet those requirements. It also incorporates regional forecasts for 2050, thus moving the planning horizon forward by 15 years from the 2035 horizon year of the current General Plan.

The Santa Rosa General Plan 2050 guides the city's economic and physical growth as well as preservation of natural and agricultural resources over an approximately 25-year buildout horizon and replaces the City's existing General Plan, with the exception of the Housing Element. The City's Housing Element (2023 to 2031) was adopted by the City Council in February 2023, certified by the State Housing and Community Development Department on April 7, 2023, and is incorporated into the General Plan 2050 by reference. The Housing Element underwent a separate environmental review as part of its adoption process; however, the residential development that could occur under the Housing Element is incorporated into the residential development analyzed as part of this EIR.

As part of the Project, the City amends the North Station Area Specific Plan (NSASP) and Roseland Area/Sebastopol Road Specific Plan to ensure consistency with the Santa Rosa General Plan 2050. Concurrent with the General Plan 2050, the City is updating its 2012 Community-wide Climate Action Plan (CCAP). The 2024 Community-wide Greenhouse Gas (GHG) Reduction Strategy is an update to and replacement of the CCAP. It is a strategic planning document that provides policies and actions that would help the City and the community at large to reduce GHG emissions and improve community resilience to hazardous conditions associated with climate change.

C. Project Objectives

Implementation of the Project is guided by the Santa Rosa Vision as a diverse, equitable, and sustainable community built on civic engagement that empowers everyone to provide and support equal and affordable opportunities to obtain housing, education, and jobs; to enjoy vibrant cultural events and arts; and to live healthy lives in resilient neighborhoods that adapt to social and environmental change. The primary purpose of the Project is to plan for the growth and conservation of Santa Rosa over an approximately 25-year time horizon while achieving the vision. The Project objectives to realize the Santa Rosa Vision are related specifically to growth in the 21 Areas of Change, the majority of which capitalize on infill opportunities in and around Priority Development Areas (PDAs) and Transit-Oriented Communities (TOCs). Development of infill sites near transit makes the most of existing infrastructure and allows for the streamlining of future development in a manner that is consistent with the Santa Rosa General Plan 2050. Meeting the vision also includes making major improvements to the transportation network, which focus on bridging east and west and enhancing multimodal connectivity and safety citywide. Achieving the vision also entails creating complete streets and complete neighborhoods to activate the Areas of Change. This requires extending the buildout horizon to year 2050 and updating goals, policies, and actions so that they meet current State requirements and community priorities. As part of this process, the City has identified the following attributes and objectives, which build on the framework of the Santa Rosa Vision and reflect the community's desires for the future of Santa Rosa and will serve as the Project objectives for the Draft EIR.

1. Realize Santa Rosa's Vision as a diverse, equitable, and sustainable community built on civic engagement that empowers everyone to provide and support equal and affordable opportunities to obtain housing, education and jobs; to enjoy vibrant cultural events and arts; and to live healthy lives

in resilient neighborhoods that adapt to social and environmental change. The full Santa Rosa Vision, with all 13 ideals, is as follows and as depicted on the image.

- **Just:** Social and environmental justice are achieved for everyone—all abilities, ages, ethnicities, gender identities, immigration status, income levels, language speakers, races, religions, and sexual orientations and identities—EVERYONE.
- **Sustainable:** Natural resources are restored, protected, and expanded to provide accessible green space for everyone in all neighborhoods, mitigate drought, and minimize greenhouse gas emissions.
- **Inclusive:** Everyone is welcome and actively encouraged to join in neighborhood and citywide decision making, and barriers to participation are identified and eliminated.
- **Healthy:** All neighborhoods have low pollution level and good air quality, are vibrant, connected, full-service communities, with the resources to be civically organized, and anchored by inclusive and accessible public outdoor spaces and buildings offering safe and welcoming places for everyone. Every person has the opportunity to attain their full health potential.
- **Resilient:** All facets of the community, including housing, infrastructure, and social services are sustainable and resilient to hazards and economic changes.
- **Prepared:** The health and safety of everyone is supported by neighborhood, City, and county-wide efforts to prepare for natural and human-caused hazards, and roadways are optimized to support efficient evacuations.
- **Sheltered:** A diverse mix of high-quality, safe, thoughtfully designed, efficiently planned, and well-served housing at all affordability levels is available throughout the community to accommodate everyone, including formerly homeless, immigrants, local workers, multigenerational households, seniors, students, and formerly incarcerated people.
- **Equitable:** Everyone has what they need to enjoy long, fulfilling, healthy lives, including affordable access to meet their daily needs—including healthy food, recreation, education, childcare, employment opportunities, reliable internet, and physical and mental health services.
- **Successful:** Top employers gravitate; Black-, Latino/Latina-, and other minority-owned businesses are in all corners of the community; equitable investments are made in all neighborhoods; local shops, food and beverage establishments and food trucks, and entertainment spaces support a vibrant city; and meaningful work in a thriving economy is available for people of all ages and backgrounds.
- **Connected:** High-quality, reliable, and safe transit service, bicycle and pedestrian facilities, and other forms of mobility connect all ages across the city and region at all times and support healthy lifestyles, clean air, equity, and resilience.
- **Safe:** Streets are safe; public safety services are provided by caring and thoughtful community members who are representative of and familiar with the neighborhoods, groups, and individuals they serve; and everyone, including immigrants and people of color, can safely access these services.



- **Educated:** Life-long education, enrichment, and supportive services and resources engage and empower young people, strengthen families (of any family structure), connect and activate seniors, and foster the success and well-being of everyone.
 - **Cultural:** Art, cultural resources, and activities, historic assets, and live music thrive in every neighborhood, are accessible to everyone, and work to celebrate our diverse community, bring people from all areas of the city together, and support the local economy.
2. Ensure compliance with changes in State Law, including but not limited to, developing an Environmental Justice element, and a Safety Element that is correlated with the requirements of the Local Hazard Mitigation Plan.
 3. Develop a plan that accommodates a level of growth that could reasonably occur over the next 2.5 decades, and that plans for both growth and conservation.
 4. Create a city with an increasingly dense urban core. Streamline future development by focusing on infill sites near transit to make the most of existing infrastructure. Ensure strong connections between land use, transportation, utilities, and other infrastructure.
 5. Focus development in the 21 Areas of Change, the majority of which capitalize on infill opportunities in and around Priority Development Areas and Transit Priority Areas. Activate Areas of Change by developing complete neighborhoods that are walkable/bikeable and increasingly protected from environmental hazards.
 6. Provide a range of housing types to meet the needs of all Santa Rosa residents, including multi-family structures, “missing middle” units (such as duplex, triplex, cottage court, multiplex and live/work), and single-family residences with accessory dwelling units, within neighborhoods that are increasingly walkable/bikeable.
 7. Create a cross-sector approach to integrating greenhouse gas reduction into all parts of the general plan, so that implementing the plan supports the City in reaching its climate mandates.
 8. Create new opportunities for a vital, thriving downtown and entertainment district.
 9. Preserve community character and environmental, historic, and cultural resources, as the city develops and becomes denser. Creatively blend old and new development to create a cohesive urban fabric and public realm.

D. Discretionary Approvals

Approval of the Santa Rosa General Plan 2050, and Specific Plan amendments, requires the City, as lead agency, as well as certain "responsible agencies," to take discrete planning and regulatory actions to approve the Project. Described below are the discretionary actions necessary to fully carry out the Project. In addition to certifying the Final EIR and adopting these Findings and the associated Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program (MMRP), the City itself must take the following actions:

The Project would require the following approvals and ministerial actions by the City of Santa Rosa:

- Planning Commission
 - Recommendation to certify the EIR pursuant to CEQA
 - Recommendation to adopt the Santa Rosa General Plan 2050, including the GHG Reduction Strategy and approve associated Specific Plan amendments
 - Future recommendation to adopt SRCC amendments that implement the General Plan 2050
- City Council
 - Certification of the EIR pursuant to CEQA
 - Adoption of the Santa Rosa General Plan 2050, associated Specific Plan amendments, and GHG Reduction Strategy
 - Future adoption of SRCC amendments that implement the General Plan 2050
- Design Review Preservation Board Commission
 - Review and comment on programs or other actions that implement the Santa Rosa General Plan 2050

Future activity that could occur following certification of the EIR 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 Project.

Responsible and Trustee Agencies

State law requires that all EIRs 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 Project. A Trustee Agency is defined in CEQA Guidelines Section 15386 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 Project would require subsequent actions or consultation from Responsible or Trustee Agencies.

- California Department of Transportation (Caltrans)
- California Department of Fish and Wildlife (CDFW)
- Native American Heritage Commission California Geologic Survey
- 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)
- Bay Area Air District (Air District)
- North Coast Regional Water Quality Control Board (RWQCB)

III. ENVIRONMENTAL REVIEW PROCESS

Pursuant to CEQA Section 21080(d) and CEQA Guidelines Section 15063, the City determined that the Project could result in potentially significant environmental impacts and that a program EIR would be required. In compliance with CEQA Section 21080.4, the City circulated a Notice of Preparation (NOP) of an EIR for the Project to the Office of Land Use and Climate Innovation (LCI) State Clearinghouse and interested agencies and persons on February 7, 2023, for a 30-day review period. A public Scoping Meeting was held virtually on Monday, February 27, 2023, at 5:30 p.m. The NOP and scoping process solicited comments from responsible and trustee agencies, as well as interested parties regarding the scope of the environmental analysis to be conducted in the Draft EIR. Appendix A, *Notice of Preparation and Scoping Comments*, of the Draft EIR contains the NOP as well as the comments received by the City in response to the NOP.

The Draft EIR includes an analysis of the following environmental topic areas:

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|-----------------------------------|--|
| • Aesthetics | • Hydrology and Water Quality |
| • Agricultural Resources | • Land Use and Planning |
| • Air Quality | • Noise |
| • Biological Resources | • Population and Housing |
| • Cultural Resources | • Public Services, Parks, and Recreation |
| • Energy | • Transportation |
| • Geology and Soils | • Tribal Cultural Resources |
| • Greenhouse Gas Emissions | • Utilities and Service Systems |
| • Hazards and Hazardous Materials | • Wildfire |

The Draft EIR also identified topical areas and specific issues within some of the above topical areas that were determined not to be significant. An explanation of why each is determined not to be significant is provided in Chapter 6 of the Draft EIR. These topical areas and issues are as follows:

- Agricultural Resources (Forestry Resources)
- Mineral Resources

The City published the Notice of Availability (NOA) and the Draft EIR (State Clearinghouse No. 2023020166) for public and agency review on October 7, 2024. A public review period of 45 days was provided for the Draft EIR, which ended on November 20, 2024, satisfying the public review period requirement as set forth in CEQA Guidelines Section 15105. A public hearing before the Planning Commission was held on Thursday, November 14, 2024, at 5:30 p.m. Following the closing of the public review period, staff and the consultant team prepared responses to comments, as set forth in the Final EIR.

The Final EIR was issued for public review on April 13, 2025. The Final EIR was also submitted to the State Clearinghouse and posted on the State Clearinghouse's CEQAnet on April 14, 2025. In accordance with CEQA Guidelines Section 15088, the Final EIR provided responses to all comments received by the City of Santa Rosa on the Draft EIR.

On April 24, 2025, the Planning Commission held a public hearing to consider the Project and associated EIR and recommended that the City Council certify the Final EIR for the General Plan 2050

and adopt the CEQA Findings of Fact, Mitigation Monitoring and Reporting Program (MMRP), and Statement of Overriding Considerations, and adopt the General Plan 2050 and Specific Plan amendments.

On June 3, 2025, the City Council will hold a public hearing to consider the General Plan 2050 and Specific Plan amendments and associated EIR, CEQA Findings of Fact, Statement of Overriding Considerations, and MMRP.

IV. RECORD OF PROCEEDINGS

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

- The NOP and all other public notices issued by the City in conjunction with the Project;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- The Draft EIR for the Project and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Draft EIR;
- The Final EIR for the Project, including comments received on the Draft EIR and responses to those comments, and all appendices;
- Documents cited or referenced in the Draft EIR and Final EIR;
- The MMRP for the Project;
- All findings and resolutions adopted by the City Council in connection with the Project and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project 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 Project;
- All documents submitted to the City by other public agencies or members of the public in connection with the Project, up through the close of the City Council public hearing on June 3, 2025;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the Project;
- 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 North Station Area Specific Plan and Roseland Area/Sebastopol Road Specific Plan and all environmental documents prepared in connection with the adoptions of the Specific Plans;
- 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 Project, 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(e).

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

The City Council has relied on all of the documents listed above in reaching its decisions on the Project, even if not every document was formally presented to the City Council or City Staff as part of the City files generated in connection with the Project. Without exception, any documents set forth above not found in the Project files fall into one of two categories. Many of them reflect prior planning or legislative decisions of which the City Council was aware in approving the Project (see *City of Santa Cruz v. Local Agency Formation Commission* (1978) 76 Cal.App.3d 381, 391-391; *Dominey v. Department of Personnel Administration* (1988) 205 Cal.App.3d 729, 738, fn. 6). Other documents influenced the expert advice provided to City Staff or consultants, who then provided advice to the City Council as final decision makers. For that reason, such documents form part of the underlying factual basis for the City Council's decisions relating to approval of the Project (see Public Resources Code Section 21167.6(e)(10); *Browning-Ferris Industries v. City Council of City of San Jose* (1986) 181 Cal.App.3d 852, 866; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155).

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 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 are required. For each significant environmental effect identified in an EIR for a project, 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 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 mitigation measures or project alternatives identified in the EIR infeasible (CEQA Guidelines Section 15091).

"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 MMRP (Exhibit C) and Table A attached 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(s) 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 Sections 15091(a) and 15091(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 Sections 15093 and 15043(b); see also Public Resources Code Section 21081(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 EIR concluded that implementation of the Project would result in significant and unavoidable impacts pertaining to agricultural resources, air quality, noise, transportation, and wildfire at the program level. Therefore, a Statement of Overriding Considerations is required when

the project is considered by the City Council. The City of Santa Rosa's Statement of Overriding Considerations for the project is included in Exhibit B.

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 Project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the EIR 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 Project.

VII.

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) (Exhibit C) has been prepared for the Project and is being approved by the same Resolution that has adopted these findings. The City will use the MMRP to track compliance with the Santa Rosa General Plan 2050 policies and actions that have been identified in the EIR as mitigation measures pursuant to PRC Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2) which establish that when a project examined in an EIR is a plan (such as a General Plan), policy, regulation, or other public project, mitigation measures may be incorporated into the plan, policy, regulation, or project design. The MMRP will remain available for public review during the compliance period. The final MMRP is attached to and incorporated into the environmental document approval resolution and is approved in conjunction with certification of the EIR and adoption of these Findings of Fact.

VIII.

SIGNIFICANT EFFECTS AND MITIGATION

The Draft EIR identified a number of significant and potentially significant environmental effects (or impacts) that the Project will cause or to which it will contribute. Most of these significant effects can be fully avoided through the adoption of the mitigating Santa Rosa General Plan 2050 policies and actions. Other effects, however, cannot be avoided by the adoption of feasible mitigation measures or alternatives, and thus will be significant and unavoidable at the program level. For reasons set forth in the Statement of Overriding Considerations, (Exhibit B), the City has determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the Project.

The City's findings with respect to the Project's significant effects and mitigating General Plan 2050 policies and actions are set forth in "Table A" attached to these findings. The findings set forth in Table A are hereby incorporated by reference.

Table A does not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, the Table provides a summary description of each impact, describes the applicable mitigating Santa Rosa General Plan 2050 policies and actions identified in the EIR and adopted by the City Council, and states the City's findings on the significance of each impact after imposition of the adopted mitigating General Plan 2050 policies and actions. A full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the

discussion and analysis in those documents supporting the EIR's determinations regarding the Project's impacts and mitigating General Plan 2050 policies and actions designed to address those impacts. In addition, the Planning Commission and City Council Staff Reports for certification or recommendation on certification of the EIR and approval or recommendation on approval of the Project, and City Council Resolution No. _____ and Planning Commission Resolution No. _____ include discussions supporting the EIR'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 EIR and Final EIR, the Planning Commission and City Council Staff Reports for certification of the EIR and approval of the Project, and Resolution No. _____ and Planning Commission Resolution No. _____ and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the EIR, the Planning Commission and City Council Staff Reports for certification of the EIR and approval of the Project, and Resolution No. _____ and Planning Commission Resolution No. _____ relating to environmental impacts and mitigating Santa Rosa General Plan 2050 policies and actions, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

In considering specific recommendations from commenters, the City has been cognizant of its legal obligation under CEQA to substantially lessen or avoid significant environmental effects to the extent feasible. The City recognizes, moreover, that comments frequently offer thoughtful suggestions regarding how a commenter believes that a particular mitigating Santa Rosa General Plan 2050 policy or action can be modified, or perhaps changed significantly, in order to more effectively, in the commenter's eyes, reduce the severity of environmental effects. The City is also cognizant, however, that the mitigating General Plan 2050 policies and actions identified in the EIR represent the professional judgment and experience of the City's expert staff and environmental consultants. Thus, in considering commenters' suggested changes or additions to the mitigating General Plan 2050 policies and actions as set forth in the EIR, the City, in determining whether to accept such suggestions, either in whole or in part, has considered the following factors, among others: (i) whether the suggestion relates to a significant and unavoidable environmental effect of the Project, or instead relates to an effect that can already be mitigated to less than significant levels by mitigating General Plan 2050 policies and actions in the Draft EIR; (ii) whether the proposed language represents a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; (iii) whether the proposed language is sufficiently clear as to be easily understood by those who will implement the mitigation as finally adopted; (iv) whether the language might be too inflexible to allow for pragmatic implementation; (v) whether the suggestions are feasible from an economic, technical, legal, or other standpoint; and (vi) whether the proposed language is consistent with the Project's objectives.

As is often evident from the specific responses given to specific suggestions, City staff and consultants carefully considered and weighed the comments submitted to the City. In some instances, the City developed alternative language addressing the same issue that was of concern to a commenter. In no instance, however, did the City fail to take seriously a suggestion made by a commenter or fail to appreciate the sincere effort that went into the formulation of suggestions.

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 Santa Rosa General Plan 2050 is a policy document that plans ahead to accommodate the amount of reasonably foreseeable growth given past growth trends and the ability of existing services and infrastructure to support future growth. Therefore, General Plan 2050 would not directly induce growth, but rather is a response to growth that is likely to occur whether the Project is adopted or not. Because the General Plan 2050 also includes recommendations for future roadway and infrastructure extension, as it is required to do by state law, it has the potential to indirectly induce growth. However, the General Plan 2050 itself is the City’s effort to adequately plan for this growth. Additionally, this additional growth would likely occur incrementally over a period of approximately 25 years and a policy framework is in place to ensure adequate planning occurs to accommodate it regardless of the development timeline.

While the Santa Rosa General Plan 2050 does not propose any specific development, implementation of the Project would induce growth by increasing the development potential in the Planning Area. State law requires the City to promote the production of housing to meet its fair share of the regional housing needs distribution made by the Association of Bay Area Governments. While the City provides adequate sites to meet its fair-share housing obligations, the additional housing capacity provided by the Project would meet the additional demand generated by new job growth. In addition, the Project would result in regional benefits by promoting growth that encourages less automobile dependence, which could have associated air quality and greenhouse gas (GHG) benefits. Encouraging infill growth in designated areas would help to reduce development pressures on lands outside the City Limits.

The Project could also be considered to indirectly induce growth because it includes policies and actions that encourage new growth in the urbanized areas of Santa Rosa. Development in these areas would consist of infill development on underutilized sites, sites that have been previously developed, are vacant, and have been determined to be suitable for development. However, infrastructure is largely in place, and growth would be required to comply with the City’s General Plan, zoning regulations, and standards for public services and utilities; secondary effects associated with this growth do not represent a new significant environmental impact that has not already been addressed in the EIR. Additional population and employment growth would be consistent with the regional planning objectives established for the Sonoma County region.

X.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guideline Section 15126(c) requires an EIR to discuss significant irreversible environmental changes which would be involved if the Project is implemented. Implementation of the Project could result in the long-term commitment of various resources to urban development.

While the Project itself would not directly entitle or result in any new development, it is reasonably foreseeable that the Santa Rosa General Plan 2050, which acts as a blueprint for growth and development in the Planning Area over the next 25 years, could result in significant irreversible impacts related to changes in land that commit future generations. While most potential future development under the Project would occur on land that is generally urbanized or on infill sites and sites in developed areas that are underutilized, some potential future development may occur on vacant non-urban sites that are already designated for development. Once future development under the Project occurs, it would not be

feasible to return the developed land to its existing (pre-project) condition. Therefore, there is potential that some of the development allowed under the Project would lead to irreversible changes in land use.

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities; however, compliance with the applicable regulations and Santa Rosa General Plan 2050 goals, policies, and actions would ensure these impacts would be less than significant. Therefore, irreversible damage is not expected to result from the adoption and implementation of the Project.

Future development under the Project would result in the commitment of limited, renewable resources and nonrenewable resources, and also represents a long-term commitment to the consumption of fossil fuels and increased energy demands. However, several regulatory measures and Santa Rosa General Plan 2050 goals, policies, and actions encourage energy and water conservation, alternative energy use, waste reduction, alternatives to automotive transportation, and green building. Compliance with applicable standards and regulations and implementation of General Plan 2050 goals, policies, and actions would reduce the use of nonrenewable resources to the maximum extent practicable; therefore, the Project would not represent a large commitment of nonrenewable resources in comparison to a business-as-usual situation.

XI. PROJECT ALTERNATIVES

A. Basis for Alternatives-Feasibility Analysis

1. Significant, Unavoidable Impacts of the Project

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 project. (California Public Resources Code Section 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)).

Most of the potential environmental impacts associated with adoption and implementation of the Project were found to be either less than significant without mitigation or less than significant with mitigation, with the exception of impacts associated with agricultural resources, air quality, noise, transportation, and wildfire, which were found to be significant and unavoidable at the program level.

2. Scope of Necessary Findings and Considerations for Project 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 also consider the feasibility of each alternative. Under CEQA, "[f]easible 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 Section 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 project'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 Project, the Project objectives were considered. The Project objectives to realize the Santa Rosa Vision are related specifically to growth in the 21 Areas of Change, the majority of which capitalize on infill opportunities in and around PDAs and TOCs. Development of infill sites near transit makes the most of existing infrastructure and allows for the streamlining of future development in a manner that is consistent with the Santa Rosa General Plan 2050. Meeting the vision also includes making major improvements to the transportation network, which focus on bridging east and west and enhancing multimodal connectivity and safety citywide. Achieving the vision also entails creating complete streets and complete neighborhoods to activate the Areas of Change. Further, it includes creating a cross-sector approach to integrating GHG reduction into all parts of the general plan; creating new opportunities for a vital thriving downtown and entertainment district; preserving community character and environmental, historic and cultural resources as the city develops and becomes denser; and creatively blending old and new development to create a cohesive urban fabric and public realm. A complete list of Project objectives is provided in Chapter 3 of the Draft EIR and in Section II.C of these findings.

Under CEQA Guidelines Section 15126.6, 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 EIR evaluated two Project alternatives in accordance with the parameters set forth by CEQA Guidelines Section 15126.6. In addition, two other alternatives were initially considered but ultimately rejected from further consideration. All alternatives were initially evaluated on their ability to meet Project objectives, feasibility, and whether they would avoid or substantially reduce the Project's significant environmental impacts. Based on this initial evaluation, the No Project Alternative and the Increased Density Alternative were identified as warranting detailed analysis, while the Reduced Housing Alternative and the Increased Planning Area Alternative were rejected because they were infeasible, would not avoid or substantially reduce the Project's significant environmental impacts, and did not meet the most basic Project objectives.

Based on the requirements of CEQA Guidelines Section 15126.6, the Project objectives, and the rejection initially considered alternatives for the above reasons, the following alternatives to the Project were identified:

- No Project Alternative
- Increased Density Alternative

The City Council finds that the range of alternatives studied in the EIR reflects a reasonable attempt to identify and evaluate various types of alternatives that potentially would reduce the Project's environmental effects, while accomplishing most, but not all, of the Project'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 Project could reduce environmental impacts and the corresponding degree to which the alternatives would hinder the City's ability to achieve the Project objectives.

B. Analysis of Project Alternatives

The purpose of a discussion of alternatives to a project in an EIR is to provide a reasonable range of potentially feasible alternatives that are capable of avoiding or substantially lessening any significant environmental effect of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be costlier. The range of alternatives describes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. CEQA Guidelines Section 15126.6 provides that an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. “The discussion of alternatives is subject to a construction of reasonableness” (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App.3d 274). A feasible alternative is an alternative capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. A feasible alternative is also one that accomplishes the project’s “underlying fundamental purpose.”

The EIR satisfies the requirements of CEQA by providing a reasonable range of alternatives, each of which is intended to address the means by which the unavoidable adverse impacts of the Project can be lessened. Determining the feasibility of Project Alternatives involves a reasonable balancing of various economic, environmental, social, and technological factors (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417). The City Council has carefully conducted a reasonable balancing of those factors in determining the feasibility of alternatives to the Project. After conducting a thorough and careful determination, the City Council finds that the No Project Alternative and Increased Density Alternative are not feasible for the reasons stated herein, and each of them independently of the other.

1. No Project Alternative

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the No Project Alternative will be the continuation of the existing plan. Pursuant to CEQA Guidelines Section 15126.6(e)(3)(C), the City of Santa Rosa, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.

a. Description

Under the No Project Alternative, potential future development in Santa Rosa would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing Santa Rosa General Plan 2035. The No Project Alternative would not implement the amendments to the North Station Area Specific Plan, Roseland Area and Sebastopol Road Specific Plan, or SRCC implementation measures associated with the Santa Rosa General Plan 2050 and Land Use Map. The No Project Alternative would also not adopt the GHG Reduction Strategy to serve as the strategic plan for how the City will reduce GHG emissions and foster a sustainable community through 2050 and beyond.

The existing Santa Rosa General Plan was adopted in 2009 and included a horizon year of 2035. A number of State and federal laws guiding general plan policies have also been updated during this time. Many of the community issues vetted in the General Plan 2035 are still relevant, well addressed, and do not require major changes. However, the No Project Alternative would not incorporate new topics that are now required by State law, such as environmental justice, and would not revise relevant policies and actions to meet those requirements.

Implementation of the No Project Alternative assumes that development growth throughout the city would remain unchanged until the buildout horizon year 2050, which is consistent with other regional plans, including Plan Bay Area 2050. Future development permitted under the No Project Alternative would not increase development potential in Santa Rosa beyond what was considered in the existing Santa Rosa General Plan 2035 and analyzed in the associated EIR (State Clearinghouse No. 2008092114) but rather assumes the remaining development growth would occur through 2050. No General Plan land use designations changes or zoning amendments would be required to accommodate these uses.

The No Project Alternative was projected to result in approximately 17,270 new residents and 3,996 new housing units. These projections result in 48,490 fewer residents and 20,094 fewer housing units compared to the Project.

b. Analysis of the No Project Alternative's Ability to Reduce Significant Unavoidable Project Impacts

While the existing conditions would not 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 greater than those of the Project. The No Project Alternative would have equivalent impacts compared to the Project related to aesthetics and lessened impacts related to agricultural resources, public services, parks, and recreation, and utilities and service systems. However, because No Project Alternative would not realize the new or modified Santa Rosa General Plan 2050 goals, policies, or actions, including a focus on city-centered growth in Planned Development Areas, Transit Oriented Communities, and Areas of Change, that were prepared as part of the Project to mitigate environmental impacts, this alternative would result in greater impacts related to biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, tribal cultural resources, and wildfire when compared to the Project. The Greenhouse Gas Reduction Strategy, which sets forth actions, including many that are integrated into the General Plan to reduce GHGs to meet State mandates, would not be implemented, resulting in greater impacts related to transportation, air quality, and GHG emissions.

c. Analysis of the No Project Alternative's Ability to Meet the Project Objectives

Under the No Project Alternative, the Project would not be implemented and therefore, this alternative does not meet any of the Project objectives: The No Project Alternative does not implement the vision of the Project; it does not ensure compliance with changes in State law; it does not focus on creating a city with an increasingly dense urban core; it does not focus on development within Areas of Change (AOC) to create walkable neighborhoods (complete neighborhoods) in Santa Rosa with access to daily services and transportation; it does not focus on creating a broader range of housing types, including Missing Middle Housing, to meet Santa Rosa's housing needs; it does not integrate reducing GHG emissions into Plan implementation to meet State GHG reduction mandates; it does not create

opportunities for a thriving downtown; and it does not creatively blend old and new development for a cohesive urban fabric and public realm.

d. Feasibility of the No Project Alternative

The No Project Alternative is not feasible because it would not meet the objectives of the project: it would not support the city in realizing its vision as a diverse, equitable and sustainable community; it would not meet recent legal requirements including, but not limited to, the requirement to prepare an Environmental Justice element; it would not provide the same benefits as the Project, in terms of guiding development towards Transit-Oriented Communities (TOCs), Priority Development Areas (PDAs) and Areas of Change (AOC); it would not achieve comparable reductions in Vehicle Miles Traveled (VMT) over the life of the plan because of the lack of focus on city-centered growth; it would not support the city in creating complete communities in Areas of Change; it would not promote greater resilience in relation to threats including wildfire, extreme heat, earthquakes, floods, and other environmental hazards; it would not result in updated information and mapping that guides development to the most suitable areas of the City and requires site specific studies and mitigation in areas that pose greater environmental risk; and it would not result in the implementation of the Communitywide Greenhouse Gas Reduction Strategy that provides a guide for the city to meet State mandates of GHG reductions of 40 percent below 1990 levels by 2030, and reductions of 85 percent below 1990 levels and carbon neutrality by 2045. As a result, it is a less desirable alternative that would be subject to legal challenge, and is not feasible

2. Increased Density Alternative

The specific purpose of this alternative is to reduce the significant and unavoidable impacts associated with transportation. The vehicle miles traveled (VMT) modeling results indicate that the Project's residential uses would be above the standard of significance that is used to measure residential VMT per capita.

a. Description

The Increased Density Alternative assumes the existing Santa Rosa General Plan 2035 would be updated as well as the associated amendments to the North Station Area Specific Plan, the Roseland Area/Sebastopol Road Specific Plan, and SRCC implementation measures associated with the General Plan 2050 and Land Use Map. Accordingly, the Increased Density Alternative, like the Project, would focus future commercial and residential growth in PDAs and/or TPAs and in the Areas of Change that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities. The Increased Density Alternative assumes the same number of households, residential units, population, and jobs as under the Project, but would allow for more opportunity for dense housing connected to transit facilities. By allowing more dense housing development in areas that can meet community needs, the Increased Density Alternative would accommodate the same amount of growth as the Project, but in a smaller footprint, and promote active and public transportation to reduce VMT.

The Increased Density Alternative presumes the same General Plan land use designations as the Project, except that the parcels designated as Medium Low density residential (8.0-13.0 units per gross acre) in Areas of Change that are in or adjacent to PDAs and/or TPAs would be redesignated to Medium High density residential (18.0-30.0 units per gross acre). Out of these 11 Areas of Change that are within or directly adjacent to a PDA and/or TPA, there are three that have parcels with Medium Low density land use designations. These are the Marlow Center and Lance Drive Annexation (#4), Downtown Station

Area (#7), and Hearn Corridor (#17) Areas of Change (see Figure 3-7 in the Draft EIR). While potential future development under the Increased Density Alternative could occur throughout the 21 Areas of Change, under this alternative, the parcels in these three Areas of Change with a Medium Low density land use designation would be changed to Medium High density land use designation to allow for more opportunities for the development of more dense housing than what is allowed under the Project. However, if a parcel has a Medium Low density land use designation and is within a Historic District, that parcel would not be redesignated to ensure the potential impacts to historic resources would not be greater in the Increased Density Alternative when compared to the Project.

The alternatives analysis assumes that the Santa Rosa General Plan 2050 goals, policies, and actions would apply to the Increased Density Alternative, including the mitigating policies and actions.

b. Analysis of the Increased Density Alternative's Ability to Reduce Significant Unavoidable Project Impacts

Under the Increased Density Alternative, the overall impacts related to the majority of environmental topic areas would be similar to or less than those of the Project and this alternative would successfully reduce significant and unavoidable impacts of the Project. Compared to the Project, the Increased Density Alternative would have equivalent impacts related to aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, parks, and recreation, and utilities and service systems. Impacts related to agricultural resources, air quality, biological resources, energy, GHG emissions, noise, transportation, tribal cultural resources, and wildfire would be lessened when compared to the Project, but would remain significant and unavoidable. However, the Increased Density Alternative would have greater impacts related to cultural resources due to increased development in and near Preservation Districts compared to the Project.

c. Analysis of the Increased Density Alternative's Ability to Meet the Project Objectives

Because the Increased Density Alternative would increase opportunities for infill development to support the reduction of VMT and GHG emissions and reduce the amount of qualifying agricultural lands that could be converted to non-agricultural uses, it would generally meet the Project objectives but not to the same degree as the Project.

For example, because the Increased Density Alternative would eliminate any Medium Low density residential in the Marlow Center and Lance Drive Annexation (#4), Downtown Station Area (#7), and Hearn Corridor (#17) Areas of Change, it would not provide the same range of housing types to meet the needs of all Santa Rosa residents as the Project. The additional housing opportunities in these three Areas of Change would have the potential to put more housing where there are known, but mitigable, environmental hazards when compared to the Project. Also, because these Areas of Change have older buildings, there is a greater potential for sites to be identified as historic buildings and districts over the 2050 buildout horizon, and therefore, the Increased Density Alternative would have greater potential to adversely affect historic and cultural resources as the city develops and becomes denser, at the same level as the Project. As a result, this Alternative would not meet the objective of preserving community character and environmental, historic, and cultural resources as the city develops and becomes denser. It would not creatively blend old and new development to create a cohesive urban fabric and public realm. The Increased Density Alternative would also not meet the objective of creating complete neighborhoods in Areas of Change throughout the City and would therefore not meet the objective of creating a range of

neighborhoods that are increasingly walkable/bikeable with access to daily services. Therefore, although the Increased Density Alternative would further some of the objectives of the Project, it would do so less than the Project.

d. Feasibility of the Increased Density Alternative

The Increased Density Alternative would reduce housing types, introduce more housing where there are mitigable environmental hazards, and would result in more conflicts in Preservation Districts with the preservation of historic and cultural resources when compared to the Project. It would focus development in Areas of Change near the City's downtown but would not result in the creation of complete neighborhoods in Areas of Change throughout the City, which is a key objective of the Proposed Project. The Increased Density Alternative would also not preserve community character and environmental, historic, and cultural resources to the same degree as the proposed project, as the City develops and becomes denser. The Increased Density Alternative would not afford the same opportunity to creatively blend old and new development to create a cohesive urban fabric and public realm. Therefore, the Increased Density Alternative would not meet the Project objectives to the same extent as the Project, and therefore is considered less desirable than the proposed Project in light of the community preferences stated during the robust public outreach process. Community members strongly favored a hybrid plan that included a focus on city-centered growth, along with investment in neighborhoods to create complete neighborhoods. The Increased Density Alternative would not meet these key objectives of the Plan and is therefore not a feasible alternative.

3. Environmentally Superior Analysis

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

TABLE 1 IMPACT COMPARISON OF THE PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC

Environmental Topic	Impact Conclusion of the Project ^a	Impact Conclusion Compared to the Project	
		No Project	Increased Density
Aesthetics	LTS	=	=
Agricultural Resources	SU	<	<
Air Quality	SU	>	<
Biological Resources	LTS/M	>	<
Cultural Resources	LTS/M	>	>
Energy	LTS	>	<
Geology and Soils	LTS/M	>	=
Greenhouse Gas Emissions	LTS	>	<
Hazards and Hazardous Materials	LTS/M	>	=
Hydrology and Water Quality	LTS/M	>	=
Land Use and Planning	LTS	>	=
Noise	SU	>	<
Population and Housing	LTS	>	=
Public Services, Parks, and Recreation	LTS	<	=
Transportation	SU	>	<
Tribal Cultural Resources	LTS/M	>	<
Utilities and Service Systems	LTS	<	=

TABLE 1 IMPACT COMPARISON OF THE PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC

Environmental Topic	Impact Conclusion of the Project ^a	Impact Conclusion Compared to the Project	
		No Project	Increased Density
Wildfire	SU	>	<
Note:			
a. The impact conclusions in this column represent the highest significance determination for each respective standard of significance.			
LTS	Less Than Significant	<	Less impact in comparison to the Project
LTS/M	Less Than Significant with Mitigation	=	Similar impact in comparison to the Project
SU	Significant and Unavoidable	>	Greater impact in comparison to the Project

The table below summarizes the qualitative environmental effects of standards that have been identified to result in significant and unavoidable impacts for each alternative in relation to the Project.

TABLE 2 COMPARISON OF SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC AND STANDARD OF SIGNIFICANCE

Environmental Topic	Impact Statement	Project	No Project	Increased Density
Agricultural Resources	Impact AG-1: Implementation of the Project could result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland land (together referred to as “CEQA Important Farmland”) to non-agricultural land uses.	SU	<	<
	Impact AG-2: Implementation of the Project could result in the loss of agricultural land under the Williamson Act.	SU	<	<
	Impact AG-4: The Project, in combination with past, present, and reasonably foreseeable projects, could result in a significant cumulative impact with respect to the conversion of CEQA Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and Williamson Act properties to non-agricultural uses.	SU	<	<
Air Quality	Impact AIR-2b: Buildout of the Project could generate operational emissions that could exceed the Bay Area Air District’s (Air District) regional significance thresholds for reactive organic compounds (ROG), nitrogen oxides (NO _x) and particulate matter (PM _{2.5} and PM ₁₀).	SU	>	<
	Impact AIR-3b: Large industrial or warehouse development projects under the Project could expose air quality-sensitive receptors to substantial toxic air contaminants (TAC) and particulate matter (PM _{2.5}) concentrations and exceed the Bay Area Air District’s (Air District) project-level and cumulative significance thresholds.	SU	>	<
	Impact AIR-5: The Project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative air quality impacts with respect to generation of criteria pollutant and exposure of substantial pollutant concentrations to sensitive receptors.	SU	>	<
Noise	Impact NOI-1a: Construction activities associated with potential future development could expose sensitive receptors to excessive noise from construction equipment.	SU	>	<

TABLE 2 COMPARISON OF SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC AND STANDARD OF SIGNIFICANCE

Environmental Topic	Impact Statement	Project	No Project	Increased Density
Transportation	Impact NOI-1b: Operational vehicle traffic noise increases could exceed the City's significance thresholds with implementation of the Project.	SU	>	<
	Impact NOI-4: Implementation of the Project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative noise impacts, with respect to generation of construction-and transportation related noise.	SU	>	<
	Impact TRAN-2a: Implementation of the Project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.	SU	>	<
	Impact TRAN-2b: Implementation of the Project could result in a significant roadway network vehicle miles traveled (VMT) impact associated with increasing the capacity of the arterial street network.	SU	>	<
	Impact TRAN-5: The Project, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impact with respect to vehicle miles traveled (VMT).	SU	>	<
Wildfire	Impact WF-2: Potential future development over the buildout horizon of the Project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.	SU	>	<
	Impact WF-5: Potential development over the buildout horizon of the Project could, in combination with other surrounding and future projects in the State Responsibility Areas (SRA), Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface Fire Areas (WUIFA), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.	SU	>	<
Notes:		<	Less impacts in comparison to the Project	
SU Significant and Unavoidable		=	Similar impact in comparison to the Project	
		>	Greater impact in comparison to the Project	

CEQA Guidelines Section 15126.6 requires 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 EIR must also identify the next most environmentally superior alternative.

The Increased Density Alternative would, in comparison to the Project, result in greater impacts to cultural resources but reduce environmental impacts related to agricultural resources, air quality, biological resources, energy, GHG emissions, noise, transportation, tribal cultural resources, and wildfire. Therefore, Alternative B would be the environmentally superior alternative.

4. Alternatives Rejected from Further Consideration

CEQA Guidelines Section 15126.6(c) requires EIRs 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 first alternative, the Reduced Housing Alternative, would reduce the amount of the Project's buildout potential, including the amount of potential housing development, to reduce construction-related impacts of the Project. However, under the Housing Accountability Act Government Code Section 65589.5(j), so long as a project complies with applicable objective General Plan and zoning standards, a local agency may not deny a project or approve it at a lower density unless the agency finds that the project would have specific, adverse, unavoidable impacts on public health or safety that can only be mitigated by lowering the residential density. The City finds that with implementation of Santa Rosa General Plan 2050 goals, policies, and actions that require the evaluation and mitigation of impacts on public health and safety from potential future development, a reduction in housing is not necessary to avoid a public health and safety impact. Due to the well-documented housing crisis and the lack of housing in Santa Rosa and the requirements to evaluate and mitigate impacts to public health and safety as a result of any future housing, the Reduced Housing Alternative is considered infeasible. Furthermore, while the Reduced Housing Alternative would reduce impacts from construction and operation when compared to the Project, it would not entirely avoid significant mitigable environmental impacts. Lastly, the Reduced Housing Alternative would not fully achieve the Project objectives that seek to provide and ensure that a diverse mix of housing at all affordability levels is available throughout the community to accommodate everyone within neighborhoods that are increasingly walkable/bikeable. Therefore, the City rejects the Reduced Housing Alternative.

The second alternative, the Increased Planning Area Alternative, would involve the expansion of the UGB and/or SOI, as considered during the scoping process. However, the expansion of the city into surrounding lands is no longer a focus of City planning efforts. Growth and change in the city will be tailored to support maintenance and development of complete neighborhoods, particularly in Areas of Change. The City finds that with implementation of the Santa Rosa General Plan 2050 land use map and the goals, policies, and actions that require the evaluation and mitigation of impacts from potential future development, the expansion of the UGB and/or SOI is not required to accommodate the Project's potential buildout or to reduce any potentially significant impacts. Rather, the City finds that the potential expansion of the UGB or SOI to accommodate growth in areas would potentially increase impacts caused by developing on undisturbed lands and on lands further away from core services areas such that VMT could be increased when compared to the Project. Lastly, the Increased Planning Area Alternative would not fully achieve the Project objectives that seek to plan for the growth and conservation of Santa Rosa over an approximately 25-year time horizon and ensure that natural resources are restored, protected, and expanded to provide accessible green space for everyone in all neighborhoods, mitigate drought, and minimize GHG. Therefore, the City rejects the Increased Planning Area Alternative.

CEQA FINDINGS OF FACT, TABLE “A”

SANTA ROSA GENERAL PLAN 2050, ASSOCIATED SPECIFIC PLAN AND SANTA ROSA CITY CODE AMENDMENTS,
AND COMMUNITY-WIDE GREENHOUSE GAS REDUCTION STRATEGY

CITY OF SANTA ROSA, CALIFORNIA

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
AGRICULTURAL RESOURCES (AG)			
<p>Impact AG-1: Implementation of the Project could result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland land (together referred to as “CEQA Important Farmland”) to non-agricultural land uses.</p>	<p>Mitigation Measures Considered. In compliance with CEQA, “each public agency shall mitigate or avoid the significant effects on the environment of the project it carries out or approves whenever it is feasible to do so.”¹ The term “feasible” is defined in CEQA to mean, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.”² CEQA Guidelines Section 15370 defines “mitigation” as: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of an action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (5) compensating for the impact by replacing or providing substitute resources or environments. The following is a brief discussion of the mitigation measures considered for mitigating or avoiding the impact of the conversion of agricultural lands to other uses and their infeasibility. However, as shown, no feasible mitigation measures are available that would reduce the agricultural resource impact to less-than-significant levels.</p> <ul style="list-style-type: none"> • Replacement of Agricultural Resources. This measure would replace the existing agricultural use with the same use on other property that is not currently used for agriculture. From a statewide 	<p>Significant and Unavoidable</p>	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 would designate CEQA Important Farmland to non-agricultural land uses. Through the General Plan 2050 goals, policies, and actions, impacts related to the conversion of qualifying agricultural lands would be reduced, but not to a less-than-significant level. The General Plan 2050 contains policies and actions to reduce the conversion of qualifying agricultural lands. Specifically, Policy 3-6.6 and Policy 3-6.7 to conserve and preserve agricultural land and soils, and Action 3-6.28 to prioritize conservation of agricultural properties. Action 3-6.16 discourages the conversion of agricultural land to non-agricultural use, Action 3-6.17 promotes restorative agricultural and landscaping techniques, and Action 3-6.19 requires the City to partner with the Sonoma County Agricultural Preservation and Open Space District and Sonoma Resource Conservation District to identify opportunities for conserving agricultural lands and preserving soil quality. These General Plan 2050 policies and actions would not reduce the amount of acreage converted through implementation of the Project; however, they would forestall development of the best agricultural land within the EIR Study Area.</p> <p>While these efforts and other mitigation measures were considered, such as preserving agricultural uses in the EIR Study Area, replacement of agricultural resources by replacing lost</p>

¹ Public Resources Code, Section 21002.1(b).

² Public Resources Code, Section 21061.1

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>perspective, the replacement of farmland means that there will be no net loss of farmland in the state. However, CEQA Important Farmland would still be developed. There is limited undeveloped land in the EIR Study Area that is not currently designated as agricultural, restricting the amount of agricultural land that would be able to be replaced elsewhere in the area, and thus conversion of these lands would be insufficient to achieve no net loss. Moreover, even if adequate land could be identified to achieve no net loss, the challenges of creating the soil, irrigation, climatic, and economic conditions that are required for productive farmland (i.e., that achieve the same CEQA Important Farmland status) are significant, and there would be no guarantee that replacement land could be successfully farmed. In addition, replacing existing undeveloped areas with active agriculture could trigger a range of negative environmental impacts, including increased groundwater consumption, habitat destruction, erosion, air quality impacts, and herbicide and pesticide application. As such, the replacement of the existing agricultural uses on other properties within the Sphere of Influence is infeasible.</p> <ul style="list-style-type: none"> Transfer of Development Rights. Transferring development rights would involve the purchasing of the right to develop land from a currently undeveloped piece of land and transferring those rights to farmland within the city. Thus, this option is also infeasible because there would still be a net loss of farmland (i.e., the farmland preserved would still likely be preserved anyhow). Even if farmland would be preserved elsewhere in Sonoma County, the CEQA Important Farmland in the city would be developed, resulting in a net loss of CEQA Important Farmland. Therefore, for the reasons outlined previously, and in this paragraph, it would not prevent significant impacts from occurring in the city and it would not be an effective CEQA mitigation measure; nor is this mitigation measure feasible from an economic perspective within this region. 		<p>agricultural uses to other areas of the city, and relocation of Prime Farmland topsoil to other areas, these mitigations are not feasible. Additionally, other mitigating efforts, such as conservation easements, one-to-one preservation, and right-to-farm ordinances all work to mitigate impacts; however, the only way to fully avoid the agricultural impact from implementation of the Project is to not allow development on state-designated CEQA Important Farmland, thereby eliminating the agricultural impact. However, doing so is not feasible or practical as the City has a responsibility to meet other conflicting obligations, including to increase the number and types of jobs available in Santa Rosa and to reduce the need for residents to commute to high-quality jobs. These measures are critical to reducing single-occupant vehicle travel to and from Santa Rosa and meeting State targets for greenhouse gas reduction. The City needs to promote both economic development and corresponding residential development, as required by State housing law, within its adopted growth boundary. While possible forms of mitigation for, or avoidance of, conservation of agricultural lands in the EIR Study Area would be implemented by the City through its General Plan 2050 policies and actions, doing so to reduce impacts to a less-than-significant level would be infeasible and inconsistent with City planning goals and objectives. Therefore, impacts would remain significant and unavoidable.</p>

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	<ul style="list-style-type: none"> • Relocation of Prime Farmland Topsoil. This measure would remove the top 12 to 18 inches of topsoil from affected areas and haul this soil to a farm site or several farm sites that have lower-quality soils. The Prime Farmland soils may assist in increasing crop yield at the relocated site. This measure would have its own environmental impacts, including increased truck traffic on local roadways from both hauling soil off-site and replacement of soil on-site, increased diesel truck emissions, construction noise, and increased duration of construction. The relocation of prime farmland soils to another active farm would increase other environmental impacts and is therefore considered infeasible. <p>As described, these measures were considered and found to be infeasible for mitigating or avoiding the impact of the conversion of agricultural lands to other uses pursuant to the definition of CEQA in that there is no guarantee that measures would result in successfully establishing CEQA Important Farmland, if doing so could happen within a reasonable period of time, that their implementation would not potentially cause greater environmental impacts, and that acquiring additional lands to be established as CEQA Important Farmland would be economically possible.</p>		
Impact AG-2: Implementation of the Project could result in the loss of agricultural land under the Williamson Act.	Mitigation Measures Considered. Pursuant to CEQA, the City has considered mitigation to reduce impacts from implementation of the Project that could conflict with lands under a Williamson Act contract. However, as shown, no feasible mitigation measures are available that would reduce the agricultural resource impact to less-than-significant levels. Specifically, the City considered a measure that would result in the replacement of Williamson Act contract farmland that would place other farmland under Williamson Act contract. Even if feasible, the placing of alternative farmland under Williamson Act contract would establish a commitment to retain that alternative farmland for agricultural use. The length of time that the alternative land will remain in agricultural use would depend on the terms of the Williamson Act contract. However, the Williamson Act contract will only reduce the potential that the alternative land will convert to non-agricultural use. The individual and	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: The Santa Rosa General Plan 2050 includes goals, policies, and actions to minimize impacts to agricultural lands. Those same General Plan 2050 goals, policies, and actions would also minimize impacts from conflicts with Williamson Act lands and reduce the likelihood of premature contract cancellations by the property owners of the Williamson Act parcels in the EIR Study Area. Mitigation for this impact was considered, including the placement of other farmland under Williamson Act contract. However, the individual and cumulative loss of agricultural land under the Williamson Act caused by the Project would still occur. Given that CEQA does not require that the project be changed to avoid an impact, and no additional mitigation is available, this would result in a significant and unavoidable impact.</p>

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	cumulative loss of agricultural land caused by the Project would still occur. Therefore, this mitigation measure will not reduce the Project's impacts on agriculture to below the level of significance. For these reasons, placing alternative privately held land under permanent restriction through Williamson Act contracts is considered infeasible.		
Impact AG-4: The Project, in combination with past, present, and reasonably foreseeable projects, could result in a significant cumulative impact with respect to the conversion of CEQA Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and Williamson Act properties to non-agricultural uses.	No mitigation measures available.	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: As described previously, implementation of the Project would result in significant and unavoidable impacts related to the conversion of CEQA Important Farmland and Williamson Act properties to non-agricultural uses. Although the Santa Rosa General Plan 2050 goals, policies, and actions would reduce and partially offset regional agricultural impacts, as well as consideration of mitigation measures to preserve agricultural lands, the only way to fully avoid the agricultural impact of the Project is to not allow development on state-designated CEQA Important Farmland, thereby eliminating the agricultural impact. However, this would be infeasible and inconsistent with City planning goals and objectives. Further, the amount of growth foreseen in the region and the decisions of Sonoma County and other surrounding counties regarding conversion of agricultural land are outside the control of the City of Santa Rosa. Therefore, this cumulative impact would be significant and unavoidable.</p>
AIR QUALITY (AIR)			
Impact AIR-2a: Construction activities that could occur over the buildout horizon of the Santa Rosa General Plan 2050 could potentially violate an air quality standard or cumulatively contribute to an existing or projected air quality violation.	<p>General Plan 2050 Chapter 3, Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</p> <p>*Action 3-6.31: The City shall require projects that exceed the Bay Area Air District (Air District) screening sizes to evaluate project-specific operation and construction emissions in conformance with the Air District methodology and if operation or construction-related criteria air pollutants exceed the Air District thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level, consistent with the Air District Guidelines, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-6.32: The City shall continue to implement the Air District Basic Control Measures included the Air</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-6.31 and *Action 3-6.32, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Because the Air District considers all impacts related to fugitive dust emissions (PM_{2.5} and PM₁₀) from construction from all development in their jurisdiction to be less than significant with implementation of the Air District's best management practices (see Table 4.3-7 in the Draft EIR), the ongoing implementation of the Air District's requirements by the</p>

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	District's California Environmental Quality Act (CEQA) Air Quality Guidelines, as subsequently revised, supplemented, or replaced, to control fugitive dust (i.e., particulate matter PM _{2.5} and PM ₁₀) during demolition, ground-disturbing activities, and/or construction.		City pursuant to mitigating Santa Rosa General Plan 2050 *Action 3-6.31 and *Action 3-6.32 would ensure impacts would be less than significant.
Impact AIR-2b: Buildout of the Project could generate operational emissions that could exceed the Bay Area Air District's (Air District) regional significance thresholds for reactive organic compounds (ROG), nitrogen oxides (NO _x) and particulate matter (PM _{2.5} and PM ₁₀).	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-6.31: The City shall require projects that exceed the Bay Area Air District (Air District) screening sizes to evaluate project-specific operation and construction emissions in conformance with the Air District methodology and if operation or construction-related criteria air pollutants exceed the Air District thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level, consistent with the Air District Guidelines, as subsequently revised, supplemented, or replaced.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Buildout in accordance with the Project would generate long-term emissions that would exceed the Air District's regional significance thresholds and cumulatively contribute to the nonattainment designations of the San Francisco Bay Area Air Basin (SFBAAB). The Santa Rosa General Plan 2050 goals, policies, and actions would reduce air pollutant emissions to the extent practicable. Additionally, the General Plan 2050 goals, policies, and actions covering topics such as expansion of the pedestrian and bicycle networks, promotion of public and active transit, and support to increase building energy efficiency and energy conservation would also reduce criteria air pollutants within the EIR Study Area. Specifically, mitigating *Action 3-6.31 requires potential future development in Santa Rosa that exceeds the Air District screening sizes to evaluate project-specific operation emissions in conformance with the Air District methodology. Where the technical assessment determines the Air District-adopted thresholds are exceeded, the applicants for new development projects would be required to incorporate mitigation measures to reduce air pollutant emissions during operational activities. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Implementing commute trip reduction programs. • Unbundling residential parking costs from property costs. • Expanding bikeway networks. • Expanding transit network coverage or hours. • Using cleaner-fueled vehicles. • Exceeding the current Title 24 Building Envelope Energy Efficiency Standards. • Establishing on-site renewable energy generation systems. • Implementing all-electric buildings. • Replacing gas-powered landscaping equipment with zero-emission alternatives.

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			<ul style="list-style-type: none"> • Implementing organics diversion programs. • Expanding urban tree planting. <p>The EIR quantifies the increase in criteria air pollutants emissions in the EIR Study Area. However, at the programmatic level, it is not feasible to quantify the increase in toxic air contaminants (TAC) from stationary sources associated with the Project or meaningfully correlate how regional criteria air pollutant emissions above the Air District's significance thresholds correlate with basin wide health impacts.</p> <p>To determine cancer and noncancer health risk, the location, velocity of emissions, meteorology and topography of the area, and locations of receptors are equally important as model parameters as the quantity of TAC emissions. The white paper prepared by the Association of Environmental Professionals' Climate Change Committee, <i>We Can Model Regional Emissions, But Are the Results Meaningful for CEQA?</i>, describes several of the challenges of quantifying local effects—particularly health risks—for large-scale, regional projects, and these are applicable to both criteria air pollutants and TACs. Similarly, the two amicus briefs filed by the air districts on the Friant Ranch case describe two positions regarding CEQA requirements, modeling feasibility, variables, and reliability of results for determining specific health risks associated with criteria air pollutants. The discussions also include the distinction between criteria air pollutant emissions and TACs with respect to health risks. The following summarizes major points about the infeasibility of assessing health risks of criteria air pollutant emissions and TACs associated with implementation of a general plan. The white paper and amicus briefs are provided in Appendix B of the Draft EIR.</p> <p>To achieve and maintain air quality standards, the Air District has established numerical emission indicators of significance for regional and localized air quality impacts for both construction and operational phases of a local plan or project. The numerical emission indicators are based on the recognition that the air basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards (AAQS) have been promulgated to protect public health. The thresholds represent the maximum emissions from a plan or project that are expected not to cause or contribute to an exceedance of the most stringent</p>

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			<p>applicable national or state ambient air quality standard. By analyzing the plan's emissions against the thresholds, an EIR assesses whether these emissions directly contribute to any regional or local exceedances of the applicable AAQS and exposure levels.</p> <p>The Air District currently does not have methodologies that would provide the City with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a Project's mass emissions. For criteria air pollutants, exceedance of the regional significance thresholds cannot be used to correlate a project to quantifiable health impacts unless emissions are sufficiently high to use a regional model. The Air District has not provided methodology to assess the specific correlation between mass emissions generated and their effect on health (note Appendix B of the Draft EIR provides the San Joaquin Valley Air Pollution Control District's amicus brief, and South Coast Air Quality Management District's amicus brief).</p> <p>Ozone concentrations depend on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Secondary formation of particulate matter and ozone can occur far from sources as a result of regional transport due to wind and topography (e.g., low-level jet stream). Photochemical modeling depends on all emission sources in the entire domain (i.e., modeling grid). Low resolution and spatial averaging produce "noise" and modeling errors that usually exceed individual source contributions. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds.</p> <p>Current models used in CEQA air quality analyses are designed to estimate potential project construction and operation emissions for defined projects. The estimated emissions are compared to significance thresholds, which are keyed to reducing emissions to levels that will not interfere with the region's ability to attain the health-based standards. This serves to protect public health in the overall region, but there is currently no CEQA methodology to determine the impact of emissions (e.g., pounds per day) on future concentration levels (e.g., parts per million or micrograms</p>

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			<p>per cubic meter) in specific geographic areas. CEQA thresholds, therefore, are not specifically tied to potential health outcomes in the region.</p> <p>The EIR must provide an analysis that is understandable for decision making and public disclosure. Regional-scale modeling may provide a technical method for this type of analysis, but it does not necessarily provide a meaningful way to connect the magnitude of a project's criteria pollutant emissions to health effects without speculation. Additionally, this type of analysis is not feasible at a general plan level because the location of emissions sources and quantity of emissions are not known. However, because cumulative development within the EIR Study Area would exceed the regional significance thresholds, the EIR finds that the Project could contribute to an increase in health effects in the basin until the attainment standards are met in the SFBAAB.</p> <p>In summary, implementation of the Project would generate emissions that would exceed the Air District's regional significance thresholds (no net increase). The Santa Rosa General Plan 2050 includes goals, policies, and actions to reduce these long-term regional criteria air pollutant emissions. However, due to the programmatic nature of the Project, no additional mitigating measures are available, and the impact is considered significant and unavoidable. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.</p>
<p>Impact AIR-3a: Construction activities associated with potential future development could expose nearby receptors to substantial concentrations of toxic air contaminants.</p>	<p>General Plan 2050 Chapter 6, <i>Health, Equity, Environmental Justice, and Parks</i></p> <p>*Action 6-1.5: As recommended by the California Air Resources Board, the City shall require projects that would result in construction activities within 1,000 feet of residential and other land uses that are sensitive to toxic air contaminants (e.g., hospitals, nursing homes, day care centers), as measured from the property line of the project, to prepare a construction health risk assessment in accordance with policies and procedures of the Office of Environmental Health Hazard Assessment and the Bay Area Air District (Air District) California Environmental Quality Act (CEQA) Guidelines that identifies mitigation measures</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 6-1.5, which has been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigating General Plan action be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: The Santa Rosa General Plan 2050 goals, policies, and actions listed in Section 4.3.2.3 in Chapter 4.3 of the Draft EIR would serve to protect sensitive receptors from poor air quality in the EIR Study Area. Specifically, mitigating *Action 6-1.5 would require projects that result in construction activities</p>

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	and appropriate enforcement mechanisms capable of reducing potential cancer and non-cancer risks below the Air District threshold.		within 1,000 feet of residential and other land uses that are sensitive to toxic air contaminants to prepare a construction health risk assessment that identifies mitigation measures and appropriate enforcement mechanisms capable of reducing potential cancer and non-cancer risks below the Air District threshold. Therefore, with implementation of the General Plan 2050 goals, policies, and actions, construction-related health risk impacts associated with the Project are considered less than significant.
<p>Impact AIR-3b: Large industrial or warehouse development projects under the Project could expose air quality-sensitive receptors to substantial toxic air contaminants (TAC) and particulate matter (PM_{2.5}) concentrations and exceed the Bay Area Air District's (Air District) project-level and cumulative significance thresholds.</p>	<p>General Plan 2050 Chapter 6, <i>Health, Equity, Environmental Justice, and Parks</i></p> <p>*Action 6-1.6: The City shall require an operational health risk assessment for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use or Overburdened Community, as defined by the Air District. The operational HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Air District. If the operational HRA shows that the incremental cancer risk exceeds 10 in a million, the noncancer hazard index of 1.0, or the thresholds as determined by the Air District, require the project applicant to identify and demonstrate measures that can reduce potential cancer and noncancer risks to acceptable levels.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Potential future development over the buildout horizon of the Project could result in new sources of TACs or PM_{2.5} near existing or planned sensitive receptors. Review of development projects by the Air District for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gas stations) in addition to the Santa Rosa General Plan 2050 goals, policies, and actions would ensure that health risks are minimized. Specifically, the implementation of project-specific operational health risk assessments (HRA) as required by mitigating *Action 6-1.6 would identify any impacts and mitigation measures to reduce the operational health risks for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes) or an "overburdened community," as measured from the property line of the project to the property line of the nearest sensitive use. Operational HRAs would be required to be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Air District. If the operational HRA shows that the cumulative and project-level incremental cancer risk, noncancer hazard index, and/or PM_{2.5} exceeds the respective threshold as established by the Air District and project-level risk of 10 in one million at the time a project is considered, the project applicant would be required to identify "best available control technologies for toxics" and appropriate enforcement mechanisms, and demonstrate that they are capable of reducing potential cancer, noncancer risks, and PM_{2.5} to an</p>

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			<p>acceptable level. Best available control technologies for toxics may include but are not limited to:</p> <ul style="list-style-type: none"> • Restricting idling on-site beyond air toxic control measures idling restrictions • Electrifying warehousing docks • Requiring use of newer equipment • Requiring near-zero or zero-emission trucks for a portion of the vehicle fleet based on opening year • Truck electric vehicle (EV) capable trailer spaces • Restricting off-site truck travel through the creation of truck routes <p>The same Santa Rosa General Plan 2050 goals, policies, and actions listed in Section 4.3.2.3 in Chapter 4.3 of the Draft EIR would serve to protect sensitive receptors from poor air quality in the EIR Study Area. Specifically, Action 6-1.11 would require the City to update the Zoning Code to require health impact assessments for nonresidential and developments of 100,000 square feet or more in Equity Priority Areas (EPA) to identify and mitigate any potential negative health implications of the project. Individual development projects would be required to achieve the incremental risk thresholds established by the Air District, and TAC and PM2.5 project-level impacts would be less than significant. However, these projects could contribute to significant cumulative risk in the Bay Area that could affect sensitive populations and EPAs. As a result, the Project's contribution to cumulative health risk is considered significant and unavoidable. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.</p>
<p>Impact AIR-5: The Project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative air quality impacts with respect to generation of criteria pollutant and exposure of substantial pollutant concentrations to sensitive receptors.</p>	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-6.31: The City shall require projects that exceed the Bay Area Air District (Air District) screening sizes to evaluate project-specific operation and construction emissions in conformance with the Air District methodology and if operation or construction-related criteria air pollutants exceed the Air District thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level, consistent with the Air</p>	<p>Significant and Unavoidable</p>	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Criteria air pollutant emissions generated by land uses within the Project could exceed the Air District's regional thresholds. Air quality impacts identified under Impacts AIR-2a, AIR-2b, AIR-3a, and AIR-3b constitute the Project's contribution to cumulative air quality impacts in the San Francisco Bay Area Air Basin. The Santa Rosa General Plan 2050 goals, policies, and actions would help reduce project-</p>

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	<p>District Guidelines, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-6.32: The City shall continue to implement the Air District Basic Control Measures included the Air District's California Environmental Quality Act (CEQA) Air Quality Guidelines, as subsequently revised, supplemented, or replaced, to control fugitive dust (i.e., particulate matter PM_{2.5} and PM₁₀) during demolition, ground-disturbing activities, and/or construction.</p> <p>General Plan 2050 Chapter 6, Health, Equity, Environmental Justice, and Parks</p> <p>*Action 6-1.5: As recommended by the California Air Resources Board, the City shall require projects that would result in construction activities within 1,000 feet of residential and other land uses that are sensitive to toxic air contaminants (e.g., hospitals, nursing homes, day care centers), as measured from the property line of the project, to prepare a construction health risk assessment in accordance with policies and procedures of the Office of Environmental Health Hazard Assessment and the Bay Area Air District (Air District) California Environmental Quality Act (CEQA) Guidelines that identifies mitigation measures and appropriate enforcement mechanisms capable of reducing potential cancer and non-cancer risks below the Air District threshold.</p> <p>*Action 6-1.6: The City shall require an operational health risk assessment for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use or Overburdened Community, as defined by the Air District. The operational HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Air District. If the operational HRA shows that the incremental cancer risk exceeds 10 in a million, the noncancer hazard index of 1.0, or the thresholds as determined by the Air District, require the project applicant to identify and</p>		<p>related emissions to the extent feasible. Specifically, mitigating *Action 3-6.31, *Action 3-6.32, *Action 6-1.5, and *Action 6-1.6 would reduce impacts at the project level. However, due to the programmatic nature of the Project, no additional mitigation measures are available. Air pollutant emissions associated with the Project would result in a cumulatively considerable contribution to air quality impacts and remain significant and unavoidable at the program level.</p>

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	demonstrate measures that can reduce potential cancer and noncancer risks to acceptable levels.		
BIOLOGICAL RESOURCES (BIO)			
<p>Impact BIO-1: Impacts to special-status species or the inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF), could occur as a result of implementation of the Project.</p>	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-5.7: The City shall continue to consult with the California Department of Fish and Wildlife (CDFW) to identify significant environments and priorities for acquisition or maintenance of open space areas based on biological and environmental concerns and develop a strategy for maintaining areas that will preserve the protected and sensitive populations of plants and animals currently found in the UGB. Strategies shall be based on federal, State, and local regulations relevant to the protection of the identified species, including, but not limited to, Federal or California Endangered Species Act, Santa Rosa Plain Conservation Strategy, and United States Fish and Wildlife Service Programmatic Biological Opinion, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.10: The City shall continue to require the implementation of existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, prior to, during, and after project approval and construction for projects that may affect wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-5.7, *Action 3-5.10, *Action 3-5.11, *Action 3-5.12, and *Action 3-5.13, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Chapter 3 of the Santa Rosa General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to biological resources, including special-status species and active bird nests, on a project-by-project basis. Mitigating *Action 3-5.7 requires the City to consult with CDFW to identify significant environments and develop a strategy for maintaining areas that will preserve special-status species; *Action 3-5.10 requires the City to continue to implement existing regulations to conserve habitat for special-status species; and *Action 3-5.11 requires the City to have biological resource assessments prepared that identify potential impacts and mitigation measures for protecting the resources for proposed development on sites that may support special-status species. In addition, mitigating *Action 3-5.12 and *Action 3-5.13 require the protection of bird habitat, including the possible loss or disturbance to bird nests in active use, which conflicts with both the MBTA and CFGF. Implementation of the General Plan 2050 goals, policies, and actions, in conjunction with adherence to State and federal regulations related to the protection of special-status species, including the Santa Rosa Plain Conservation Strategy, as subsequently revised, supplemented, or replaced, where applicable, would address potential impacts of anticipated future development under the Project. Future development would continue to be reviewed through the City's entitlement process and CEQA, when applicable, to ensure consistency with local, State, and federal regulations and all General Plan policies and actions intended to protect sensitive biological resources. Ultimately, potential future development in Santa Rosa over the buildout horizon of the</p>

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	<p>California; Fish and Game Code Section 1600 et seq; Clean Water Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.11: The City shall require a qualified biologist to prepare a biological resource assessment (BRA) for proposed development on sites that may support or have the potential to affect special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters to identify potential impacts and measures for protecting the resource and surrounding habitat prior to, during, and after project construction. The BRA shall be prepared to address conformance with all applicable federal, State, and local regulations and protocols, including, but not limited to, those listed in Action 3-5.10, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.12: The City shall require that construction or other ground-disturbing activities that may affect bird nests or nesting habitat avoid nests of native birds when the nest is in active use by implementing protection measures specified by a qualified ornithologist or biologist to ensure compliance with the California Fish and Game Code and federal Migratory Bird Treaty Act. If demolition, construction, ground-disturbing, or tree removal/pruning activities occur during the nesting season (February 1 and August 31), preconstruction surveys shall be conducted by a qualified ornithologist or biologist and approved by the City prior to issuance of building permits. Preconstruction surveys are not required for construction, ground-disturbing, or tree removal/pruning activities outside the nesting season.</p> <p>*Action 3-5.13: The City shall develop and adopt a bird-safe design ordinance in consultation with a qualified biologist and require projects to demonstrate compliance with the ordinance prior to project approval. The ordinance shall apply to all new development and redevelopment projects and include the latest bird-safe design guidelines and best management practice strategies, such as those from the National Audubon Society, to provide specific criteria and refined guidelines as part of design review and/or</p>		<p>Project would be performed in accordance with the General Plan 2050 goals, policies, and actions, which would ensure that potential impacts on special-status species would be less than significant.</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	project approval process of new buildings and taller structures to protect birds from injury and mortality from collisions with buildings, towers, and other human-made structures. Prior to adoption of the bird-safe design ordinance, project applicants shall show compliance with bird-safe design requirements, consistent with best practices.		
<p>Impact BIO-2: Impacts to riparian areas, drainages, and sensitive natural communities could occur from potential future development under the Santa Rosa General Plan 2050 where natural habitat remains.</p>	<p>General Plan 2050 Chapter 3, Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</p> <p>*Action 3-5.7: The City shall continue to consult with the California Department of Fish and Wildlife (CDFW) to identify significant environments and priorities for acquisition or maintenance of open space areas based on biological and environmental concerns and develop a strategy for maintaining areas that will preserve the protected and sensitive populations of plants and animals currently found in the UGB. Strategies shall be based on federal, State, and local regulations relevant to the protection of the identified species, including, but not limited to, Federal or California Endangered Species Act, Santa Rosa Plain Conservation Strategy, and United States Fish and Wildlife Service Programmatic Biological Opinion, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.10: The City shall continue to require the implementation of existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, prior to, during, and after project approval and construction for projects that may affect wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-5.7, *Action 3-5.10, *Action 3-5.11, *Action 3-5.19, and *Action 3-5.20, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Chapter 3 of the Santa Rosa General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to biological resources, including riparian areas, drainages, and sensitive natural communities, on a project-by-project basis. Mitigating *Action 3-5.19 requires that new development along waterways establish an ecological buffer zone between the waterway and development and *Action 3-5.20 requires new development to maintain an adequate setback from waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals. Also, as described under impact discussion BIO-1 in the Draft EIR, Action 3-5.7, mitigating *Action 3-5.10, and mitigating *Action 3-5.11 require agency consultation, implementation of existing regulations, and preparation of technical reports that identify and mitigate project-specific impacts. Implementation of the General Plan 2050 goals, policies, and actions would serve to ensure that occurrences of sensitive natural communities are identified, avoided, or adequately mitigated. Future development would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan policies and actions intended to</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California; Fish and Game Code Section 1600 et seq; Clean Water Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.11: The City shall require a qualified biologist to prepare a biological resource assessment (BRA) for proposed development on sites that may support or have the potential to affect special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters to identify potential impacts and measures for protecting the resource and surrounding habitat prior to, during, and after project construction. The BRA shall be prepared to address conformance with all applicable federal, State, and local regulations and protocols, including, but not limited to, those listed in Action 3-5.10, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.19: The City shall require new development along waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.20: The City shall require new development to maintain an adequate setback from waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.</p>		<p>protect sensitive biological resources, including sensitive natural communities. Potential future development over the buildout horizon of the Project would be performed in accordance with the General Plan 2050 goals, policies and actions, which would ensure that potential impacts on sensitive natural communities would be less than significant.</p>
<p>Impact BIO-3: Potential future development from implementation of the Santa Rosa General Plan 2050 could result in</p>	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-5.10: The City shall continue to require the implementation of existing regulations and procedures, including subdivision guidelines, zoning, design review,</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-5.10 and *Action 3-5.11, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council,</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
direct and indirect impacts to wetland habitat.	<p>and environmental law, prior to, during, and after project approval and construction for projects that may affect wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California; Fish and Game Code Section 1600 et seq; Clean Water Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.11: The City shall require a qualified biologist to prepare a biological resource assessment (BRA) for proposed development on sites that may support or have the potential to affect special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters to identify potential impacts and measures for protecting the resource and surrounding habitat prior to, during, and after project construction. The BRA shall be prepared to address conformance with all applicable federal, State, and local regulations and protocols, including, but not limited to, those listed in Action 3-5.10, as subsequently revised, supplemented, or replaced.</p>		<p>therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Chapter 3 of the Santa Rosa General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to biological resources, including wetlands, on a project-by-project basis. The General Plan 2050 goals, policies, and actions listed under impact discussions BIO-1 and BIO-2 in the Draft EIR would serve to mitigate potential adverse impacts on wetlands in the EIR Study Area. Many of these General Plan actions call for identifying and protecting creeks, wetlands and other regulated waters. Site-specific assessments would be required as called for in mitigating *Action 3-5.11 for developments proposed on or near sensitive habitats, such as wetlands. This project-specific assessment would serve to identify the presence or absence of any jurisdictional waters and would ensure adequate protection or appropriate compensatory mitigation is provided as part of new development. Mitigating Action 3-5.5 and *Action 3-5.10 call for avoidance of wetlands and other sensitive resources during the environmental review process, compliance with applicable regulations and standards, and adequate compensatory mitigation where potential impacts are unavoidable. Where regulated waters are present, federal and State authorizations and adequate compensatory mitigation would be required where regulated waters would be affected. Potential future development that occurs from implementation of the Project would also be required to comply with SRCC Section 20-30.040 related to creek setbacks standards as well as the policies and objectives of the Santa Rosa Citywide Creek Master Plan. Future development would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan policies and actions intended to protect sensitive biological resources, including wetlands. Potential future development over the buildout horizon of the Project would be performed in accordance with the General Plan 2050 goals, policies and actions, which would ensure that potential impacts on wetlands would be less than significant.</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
CULTURAL RESOURCES (CUL)			
<p>Impact CUL-1: Impacts to known or yet to be classified historic buildings or structures could occur from potential future development under the Santa Rosa General Plan 2050.</p>	<p>General Plan 2050 Chapter 4, <i>Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture</i></p> <p>*Action 4-3.2: For projects with known or the potential to have historic structures, the City shall require the project to follow the Secretary of the Interior Standards for Preservation, Rehabilitation, Restoration, and Reconstruction for the treatment of historic properties and the California Historic Building Code, as subsequently revised, supplemented, or replaced.</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 4-3.2, *Action 4-3.6, *Action 4-3.7, and *Action 4-3.9, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of the SRCC, Design Guidelines, and the Santa Rosa General Plan 2050 goals, policies, and actions, would ensure that new development and exterior remodels are compatible with cultural and historic resources; that landmarks and historic treasures would be preserved, enhanced, and rehabilitated, and that cultural and historic resources of Santa Rosa would be protected and restored. Specifically, mitigating *Action 4-3.2 would mitigate potential impacts by requiring the City to follow the Secretary of the Interior's Standards for Preservation, Rehabilitation, Restoration, and Reconstruction of historic structures in Santa Rosa and the California Historic Building Code, as subsequently revised, supplemented, or replaced, and *Action 4-3.6 would require the City to work with the owners of historic properties to promote preservation, renovation and rehabilitation of historic structures. Under Action 4-3.6, Action 4-3.7, and Action 4-3.9, the City would require cultural and/or historic inventories or surveys of the city and the identification of buildings and park properties that should be recognized for their cultural significance to further preserve qualifying historic properties in Santa Rosa. Accordingly, implementation of the General Plan 2050 would require the preservation of historic resources and require new development to analyze and avoid any potential impacts to designated historic resources through record searches, preconstruction field surveys, ground-disturbance monitoring, and implementation of appropriate measures or project alternatives to avoid identified significant impacts. Finally, CEQA would require that future potential projects in the EIR Study Area with the potential to significantly impact historical resources be subject to project-level CEQA review wherein the future potential project's potential to affect the significance of a surrounding historical resource would be evaluated and mitigated to the extent feasible.</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			<p>The requirement for subsequent CEQA review, pursuant to State law, would minimize the potential for new development to indirectly affect the significance of existing historical resources to the maximum extent practicable.</p> <p>Potential impacts from future development on historical resources could lead to (1) demolition, which by definition results in the material impairment of a resource's ability to convey its significance; (2) inappropriate modification, which may use incompatible materials, designs, or construction techniques in a manner that alters character-defining features; and (3) inappropriate new construction, which could introduce incompatible new buildings that clash with an established architectural context. While any of these scenarios, especially demolition and alteration, have the potential to change the historic fabric or setting of an architectural resource such that the resource's ability to convey its significance may be materially impaired, compliance with federal and State laws as described in Section 4.5.1.2 in the Draft EIR, the SRCC, and the General Plan 2050 goals, policies, and actions would ensure future development would not be detrimental or injurious to property or improvements in the vicinity and impacts would be less than significant.</p>
<p>Impact CUL-2: Impacts to known and unknown archeological resources could occur from potential future development under the Santa Rosa General Plan 2050.</p>	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-5.19: The City shall require new development along waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.20: The City shall require new development to maintain an adequate setback from waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-5.19, *Action 3-5.20, *Action 4-2.1, *Action 4-2.2, *Action 4-2.3, and *Action 4-2.4, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions would ensure that new development in the EIR Study Area reduces and mitigates potential impacts to archaeological resources. As demonstrated, the General Plan 2050 goals, policies, and actions encourage infill development, adaptive reuse of structures, and development on underutilized land, which would reduce the potential for disturbing archaeological deposits since ground-disturbing activities have already taken place in developed areas. Specifically, Policy 2-2.2 encourages compact development in</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>General Plan 2050 Chapter 4, <i>Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture</i></p> <p>*Action 4-2.1: The City shall continue to review proposed developments in accordance with federal and State laws and utilize the California Historical Resources Information System, Northwest Information Center at Sonoma State University as a resource to determine whether project areas contain known subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or if they have the potential to hold such resources.</p> <p>*Action 4-2.2: The City shall work in good faith with local tribes and archaeologists to evaluate proposed development sites for the presence of subsurface archaeological resources, both prehistoric and/or historic era, and tribal cultural resources. These efforts may include:</p> <ul style="list-style-type: none"> • Consideration of existing reports and studies. • Consultation with Native American tribes as required by State law. • Appropriate site-specific investigative actions. • On-site monitoring during excavation if appropriate. • Working with local tribes to develop and apply tribal protection policies related to tribal cultural resources. <p>*Action 4-2.3: The City shall continue to require that project areas found to contain significant subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation developed in collaboration with local Native American tribes and appropriate tribal monitors, as necessary. Recommendations shall meet the standards of the National Historic Preservation Act, Native American Historic Resource Protection Act, National and California Environmental Quality Act, and applicable Santa Rosa planning guidelines, policies, and procedures to protect the resource.</p> <p>*Action 4-2.4: During ground disturbance for development projects, if tribal cultural resources are encountered, work shall be halted to avoid altering the materials and their</p>		<p>the Areas of Change. Policy 4- 1.1 requires the preservation and enhancement of the city's natural waterways and landscapes, Policy 3-5.7 requires that construction adjacent to creek channels is sensitive to the natural environment, preserves topography and vegetation along the creek, does not disrupt or pollute the waterway, and provides an adequate setback buffer, and mitigating *Action 3-5.19 and *Action 3-5.20 require new development along channelized waterways to establish an ecological buffer zone between the waterway and development. Additionally, implementation of the mitigating *Action 4-2.1 and *Action 4-2.2 would require the preservation of archaeological and historic resources that are found in the EIR Study Area and would require new development to implement protocols and best management practices to analyze and avoid any potential impacts to subsurface archaeological resources through record searches, preconstruction field surveys, ground-disturbance monitoring, and implementation of appropriate measures or project alternatives to avoid identified significant impacts. Implementation of these protocols and best management practices would ensure compliance with National Historic Preservation Act, Native American Historic Resource Protection Act, National Environmental Policy Act, CEQA, and/or applicable Santa Rosa planning guidelines, policies, and procedures to protect the archaeological deposits, both tribal and nontribal. Mitigating *Action 4-2.3 requires the City to continue to require that project areas found to contain significant archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation developed in collaboration with local tribes and tribal monitors and *Action 4-2.4 requires the evaluation and mitigation of tribal cultural resources by a qualified consulting archaeologist and Native American representative as appropriate. Proposed *Action 4-2.2 also requires development project applicants to consult with Native American representatives regarding cultural resources to identify locations of importance to Native Americans, including archaeological sites and traditional cultural properties. Compliance with federal and State laws, as described in Section 4.5.1.2 of the Draft EIR and the General Plan 2050 goals, policies, and actions would protect recorded and unrecorded archaeological deposits in the EIR Study Area by providing for the early detection of potential</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	context until a qualified consulting archaeologist and Native American representative have evaluated the situation and recorded identified tribal cultural resources—which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, or plants with cultural value to the tribe(s)—and determined suitable mitigation measures. If human remains are inadvertently discovered, contact the Most Likely Descendants, as identified by the NAHC.		conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation would ensure that potential impacts from implementation of the Project would be less than significant.
GEOLOGY AND SOILS (GEO)			
<p>Impact GEO-1: Impacts from potential future development under the Santa Rosa General Plan 2050 where there are known geological hazards could occur over the buildout horizon of the Project.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Policy 5-1.1: Prior to new development approval, where there are known geological hazards as shown on Figures 5-2, 5-3, and 5-4 and current maps from the United States Geological Survey, California Geological Survey, California Department of Water Resources, California Office of Emergency Services, the City shall ensure that new development, redevelopment, and major remodels avoid or adequately mitigate seismic and geologic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures.</p> <p>*Action 5-1.1: Prior to new development approval, the City shall ensure site-specific geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer to appropriately mitigate hazardous conditions.</p> <p>*Action 5-1.2: The City shall restrict development in areas where adverse conditions associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a California Certified Engineering Geologist and/or Geotechnical Engineer.</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Policy 5-1.1, *Action 5-1.1, and *Action 5-1.2, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions, as well as compliance with State, regional, and local regulations pertaining to structural safety regarding fault rupture, ground shaking, liquefaction, and landslides, would ensure that potential future development under the Project would not directly or indirectly cause or worsen the likelihood of or substantial adverse effects from seismic hazards related to earthquakes, including the risk of loss, injury, or death. Specifically, mitigating *Policy 5-1.1 requires that potential future development avoid or mitigate seismic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures; *Action 5-1.1 requires site-specific geologic studies are deemed acceptable qualified engineers; and *Action 5-1.2 requires that potential future development be restricted in areas where adverse conditions associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a qualified engineer. This includes prohibiting development that would be subject to geological hazard due to its location and/or design and that cannot be mitigated to safe levels. Compliance with SRCC regulations and General Plan 2050 goals, policies, and actions would mitigate impacts by permitting</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			development only in areas where potential danger to the health, safety, and welfare of the community can be adequately mitigated. Because potential future development under the Project would be required to comply with both the California Building Code and the SRCC, as well as General Plan 2050 goals, policies, and actions, implementation of the Project would not cause or worsen seismic ground shaking; therefore, impacts would be less than significant.
Impact GEO-3: Impacts from potential future development under the Santa Rosa General Plan 2050 where there are potentially unstable soils could occur over the buildout horizon of the Project.	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Policy 5-1.1: Prior to new development approval, where there are known geological hazards as shown on Figures 5-2, 5-3, and 5-4 and current maps from the United States Geological Survey, California Geological Survey, California Department of Water Resources, California Office of Emergency Services, the City shall ensure that new development, redevelopment, and major remodels avoid or adequately mitigate seismic and geologic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures.</p> <p>*Action 5-1.1: Prior to new development approval, the City shall ensure site-specific geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer to appropriately mitigate hazardous conditions.</p> <p>*Action 5-1.2: The City shall restrict development in areas where adverse conditions associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a California Certified Engineering Geologist and/or Geotechnical Engineer.</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Policy 5-1.1, *Action 5-1.1, and *Action 5-1.2, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: As determined under impact discussions GEO-1 and GEO-2 of the Draft EIR, potential future development from implementation of the Project would be required to comply with the California Building Code, as adopted in SRCC Chapter 18-16, which provides regulations for building design and construction to ensure geologic and soil stability. In addition to protections afforded by State laws, the General Plan 2050 goals, policies, and actions listed under impact discussions GEO-1 and GEO-2 would require local planning and development decisions to consider potential risks of development on unstable soils or geologic units. Specifically, SRCC Chapters 17-08 and 20-32 and mitigating *Policy 5-1.1, *Action 5-1.1, and *Action 5-1.2 requirements for geotechnical reports that identify and mitigate impacts related to unstable soils. All potential future development under the Project would be required to comply with State, regional, and local regulations, including SRCC provisions and the General Plan 2050 goals, policies, and actions, to ensure that potential future development that results from implementation of the Project would not directly or indirectly cause substantial adverse effects. Therefore, impacts would be less than significant.</p>
Impact GEO-4: Impacts from potential future development under the Santa Rosa General Plan 2050 where there are	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Policy 5-1.1: Prior to new development approval, where there are known geological hazards as shown on Figures 5-</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Policy 5-1.1, *Action 5-1.1, and *Action 5-1.2, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
expansive soils could occur over the buildout horizon of the Project.	<p>2, 5-3, and 5-4 and current maps from the United States Geological Survey, California Geological Survey, California Department of Water Resources, California Office of Emergency Services, the City shall ensure that new development, redevelopment, and major remodels avoid or adequately mitigate seismic and geologic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures.</p> <p>*Action 5-1.1: Prior to new development approval, the City shall ensure site-specific geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer to appropriately mitigate hazardous conditions.</p> <p>*Action 5-1.2: The City shall restrict development in areas where adverse conditions associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a California Certified Engineering Geologist and/or Geotechnical Engineer.</p>		<p>directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions would mitigate potential impacts as a result of developing on expansive soils. Specifically, mitigating *Policy 5-1.1, *Action 5-1.1, and *Action 5-1.2 include requirements for geotechnical reports that would ensure that new development, redevelopment, and major remodels avoid or adequately mitigate seismic and geologic hazards as part of the City project review process. Additionally, compliance with existing State, regional, and local regulations, would ensure that potential future development under the Project would not directly or indirectly cause substantial adverse effects, including the risks to life or property. Therefore, impacts would be less than significant.</p>
HYDROLOGY AND WATER QUALITY (HYD)			
Impact HYD-1: Impacts to water quality could occur from implementation of the Project.	<p>General Plan 2050 Chapter 3, Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</p> <p>*Action 3-5.10: The City shall continue to require the implementation of existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, prior to, during, and after project approval and construction for projects that may affect wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-5.10, *Action 3-5.12, *Action 3-5.19, *Action 3-5.20, *Action 5-2.14, *Action 5-2.15, *Action 5-2.17, and *Action 5-9.30, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions would reduce impacts related to water quality. Specifically, mitigating *Action 3-5.10 and *Action 3-5.11 require the evaluation and mitigation of impacts to sensitive habitats, which include wetlands and waterways, and would ensure impacts to water quality would be mitigated. Mitigating *Action 3-5.19 and *Action 3-5.20 require that new development along waterways establish an ecological buffer zone between the waterway and development and that adequate setbacks be maintained to protect water quality. Mitigating</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California; Fish and Game Code Section 1600 et seq; Clean Water Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.12: The City shall require that construction or other ground-disturbing activities that may affect bird nests or nesting habitat avoid nests of native birds when the nest is in active use by implementing protection measures specified by a qualified ornithologist or biologist to ensure compliance with the California Fish and Game Code and federal Migratory Bird Treaty Act. If demolition, construction, ground-disturbing, or tree removal/pruning activities occur during the nesting season (February 1 and August 31), preconstruction surveys shall be conducted by a qualified ornithologist or biologist and approved by the City prior to issuance of building permits. Preconstruction surveys are not required for construction, ground-disturbing, or tree removal/pruning activities outside the nesting season.</p> <p>*Action 3-5.19: The City shall require new development along waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.20: The City shall require new development to maintain an adequate setback from waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.</p> <p>General Plan 2050 Chapter 5, Safety, Climate Resilience, Noise, and Public Services and Facilities</p>		<p>*Action 5-2.14 and *Action 5-2.15 require improvements that maintain and improve the storm drainage system citywide and that ensure creekside paths and trails are developed consistent with the Citywide Creek Master Plan, which ensures runoff is captured and water quality is protected. Mitigating *Action 5-2.17 requires implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system. Lastly, mitigating *Action 5-9.30, requires the evaluation of stormwater capture and reuse consistent with goals of the Santa Rosa Citywide Creek Master Plan and the municipal separate storm sewer systems (MS4) National Pollutant Discharge Elimination System permit. Implementation of the General Plan 2050 goals, policies, and actions, in conjunction with adherence to MS4 permit requirements, the Construction General Permit, and the City's Low Impact Development Technical Design Manual, would ensure that potential future development under the Project would not violate any water quality standards or waste discharge requirements for both construction and operational phases, and impacts would be less than significant.</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>*Action 5-2.14: The City shall require improvements that maintain and improve the storm drainage system citywide and prioritize areas needing significant investment, consistent with the Santa Rosa Citywide Creek Master Plan goals of preserving natural conditions of waterways and minimizing channelization of creeks.</p> <p>*Action 5-2.15: The City shall ensure creek-side paths and trails are consistent with the Citywide Creek Master Plan and Bicycle and Pedestrian Master Plan, as subsequently revised, supplemented, or replaced, and are incorporated into stormwater improvement projects along creek corridors.</p> <p>*Action 5-2.17: The City shall require implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system.</p> <p>*Action 5-9.30: The City shall evaluate stormwater capture and reuse consistent with goals of the Santa Rosa Citywide Creek Master Plan and the MS4 National Pollutant Discharge Elimination System (NPDES) permit to preserve natural conditions of waterways, minimize channelization of creeks, and protect water quality, and identify, educate, and label to promote community awareness that storm drains flow untreated into creeks.</p>		
NOISE (NOI)			
<p>Impact NOI-1a: Construction activities associated with potential future development could expose sensitive receptors to excessive noise from construction equipment.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-7.1: The City shall continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.</p> <p>*Action 5-7.2: The City shall use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify measures during the project approval process to ensure the threshold is met prior to project approval.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: In most cases, construction of individual developments associated with implementation of the Project would temporarily increase the ambient noise environment in the vicinity of each individual project, potentially affecting existing and future nearby sensitive uses. The policies and actions of the Santa Rosa General Plan 2050 would minimize the effects of construction noise. Specifically, mitigating *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts, and *Action 5-7.2 and *Action 5-7.10 would mitigate noise impacts by requiring the City to use the noise and vibration</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>*Action 5-7.10: The City shall update the Noise Ordinance to incorporate construction best management practices (BMP) to minimize construction noise, and require projects to demonstrate compliance with the BMPs prior to project approval.</p>		<p>thresholds based on the Federal Transit Administration's criteria for acceptable levels of construction noise and vibration to evaluate and mitigate impacts, and adopt construction best management practices, respectively. However, because construction activities associated with any individual development may occur near noise-sensitive receptors and because—depending on the project type, equipment list, time of day, phasing, and overall construction durations—noise disturbances may occur for prolonged periods of time, during the more sensitive nighttime hours, or may exceed 80 dBA L_{eq} at residential land uses even with future project-level mitigation, construction noise impacts associated with implementation of the Project are considered significant and unavoidable. Due to the programmatic nature of this EIR, project-level conclusions of construction noise would be speculative; however, the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the noise thresholds.</p>
<p>Impact NOI-1b: Operational vehicle traffic noise increases could exceed the City's significance thresholds with implementation of the Project.</p>	<p>General Plan 2050 Chapter 5, Safety, Climate Resilience, Noise, and Public Services and Facilities</p> <p>*Action 5-7.1: The City shall continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.</p> <p>*Action 5-7.2: The City shall use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify measures during the project approval process to ensure the threshold is met prior to project approval.</p> <p>*Action 5-7.3: The City shall require development projects to reduce noise exceeding normally acceptable levels as identified in Figure 5-13, unless the activities are specifically exempted by the City Council, on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens.</p> <p>*Action 5-7.7: The City shall work with Caltrans to evaluate and develop traffic noise mitigation programs along Highway 101 and State Route 12.</p>	<p>Significant and Unavoidable</p>	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Implementation of Santa Rosa General Plan 2050 *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts. Mitigating *Action 5-7.2 requires the City to apply the Federal Transit Administration's vibration thresholds to assess impacts to surrounding land uses. Mitigating *Action 5-7.3 requires development projects to reduce noise exceeding normally acceptable levels unless the activities are specifically exempted by the City Council on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens. Mitigating *Action 5-7.7 requires the City to work with Caltrans to evaluate and develop traffic noise mitigation programs along US Highway 101 and State Route 12. Furthermore, mitigating *Action 5-7.9 requires development projects to implement measures to reduce noise impacts primarily through site planning and avoid engineering solutions for noise mitigation, such as sound walls, if possible. Since project-specific details are unknown and future conditions of approval may not be feasible or reduce vehicle traffic noise</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>*Action 5-7.9: The City shall require development projects to implement measures to reduce noise and vibration impacts primarily through site planning, and avoid engineering solutions for noise and vibration mitigation, such as sound walls, if possible.</p>		<p>below significance thresholds in all cases, this impact is conservatively considered significant and unavoidable. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the noise thresholds.</p>
<p>Impact NOI-1c: Operational noise increases could exceed the City's significance thresholds and could be incompatible with existing uses.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-7.1: The City shall continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.</p> <p>*Action 5-7.3: The City shall require development projects to reduce noise exceeding normally acceptable levels as identified in Figure 5-13, unless the activities are specifically exempted by the City Council, on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens.</p> <p>*Action 5-7.9: The City shall require development projects to implement measures to reduce noise and vibration impacts primarily through site planning, and avoid engineering solutions for noise and vibration mitigation, such as sound walls, if possible.</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 5-7.1, *Action 5-7.3, and *Action 5-7.9, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Chapter 5 of the Santa Rosa General Plan 2050 requires local planning and development decisions to consider noise and land use compatibility. Specifically, Policy 5-7.1 requires the City to maintain and enforce the City's Noise Ordinance to protect the health and comfort of people living, working, going to school, and recreating in Santa Rosa. Mitigating *Action 5-7.1 directs the City to continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Santa Rosa City Code standards. Mitigating *Action 5-7.3 requires development projects to reduce noise exceeding normally acceptable levels unless the activities are specifically exempted by the City Council on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens. Action 5-7.5 requires the City to consider ways to reduce roadway noise to normally acceptable levels in areas where noise standards may otherwise be exceeded (e.g., where homes front regional/arterial streets and in areas of mixed-use development). Action 5-7.6 requires the City to consider updating the Municipal Code to require new development to provide buffers other than sound walls and allow sound walls only when other techniques would not prevent projected noise levels from exceeding adopted land use compatibility standards. Mitigating *Action 5-7.9 requires development projects to implement measures to reduce noise impacts primarily through site planning and avoid engineering solutions for noise mitigation, such as sound walls, if possible. Accordingly, implementation of the policies and actions of the</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			General Plan 2050, noise and land use compatibility would be a factor in project approval decisions, to verify that the proposed development would not increase noise beyond the City's established thresholds and that it would not generate noise that would be incompatible with existing uses in the vicinity of the proposed development. Accordingly, impacts associated with land use compatibility would be less than significant.
<p>Impact NOI-2a: Construction activities associated with potential future development under the Santa Rosa General Plan 2050 could generate excessive short-term vibration levels during project construction.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-7.1: The City shall continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.</p> <p>*Action 5-7.2: The City shall use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify measures during the project approval process to ensure the threshold is met prior to project approval.</p> <p>*Action 5-7.10: The City shall update the Noise Ordinance to incorporate construction best management practices (BMP) to minimize construction noise, and require projects to demonstrate compliance with the BMPs prior to project approval.</p>	Less than Significant	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 5-7.1, *Action 5-7.2, and *Action 5-7.10, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Chapter 5 of the Santa Rosa General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider noise impacts, including those from vibration. Specifically, mitigating *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts. Mitigating *Action 5-7.2 requires the City to use the Federal Transit Administration's (FTA) construction and noise vibration thresholds to assess impacts to surrounding land uses. Mitigating *Action 5-7.10 requires the City to adopt construction best management practices (BMP) to reduce vibration caused from construction equipment and require projects to demonstrate compliance with BMPs. In most cases of individual developments associated with implementation of the Project, construction that requires the use of vibration-causing construction equipment, such as pile driving, caisson drilling, vibratory roller, or a large bulldozer, would temporarily increase the ambient noise environment in the vicinity of the individual project, potentially affecting existing and future nearby sensitive users. The use of alternate methods/equipment for construction required in mitigating *Action 5-7.10 throughout the entire active construction period would help to ensure that construction noise from vibration is minimized to the extent feasible. Some common alternate methods/equipment used for construction include, but are not limited to:</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			<ul style="list-style-type: none"> For pile driving, the use of caisson drilling (drill piles), vibratory pile drivers, oscillating or rotating pile installation methods, pile pressing, “silent” piling, and jetting or partial jetting of piles into place using a water injection at the tip of the pile. For paving, use of a static roller in lieu of a vibratory roller. For grading and earthwork activities, off-road equipment limited to 100 horsepower or less. <p>Mitigating *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts and *Action 5-7.2 requires the City to use vibration thresholds based on the FTA criteria for acceptable levels of groundborne vibration for various types of construction equipment. Should the FTA criteria be exceeded, a list of alternate methods/equipment can be used, as provided above. This would ensure that construction vibration impacts would remain less than significant because alternate methods/equipment with less or no vibration, such as those shown in Table 4.12-14 of the Draft EIR, would meet the thresholds. The potential vibration impacts associated with demolition and construction activities would be reduced to a less-than-significant level by establishing safe limits to protect structures from potential damage and would minimize vibration impacts.</p>
<p>Impact NOI-2b: Operational activities associated with potential future development under the Santa Rosa General Plan 2050 could generate excessive long-term vibration levels.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-7.1: The City shall continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.</p> <p>*Action 5-7.2: The City shall use the Federal Transit Administration’s construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify measures during the project approval process to ensure the threshold is met prior to project approval.</p> <p>*Action 5-7.9: The City shall require development projects to implement measures to reduce noise and vibration impacts primarily through site planning, and avoid engineering solutions for noise and vibration mitigation, such as sound walls, if possible.</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 5-7.1, *Action 5-7.2, and *Action 5-7.9, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of mitigating Santa Rosa General Plan 2050 *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts and *Action 5-7.2 requires the City to use vibration thresholds based on the FTA’s groundborne vibration for various types of construction equipment. As described in Section 4.12.2.2 of the Draft EIR, the FTA establishes vibration limits from operational activities for impacts to be less than significant on a project-by-project basis. For vibration annoyance from operational sources, the FTA recommends criteria for</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			frequent, occasional, and infrequent events. Furthermore, mitigating *Action 5-7.9 requires development project to implement measures to reduce noise impacts primarily through site planning, and avoid engineering solutions for noise mitigation, such as sound walls, if possible. As part of the project approval process, future project applicants would be required to comply with the FTA thresholds and the City would review all development proposals to verify that the proposed development would not significantly increase noise beyond the City's established thresholds. Therefore, with implementation of the mitigating *Action 5-7.1, *Action 5-7.2, and *Action 5-7.9, vibration impacts from operation are considered less than significant.
<p>Impact NOI-4: Implementation of the Project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative noise impacts, with respect to generation of construction-and transportation related noise.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-7.1: The City shall continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.</p> <p>*Action 5-7.2: The City shall use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify measures during the project approval process to ensure the threshold is met prior to project approval.</p> <p>*Action 5-7.3: The City shall require development projects to reduce noise exceeding normally acceptable levels as identified in Figure 5-13, unless the activities are specifically exempted by the City Council, on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens.</p> <p>*Action 5-7.7: The City shall work with Caltrans to evaluate and develop traffic noise mitigation programs along Highway 101 and State Route 12.</p> <p>*Action 5-7.9: The City shall require development projects to implement measures to reduce noise and vibration impacts primarily through site planning, and avoid engineering solutions for noise and vibration mitigation, such as sound walls, if possible.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Construction activities associated with potential future development could expose sensitive receptors in close proximity to a construction site to excessive noise from construction equipment (see Impact NOI-1a of the Draft EIR). Implementation of mitigating Santa Rosa General Plan 2050 *Action 5-7.1, *Action 5-7.2, and *Action 5-7.10 would help reduce construction-related noise impacts. In addition, operational vehicle traffic noise increases could exceed the City's significance thresholds with implementation of the Project and expose sensitive receptors in close proximity to new development-generated roadway noise to excessive levels (see Impact NOI-1b of the Draft EIR). As with construction noise, implementation of mitigating *Action 5-7.1, *Action 5-7.2, and *Action 5-7.10 would help reduce transportation-related noise impacts along with mitigating *Action 5-7.3, *Action 5-7.7, and *Action 5-7.9. However, due to the programmatic nature of the Project, no additional mitigation measures are available. As such, the cumulative noise impact is considered significant and unavoidable at the program level.</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<p>*Action 5-7.10: The City shall update the Noise Ordinance to incorporate construction best management practices (BMP) to minimize construction noise, and require projects to demonstrate compliance with the BMPs prior to project approval.</p>		
TRANSPORTATION (TRAN)			
<p>Impact TRAN-2a: Implementation of the Project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.</p>	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-1.1: For all projects with the potential to increase VMT based on the City's VMT screening criteria, the City shall require a qualified transportation engineer to prepare an analysis of projected VMT and mitigation consistent with the City's VMT guidelines, as subsequently revised, supplemented, or replaced.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions would reduce the VMT generated by all development including residential uses. In support of General Plan 2050 Policy 3-1.1 to reduce VMT, mitigating *Action 3-1.1 requires a qualified transportation engineer to prepare an analysis of project VMT consistent with the City's VMT guidelines for all projects with the potential to increase VMT based on the City's VMT screening criteria. Action 3-1.2 requires the City to work with other local and regional partners to explore developing a VMT mitigation bank. Action 3-1.3 and Action 3-1.5 support prioritizing investments that will reduce VMT and GHG emissions.</p> <p>If all individual development projects achieve the required residential VMT per capita through mitigation, use of a bank, or implementation of offsite measures, impacts would be reduced to a less-than-significant level. There are, however, two important aspects that introduce uncertainty as to whether these reductions can consistently be achieved. First, the Santa Rosa General Plan 2050 is a programmatic plan. Specific development plans defining the size, configuration, and characteristics of residential projects affect VMT projections, but site-specific information about future development projects is not available at this time. Because VMT performance is sensitive to these factors, it is not currently possible to conclusively determine VMT performance metrics and the effectiveness of VMT reduction strategies for individual sites. Second, there is uncertainty about the ability of all residential development projects to achieve the required VMT reductions—particularly projects in suburban locations in the outer areas of Santa Rosa where it may be infeasible to provide new or more frequent transit service and very few VMT reduction strategies are viable. Programs such as VMT</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			<p>mitigation exchanges or banks may provide a viable mitigation mechanism for developments, but the timing of when such programs may become available is unknown.</p> <p>Given the programmatic nature of the Project, uncertainties as to whether individual development projects will be able to successfully meet VMT standards even with mitigation, and uncertainties as to the availability of other mitigation strategies such as VMT exchanges or banks, the impact is considered significant and unavoidable. Note that this impact conclusion does not preclude the finding of less than significant at the project level for future projects over the 2050 buildout horizon.</p>
<p>Impact TRAN-2b: Implementation of the Project could result in a significant roadway network vehicle miles traveled (VMT) impact associated with increasing the capacity of the arterial street network.</p>	<p>General Plan 2050 Chapter 3, Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</p> <p>*Action 3-1.1: For all projects with the potential to increase VMT based on the City's VMT screening criteria, the City shall require a qualified transportation engineer to prepare an analysis of projected VMT and mitigation consistent with the City's VMT guidelines, as subsequently revised, supplemented, or replaced.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions listed under impact discussion TRAN-1 and TRAN-2 would improve the active transportation network, work with partner agencies to reduce VMT, encourage development in TPAs and PDA, amongst other to reduce VMT generated by all development. Specifically, mitigating *Action 3-1.1 requires a qualified transportation engineer to prepare an analysis of project VMT consistent with the City's VMT guidelines for all projects with the potential to increase VMT based on the City's VMT screening criteria. Even with implementation of the General Plan 2050 goals, policies, and actions related to VMT reduction, the effectiveness of VMT-reduction strategies and availability of alternative mitigation strategies such as VMT exchanges or banks is not certain. As such, the impact on roadway network VMT is considered significant and unavoidable.</p>
<p>Impact TRAN-5: The Project, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impact with respect to vehicle miles traveled (VMT).</p>	<p>General Plan 2050 Chapter 3, Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</p> <p>*Action 3-1.1: For all projects with the potential to increase VMT based on the City's VMT screening criteria, the City shall require a qualified transportation engineer to prepare an analysis of projected VMT and mitigation consistent with the City's VMT guidelines, as subsequently revised, supplemented, or replaced.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Even with the Santa Rosa General Plan 2050 goals, policies, and actions described under impact discussion TRAN-2, including mitigating *Action 3-1.1, the effectiveness of VMT-reduction strategies is not certain. As such, the cumulative impact on VMT is considered significant and unavoidable.</p>
TRIBAL CULTURAL RESOURCES (TCR)			

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
<p>Impact TCR-1: Impacts to unknown tribal cultural resources (TCR) could occur from potential future development under the Santa Rosa General Plan 2050.</p>	<p>General Plan 2050 Chapter 3, <i>Circulation, Open Space, Conservation, and Greenhouse Gas Reduction</i></p> <p>*Action 3-5.19: The City shall require new development along waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.</p> <p>*Action 3-5.20: The City shall require new development to maintain an adequate setback from waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.</p> <p>General Plan 2050 Chapter 4, <i>Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture</i></p> <p>*Action 4-2.1: The City shall continue to review proposed developments in accordance with federal and State laws and utilize the California Historical Resources Information System, Northwest Information Center at Sonoma State University as a resource to determine whether project areas contain known subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or if they have the potential to hold such resources.</p> <p>*Action 4-2.2: The City shall work in good faith with local tribes and archaeologists to evaluate proposed development sites for the presence of subsurface archaeological resources, both prehistoric and/or historic era, and tribal cultural resources. These efforts may include:</p> <ul style="list-style-type: none"> • Consideration of existing reports and studies. • Consultation with Native American tribes as required by State law. • Appropriate site-specific investigative actions. • On-site monitoring during excavation if appropriate. 	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 3-5.19, *Action 3-5.20, *Action 4-2.1, *Action 4-2.2, and *Action 4-2.4, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: The Santa Rosa General Plan 2050 includes goals, policies, and actions that require local planning and development decisions to reduce impacts to archaeological resources that could qualify as TCRs and to conduct consultation with Native American tribes as required by State law. Specifically, Policy 2-2.2 encourages infill development in Areas of Change, which reduces opportunities to unearth potential TCRs and Action 3-5.4 requires the City to collaborate with regional agencies to expand open space that would protect historic and TCRs. Mitigating *Action 4-2.1 and *Action 4-2.2 requires the City to continue to review proposed developments to determine if TCRs are present and evaluate proposed development sites for TCRs through consultation with local Native American tribes. Additionally, mitigating *Action 4-2.4 requires that if TCRs are encountered during ground disturbance, work is halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative have evaluated the situation, and recorded identified cultural resources, which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, and plants with cultural value to the tribe(s), and determined suitable site-specific mitigation measures.</p> <p>The Santa Rosa General Plan 2050 also includes policies and actions to protect historic and cultural resources, including waterways as Native American archaeological sites tend to be located near waterways and these locations may hold prehistoric resources. As listed under impact discussion CUL-1 of the Draft EIR, Policy 4-1.1 requires the preservation and enhancement of the city's natural waterways and landscapes; Policy 3- 5.7 requires that construction adjacent to creek channels is sensitive to the natural environment, preserves topography and vegetation along the creek, does not disrupt or pollute the waterway, and</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
	<ul style="list-style-type: none"> Working with local tribes to develop and apply tribal protection policies related to tribal cultural resources. <p>*Action 4-2.4: During ground disturbance for development projects, if tribal cultural resources are encountered, work shall be halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative have evaluated the situation and recorded identified tribal cultural resources—which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, or plants with cultural value to the tribe(s)—and determined suitable mitigation measures. If human remains are inadvertently discovered, contact the MLDs, as identified by the NAHC.</p>		<p>provides an adequate setback buffer; and mitigating *Action 3-5.19 and *Action 3-5.20 require new development along channelized waterways to establish an ecological buffer zone between the waterway and development.</p> <p>Compliance with federal and State laws, as described in Section 4.16.1.1 of the Draft EIR and the Santa Rosa General Plan 2050 goals, policies, and actions would protect unrecorded TCRs in the EIR Study Area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. Therefore, impacts to TCRs would be less than significant.</p>
WILDFIRE (WF)			
<p>Impact WF-1: Implementation of the Santa Rosa General Plan 2050 could result in inadequate wildfire-related evacuation access and impair the implementation of an emergency evacuation plan.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-5.14: The City shall require all new development projects to provide adequate access for fire and emergency response personnel.</p> <p>*Action 5-5.15: The City shall prohibit the creation of new single ingress/egress roadway conditions in the city.</p> <p>*Action 5-5.16: The City shall retrofit existing single-access residential neighborhoods to include additional access routes or other provisions to increase evacuation safety.</p> <p>*Action 5-5.17: The City shall analyze the capacity, viability, and safety of evacuation routes and evacuation locations throughout the city under a range of emergency scenarios and incorporate the results, as necessary, into the Safety Element of the General Plan. This analysis will be completed as part of the City’s Annex to the Sonoma County Multi-Jurisdictional Hazard Mitigation Plan in 2026.</p>	<p>Less than Significant</p>	<p>Finding: Implementation of mitigating Santa Rosa General Plan *Action 5-5.14, *Action 5-5.15, *Action 5-5.16, and *Action 5-5.17, which have been required or incorporated into the Project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigating General Plan actions be adopted. The City Council, therefore, finds that changes or alterations have been required in the Project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p>Explanation: Implementation of the Santa Rosa General Plan 2050 goals, policies, and actions would increase the effectiveness of emergency operations and wildfire-related evacuation, and therefore would not impair or conflict with applicable plans. Specifically, mitigating *Action 5-5.16 would reduce the number of evacuation-constrained residential parcels identified on Figure 4.18-5 of the Draft EIR, by retrofitting existing single-access roads in residential neighborhoods to include additional access routes or other provisions to increase evacuation safety. Mitigating *Action 5-5.17 would improve evacuation scenarios by requiring the City to analyze the capacity, viability, and safety of evacuation routes and evacuation locations throughout the city under a range of emergency scenarios and incorporate the results, as necessary, into the Safety Element of the General Plan. This analysis shall be completed as part of the City’s Annex to the Sonoma County Multi-Jurisdictional Hazard Mitigation Plan in 2026. In addition, as described, the proposed changes to the circulation infrastructure include strategic improvements that</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			include evacuation route upgrades primarily on arterials within Wildland-Urban Interface Fire Areas (WUIFA). Future development, regardless of whether it includes new development or redevelopment, would be required to comply with adopted local, regional, and State plans and regulations addressing emergency response and evacuation, including mitigating *Action 5-5.14 and *Action 5-5.15, which require the provision of adequate access for fire and emergency response personnel and prohibit the creation of new single access roadways in the city. Therefore, implementation of the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.
<p>Impact WF-2: Potential future development over the buildout horizon of the Project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-3.8: The City shall require the preparation of fire protection plans for new development and major remodels in the City's Wildland-Urban Interface Fire Area (WUIFA). Require that fire protection plans be consistent with requirements of the California Fire Code and include a risk analysis, fire response capabilities, fire safety requirements (e.g., defensible space, infrastructure, and building ignition resistance), mitigation measures, design considerations for non-conforming fuel modifications, wildfire education maintenance and limitations, and evacuation plans.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Goals, policies, and actions identified in the Santa Rosa General Plan 2050 provide the best wildfire hazard reduction measures available. Specifically, mitigating *Action 5-3.8 requires the preparation of fire protection plans for new development and major remodels in the City's WUIFA, which are highly vulnerable areas; that are consistent with requirements of the California Fire Code and include a risk analysis, fire response capabilities, fire safety requirements (e.g., defensible space, infrastructure, and building ignition resistance), mitigation measures, design considerations for nonconforming fuel modifications, wildfire education maintenance and limitations, and evacuation plans. However, the only way to fully avoid the wildfire impact from implementation is to prohibit development in Very High Fire Hazard Severity Zones (FHSZ) and the WUIFA. The majority of northern and eastern Santa Rosa is in a Very High FHSZ and/or the WUIFA. Prohibiting new development in this portion of Santa Rosa is not feasible or practical because the City has a responsibility to meet other, conflicting obligations, including increasing the number and type of housing available and allowing reconstruction of homes burned by wildfires. Therefore, this measure is considered and rejected, and there are no feasible mitigation measures beyond the policies and plans described above. Due to potential unknown impacts from future development over the buildout horizon of the Project, impacts at the programmatic level would</p>

ENVIRONMENTAL IMPACT	MITIGATING GENERAL PLAN 2050 POLICIES AND ACTIONS	SIGNIFICANCE WITH MITIGATION	FINDINGS OF FACT
			remain significant and unavoidable. This conclusion does not preclude a finding of less-than-significant impacts at the project level.
<p>Impact WF-5: Potential development over the buildout horizon of the Project could, in combination with other surrounding and future projects in the State Responsibility Areas (SRA), Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface Fire Areas (WUIFA), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.</p>	<p>General Plan 2050 Chapter 5, <i>Safety, Climate Resilience, Noise, and Public Services and Facilities</i></p> <p>*Action 5-3.8: The City shall require the preparation of fire protection plans for new development and major remodels in the City’s Wildland-Urban Interface Fire Area (WUIFA). Require that fire protection plans be consistent with requirements of the California Fire Code, as subsequently revised, supplemented, or replaced, and include a risk analysis, fire response capabilities, fire safety requirements (e.g., defensible space, infrastructure, and building ignition resistance), mitigation measures, design considerations for non-conforming fuel modifications, wildfire education maintenance and limitations, and evacuation plans.</p>	Significant and Unavoidable	<p>Finding: The City Council finds that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p>Explanation: Same as Impact WF-2, even with implementation of the Santa Rosa General Plan 2050 goals, policies, and actions, including mitigating *Action 5-3.8, the only way to fully avoid the cumulative wildfire impact is to prohibit development in the SRA, Very High FHSZs, and WUIFA throughout the region. As a full prohibition of development in these areas is not feasible in the region, this impact is significant and unavoidable.</p>