2. Executive Summary

This chapter presents an overview of the proposed Santa Rosa General Plan 2050 (also known as Santa Rosa Forward), along with the associated Specific Plan and Santa Rosa City Code amendments, and Community-wide Greenhouse Gas Reduction Strategy (GHG Reduction Strategy) herein referred to together or separately as the "proposed project." This chapter also provides a summary of the alternatives to the proposed project, identifies issues to be resolved, areas of controversy, and conclusions of the analyses contained in Chapters 4.1 through 4.18 of this Draft Environmental Impact Report (EIR). For a complete description of the proposed project, see Chapter 3, *Project Description*, of this Draft EIR. For a discussion of alternatives to the proposed project, see Chapter 5, *Alternatives to the Proposed Project*, of this Draft EIR.

This Draft EIR addresses the environmental effects associated with adoption and implementation of the proposed project. The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An EIR is a public document designed to provide the public, local, and State governmental agency decision makers with an analysis of potential environmental consequences to support informed decision making.

This Draft EIR has been prepared pursuant to the requirements of CEQA[1] and the CEQA Guidelines[2] to determine if approval of the identified discretionary actions and related subsequent development could have a significant physical impact on the environment. As lead agency, the City of Santa Rosa (City) has reviewed and revised as necessary all submitted drafts, technical studies, and reports to reflect its own independent judgment, including reliance on applicable City technical personnel and review of all technical reports. Information for this Draft EIR was obtained from on-site field observations; discussions with public service agencies; analysis of adopted plans and policies; review of available studies, reports, data, and similar literature in the public domain; and specialized environmental assessments (e.g., air quality, cultural resources, biological resources, greenhouse gas emissions, noise, transportation, tribal cultural resources, and utilities and service systems).

[1] The CEQA Statute is found at Public Resources Code, Division 13, *Environmental Quality*, Sections 21000 to 21189.

[2] The CEQA Guidelines are found at California Code of Regulations, Title 14, *Natural Resources*, Division 6, *Resources Agency*, Chapter 3, *Guidelines for Implementation of the California Environmental Quality Act*, Sections 15000 to 15387.

2.1 ENVIRONMENTAL PROCEDURES

This Draft EIR has been prepared to assess the environmental effects associated with implementation of the proposed project. The main objectives of this document, as established by CEQA, are:

- To disclose to decision makers and the public the significant environmental effects of proposed activities.
- To identify ways to avoid or reduce environmental damage.
- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- To disclose to the public reasons for agency approval of projects with significant environmental effects.
- To foster interagency coordination in the review of projects.
- To enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation identified in the CEQA statute and CEQA Guidelines. It provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts. An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information contained in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations[3] if the proposed project would result in significant and unavoidable impacts.

2.1.1 REPORT ORGANIZATION

This Draft EIR is organized into the following chapters:

- Chapter 1, *Introduction*. Provides an overview describing the Draft EIR.
- Chapter 2, *Executive Summary*. Summarizes environmental consequences that would result from implementation of the proposed project, describes recommended mitigation measures, and indicates the level of significance of environmental impacts with and without mitigation.
- Chapter 3, *Project Description*. Describes the proposed project in detail, including the characteristics, objectives, and the structural and technical elements of the proposed action.
- Chapter 4, *Environmental Analysis*. Organized into Chapters 4.1 through 4.18 corresponding to the environmental resource categories identified in CEQA Guidelines Appendix G, *Environmental Checklist*, these chapters provide a description of the physical environmental conditions in the vicinity of the

[3] CEQA Guidelines Section 15093.

proposed project as they existed at the time the Notice of Preparation was published, from both a local and regional perspective. Additionally, this chapter provides an analysis of the potential environmental impacts of the proposed project, and recommended mitigation measures, if required, to reduce the impacts to less than significant where possible, and to reduce their magnitude or significance when impacts cannot be reduced to a less-than-significant level. The environmental setting included in each chapter provides baseline physical conditions, which provides a context that the lead agency uses to determine the significance of environmental impacts resulting from the proposed project. Each chapter also includes a description of the thresholds used to determine if a significant impact would occur, the methodology to identify and evaluate the potential impacts of the proposed project, and the potential cumulative impacts associated with the proposed project.

- Chapter 5, *Alternatives to the Proposed Project*. Considers alternatives to the proposed project, including the CEQA-required "No Project Alternative" and "Environmentally Superior Alternative."
- Chapter 6, *CEQA-Required Conclusions*. Discusses growth inducement, unavoidable significant effects, and significant irreversible changes as a result of the proposed project.
- Chapter 7, *Organizations and Persons Consulted*. Lists the people and organizations that were contacted during the preparation of this EIR for the proposed project.
- Chapter 8, *Acronyms and Abbreviations*. Lists the common acronyms and abbreviations in this Draft EIR.
- Appendices: The appendices for this document contain the following supporting documents:
  - Appendix A: Notice of Preparation and Scoping Comments
  - Appendix B: Air Quality and Greenhouse Gas Emissions Data
  - Appendix C: 2020 VMT Guidelines
  - Appendix D: Water Supply Assessment

2.1.2 TYPE AND PURPOSE OF THIS EIR

According to CEQA Guidelines Section 15121(a), the purpose of an EIR is to inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses. Because of the long-term planning horizon of the proposed project and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions for implementation, this EIR has been prepared as a program EIR for the proposed project, pursuant to CEQA Guidelines Section 15168.

Once a program EIR has been certified, subsequent activities within the program must be evaluated to determine whether additional CEQA review needs to be prepared. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, subsequent activities could be found to be within the program EIR scope, and additional environmental review may not be required (CEQA Guidelines Section 15168[c]). When a program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the program EIR into

the subsequent actions (CEQA Guidelines Section 15168[c][3]). If a subsequent activity would have effects that are not within the scope of a program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, a Mitigated Negative Declaration, or an EIR. For these subsequent environmental review documents, this Program EIR will serve as the first-tier environmental analysis.

2.2 SUMMARY OF PROPOSED PROJECT

The proposed project would replace the City's existing General Plan with an updated General Plan. The existing General Plan was prepared in 2009 and included a horizon year of 2035. While this horizon year is still approximately 11 years away, in the years between 2009 and 2022, Santa Rosa has experienced low housing production and increased homelessness, the destruction of housing and displacement of residents by the Tubbs fire, the impact of cannabis business activity on industrial and commercial land, and the annexation of the Roseland community into the city limit. 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 proposed 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 proposed 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. Because California Government Code Section 65860 requires the city's Specific Plans and Zoning Code to be consistent with its General Plan, the proposed project would also amend the maps in the North Station Area Specific Plan and Downtown Station Area Specific Plan, as well as SRCC Code. The proposed project would also replace the City's existing 2012 Climate Action Plan with a GHG Reduction to reduce community-wide GHG emissions through 2045 and beyond. Chapter 3, *Project Description*, of this Draft EIR includes a detailed description of the proposed project.

2.3 SUMMARY OF PROJECT ALTERNATIVES

This Draft EIR analyzes alternatives to the proposed project that are designed to reduce the significant environmental impacts of the proposed project and feasibly attain most of the proposed project objectives. There is no set methodology for comparing the alternatives or determining the environmentally superior alternative under CEQA. Identification of the environmentally superior alternative involves weighing and balancing all of the environmental resource areas by the City. The following alternatives to the proposed project were considered and analyzed in detail:

- Alternative A: No Project (Current General Plan). Consistent with CEQA Guidelines Section 15126.6(e)(2), Alternative A presents the No Project scenario. Accordingly, under this alternative, the proposed project would not be adopted or implemented, and further development in the city would continue to be subject to existing policies, regulations, development standards, and land use designations under the existing General Plan 2035, existing Zoning districts, and a new GHG Reduction Strategy would not be implemented.
- Alternative B: Increased Density Alternative. Alternative B, like the proposed project, would focus future commercial and residential growth in Priority Development Areas (PDA) and/or Transit Priority Areas (TPA) and in Areas of Change that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities. Alternative B assumes the same number of households, residential units, population, and jobs would occur as under the proposed project, but would allow for more opportunity for dense housing connected to transit facilities. Alternative B presumes the same General Plan land use designations as the proposed project, except that the parcels designated as Medium Low density residential in Areas of Change that are in or adjacent to PDAs and/or TPAs would be redesignated as Medium High density residential.

Chapter 5, *Alternatives to the Proposed Project*, of this Draft EIR includes a complete discussion of these alternatives. As discussed in Chapter 5, Alternative B is the Environmentally Superior Alternative pursuant to CEQA Guidelines Section 15126.6.

2.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the City of Santa Rosa, as lead agency, related to:

- Whether this Draft EIR adequately describes the environmental impacts of the proposed project.
- Whether the benefits of the proposed project override those environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
- Whether the proposed land use changes are compatible with the character of the existing area.
- Whether the identified goals, policies, or mitigation measures should be adopted or modified.
- Whether there are other mitigation measures that should be applied to the proposed project besides those mitigation measures identified in the Draft EIR.
- Whether there are any alternatives to the proposed project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic objectives.

2.5 AREAS OF CONTROVERSY

The City issued a Notice of Preparation (NOP) on February 7, 2023. The CEQA-mandated scoping period for this EIR was between February 7, 2023, and March 8, 2023, during which time interested agencies and the public could submit comments about the potential environmental impacts of the proposed project.

During this time, the City received comment letters from a variety of State and local agencies as well as several organizations and members of the public. Appendix A, *Notice of Preparation and Scoping Comments*, of this Draft EIR contains the NOP as well as the comments received by the City in response to the NOP.

The following is a discussion of issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. Though every concern applicable to the CEQA process is addressed in this Draft EIR, this list is not necessarily exhaustive, but rather attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- Protection of biological resources
- Adequacy of existing water supply and increased water demand
- Annexation of land into the city limit
- Protection from radiofrequency radiation

2.6 SUMMARY OF SIGNIFICANT IMPACTS

Table 2-1, *Summary of Significant Impacts and Mitigating Policies and Actions,* summarizes the conclusions of the environmental analysis in this Draft EIR and presents a summary of the identified significant impacts and the proposed mitigating General Plan 2050 policies and actions.[4] These proposed policies and actions are required as means to mitigate environmental impacts under CEQA. These policies and actions are fully enforceable at the discretion of the decision-maker through permit conditions, agreements, or other legally binding instruments. These mitigating policies and actions use the imperative "shall," include performance criteria, and are marked with an asterisk (*). Note that all actions are required to be implemented by the City and therefore the imperative "shall," if not explicitly stated, is implied. Please see Chapter 4.0, *Environmental Analysis*, of this Draft EIR for further discussion of the proposed mitigating General Plan 2050 policies and actions.

As summarized in Table 2-1, and as required by CEQA, some impacts remain significant and unavoidable after implementation of the proposed mitigating General Plan 2050 policies and actions. Table 2-1 is organized to correspond with the environmental issues in Chapters 4.1 through 4.18 of this Draft EIR. Table 2-1 is arranged in three columns: (1) impact, (2) proposed mitigating General Plan 2050 policies and actions, and (3) significance with proposed mitigating policies and actions. All environmental topics not listed in this table were found to have less-than-significant impacts without mitigation. For a complete description of potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.18 of this Draft EIR.

[4] Public Resources Code Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2) 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. Therefore, as this is a General Plan EIR, some policies and actions in the proposed General Plan 2050 are also required as means to mitigate environmental impacts under CEQA.

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
AGRICULTURAL RESOURCES (AG)		
Impact AG-1: Implementation of the proposed project could result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland land (together referred to as "CEQA Important Farmland") to non-agricultural land uses.	**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."[5] 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."[6] 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. ▪ **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 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.	Significant and unavoidable

[5] Public Resources Code, Section 21002.1(b).
[6] Public Resources Code, Section 21061.1

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	▪ **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. ▪ **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. 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.	
	As discussed previously, implementation of the proposed General Plan 2050 would designate CEQA Important Farmland land to non-agricultural land uses. Through the proposed 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 proposed General Plan 2050 contains policies and actions to reduce the conversion of qualifying agricultural lands. Specifically, proposed 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. Proposed 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 proposed General Plan 2050 policies and actions would not reduce the amount of acreage converted through implementation of	

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	the proposed project; however, they would forestall development of the best agricultural land within the EIR Study Area. 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 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 proposed 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 proposed 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.*	
Impact AG-2: Implementation of the proposed project could result in the loss of agricultural land under the Williamson Act.	**Mitigation Measures Considered.** As described under impact discussion AG-1, pursuant to CEQA, the City has considered mitigation to reduce impacts from implementation of the proposed 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 cumulative loss of agricultural land caused by the proposed project would still occur. Therefore, this mitigation measure will not reduce the proposed 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.	Significant and unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	As described under impact discussion AG-1, the proposed General Plan 2050 includes goals, policies, and actions to minimize impacts to agricultural lands. Those same proposed 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 proposed 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.	
Impact AG-4: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in a significant cumulative impact with respect to the conversion of CEQA Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and Williamson Act properties to non-agricultural uses.	As described previously, implementation of the proposed 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 proposed 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 proposed 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*.	Significant and unavoidable
AIR QUALITY (AIR)		
Impact AIR-2a: Construction activities that could occur over the buildout horizon of the proposed General Plan 2050 could potentially violate an air quality standard or cumulatively contribute to an existing or projected air quality violation.	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-6.31:** Require projects that exceed the Bay Area Air Quality Management District (BAAQMD) screening sizes to evaluate project-specific operation and construction emissions in conformance with the BAAQMD methodology and if operation or construction-related criteria air pollutants exceed the BAAQMD thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level. ***Action 3-6.32:** Continue to implement the Bay Area Air Quality Management District (BAAQMD) Basic Control Measures included in the latest version of BAAQMD's CEQA Air Quality Guidelines to control fugitive dust (i.e., particulate matter $PM_{2.5}$ and PM_{10}) during demolition, ground-disturbing activities, and/or construction.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
Impact AIR-2b: Buildout of the proposed project could generate operational emissions that could exceed the Bay Area Air Quality Management District's (BAAQMD) regional significance thresholds for reactive organic compounds (ROG), nitrogen oxides (NO_X) and particulate matter ($PM_{2.5}$ and PM_{10}).	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-6.31:** Require projects that exceed the Bay Area Air Quality Management District (BAAQMD) screening sizes to evaluate project-specific operation and construction emissions in conformance with the BAAQMD methodology and if operation or construction-related criteria air pollutants exceed the BAAQMD thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level. Buildout in accordance with the proposed project would generate long-term emissions that would exceed BAAQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the San Francisco Bay Area Air Basin (SFBAAB). The proposed General Plan 2050 goals, policies, and actions would reduce air pollutant emissions to the extent practicable. Additionally, the proposed 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, proposed *Action 3-6.31 requires potential future development in Santa Rosa that exceeds the BAAQMD screening sizes to evaluate project-specific operation emissions in conformance with the BAAQMD methodology. Where the technical assessment determines the BAAQMD-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: ▪ 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. ▪ Implementing organics diversion programs. ▪ Expanding urban tree planting.	Significant and unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	This 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 proposed project or meaningfully correlate how regional criteria air pollutant emissions above BAAQMD's significance thresholds correlate with basin wide health impacts. 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, We Can Model Regional Emissions, But Are the Results Meaningful for CEQA, 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, *Air Quality and Greenhouse Gas Emissions Data*, of this Draft EIR. To achieve and maintain air quality standards, BAAQMD 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 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. BAAQMD 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 proposed 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. BAAQMD has not provided methodology to assess the specific correlation between mass emissions generated and their effect on health (note Appendix B, *Air Quality and Greenhouse Gas Emissions Data*, of this Draft EIR provides the San Joaquin Valley Air Pollution Control District's amicus brief, and South Coast Air Quality Management District's amicus brief).	

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	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. 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 per cubic meter) in specific geographic areas. CEQA thresholds, therefore, are not specifically tied to potential health outcomes in the region. 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, this EIR finds that the proposed project could contribute to an increase in health effects in the basin until the attainment standards are met in the SFBAAB. In summary, as described above, implementation of the proposed project would generate emissions that would exceed BAAQMD's regional significance thresholds (no net increase). The proposed 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 proposed 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.	

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
Impact AIR-3a: Construction activities associated with potential future development could expose nearby receptors to substantial concentrations of toxic air contaminants.	General Plan 2050 Chapter 6, *Health, Equity, Environmental Justice, and Parks* ***Action 6-1.5:** As recommended by the California Air Resources Board, 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 Quality Management District (BAAQMD) CEQA Guidelines that identifies mitigation measures and appropriate enforcement mechanisms capable of reducing potential cancer and non-cancer risks below the BAAQMD threshold.	Less than significant
Impact AIR-3b: Large industrial or warehouse development projects under the proposed project could expose air quality-sensitive receptors to substantial toxic air contaminants (TAC) and particulate matter ($PM_{2.5}$) concentrations and exceed the Bay Area Air Quality Management District's (BAAQMD) project-level and cumulative significance thresholds.	General Plan 2050 Chapter 6, *Health, Equity, Environmental Justice, and Parks* ***Action 6-1.6:** 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 BAAQMD. The operational HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and BAAQMD. 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 BAAQMD, require the project applicant to identify and demonstrate measures, such as those listed in the General Plan Environmental Impact Report, that can reduce potential cancer and noncancer risks to acceptable levels. Potential future development over the buildout horizon of the proposed project could result in new sources of TACs or $PM_{2.5}$ near existing or planned sensitive receptors. Review of development projects by BAAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gas stations) in addition to proposed 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 proposed General Plan 2050 *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 BAAQMD. 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 BAAQMD 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	Significant and unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	they are capable of reducing potential cancer, noncancer risks, and $PM_{2.5}$ to an acceptable level. Best available control technologies for toxics may include but are not limited to: ▪ 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 The same proposed General Plan 2050 goals, policies, and actions listed in Section 4.3.2.3, *Impacts of the Environment on a Project*, would serve to protect sensitive receptors from poor air quality in the EIR Study Area. Specifically, proposed 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 BAAQMD, and TAC and $PM_{2.5}$ 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 proposed project's contribution to cumulative health risk is considered *significant and unavoidable*. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.	
Impact AIR-5: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative air quality impacts with respect to generation of criteria pollutant and exposure of substantial pollutant concentrations to sensitive receptors.	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-6.31:** Require projects that exceed the Bay Area Air Quality Management District (BAAQMD) screening sizes to evaluate project-specific operation and construction emissions in conformance with the BAAQMD methodology and if operation or construction-related criteria air pollutants exceed the BAAQMD thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level. ***Action 3-6.32:** Continue to implement the Bay Area Air Quality Management District (BAAQMD) Basic Control Measures included in the latest version of BAAQMD's CEQA Air Quality Guidelines to control fugitive dust (i.e., particulate matter $PM_{2.5}$ and PM_{10}) during demolition, ground-disturbing activities, and/or construction.	Significant and unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	General Plan 2050 Chapter 6, *Health, Equity, Environmental Justice, and Parks* ***Action 6-1.5:** As recommended by the California Air Resources Board, 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 Quality Management District (BAAQMD) CEQA Guidelines that identifies mitigation measures and appropriate enforcement mechanisms capable of reducing potential cancer and non-cancer risks below the BAAQMD threshold. ***Action 6-1.6:** 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 BAAQMD. The operational HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and BAAQMD. 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 BAAQMD, require the project applicant to identify and demonstrate measures, such as those listed in the General Plan Environmental Impact Report, that can reduce potential cancer and noncancer risks to acceptable levels.	
	Criteria air pollutant emissions generated by land uses within the proposed project could exceed the Bay Area Air Quality Management District's regional thresholds. Air quality impacts identified under Impacts AIR-2a, AIR-2b, AIR-3a, and AIR-3b constitute the proposed project's contribution to cumulative air quality impacts in the San Francisco Bay Area Air Basin. Proposed General Plan 2050 goals, policies, and actions would help reduce project-related emissions to the extent feasible. Specifically, proposed *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 proposed project, no additional mitigation measures are available. Air pollutant emissions associated with the proposed project would result in a cumulatively considerable contribution to air quality impacts and remain *significant and unavoidable* at the program level.	
BIOLOGICAL RESOURCES (BIO)		
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 (CFGC), could occur as a result of implementation of the proposed project.	General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction* ***Action 3-5.7:** Continue to consult with the California Department of Fish and Wildlife 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 populations of plants and animals currently found in the UGB.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	***Action 3-5.10:** Continue to implement existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, to conserve wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species. ***Action 3-5.11:** Require a qualified biologist to prepare a biological resource assessment as part of project approval for proposed development on sites that may support 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. ***Action 3-5.12:** Require that construction or other ground-disturbing activities avoid nests of native birds when in active use by implementing protection measures to ensure compliance with the California Fish and Game Code and federal Migratory Bird Treaty Act. Compliance guidelines are detailed in the General Plan Environmental Impact Report. ***Action 3-5.13:** Develop and adopt a bird-safe design ordinance to provide specific criteria and refined guidelines as part of design review of new buildings and taller structures to protect birds from injury and mortality from collisions with buildings, towers, and other human-made structures. Preserve and restore wildlife habitats and corridors. Continue to provide some protection for habitat areas in the city, such as for the rookery on West 9th Street.	
Impact BIO-2: Impacts to riparian areas, drainages, and sensitive natural communities could occur from potential future development under the proposed General Plan 2050 where natural habitat remains.	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-5.7:** Continue to consult with the California Department of Fish and Wildlife 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 populations of plants and animals currently found in the UGB. ***Action 3-5.10:** Continue to implement existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, to conserve wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species. ***Action 3-5.11:** Require a qualified biologist to prepare a biological resource assessment as part of project approval for proposed development on sites that may support 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. ***Action 3-5.19:** Require new development along channelized waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	***Action 3-5.20:** Require new development to maintain an adequate setback from channelized waterways to recognize the 100-year flood elevation, with setbacks in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans to meet restoration and enhancement goals.	
Impact BIO-3: Potential future development from implementation of the proposed General Plan 2050 could result in direct and indirect impacts to wetland habitat.	General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction* ***Action 3-5.10:** Continue to implement existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, to conserve wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species. ***Action 3-5.11:** Require a qualified biologist to prepare a biological resource assessment as part of project approval for proposed development on sites that may support 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.	Less than significant
CULTURAL RESOURCES (CUL)		
Impact CUL-1: Impacts to known or yet to be classified historic buildings or structures could occur from potential future development under the proposed General Plan 2050.	General Plan 2050 Chapter 4, *Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture* ***Action 4-3.2:** Follow the Secretary of the Interior Standards for Preservation, Rehabilitation, Restoration, and Reconstruction for the treatment of historic properties. ***Action 4-3.6:** Identify and minimize or remove obstacles for owners of historic properties to support preservation, including guides for repurposing facilities. Identify resources to: ▪ Keep cultural surveys relevant. ▪ Periodically update the City's Cultural Heritage Survey to ensure consistency with current guidelines and best practices, to reflect potential changes in status, and to include properties that have become age-eligible for listing. ▪ Conduct cultural and/or historic inventories or surveys of areas of the city that have not been surveyed. ▪ Install plaques and/or educational signage at locations of cultural significance and significant events. ▪ Implement recommendations in the City's Cultural Heritage studies. ▪ Partner with the local tourism industry, property owners, businesses, nonprofit organizations, and other public agencies to develop and promote Heritage Tourism opportunities, integrating efforts with ongoing initiatives for economic development and the creative economy. ▪ Work with local schools and historic organizations to engage and interest residents of all ages in Santa Rosa's history and historic sites, structures, and neighborhoods.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	***Action 4-3.7:** Identify buildings that should be recognized for cultural significance and/or considered for landmark designation. ***Action 4-3.9:** Preserve historic aspects of parks while integrating modern uses and amenities.	
Impact CUL-2: Impacts to known and unknown archeological resources could occur from potential future development under the proposed General Plan 2050.	General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction* ***Action 3-5.19:** Require new development along channelized waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation. ***Action 3-5.20:** Require new development to maintain an adequate setback from channelized waterways to recognize the 100-year flood elevation, with setbacks in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans to meet restoration and enhancement goals. General Plan 2050 Chapter 4, *Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture* ***Action 4-2.1:** Continue to review proposed developments in conjunction with the California Historical Resources Information System, Northwest Information Center, at Sonoma State University to determine whether project areas contain known archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or if they have the potential to hold such resources and if so, implement mitigation to protect the resource. ***Action 4-2.2:** Work in good faith with interested communities to evaluate proposed development sites for the presence of subsurface historic, archaeological, and tribal cultural resources. These efforts may include: ▪ 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. ***Action 4-2.3:** Continue to require that project areas found to contain significant archaeological resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation. ***Action 4-2.4:** If tribal cultural resources are encountered during development, halt work to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative (if appropriate) have evaluated the situation and recorded identified tribal cultural resources—which may include animals, structures, landscapes, or plants—and determined suitable mitigation measures.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
GEOLOGY AND SOILS (GEO)		
Impact GEO-1: Impacts from potential future development under the proposed General Plan 2050 where there are known geological hazards could occur over the buildout horizon of the proposed project.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Policy 5-1.1:** Ensure that new development, redevelopment, and major remodels shall avoid or adequately mitigate seismic and geologic hazards. ***Action 5-1.1:** Prior to new development approval, ensure geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer for applicable hazard conditions. ***Action 5-1.2:** Restrict development in areas where adverse impacts 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.	Less than significant
Impact GEO-3: Impacts from potential future development under the proposed General Plan 2050 where there are potentially unstable soils could occur over the buildout horizon of the proposed project.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Policy 5-1.1:** Ensure that new development, redevelopment, and major remodels shall avoid or adequately mitigate seismic and geologic hazards. ***Action 5-1.1:** Prior to new development approval, ensure geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer for applicable hazard conditions. ***Action 5-1.2:** Restrict development in areas where adverse impacts 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.	Less than significant
Impact GEO-4: Impacts from potential future development under the proposed General Plan 2050 where there are expansive soils could occur over the buildout horizon of the proposed project.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Policy 5-1.1:** Ensure that new development, redevelopment, and major remodels shall avoid or adequately mitigate seismic and geologic hazards. ***Action 5-1.1:** Prior to new development approval, ensure geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer for applicable hazard conditions. ***Action 5-1.2:** Restrict development in areas where adverse impacts 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.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
HYDROLOGY (HYD)		
Impact HYD-1: Impacts to water quality could occur from implementation of the proposed project.	General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction* ***Action 3-5.10:** Continue to implement existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, to conserve wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species. ***Action 3-5.12:** Require a qualified biologist to prepare a biological resource assessment as part of project approval for proposed development on sites that may support 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. ***Action 3-5.19:** Require new development along channelized waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation. ***Action 3-5.20:** Require new development to maintain an adequate setback from channelized waterways to recognize the 100-year flood elevation, with setbacks in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans to meet restoration and enhancement goals. General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-2.14:** 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. ***Action 5-2.15:** Ensure creek-side paths and trails are consistent with the Citywide Creek Master Plan and Bicycle and Pedestrian Master Plan and are incorporated into stormwater improvement projects along creek corridors. ***Action 5-2.17:** Require implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system. ***Action 5-9.30:** 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.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
NOISE (NOI)		
Impact NOI-1a: Construction activities associated with potential future development could expose sensitive receptors to excessive noise from construction equipment.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-7.1:** Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards. ***Action 5-7.2:** Use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify mitigation during the project approval process. ***Action 5-7.10:** Update the Noise Ordinance to incorporate construction best management practices to minimize construction noise.	Significant and unavoidable
	In most cases, construction of individual developments associated with implementation of the proposed 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 proposed General Plan 2050 would minimize the effects of construction noise. Specifically, proposed *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 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 proposed 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.	
Impact NOI-1b: Operational vehicle traffic noise increases could exceed the City's significance thresholds with implementation of the proposed project.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-7.1:** Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards. ***Action 5-7.2:** Use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify mitigation during the project approval process.	Significant and unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	***Action 5-7.3:** Require conditions of approval or mitigation 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. ***Action 5-7.7:** Work with Caltrans to evaluate and develop traffic noise mitigation programs along Highway 101 and State Route 12. ***Action 5-7.9:** Use conditions of approval to achieve 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.	
	Implementation of proposed General Plan 2050 *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts. Proposed *Action 5-7.2 requires the City to apply the Federal Transit Administration's vibration thresholds to assess impacts to surrounding land uses. Proposed *Action 5-7.3 requires conditions of approval or mitigation 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. Proposed *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, proposed *Action 5-7.9 requires conditions of approval to achieve 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 below significance thresholds in all cases, this impact is conservatively considered *significant and unavoidable*. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the noise thresholds.	
Impact NOI-1c: Operational noise increases could exceed the City's significance thresholds and could be incompatible with existing uses.	**General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities*** ***Action 5-7.1:** Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards. ***Action 5-7.3:** Require conditions of approval or mitigation 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. ***Action 5-7.9:** Use conditions of approval to achieve 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.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
Impact NOI-2a: Construction activities associated with potential future development under the proposed General Plan 2050 could generate excessive short-term vibration levels during project construction.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-7.1:** Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards. ***Action 5-7.2:** Use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify mitigation during the project approval process. ***Action 5-7.10:** Update the Noise Ordinance to incorporate construction best management practices to minimize construction noise.	Less than significant
Impact NOI-2b: Operational activities associated with potential future development under the proposed General Plan 2050 could generate excessive long-term vibration levels.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-7.1:** Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards. ***Action 5-7.2:** Use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify mitigation during the project approval process. ***Action 5-7.9:** Use conditions of approval to achieve 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.	Less than significant
Impact NOI-4: Implementation of the proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative noise impacts, with respect to generation of construction-and transportation related noise.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-7.1:** Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards. ***Action 5-7.2:** Use the Federal Transit Administration's construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify mitigation during the project approval process. ***Action 5-7.3:** Require conditions of approval or mitigation 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. ***Action 5-7.7:** Work with Caltrans to evaluate and develop traffic noise mitigation programs along Highway 101 and State Route 12. ***Action 5-7.9:** Use conditions of approval to achieve 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.	Significant and unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	***Action 5-7.10:** Update the Noise Ordinance to incorporate construction best management practices to minimize construction noise.	
	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). Implementation of proposed 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 proposed project and expose sensitive receptors in close proximity to new development-generated roadway noise to excessive levels (see Impact NOI-1b). As with construction noise, implementation of proposed *Action 5-7.1, *Action 5.7-2, and *Action 5-7.10 would help reduce transportation-related noise impacts along with *Action 5-7.3, *Action 5-7.7, and *Action 5-7.9. However, due to the programmatic nature of the proposed project, no additional mitigation measures are available. As such, the cumulative noise impact is considered *significant and unavoidable* at the program level.	
TRANSPORTATION (TRAN)		
Impact TRAN-2a: Implementation of the proposed project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-1.1:** Require an analysis of projected VMT and mitigation, as necessary, as part of the project review process for projects with the potential to increase VMT.	Significant and unavoidable
	Implementation of the proposed General Plan 2050 goals, policies, and actions would reduce the VMT generated by all development including residential uses. In support of proposed General Plan 2050 Policy 3-1.1 to reduce VMT, proposed *Action 3-1.1 requires an analysis of project VMT and mitigation as part of the project review process. Proposed Action 3-1.2 requires the City to work with other local and regional partners to explore developing a VMT mitigation bank. Proposed Action 3-1.3 and Action 3-1.5 supports prioritizing investments that will reduce VMT and GHG emissions. 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 proposed 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	

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	as VMT mitigation exchanges or banks may provide a viable mitigation mechanism for developments, but the timing of when such programs may become available is unknown. Given the programmatic nature of the proposed project, uncertainties as to whether individual development projects will be able to successfully meet VMT standards even with mitigation, and uncertainties as to the availability of other mitigation strategies such as VMT exchanges or banks, the impact is considered *significant and unavoidable*. Note that this impact conclusion does not preclude the finding of less than significant at the project level for future projects over the 2050 buildout horizon.	
Impact TRAN-2b: Implementation of the proposed project could result in a significant roadway network vehicle miles traveled (VMT) impact associated with increasing the capacity of the arterial street network.	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-1.1:** Require an analysis of projected VMT and mitigation, as necessary, as part of the project review process for projects with the potential to increase VMT. Implementation of the proposed 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, proposed *Action 3-1.1 requires an analysis of project VMT and mitigation as part of the project review process. Even with implementation of the proposed 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*.	Significant and Unavoidable
Impact TRAN-5: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in significant cumulative impact with respect to vehicle miles traveled (VMT).	**General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*** ***Action 3-1.1:** Require an analysis of projected VMT and mitigation, as necessary, as part of the project review process for projects with the potential to increase VMT. Even with the proposed General Plan 2050 goals, policies, and actions described under impact discussion TRAN-2, including proposed *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*.	Significant and Unavoidable

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
TRIBAL CULTURAL RESOURCES (TCR)		
Impact TCR-1: Impacts to unknown tribal cultural resources (TCR) could occur from potential future development under the proposed General Plan 2050.	General Plan 2050 Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction* ***Action 3-5.19:** Require new development along channelized waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for multiuse trails and recreation. ***Action 3-5.20:** Require new development to maintain an adequate setback from channelized waterways to recognize the 100-year flood elevation, with setbacks in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans to meet restoration and enhancement goals. General Plan 2050 Chapter 4, *Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture* ***Action 4-2.1:** Continue to review proposed developments in conjunction with the California Historical Resources Information System, Northwest Information Center, at Sonoma State University to determine whether project areas contain known archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or if they have the potential to hold such resources and if so, implement mitigation to protect the resource. ***Action 4-2.2:** Work in good faith with interested communities to evaluate proposed development sites for the presence of subsurface historic, archaeological, and tribal cultural resources. These efforts may include: ▪ 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. ***Action 4-2.4:** If tribal cultural resources are encountered during development, halt work to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative (if appropriate) have evaluated the situation and recorded identified tribal cultural resources—which may include animals, structures, landscapes, or plants—and determined suitable mitigation measures.	Less than significant
WILDFIRE (WF)		
Impact WF-1: Implementation of the proposed General Plan 2050 could result in inadequate evacuation access the impair the implementation of an emergency evacuation plan.	General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities* ***Action 5-5.14:** Require all new development projects to provide adequate access for fire and emergency response personnel. ***Action 5-5.15:** Prohibit the creation of new single ingress/egress roadway conditions in the city. ***Action 5-5.16:** Retrofit existing single-access residential neighborhoods to include additional access routes or other provisions to increase evacuation safety.	Less than significant

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
	***Action 5-5.17:** Analyze the capacity, viability, and safety of evacuation routes for hazard areas in the city (e.g., WUIFA) and incorporate the results into the City's Emergency Operations Plan.	
Impact WF-2: Potential future development over the buildout horizon of the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.	**General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities*** ***Action 5-3.8:** 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.	Significant and unavoidable
	Goals, policies, and actions identified in the proposed General Plan 2050 provide the best wildfire hazard reduction measures available. Specifically, proposed *Action 5-3.8 requires the preparation of fire protection plans for new development and major remodels in the City's Wildland-Urban Interface Fire Area (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 proposed project, impacts at the programmatic level would remain *significant and unavoidable*. This conclusion does not preclude a finding of less-than-significant impacts at the project level.	

TABLE 2-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATING POLICIES AND ACTIONS

Environmental Impact	Proposed Mitigating General Plan 2050 Policies and Actions	Significance with Mitigation
Impact WF-5: Potential development over the buildout horizon of the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas (SRA), Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface Fire Areas (WUIFA), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.	**General Plan 2050 Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities*** ***Action 5-3.8:** 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. Same as Impact WF-2, even with implementation of the proposed General Plan 2050 goals, policies, and actions, including proposed *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*.	Significant and unavoidable

Note: In addition to the proposed General Plan 2050 policies and actions, potential future development under the proposed project would also be required to comply with applicable federal, State, and local regulations. Please see Chapter 4.1 through Chapter 4.18 of this Draft EIR for the regulatory framework for each environmental resource topic.

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