

5 CEQA Required Conclusions

This section presents a summary of the impacts of the Proposed Plan in several subject areas specifically required by CEQA, including growth-inducing impacts, cumulative impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant. These findings are based, in part, on the analysis provided in Chapter 3: Environmental Settings and Impacts.

5.1 Growth-Inducing Impacts

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.

Growth-inducing impacts, such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period, are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events such as business development cycles and natural disasters. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies related to a single city or development project. Business trends are influenced by economic conditions throughout the state and country, as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private or public sector. These investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. These factors, combined with the regulatory authority of local governments, mediate the growth-inducing potential or pressure created by a proposed plan. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the Proposed Plan.

The Proposed Plan allows for new residential and non-residential development that could result in an increase in population, housing, and jobs, compared to existing conditions.

GROWTH HISTORY AND PROJECTIONS

The Metropolitan Transportation Commission (MTC) is the transportation planning, funding and coordinating agency for the nine-county San Francisco Bay Area. The Association of Bay Area Governments (ABAG) is the regional planning agency for the Bay Area's nine counties and 101 cities and towns. The two agencies merged in 2017 and together they are the key regional agency involved in forecasting growth in Sonoma County. Although MTC/ABAG can forecast growth, it does not have authority to approve or deny land use plans or development projects.

Population

The Planning Area currently has a population of approximately 5,500 residents. Current citywide population is approximately 174,244¹, an approximately four percent increase from its population in 2010 (167,815²). This population growth was in line with population growth for Sonoma county as a whole, whose population increased by about 3.5 percent between 2010 and 2019, from a population of 483,878 to 500,943 (American Community Survey, 2018) (US Census Bureau, 2010).

The Association of Bay Area Governments (ABAG) projects that through 2040, Santa Rosa's population is projected to grow to about 223,060 residents and 83,880 households. Existing population and anticipated future population, based on buildout of the Proposed Plan are shown in Tables 5.1-1 and 5.1-2.

Table 5.1-1 Projected Residential Population within the Planning Area

	Existing (2019)	2007 DSASP (2035)	Proposed Plan (2040)
Housing Units	2,445	5,694	9,451
Population	5,500	15,488 ¹	22,300

Notes:

1. Calculated based on an average household size of 2.72, from ACS 5-Year estimate for 2019 for the City of Santa Rosa

Source: Dyett and Bhatia, 2019

Table 5.1-2 Projected Residential Population Citywide

	Existing (2019)	Projected (2040)	Projected with Proposed Plan (2040)
Housing Units	64,709	83,880	87,041
Population	174,244	223,060	239,860

Source: American Community Survey, 2013; Association of Bay Area Governments & Metropolitan Transportation Commission, 2018; Dyett & Bhatia, 2019

¹ ACS 2017 (5-Year Estimates)

² US Census, 2010.

Increase in Regional Housing Demand

Between 2000 and 2018, the number of housing units increased throughout the Bay Area by approximately 13.2 percent, from 2,552,404 to 2,888,882 (California Department of Finance, 2012) (California Department of Finance, 2018).

Between 2010 and 2019, Sonoma County experienced an approximate 3 percent growth in the housing stock, adding about 4,233 units (US Census Bureau, 2010) (American Community Survey, 2018). During the same time, the number of housing units in the City of Santa Rosa increased by approximately 2 percent, from 63,590 housing units in 2010 to 64,709 in 2018. ABAG projects a housing increase to 83,880 housing units by 2040, an increase of 30 percent from current stock.

Employment Growth

ABAG projects an employment base of 92,060 within the City of Santa Rosa by 2040, an increase of 7 percent over what is projected for 2020. The Proposed Plan includes opportunities for employment growth, based on assessment of economic factors and potential demand.

An 18 percent increase in jobs is projected to occur in the Planning Area between 2019 and 2040, for a total of 17351 jobs.

Table 5.1-3 describes employment within the Planning Area by sector under existing conditions and the Proposed Plan.

Table 5.1-3: Projected Employment (2040)

	<i>Existing (2019)</i>	<i>Future Development</i>	<i>2040 Total¹</i>
Office	5,518	880	6,398
Retail	5,638	745	6,383
Service	2,175	1,240	3,415
Industrial	1,139	122	963
Total Jobs ¹	14,698	3,011	17,351

Notes:

1. Numbers may not add due to rounding

Source: Dyett and Bhatia, 2019.

Jobs/Housing Ratio

The Proposed Plan’s population and housing growth would exceed that projected by ABAG. Additionally, as shown in Table 5.1-4, the City of Santa Rosa’s jobs-to-housing ratio would decline under implementation of the Proposed Plan. As of 2019, the City’s jobs-to-housing ratio was 6.01. Under the Proposed Plan, this ratio would decline to 1.84. A jobs-to-housing ratio higher than 1.0 suggests that residents are not required to commute to jobs outside of their place of residence.

Table 5.1-4: Jobs-to-Housing Unit Ratio (2019 & 2040)

	2019	2040
Jobs	14,698	17,351
Housing Units	2,445	9,451
Jobs to Housing Unit Ratio	6.01	1.84

Sources: American Community Survey, 2013; Dyett & Bhatia, 2019

DIRECT AND INDIRECT GROWTH

As shown in Tables 5.1-1 and 5.1-2, the Proposed Plan would support a degree of anticipated growth in the City of Santa Rosa and this direct growth is analyzed throughout this EIR. Impacts of growth on infrastructure such as public services and utilities, the transportation system, and natural resources are identified, based on the buildout of the Proposed Plan. Some of the identified effects of growth are significant and unavoidable. In general, future development would be subject to additional site-specific environmental review under CEQA.

Given the Planning Area's central importance to economic life in Santa Rosa and Santa Rosa's relatively large population compared to Sonoma county as a whole, it is possible that growth within the Planning Area will cause pressure for growth elsewhere in the City and County. However, while **the Planning Area's jobs-to-housing ratio** would decline under implementation of the Proposed Plan, it would be reduced to slightly above 1.0, indicating that jobs and housing would be relatively well-balanced. Excessive commuting in or out of the Planning Area is thus unlikely.

Growth under the Proposed Plan would primarily serve the local community and would accommodate existing and projected demand. Growth within the Planning Area would increase available housing, jobs, retail and entertainment opportunities, and access to transit options.

REMOVAL OF OBSTACLES TO GROWTH

The 2007 DSASP could be viewed as an obstacle to growth, given that it has not resulted in the degree of growth that was projected at its adoption. By updating the DSASP, the Proposed Plan could be viewed as removing an obstacle to growth. Specific impacts resulting from this change are analyzed by resource area in Chapter 3 of this EIR.

5.2 Cumulative Impacts

CEQA requires that an EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a **cumulative impact** “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” Furthermore, the analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence.” (CEQA Guidelines Section 15130(b)).

In order to assess cumulative impacts, an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or

related planning document. Because it is a long-range, programmatic plan for an entire city and surrounding area, the Proposed Plan represents the cumulative development scenario for the reasonably foreseeable future in the Planning Area, and this analysis uses the summary projections of the Proposed Plan.

Several analyses presented in Chapter 3: Environmental Settings and Impacts represent cumulative analyses of issues through the Proposed Plan horizon year of 2040 because they combine the anticipated effects of the Proposed Plan with anticipated effects of regional growth and development. By their nature, the air quality transportation, noise, energy, greenhouse gas emissions, and climate change analyses presented in Chapter 3 represent a cumulative analysis, because the effects specific to the Proposed Plan cannot reasonably be differentiated from the broader effects of regional growth and development. Thus, analyses for these topics reflect not just growth in the Planning Area, but growth elsewhere in the region as well. The cumulative conclusions are summarized there, and where applicable, significant unavoidable impacts are listed in Section 5.3 Significant and Unavoidable Impacts. Other cumulative impacts are identified below.

AIR QUALITY

The City of Santa Rosa is located in the San Francisco Bay Area Air Basin (SFBAAB). The Bay Area Air Quality Management District is the regional air quality agency for the SFBAAB, which comprises all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties, the southern portion of Sonoma County, and the southwestern portion of Solano County. Air quality in this region is determined by such factors as topography, meteorology, and climate. Given the regional scale at which air quality patterns emerge and are regulated, the entirety of the SFBAAB serves as area of potential effect for cumulative air quality impacts. Accordingly, the air quality analysis presented in Chapter 3 represents a cumulative analysis of air quality conditions through 2040. As a result of the amount of development anticipated by the Proposed Plan, the **Proposed Plan's generation of criteria air pollutants** is the cumulative condition for CEQA purposes.

Implementation of the Proposed Plan would facilitate growth within the Planning Area which, in conjunction with other reasonably foreseeable development, could cumulatively degrade regional air quality. However, the BAAQMD publishes the Bay Area Clean Air Document, a regional strategy document which includes control measures designed to decrease air pollution. Regional adherence to this plan would ensure that the cumulative impacts of development on air quality are less than significant. Additionally, BAAQMD has established project-level thresholds to evaluate impacts to air quality and to prevent deterioration of ambient air quality. In developing thresholds of significance for air pollutants, BAAQMD considers **the emission levels for which a project's individual emissions would be cumulatively considerable**. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant **adverse air quality impacts to the region's existing air quality conditions**. This practice provides a tool to ensure that all future development considers potential contributions to cumulative air quality impacts early in project life, and thereby reduces the possibility that cumulative air quality impacts will occur. Thus, the Proposed Plan, in conjunction with reasonably foreseeable future development, would cumulatively have a less than significant impact on ambient air quality.

Implementation of the Proposed Plan would facilitate growth within the Planning Area which, in conjunction with other development occurring within the Air Basin, would increase construction-related air pollution emissions. However, all development occurring within BAAQMD's territory would be subject to the agency's project-level thresholds which, as discussed above, consider cumulative air quality impacts. Cumulative construction-related emissions would thus be less than significant.

As discussed above, BAAQMD has identified project-level thresholds to evaluate impacts to air quality (Table 3.1-7). The thresholds have been adopted to prevent further deterioration of ambient air quality, which is influenced by emissions generated by projects within a specific air basin. The project-level thresholds, therefore, consider relevant past, present, and reasonably foreseeable future projects within SFBAAB. Regional adherence to these thresholds would ensure that the Proposed Plan, in conjunction with reasonably foreseeable development across the region, would not result in a significant impact on the emissions of criteria air pollutants for which the Proposed Plan region is in non-attainment, for both operational and construction emissions.

Implementation of the Proposed Plan would facilitate growth within the Planning Area which, in conjunction with other reasonably foreseeable development, could result in new sensitive receptors located in proximity to cumulatively considerable emissions of toxic air contaminants from mobile and stationary sources. As discussed in Chapter 3, BAAQMD has established project-level and cumulative thresholds for cancer and non-cancer health hazards for sources within 1,000 feet of a sensitive receptor. If a project exceeds the identified project-level significance thresholds, its emissions in concert with contributions from all nearby sources (cumulative emissions) may result in significant adverse air quality impacts. Cumulative health risk thresholds defined by BAAQMD are the probability of contracting cancer for the maximally exposed individual (MEI) exceeding 100.0 in 1 million, the ground-level concentrations of non-carcinogenic TACs resulting in a hazard index (HI) greater than 1.0 for the MEI, and PM_{2.5} exhaust concentrations exceeding 0.8 µg/m³. Implementation of Proposed Plan policies and Mitigation Measures AQ-1 through AQ-4 would ensure that new sensitive receptors would not be exposed to pollutant concentrations exceeding project-level thresholds. Given that cumulative emissions from all existing and reasonably foreseeable future sources within 1,000 feet of new sensitive receptors under the Proposed Plan would not exceed BAAQMD cumulative health risk thresholds, the Proposed Plan would have a less than cumulatively considerable impact on the health of sensitive receptors.

Finally, implementation of the Proposed Plan would facilitate growth within the Planning Area which, in conjunction with other reasonably foreseeable development, could result in cumulatively considerable emissions of odorous substances. As discussed in Chapter 3, future development within the City of Santa Rosa would be required to comply with City Code performance standards that address noxious odors and BAAQMD rules. Future development within the Planning Area that would fumes or odors would be required to be designed to minimize any impacts on adjacent sensitive uses, including provision of adequate ventilation. Therefore, the Proposed Plan would have a less than cumulatively considerable impact with respect to consistency with applicable air quality plans and generation of other pollutants such as odorous substances.

CULTURAL, HISTORIC, AND TRIBAL CULTURAL RESOURCES

The geographic context considered for the cumulative cultural, historic, and tribal cultural resources impacts consists of the area surrounding the Planning Area which, when combined with the Planning Area, could result in cumulative impacts to historical, archaeological, and tribal cultural resources. However, at the time development or redevelopment projects are proposed, the project-level CEQA document would need to identify potential impacts on known or potential historic sites and structures. The CEQA Guidelines require a project that will have potentially adverse impacts on historical resources to conform to the **Secretary of the Interior's Standards for the Treatment of Historic Properties**. Adherence to these requirements, in conjunction with Proposed Plan policies requiring the preservation and maintenance of historic resources, would ensure that the **Proposed Plan's** incremental contribution to this impact would not be cumulatively considerable.

Archaeological resources have been found in the Planning Area, and there are sites in the Planning Area that may be sensitive for unrecorded resources, most notably anywhere that has been under occupation or use for at least 45 years. Anticipated development projects under the Proposed Plan may involve grading, excavation, or other ground-disturbing activities, which could have a cumulative impact on unknown archaeological resources. However, compliance with General Plan policies, as well as applicable local, State, and federal laws, would ensure that the Proposed Plan's contribution to this impact would not be cumulatively considerable.

All development projects allowed under the Proposed Plan would be required to comply with State laws pertaining to the discovery of human remains and disposition of Native American burials; therefore, the Proposed Plan would result in a less than cumulatively considerable contribution to impacts related to human burials.

While there are no recorded Native American resources within the Planning Area, development projects allowed under the Proposed Plan may result in the identification of unrecorded tribal cultural resources given the historic occupation of the area. Future projects that would not otherwise qualify for an exemption under CEQA would be required to comply with the provisions of AB 52 to incorporate tribal consultation into the CEQA process. Therefore, the Proposed Plan's contribution to this impact is not cumulatively considerable.

ENERGY, CLIMATE CHANGE, AND GREENHOUSE GAS EMISSIONS

As discussed above, the City of Santa Rosa is located in the SFBAAB. The Bay Area Air Quality Management District (BAAQMD) has local jurisdiction over air quality in the San Francisco Bay Area Basin (SFBAAB), including projects in the City of Santa Rosa. BAAQMD has adopted advisory emission thresholds to assist CEQA lead agencies in determining the level of significance of a project's GHG emissions, including long range plans. Additionally, the Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG) is the MPO for the nine counties that comprise the San Francisco Bay Area, which includes the City of Santa Rosa. MTC/ABAG adopted an SCS as part of their regional transportation plan (RTP) known as Plan Bay Area. Given the regional scale at which climate change impacts are felt and regulated, the entirety of the SFBAAB serves as area of potential effect for cumulative energy, climate change, and greenhouse gas (GHG) emissions impacts. By its nature, the analysis presented in Chapter 3

represents a cumulative analysis of energy consumption and GHG emissions through 2040. As a **result of the amount of development anticipated by the Proposed Plan, the Proposed Plan's** consumption of energy and generation of greenhouse gases the cumulative condition for CEQA purposes.

Implementation of the Proposed Plan would facilitate growth within the Planning Area which, in conjunction with other reasonably foreseeable development, could cumulatively degrade regional air quality. However, the BAAQMD publishes the Bay Area Clean Air Document, a regional strategy document which includes control measures designed to decrease air pollution. Regional adherence to this plan would ensure that the cumulative impacts of development on air quality are less than significant. Additionally, BAAQMD has established project-level thresholds to evaluate impacts to air quality and to prevent deterioration of ambient air quality. In developing thresholds of significance for air pollutants, BAAQMD considers **the emission levels for which a project's** individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant **adverse air quality impacts to the region's existing air quality conditions**. This practice provides a tool to ensure that all future development considers potential contributions to cumulative air quality impacts early in project life, and thereby reduces the possibility that cumulative air quality impacts will occur. Thus, the Proposed Plan, in conjunction with reasonably foreseeable future development, would cumulatively have a less than significant impact on ambient air quality.

Implementation of the Proposed Plan would facilitate growth within the Planning Area which, in conjunction with other development occurring within the Air Basin, would consume energy and **generate GHG emissions**. However, **all construction occurring within BAAQMD's territory** would be regulated under three airborne toxic control measures (ATCMs) adopted by CARB that would increase energy efficiency and reduce generation of greenhouse gases. All future development would be required to comply with the latest California Building Code (CBC) requirements, including CBC Energy Efficiency Standards, as well as all federal, State, and local rules and regulations pertaining to energy consumption and conservation. Additionally, the Proposed Plan includes measures aimed at addressing energy efficiency in construction, including requiring projects to utilize alternative fueled construction vehicles and equipment. Therefore, construction of projects within the Planning Area and other reasonably foreseeable development would not cumulatively contribute to energy consumption or GHG emissions.

As discussed in Chapter 3, the Proposed Plan includes multiple policies that support development of green buildings and green infrastructure, expansion of the electric vehicle network, and emphasize vehicle trip reduction strategies, compact development patterns, and mixed use development. These development patterns are designed to reduce emissions in accordance with the MTC/ABAG Sustainable Communities Strategy and therefore Plan Bay Area, which was developed to anticipate GHG emissions and energy consumption from all foreseeable development within the 9 Bay Area counties. The Proposed Plan would be consistent with the significance threshold of 1.7 MTCO₂e per capita in 2040 based on Statewide GHG reduction goals established in SB 32 and EO S-3-05 and CARB Scoping Plan per capita reduction targets. Therefore, attainment of this target is considered **"substantial progress" towards the 2050 statewide milestone**. **The Proposed Plan would** be consistent with State and local plans for renewable energy or energy efficiency and those adopted for the purpose of reducing GHG emissions. Therefore, development under the Proposed Plan in combination with reasonably foreseeable development within the Bay Area would not cumulatively

contribute to operational emissions of GHGs or energy consumption beyond what has been planned for.

HYDROLOGY AND WATER QUALITY

According to the DWR, the Planning Area is located in the Santa Rosa Plain Sub-basin of the greater Santa Rosa Valley Groundwater Basin. US Geological Survey Water Supply Paper 1427 established that the primary water-bearing unit of the Santa Rosa Plain Sub-basin is the Merced Formation. This is the area of potential effect for cumulative groundwater impacts.

Development facilitated by the Proposed Plan would result in indirect cumulative impacts on groundwater resources by accommodating future planned urban development that would have the potential to increase demand for groundwater resources and impede groundwater recharge. However, the City of Santa Rosa is a participant in the Santa Rosa Plain GSA (SRPGSA). As described in Section 3.4, *Hydrology*, the State has designated the Santa Rosa Sub-basin as a medium-priority groundwater basin, and as such, it is subject to SGMA. The SRPGSA is required to complete and maintain a plan for long term sustainability of the Santa Rosa Sub-basin. Compliance with the SGMA legislation, by regularly demonstrating that the basin is not overdrafted, ensures that the groundwater draws will be carefully managed and sustainably used, and that future development will not substantially deplete groundwater supplies from increased demand. Thus, implementation of the Proposed Plan, in conjunction with reasonably anticipated future development in the region, would not constitute a cumulatively considerable impact on groundwater supply. As the Planning Area is already highly built out, development under the Proposed Plan would not contribute to a significant impact to groundwater recharge. **The Proposed Plan's incremental contribution to cumulative impacts would therefore not be significant.**

NOISE

The area of potential effect used to determine the cumulative effects of noise is the City of Santa Rosa city limit, as this border demarcates the area over which the City has authority to regulate noise levels. The effects specific to the Proposed Plan cannot reasonably be differentiated from the broader effects of regional growth and development. Thus, the noise analysis reflects not just growth in the Planning Area, but growth elsewhere in the region as well. Thus, the noise analysis represents a cumulative analysis of noise impacts with the potential to effect the Planning Area because it combines the anticipated effects of the Proposed Plan with anticipated effects of regional growth and development. Consequently, the impact significance conclusions discussed in Chapter 3.5 are representative of cumulative impacts.

As discussed in Chapter 3.5, implementation of the Proposed Plan would facilitate growth, which would increase both the level of traffic-related noise and the number of sensitive receptors within both the Planning Area and city of Santa Rosa as a whole. This development could lead to cumulative impacts on exterior and interior noise levels.

Adherence to General Plan policies NS-B-4 and NS-B-8 would help mitigate exterior noise impacts citywide by limiting noise associated with traffic and requiring acoustical studies be performed and appropriate mitigation measures be identified for new construction in areas where the General Plan's noise standards may not be met. Adherence to General Plan Policy NS-B-9 would mitigate

interior noise impacts by encouraging developers to incorporate sound attenuating features into site plans. Both sets of policies would be applied citywide and would therefore ensure that cumulative impacts of noise are less than significant.

PUBLIC FACILITIES AND RECREATION

The area of potential effect used to determine cumulative effects on public facilities and recreation is the City of Santa Rosa city limit, as this border demarcates the area over which the City has responsibility for and ability to construct, fund, and maintain public facilities, as well as the area for which park service standards are calculated.

The Proposed Plan would facilitate population growth, which increase the demand for parks and recreational facilities.

In 2018, Plan Bay Area projected that total population in Santa Rosa would be 223,060 by 2040 (Association of Bay Area Governments, Metropolitan Transportation Commission, 2018). Adding the 16,800 new residents expected to result from implementation of the Proposed Plan generates a citywide population projection of 231,730 by 2040.

Table 5.2-1: Current and Projected Population within the Planning Area and Citywide

	Planning Area	Citywide
Current Population (2019)	5,500	174,244
Buildout Population (2040)	22,300	231,730

Sources: American Community Survey, 2013-2017; Association of Bay Area Governments & Metropolitan Transportation Commission, 2018; Dyett and Bhatia, 2019

This projected population growth would be accompanied by growth in Santa Rosa’s park acreage. The City has recently approved 47.7 acres of new parkland development, which may be operational by Proposed Plan buildout. Improvements or updates to three existing parks are currently planned: A Place to Play Park, Coffey Neighborhood Park, and Rinconada Park (City of Santa Rosa, n.d.). As shown in Table 5.2-2, citywide growth and expansion of park services is projected to reduce the citywide park service standard from 3.68 to 2.97 parkland acres per 1,000 residents. This decrease in parkland service ratio below the 3.5 acres of parkland per 1,000 residents would represent a significant cumulative impact to park and recreational services. Further, as development under the Proposed Plan is projected to represent approximately 30 percent of citywide growth through 2040, **the Proposed Plan’s incremental impact is cumulatively considerable.**

Table 5.2-2: Current and Projected Citywide Park Acreage

Current Park Acreage (2019)	641.4
Current Parkland Service Ratio (acres of parkland / 1,000 residents)	3.68
Projected (2040)	689.1
Projected Parkland Service Ratio (acres of parkland / 1,000 residents)	2.97

Sources: Dyett and Bhatia, 2019; City of Santa Rosa, n.d.

However, as development occurs within the Planning Area, project proponents would be required to dedicate land or pay an in-lieu fee pursuant to parkland dedication requirements of the City Code. Proposed Plan Policy UDCS 1-4 explicitly requires that all park impact fees collected Downtown are used for park and recreational space facilities in the Downtown Station Area. The **City's park funding mechanisms, such as Measure M, would provide funding for ongoing operation and maintenance.** Additionally, Policy PSS 3-2 empowers the City to explore a range of financing strategies to fund and maintain public service and infrastructure improvements, including the maintenance and construction of parks.

Additionally, mitigation measure MM PF-1 requires that the City update the General Plan to identify potential locations for new neighborhood and community parks as needed to satisfy projected demand and complete environmental review within 36 months of adopting the Proposed Plan. **Implementation of the above regulations would ensure that the Proposed Plan's impacts associated with the construction of new and the expansion of existing park facilities would be less than cumulatively significant.**

TRANSPORTATION

By their nature, the performance of transportation networks—particularly routes such as US 101 and SR 12—may be impacted by development occurring within the Planning Area, City of Santa Rosa, greater Bay Area, and beyond. These networks serve transportation needs across the State and are often directly managed and regulated via State and federal agencies. Thus, the transportation analysis presented in Chapter 3 represents a cumulative analysis of transportation conditions through 2040. As a result of the amount of development anticipated by the Proposed Plan, the Proposed Plan's travel demand and VMT is the cumulative condition for CEQA purposes.

Under the Proposed Plan cumulative scenario, the amount of vehicle travel generated by residents as well as the service population (residents plus employees) within the Planning Area would be more than 15 percent below current cityside levels, and the amount of vehicle travel generated by employees within the Planning Area would be more than 15 percent below the countywide average. Per CEQA Guidelines section 15064.3, this is well below the thresholds of significance and constitutes a less than considerable contribution impact regarding VMT.

The Proposed Plan includes multiple policies that improve multi-modal mobility and would expand the existing bicycle and pedestrian facilities while accommodating vehicle traffic. Implementation of these policies would ensure that the Proposed Plan, in conjunction with reasonably foreseeable future development, would have a less than significant cumulatively considerable contribution towards conflicts with programs and plans that address the circulation system **The Proposed Plan's incremental impact would therefore also be less than cumulatively significant.**

The Proposed Plan covers a geographic area that is already predominantly built out, with much of the future development potential occurring through redevelopment of existing developed sites. Vehicular access to projects within the Planning Area would generally take place via existing streets. Where new roads or access points are required, specific access schemes would be determined during project design, and would undergo review for compliance with safety and design standards by the City of Santa Rosa as required. Any new transportation facilities would be designed and

constructed to local, regional, and federal standards, and as such, would not be expected to introduce any hazardous design features. Additionally, queuing analysis conducted for the freeway off-ramps in the vicinity of the Planning Area that would provide primary access to the Planning Area and encounter future increases in traffic associated with implementation of the Proposed Plan concluded that off-ramp queues are projected to remain within the available ramp storage capacities and not extend onto the mainline freeways. Thus, the Proposed Plan, in conjunction with reasonably foreseeable future development, would not cumulatively result in a significant impact to road safety with regards to a geometric design feature or incompatible uses. The incremental impact of the Proposed Plan would thus be less than significant.

Future development under the Proposed Plan would be subject to the requirements contained in **the City's Design and Construction Standards, which include requirements for emergency access, and would be reviewed by public safety officials as part of the City's entitlement process.** In addition, SRCC Chapter 18-44, Fire Code, requires that roads be maintained to provide adequate space for emergency vehicle access. The Proposed Plan, in conjunction with reasonably foreseeable future development, would therefore not cumulatively result in a significant impact to emergency access. The incremental impact of the Proposed Plan would therefore be less than significant.

UTILITIES AND SERVICE SYSTEMS

The cumulative geographic context for the activities facilitated by the Proposed Plan consists of the Planning Area as well as all areas within the City of Santa Rosa city limit, as utility services are provided citywide. Future development anticipated by the Proposed Plan would generate growth within the city limit, and hence additional demand for water and wastewater, stormwater, and solid waste services, as well as generating additional solid waste. These increases in demand for City utilities could cause cumulatively considerable impacts.

Development under the Proposed Plan would increase demand for water infrastructure. However, the City has already planned citywide Capital Improvements Projects which would, with the exception of the Maxwell Court area, ensure sufficient access to water utilities everywhere in the city. **Future development's water needs would be assessed on a site-level basis.** Thus, **cumulative impacts on water infrastructure would be less than significant, as would be the Proposed Plan's incremental impact.**

The City of Santa Rosa is a participant in the Santa Rosa Plain GSA (SRPGSA). As described in Section 3.4, *Hydrology*, the State has designated the Santa Rosa Sub-basin as a medium-priority groundwater basin, and as such, it is subject to SGMA. The SRPGSA is required to complete and maintain a plan for long term sustainability of the Santa Rosa Sub-basin. Compliance with the SGMA legislation, by regularly demonstrating that the basin is not overdrafted, ensures that the groundwater draws will be carefully managed and sustainably used, and that future development will not substantially deplete groundwater supplies from increased demand. Thus, **cumulative impacts on groundwater resources would be less than significant, as would be the Proposed Plan's incremental impact.**

Development under the Proposed Plan would facilitate growth and thereby increase sewer flows. However, the **City's citywide Sanitary Sewer Management Plan** already recommends capital improvements for trunk mains. These improvements would increase trunk capacity and facilitate

wastewater flows throughout the service area. Thus, cumulative impacts on sewer infrastructure would be less than significant. Additionally, additional flows attributable to the Proposed Plan are **well below current average flow rates, meaning that the Proposed Plan's incremental contribution** to any cumulative impacts would not be cumulatively considerable. However, the City may want to consider changing some its Priority 2 Crosstown Trunk improvements to Priority 1.

Implementation of the Proposed Plan would facilitate development within the Planning Area. Associated construction activities and increases in the surface area of impermeable surfaces may have a cumulative impact on local stormwater runoff. However, as the City of Santa Rosa is already heavily built out, these cumulative impacts would be less than significant, as would the incremental effect of the Proposed Plan.

Development under the Proposed Plan would facilitate growth and thereby lead to higher rates of solid waste disposal. Development under the Proposed Plan, in conjunction with other development within the waste disposal service area, may have a cumulative impact on volumes of waste disposal. However, **the City's rigorous waste reduction policies ensure** that waste reduction is a high priority citywide. Therefore, the cumulative impacts of development within the service area would be less than significant. Further, **the Proposed Plan's increase in waste generation rate represents 1.6 percent of the Central Disposal Facility's annual permitted throughput. This minimal increase in waste disposal rate, combined with the Proposed Plan's commitment to supporting the goals of the City's Zero Waste Master Plan, would ensure that the incremental impact of the Proposed Plan is less than cumulatively considerable.**

Development under the Proposed Plan would increase local population and employment and thus increase demand for dry utilities such as gas, electricity, and internet service. However, increases in demand for these utilities will likely represent a small fraction of their regional capacity. Impacts are thus less than cumulatively considerable.

Population and employment within the Planning Area are both projected to increase under the Proposed Plan, facilitating increases in water demand. However, the State and local water conservation measures, including SB 606, AB 1668, the Green Building Code, SB 407, AB 1881, and **the City's Water Waste Ordinance, would ensure that the cumulative impacts of citywide development on local water resources are less than significant.** The water demand associated with implementation of the Proposed Plan is 558.25 million gallons per year, or approximately 1,833 AFY, by 2040. **This represents slightly more than 6 percent of Santa Rosa's current annual water usage. The Proposed Plan's incremental impact would therefore be less than cumulatively considerable..**

5.3 Significant and Unavoidable Impacts

Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. According to CEQA Guidelines 15126.2(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program, including those that can be mitigated, but not to a less-than-significant level. The analysis in Chapter 3 determined that the Proposed Plan would not result in any significant and unavoidable impacts.

As discussed in Chapter 3, the Proposed Plan would result in potentially significant impacts associated with the health of sensitive receptors from substantial pollutant concentrations, the potential demolition of historic structures, and access to parkland to a less than significant level. However, implementation of Proposed Plan policies and mitigation would reduce these impacts to a less-than-significant level.

5.4 Significant Irreversible Environmental Change

CEQA Guidelines require an EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (CEQA Guidelines Section 15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land or waterways, and resources that are renewable only over long time spans, such as soil productivity. A resource commitment is considered irretrievable when the use or consumption of the resource is neither renewable nor recoverable for use by future generations. Irreversible changes and irretrievable commitments of non-renewable resources anticipated by the Proposed Plan include the following issues. The Proposed Plan would involve two types of resources: (1) general industrial resources including fuels and construction materials; and (2) project-specific resources such as land, biotic and cultural resources at the building sites.

COMMITMENT/CONSUMPTION OF NON-RENEWABLE RESOURCES

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

- **Air Quality:** Increases in vehicle trips resulting from buildout of the Proposed Plan would potentially contribute to long-term degradation of air quality and atmospheric conditions in the region. Technological improvements in automobiles, including the growth of the electric vehicle market share, may lower the rate of air quality degradation in the coming decades. Nonetheless, vehicle trips resulting from implementation of the Proposed Plan could result in the irreversible consumption of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline for non-electric automobiles and long-term degradation of air quality.
- **Water Consumption:** To the extent that the Proposed Plan would accommodate new population and jobs, it would increase the demand for water and place a greater burden on water supply. While additional residents and workers would use more water, the City is expected to have adequate water to meet demand in normal and wet years in 2040. Despite the change in demand resulting from the Proposed Plan being marginal, the increase would represent an irreversible environmental change, as use of this resource would increase.
- **Energy Sources:** Residential and non-residential developments use electricity, natural gas, and petroleum products for lighting, heating, and other indoor and outdoor power

demands, while cars use both oil and gas. New development anticipated by the Proposed Plan would result in increased energy use for the operation of new buildings and for transportation. This new development would therefore result in an overall increased use of both renewable and nonrenewable energy resources. To the extent that new development uses more nonrenewable energy sources, this would represent an irreversible environmental change.

CONSTRUCTION-RELATED COMMITMENTS

Irreversible environmental changes could also occur during the course of constructing development projects anticipated by the Proposed Plan. New construction would result in the consumption of building materials (such as lumber, sand and gravel), natural gas, and electricity, water, and petroleum products to process, transport and build with these materials. Construction equipment running on fossil fuels would be needed for excavation and the shipping of building materials. Due to the non-renewable or slowly renewable nature of these resources, this represents an irretrievable commitment of resources.

However, development allowed under the Proposed Plan would not necessarily result in the inefficient or wasteful use of resources. Compliance with all applicable building codes, as well as existing and Proposed Plan policies and standard conservation features would ensure that natural resources are conserved to the maximum extent feasible. It is possible that new technologies or systems will emerge, or become more cost-effective or user-friendly, to further reduce the reliance upon non-renewable natural resources. Nonetheless, future activities related to implementation of the Proposed Plan could result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

5.5 Impacts Found Not to Be Significant

CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to be not significant. Chapter 3 of this EIR discusses all potential impacts, regardless of their magnitude in all issue areas except aesthetics, biological resource, forestry, geology and soils, hazards and hazardous materials, land use, mineral resources, and population and housing.

- **Aesthetics:** This topic was addressed in the EIR for the 2007 DSASP and all impacts were found to either be less than significant or less than significant with mitigation. It was determined that no new conditions or information emerged such that further environmental analysis would be needed for the Proposed Plan.
- **Biological Resources:** This topic was addressed in the EIR for the 2007 DSASP and all impacts were found to either be less than significant or less than significant with mitigation. It was determined that no new conditions or information emerged such that further environmental analysis would be needed for the Proposed Plan.
- **Forestry:** Forestry resources do not occur in the Planning Area and, therefore, would not be affected by the land use changes in the Proposed Plan.

- **Geology and Soils (including Mineral Resources):** This topic was addressed in the EIR for the 2007 DSASP and all impacts were found to either be less than significant or less than significant with mitigation. It was determined that no new conditions or information emerged such that further environmental analysis would be needed for the Proposed Plan.
- **Hazards and Hazardous Materials:** This topic was addressed in the EIR for the 2007 DSASP and all impacts were found to either be less than significant or less than significant with mitigation. It was determined that no new conditions or information emerged such that further environmental analysis would be needed for the Proposed Plan.
- **Land Use (including Agricultural Resources):** This topic was addressed in the EIR for the 2007 DSASP and all impacts were found to either be less than significant or less than significant with mitigation. It was determined that no new conditions or information emerged such that further environmental analysis would be needed for the Proposed Plan.
- **Mineral Resources:** There are no mineral resources identified in the Planning Area and, therefore, no potential impacts on this type of resource. It does not appear that there are any active oil wells in the vicinity of proposed new development or redevelopment.
- **Population and Housing:** This topic was addressed in the EIR for the 2007 DSASP and all impacts were found to either be less than significant or less than significant with mitigation. It was determined that no new conditions or information emerged such that further environmental analysis would be needed for the Proposed Plan.