4. Environmental Analysis

This chapter describes the organization of the environmental analysis section of this Draft Environmental Impact Report (EIR) and the assumptions and methodology of the impact analysis and the cumulative impact setting.

CHAPTER ORGANIZATION

The Draft EIR is made up of 18 chapters that evaluate the direct, indirect, and cumulative environmental impacts of the proposed project. In accordance with Appendix F, *Energy Conservation*, and Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines, the potential environmental effects of the proposed project are analyzed for potential significant impacts in the following environmental issue areas, which are organized with the listed abbreviations:

4.1 Aesthetics (AES)
4.2 Agricultural Resources (AG)
4.3 Air Quality (AIR)
4.4 Biological Resources (BIO)
4.5 Cultural Resources (CUL)
4.6 Energy (ENE)
4.7 Geology and Soils (GEO)
4.8 Greenhouse Gas Emissions (GHG)
4.9 Hazards and Hazardous Materials (HAZ)
4.10 Hydrology and Water Quality (HYD)
4.11 Land Use and Planning (LU)
4.12 Noise (NOI)
4.13 Population and Housing (POP)
4.14 Public Services, Parks, and Recreation (PS)
4.15 Transportation (TRAN)
4.16 Tribal Cultural Resources (TCR)
4.17 Utilities and Service Systems (USS)
4.18 Wildfire (WF)

Each chapter is organized into the following sections:

- Environmental Setting offers an overview of federal, state, regional, and local laws and regulations relevant to each environmental issue, and a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- Standards of Significance refer to the quantitative or qualitative standards, performance levels, or criteria used to evaluate the existing setting with and without the proposed project to determine whether the impact is significant. These thresholds are based primarily on the CEQA Guidelines, and also may reflect established health standards, ecological tolerance standards, public service capacity standards, or guidelines established by agencies or experts.
- Impact Discussion gives an overview of the potential impacts of the proposed project and explains why impacts are found to be significant or less than significant prior to mitigation. This subsection also includes a discussion of cumulative impacts related to the proposed project. Impacts and mitigation measures are numbered consecutively within each topical analysis and begin with an acronym or abbreviated reference to the impact section.

STANDARDS OF SIGNIFICANCE

As stated, significance criteria are identified before the impact discussion subsection, under the subsection, "Standards of Significance." For each impact identified, a level of significance is determined using the following classifications:

- No impact. A no impact conclusion describes circumstances where there is no adverse effect on the environment.
- Less than significant. A less-than-significant impact includes effects that are noticeable, but do not exceed established or defined thresholds, or can be mitigated below such thresholds.
- Significant. A significant impact includes a description of the circumstances where an established or defined threshold would be exceeded.
- Significant and unavoidable. For each impact identified as being significant, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measure would reduce the impact to a less-than-significant level successfully, this is stated in the EIR. Significant and unavoidable impacts are described where mitigation measures would not diminish these effects to less-than-significant levels. The identification of a program-level significant and unavoidable impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with the applicable regulations and meet applicable thresholds of significance.

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the City of Santa Rosa, acting as the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. The analysis in the Draft EIR is based on scientific and factual data that has been reviewed by the lead agency and represents the lead agency's independent judgment and conclusions.[1] This section describes the methodology for the program-level evaluation in Chapters 4.1 through 4.18 with respect to the horizon year, the baseline, the application of the proposed General Plan 2050 policies, amendments to the Zoning Map, the strategies to reduce GHG emissions, potential future projects in a priority development area (PDA) or a transit priority area (TPA), parking impacts, effects of the environment on the project, and cumulative impacts.

2050 HORIZON DEVELOPMENT POTENTIAL

The proposed project is made up of long-range policy documents (General Plan 2050, Zoning Map, and GHG Reduction Strategy) that do not directly result in development without additional approvals. Before any development can occur in the EIR Study Area, it must be analyzed for consistency with the adopted

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15064(b).

General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA as applicable; and obtain all necessary clearances and permits from regulatory agencies. The environmental analysis in this EIR discusses the potential for adverse impacts to occur from extending the buildout potential in the EIR Study Area to horizon year 2050; increasing the buildout potential in the EIR Study Area; new and modified General Plan goals, policies, and actions; amending the Zoning Map for consistency with the General Plan, and the new strategies to reduce GHG emissions.

The 2050 horizon development potential under the proposed project includes the net increase of realistic development potential for the city, including the application of current and future density bonuses, the proposed Missing Middle Housing Bonus described in Section 3.7.3.2, *Title 20: Zoning Code,* of Chapter 3, *Project Description*, of this Draft EIR*,* and other development incentives, that could occur over the next 25 years. Buildout methodology focused on vacant and underutilized lands and pipeline development projects in the city of Santa Rosa. Various unit per acre density factors and developable lot coverage were applied for each parcel based on zoning code requirements, total parcel size, site location, and possible constraints. Constraints included existing structures, fire hazard zones, and/or lands within 500 feet of select highway right of way. Opportunity sites within the Areas of Change were also closely analyzed to determine total growth capacity and investigate rezoning opportunities to meet the development goals for each growth area.

As shown in Table 3-6, *Proposed 2050 Buildout Projections in the EIR Study Area*, in Chapter 3 of this Draft EIR, this combined projected new growth in the entire EIR Study Area for the 2050 horizon year includes approximately 24,090 new residential units; 65,760 new residents; and 14,090 new jobs. Because the proposed project consists of long-term policy documents (i.e., General Plan 2050, Zoning Ordinance, and GHG Reduction Strategy) that are intended to guide future development activities and City actions, and because no specific development projects are proposed as part of the project, it is reasonable to assume that future development would occur incrementally or gradually over the approximately 25-year buildout horizon (e.g., 2025 to 2050). However, while this assumption describes the long-range nature of the proposed project, it does not prohibit or restrict when development can occur over the horizon period.

BASELINE

This EIR evaluates the impacts of the proposed project relative to existing conditions of the EIR Study Area, as required by CEQA Guidelines Section 15126.2. As described in Chapter 3, *Project Description*, of this Draft EIR, the EIR Study Area includes all land within the city limit, planning area, Urban Growth Boundary and Sphere of Influence (see Figure 3-2, *General Plan 2050 Planning Boundaries and EIR Study Area*, in Chapter 3 of this Draft EIR). The baseline represents the existing conditions on the ground ("physical conditions") at the time that the Notice of Preparation (NOP) was issued (February 7, 2023). However, some baseline conditions apply 2019 data.

As described in Chapter 3 of this Draft EIR, the process to update the existing General Plan 2035 began in 2019 and the collection of data was initially hindered by the disruptions created by the coronavirus disease 2019 (COVID-19) pandemic. The COVID-19 pandemic introduced a substantial amount of uncertainty in human lives. It directly affected human behavior, by initially requiring people to shelter in place, implement social/physical distancing, and make other changes to the way they live. Indirectly, it affected the economy, resulting in reduced consumer spending, business closures, and widespread

unemployment. Though some of these trends were considered short term and, in some cases, have reversed, some permanent changes in the ways humans live and behave have occurred in the post-pandemic world. Because the NOP was issued in early 2023, where feasible, baseline data has been applied that reflects the 2023 NOP. However, transportation data, which, in addition to the transportation analysis, is relevant to air quality, energy, greenhouse gas emissions, and noise, relies on the Sonoma County Transportation Authority (SCTA) Sonoma County Travel Model (SCTM19, revised December 2021). The SCTA updates the SCTM on an approximately five-year cycle. Each major revision includes updates to existing land use inventories for all jurisdictions in the County, as well as calibration to both reflect current travel patterns within the County and align with the inputs and projections produced by the nine-County regional travel demand model maintained by the Metropolitan Transportation Commission (MTC). The SCTA travel demand model used in the analysis for this EIR is keyed to a 2019 base year and remains the model version used in Sonoma County to establish baseline VMT values. The next revision of the SCTM model is anticipated to be released by SCTA in 2025.

As discussed in Chapter 3 of this Draft EIR and shown in Table 3-6, *Proposed 2050 Buildout Projections in the EIR Study Area*, the baseline for the EIR Study Area includes the following existing conditions:

- Housing Units: 75,850
- Population: 197,980
- Jobs: 77,590

GENERAL PLAN 2050 GOALS, POLICIES, AND ACTIONS

As discussed in Chapter 3, *Project Description*, of this Draft EIR, the proposed General Plan 2050 goals, policies, and actions aim to reduce vehicle miles traveled (VMT), GHG emissions, air and water pollutants, wasteful energy consumption, and solid waste generation, and improve water use efficiency by promoting infill development; increase opportunities for alternative modes of transportation, pedestrian and bicycle access and connectivity, and local jobs; protect open space; conserve natural resources; and require adherence to green building practices. The proposed General Plan 2050 goals, policies, and actions aim to avoid hazardous conditions and facilitate a healthy and safe environment for residents and visitors to Santa Rosa. In addition, General Plan policies aim to protect cultural resources, including historic buildings, and ensure new development and redevelopment is compatible with neighboring land uses. While the proposed General Plan 2050 policies and actions aim to reduce environmental impact, the EIR process provides an additional opportunity to modify the policies and programs to ensure they adequately reduce impacts from potential future projects in Santa Rosa.

For each significant impact, the EIR must identify one or more feasible mitigation measures or explain why no feasible mitigation measures are available. CEQA Guidelines Section 15370 defines “mitigation” as including: (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; or (5) compensating for the impact by replacing or providing substitute resources or environments. An EIR

should focus on mitigation measures that are feasible,[2] practical, and effective. Pursuant to CEQA Guidelines Section 12156.4(a)(1)(B), it is ordinarily not appropriate to defer the formulation of mitigation measures until some future time. The CEQA Guidelines acknowledge an exception, explaining that mitigation measures may specify performance standards for mitigating a significant impact that might be accomplished in various ways. Therefore, when it is known that mitigation is feasible, but it is impractical to devise specific measures during the planning process, the agency can commit itself to devising measures that satisfy performance criteria.

Public Resources Code (PRC) 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 are also required as means to mitigate environmental impacts under CEQA. These policies and actions are fully enforceable at the discretion of the decision-maker and use the imperative "shall," and in all cases are mandatory. The mitigating policies and actions described in the EIR that are fully enforceable through permit conditions, agreements, or other legally binding instruments and include performance criteria are marked with an asterisk (*). These proposed General Plan policies and actions are listed in the impact discussions of Chapters 4.1 through 4.18 of this Draft EIR to illustrate where the proposed polices and actions would reduce impacts from future development in Santa Rosa.

Additionally, the EIR considers the potential for environmental impacts from the implementation of General Plan policies and actions. Amended and new policies collectively reflect the changes to the current General Plan 2035. Substantive General Plan policy and action changes include the addition, removal, or functional revisions (i.e., not purely semantic) to the text in ways that have the potential to result in a physical impact on the environment. Nonsubstantive changes include the renumbering of policies and actions or minor text revisions, which do not have the potential to result in a physical change to the environment. The content of the proposed General Plan 2050 policies and actions is directly integrated with and reflective of the proposed project as a whole. Therefore, impact discussions for the effects of the proposed project necessarily encompass analysis of the effects of the substantive policy changes as a whole, and those with relevance to CEQA topics are discussed in the appropriate chapters.

ASSOCIATED SPECIFIC PLAN AND CODE AMENDMENTS

As required by State law, the proposed project includes multiple components to ensure that each element of the Santa Rosa General Plan is internally (or horizontally) consistent[3] and the North Station Area Specific Plan (NSASP), Downtown Station Area Specific Plan (DSASP), the Santa Rosa City Code (SRCC), and GHG Reduction Strategy are consistent with the General Plan (also known as vertical consistency).[4] The impacts from the proposed amendments to the NSASP, DSASP, and SRCC are therefore analyzed concurrently with the impacts of the proposed General Plan 2050.

[2] Pursuant to CEQA Section 21061.1, the term "feasible" is defined 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."

[3] Government Code Section 65300.5 (internal consistency).

[4] Government Code Section 65860 (vertical consistency).

GREENHOUSE GAS REDUCTION STRATEGY

As described in Chapter 3, *Project Description*, of this Draft EIR the proposed GHG Reduction Strategy is an update to and replacement of the City's 2012 Community-wide Climate Action Plan and would serve as the strategic plan for how the City will reduce GHG emissions and foster a sustainable community through 2045 and beyond. The proposed GHG Reduction Strategy provides a framework for reducing GHG emissions through recommended community-wide GHG reduction strategies. The proposed GHG Reduction Strategy provides a clear roadmap to meeting the per-capita GHG emissions target consistent with State guidance as well as demonstrating the path to the goal of carbon neutrality by 2045 mandated by Executive Order (EO) B-55-18.

Under CEQA Guidelines Section 15183.5, *Tiering and Streamlining the Analysis of Greenhouse Gas Emissions*, local strategic plans to reduce GHG emissions can help with the environmental review process for new development proposals defined as projects under CEQA. Plans that may be used this way are referred to as Qualified GHG Reduction Strategies or Plans and must satisfy the following criteria:

- Quantify emissions, both existing and projected over a specified period, resulting from activities within a designed geographic area.
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from an activity covered by the plan would not be cumulatively considerable.
- Identify and analyze the emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- Specify GHG reduction strategies or a group of strategies, including performance standards that, if implemented on a project-by-project basis, substantial evidence demonstrates they would collectively achieve the specified emissions level.
- Establish a mechanism to monitor the plan's progress toward achieving specific levels and to require amendment if the plan is not achieving those levels.
- Include an environmental review of the plan.

If these plans meet the State criteria as determined by the City as the lead agency, potential future development projects that are consistent with the local qualified reduction strategy would not result in a cumulatively considerable GHG emissions impact, reducing the need for additional analyses or mitigation measures. Additionally, the GHG Reduction Strategy must identify measures and performance standards that can be clearly shown to achieve this determination. As a result, a GHG Reduction Strategy seeking to be a "Qualified" GHG Reduction Strategy must have a GHG emission-reduction target or targets that substantially reduce GHG emissions, can also be feasibly achieved, and reasonably tracked and reported over time.

As a component of the proposed project, the implementation of the proposed GHG Reduction Strategy, including potential new development associated with the new reduction measures and programs, will be analyzed at a programmatic level as part of this EIR. Following certification of this EIR, this would allow the proposed GHG Reduction Strategy to support and streamline environmental review of GHG emissions for future development projects in the city pursuant to CEQA Guidelines Section 15183.5.

The proposed GHG Reduction Strategy includes the strategies that are required to reduce GHG emissions. Like the proposed General Plan 2050 policies, the proposed GHG Reduction Strategy aims to reduce community-wide GHG emissions. The GHG emission-reduction strategies include a mix of education and outreach programs to encourage GHG emission-reduction activities, rebates, and other enticements to incentivize GHG emissions reductions, and mandates to require GHG emissions-reduction efforts. The GHG emission-reduction strategies also support broader sustainability initiatives.

Additionally, the proposed GHG Reduction Strategy implementation would not result in changes to the land use plan under the proposed General Plan 2050. Thus, because there is no specific land use component associated with the proposed GHG Reduction Strategy, its implementation would not directly result in the generation of GHG emissions. The proposed General Plan 2050 references the proposed GHG Reduction Strategy, recognizing that the City's climate action planning efforts must be updated more regularly to be responsive to the changing regulations, guidance, technology, best practices, and science.

PRIORITY DEVELOPMENT AND TRANSIT PRIORITY AREAS

The Metropolitan Transportation Commission (MTC) and Association of Bay Area Government (ABAG) *Plan Bay Area* is the San Francisco Bay Area's Regional Transportation Plan/Sustainable Community Strategy. *Plan Bay Area* is the long-range integrated transportation and land use/housing strategy through 2050 for the Bay Area, pursuant to the Sustainable Communities and Climate Protection Act (Senate Bill [SB] 375). MTC and ABAG adopted the current version of *Plan Bay Area* on October 21, 2021.[5] *Plan Bay Area* 2050 is a limited and focused update to the *Plan Bay Area* 2040, with updated planning assumptions that incorporate key economic, demographic, and financial trends from the last several years.[6] As part of the implementing framework for *Plan Bay Area*, PDAs and TPAs are identified as areas where concentrated development can have beneficial environmental effects and reduce adverse environmental impacts. Additional details about PDAs and TPAs are provided in the sections that follow.

PRIORITY DEVELOPMENT AREAS

A PDA is a place that has convenient public transit service, often referred to as "transit-oriented," that is prioritized by local governments, such as Santa Rosa, for housing, jobs, and services within existing communities. All PDAs are created and planned by local governments, which nominate eligible areas to ABAG for adoption. The PDAs identified throughout the Bay Area in *Plan Bay Area* 2050 were projected to accommodate 72 percent (or 985,000 units) of new housing and 48 percent (or 679,000) of new jobs in the region from the 2015 baseline.[7] Development in PDAs leverage existing infrastructure and therefore can minimize development in green field (undeveloped) areas and maximize growth in transit-rich

[5] Association of Bay Area Governments and Metropolitan Transportation Commission, October 2021, *Plan Bay Area 2050*, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed July 21, 2023.

[6] Metropolitan Transportation Commission and Association of Bay Area Governments, October 2021, *Plan Bay Area 2050*, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed February 27, 2023.

[7] Metropolitan Transportation Commission and Association of Bay Area Governments, October 2021, *Plan Bay Area 2050*, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed February 27, 2023.

communities to help lower VMT and consequently reduce GHG emissions, air quality pollutants, and noise from vehicles with internal combustion engines dependent on fossil fuels and reduce wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, due to the location, infill development in PDAs result in fewer impacts related to agricultural, forestry, mineral, archaeological, and biological resources, energy, geology and soils, hydrology and water quality, and wildfire. Impacts related to concentrated development in the PDAs is discussed throughout this Draft EIR, and specific quantified impacts are described in Chapter 4.3, *Air Quality*, Chapter 4.8, *Greenhouse Gas Emissions*, and Chapter 4.15, *Transportation*, of this Draft EIR.

Certain potential future residential or mixed-use residential projects and projects in PDAs that meet defined criteria in the CEQA Guidelines may be eligible for CEQA streamlining. For example, while not exclusive to PDAs, due to their urban setting, development in a PDA is more likely to qualify for a CEQA Guidelines Section 15332, *Infill Development Projects*, Class 32 Categorical Exemption.

TRANSIT PRIORITY AREAS

Plan Bay Area 2050 also identifies TPAs, referred to as Transit-Rich PDAs.[8] These are areas within 0.5 miles of a major transit stop (i.e., a stop with service frequency of 15 minutes or less) that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon of a Transportation Improvement Program adopted pursuant to Section 450.216 or Section 450.322 of Title 23 of the Code of Federal Regulations. TPAs generally include existing neighborhoods served by transit and contain a wide range of housing options along with jobs, schools, and amenities. Certain potential future residential or mixed-use residential projects and projects[9] in TPAs that meet defined criteria in the CEQA Guidelines may be eligible for CEQA streamlining. Like development in PDAs, developing in TPAs also minimizes development in green field (undeveloped) areas and maximizes growth in transit-rich communities to help lower VMT and consequently reduce GHG emissions, air quality pollutants, and noise from vehicles with internal combustion engines dependent on fossil fuels and reduce wasteful, inefficient, or unnecessary consumption of energy resources.

With respect to potential future development in a TPA, SB 743, which became effective on January 1, 2014, amended CEQA by adding PRC Section 21099 regarding analysis of transportation, aesthetics, and parking impacts for urban infill projects, among other provisions.

SB 743 required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts under CEQA, shifting from a congestion-based (level of service or LOS) standard to a VMT standard. With the passage of SB 743 and the subsequent adoption of revised CEQA Guidelines (December 2018), level of service can no longer be used as a criterion for identifying significant transportation impacts for projects regardless of their location. Transportation impacts are discussed in Chapter 4.15, *Transportation*, of this Draft EIR.

[8] Association of Bay Area Governments and Metropolitan Transportation Commission, 2021, *Plan Bay Area 2050: Regional Growth Framework Update – Overview of Existing and Updated Geographies*, https://www.planbayarea.org/sites/default/files/pdfs_referenced/2019_Regional_Growth_Framework_Update_-_Whats_Changed_1.pdf, accessed June 5, 2023.

[9] A project in a transit priority area is referred to as a transit priority project (TPP).

With respect to aesthetics and parking, CEQA Section 21099(d)(1), states, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a TPA shall not be considered significant impacts on the environment." Accordingly, these topics are no longer to be considered in determining significant environmental effects for projects that meet all three of the following criteria:

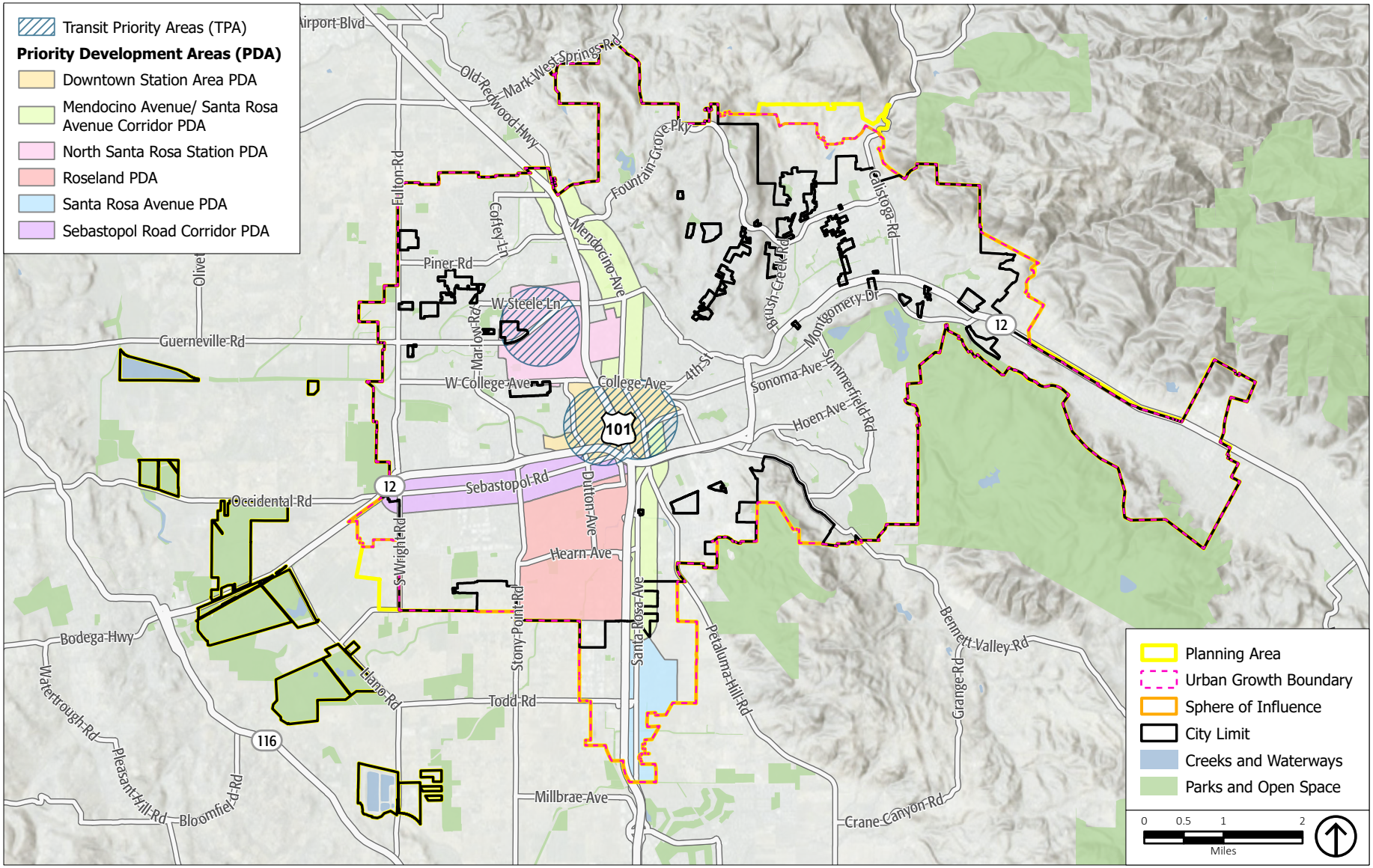
- Is located on an infill site that is defined as "a lot located within an urban area that has been previously developed or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses."
- Is a residential, mixed-use residential, or an employment-center project.
- Is in a transit priority area, as defined above.

Accordingly, in compliance with SB 743, no significant aesthetic or parking impacts can be made in the environmental analysis for potential future qualifying development in the TPAs in the EIR Study Area as they exist today or are modified over the buildout horizon.

EIR STUDY AREA PRIORITY DEVELOPMENT AND TRANSIT PRIORITY AREAS

The EIR Study Area includes six PDAs and three TPAs, which are listed below and shown on Figure 4-1, *Priority Development Areas and Transit Priority Areas.*

- Mendocino Avenue/Santa Rosa Avenue Corridor PDA. This PDA stretches north to south the length of the city along Mendocino Avenue south to Santa Rosa Avenue. It shares a border with all the other PDAs in the city. This PDA is designated as a "mixed-use corridor."
- North Santa Rosa Station PDA and TPA. This PDA/TPA surrounds the North Santa Rosa Sonoma-Marin Area Rail Transit (SMART) station in northwest Santa Rosa and the PDA shares a border with the Mendocino Avenue/Santa Rosa Avenue Corridor and Downtown Station Area PDAs. The North Santa Rosa State PDA is designated as a "suburban center."
- Downtown Station Area PDA and TPA. This PDA/TPA encompasses the Downtown SMART station in Downtown Santa Rosa. The PDA shares a border with the Mendocino Avenue/Santa Rosa Avenue Corridor, North Santa Rosa Station, and Sebastopol Road Corridor PDAs. The Downtown Station Area PDA is designated as a "city center." The Downtown Station TPA overlaps the Santa Rosa Transit Mall TPA.
- Sebastopol Road Corridor PDA. This PDA stretches east to west along Sebastopol Road in west Santa Rosa and shares a border with the Mendocino Avenue/Santa Rosa Avenue Corridor, Downtown Station Area, and Roseland PDAs. This PDA is designated as a "mixed-use corridor."
- Roseland PDA. This PDA is bordered by the Sebastopol Road Corridor PDA to the north, US Highway 101 to the east, Bellevue Avenue to the south, and Stony Point Road to the east. The Roseland PDA also shares a border with the Mendocino Avenue/Santa Rosa Avenue Corridor PDA. The Roseland PDA is designated as a "transit neighborhood."
- Santa Rosa Avenue PDA. This PDA stretches north to south along Santa Rosa Avenue, just south of the city limit and shares a border with the Mendocino Avenue/Santa Rosa Avenue Corridor PDA.



Source: City of Santa Rosa, 2020; MTC/ABAG, 2021; ESRI, 2022; PlaceWorks, 2024.

Figure 4-1
Priority Development Areas and Transit Priority Areas

- Santa Rosa Transit Mall TPA. This TPA surrounds the Santa Rosa Transit Mall, which is a major transfer point for several bus routes serving the city.

AREAS OF CHANGE

The proposed General Plan 2050 identifies 21 Areas of Change where the City will focus on housing, services, connectivity, and/or infrastructure needed to make complete neighborhoods. Potential future development in the EIR Study Area is projected to occur primarily in the proposed General Plan 2050 Areas of Change in the form of infill/intensification on sites already developed or underutilized, and/or in close proximity to existing development and infrastructure. Complementing the Areas of Change are major improvements to the transportation network, which focus on bridging east and west and enhancing multimodal connectivity and safety citywide. Table 4-1, *Proposed General Plan 2050 Areas of Change by PDA/TPA*, shows the 11 Areas of Change that are within or directly adjacent to a PDA and/or TPA.

TABLE 4-1 PROPOSED GENERAL PLAN 2050 AREAS OF CHANGE BY PDA/TPA

Area of Change No. and Name	PDA/TPA
1. Fountaingrove/Mendocino Interchange	Mendocino Avenue/Santa Rosa Avenue Corridor PDA
4. Marlow Center and Lance Drive Annexation	North Santa Rosa Station PDA and TPA
5. Coddingtown	North Santa Rosa Station PDA and TPA
6. West College Neighborhood Center	North Santa Rosa Station PDA
7. Downtown Station Area	Downtown Station Area PDA and TPA
8. Mendocino Corridor	Mendocino Avenue/Santa Rosa Avenue Corridor PDA
9. 4th Street Corridor	Downtown Station Area PDA and TPA (adjacent to)
16. Santa Rosa Marketplace/South Park	Mendocino Avenue/Santa Rosa Avenue Corridor PDA
17. Hearn Corridor	Roseland PDA
18. Roseland	Sebastopol Road Corridor PDA
19. Stony Point Circle	Sebastopol Road Corridor PDA

Notes: PDA = Priority Development Area; TPA = Transit Priority Area. See Figure 3-6, *Proposed General Plan 2050 Areas of Change,* in Chapter 3, *Project Description*, of this Draft EIR and Figure 2-5, *Areas of Change*, in Chapter 2, *Land Use and Economic Development,* of the proposed General Plan 2050.
Sources: City of Santa Rosa, 2020; Metropolitan Transportation Commission/Association of Bay Area Government, 2021; PlaceWorks, 2023.

PARKING

Effective in 2010, parking inadequacy as a significant environmental impact was eliminated from the CEQA Guidelines by OPR, which is the entity charged with drafting guidelines to help agencies implement CEQA. Accordingly, parking adequacy in the EIR Study Area is not discussed further in this Draft EIR.

POTENTIAL EFFECTS OF THE ENVIRONMENT ON THE PROJECT

The California Supreme Court concluded in the *California Building Industry Association vs. Bay Area Air Quality Management District* (CBIA vs. BAAQMD) case that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." The CBIA vs. BAAQMD ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted: (1) if the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried); (2) if the project qualifies for certain specific specified

exemptions (certain housing projects and transportation priority projects pursuant to PRC Sections 21159.21 (f) and (h), 21159.22 (a) and (b)(3), 21159.23 (a)(2)(A), 21159.24 (a)(1) and (3), or 21155.1 (a)(4) and (6)); (3) if the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC Section 21096); and (4) school projects require specific assessment of certain environmental hazards (pursuant to PRC Section 21151.8). Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Existing potential environmental hazards in Santa Rosa include seismic hazards, flooding, and wildfire. Therefore, while the effects of these hazards on the proposed project are not subject to CEQA review following the CBIA vs. BAAQMD case,[10] the City recognizes that seismic, flooding, and wildfire hazards are issues of local concern. Therefore, a discussion of the project's potential to exacerbate these hazardous conditions is provided in Chapter 4.7, *Geology and Soils*; Chapter 4.10, *Hydrology and Water Quality;* and Chapter 4.18, *Wildfire,* of this Draft EIR.

CUMULATIVE IMPACT ANALYSIS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Used in this context, cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. In the case of a long-range plan such as the General Plan 2050, cumulative effects occur when future development under the long-range plan is combined with development in the surrounding areas, or in some instances, in the entire region.

Where the incremental effect of a project is not "cumulatively considerable," a lead agency need not consider that effect significant but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. The CEQA Guidelines state that a lead agency has discretion to determine if a project's contribution to a significant cumulative impact is cumulatively considerable.

The cumulative discussions in Chapters 4.1 through 4.18 of this Draft EIR explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, or air basin). The geographic area considered for each cumulative impact depends on the impact that is being analyzed. For example, in assessing macro-scale air quality impacts, all development within the air basin contributes to regional emissions of criteria pollutants, and basinwide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, on the other hand, only development within the local area of change would contribute to a cumulative visual effect since the area of change is only visible in its vicinity.

[10] *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369.

CEQA Guidelines Section 15130 permits two different methodologies for the cumulative impact analysis:

- The "list" approach permits the use of a list of past, present, and probable future projects producing related or cumulative impacts, including projects both within and outside the city.
- The "projections" approach allows the use of a summary of projections in an adopted plan or related planning document, such as an RTP, or in an EIR prepared for such a plan. The projections may be supplemented with additional information such as regional modeling.

The cumulative impact analysis in this Draft EIR relies on a projections approach and takes into account growth from the proposed project in the EIR Study Area in combination with impacts from projected growth in the rest of Sonoma County and the surrounding region, as forecast by the *Plan Bay Area*. The following provides a summary of the cumulative impact setting for each impact area:

- Aesthetics: The cumulative setting for visual impacts includes potential future development under the proposed project combined with effects of development on lands adjacent to the city in unincorporated Sonoma County.
- Agricultural Resources: The geographic scope of the cumulative analysis for agricultural resources considers those agriculture resources deemed to be resources of statewide importance in the surrounding incorporated and unincorporated lands, the region, and the state.
- Air Quality: Cumulative air quality impacts could occur from a combination of the proposed project with regional growth in the San Francisco Bay Area Air Basin.
- Biological Resources: The geographic scope of the cumulative analysis for biological resources considers the surrounding incorporated and unincorporated lands and the region.
- Cultural Resources: Cumulative impacts to cultural resources could occur from projected growth in the surrounding region.
- Energy: Cumulative impacts to energy resources could occur from the estimated growth in the service area for the two energy providers, Sonoma Clean Power and Pacific Gas and Electric Company.
- Geology and Soils: Potential cumulative geological impacts could arise from future growth in the immediate vicinity of Sonoma County.
- Greenhouse Gas Emissions: The cumulative impact analyses for GHG emissions are related to the entire region. Because GHG emissions are not confined to a particular air basin but are dispersed worldwide, the cumulative impact analysis focuses on the global impacts and thus, is by its nature cumulative.
- Hazards and Hazardous Materials: The cumulative analysis considers the effects of growth in the rest of Sonoma County and surrounding region.
- Hydrology and Water Quality: The geographic context used for the cumulative assessment of hydrology and water quality impacts, including the potential to exacerbate the potential for flooding, considers the watersheds that encompass Santa Rosa.
- Land Use and Planning: The geographic context for the cumulative land use and planning effects considers impacts from projected growth in the rest of Sonoma County and the surrounding region, as forecast in the *Plan Bay Area*.

- Noise: The traffic noise levels are based on cumulative traffic conditions that take into account cumulative development in the Sonoma County region.
- Population and Housing: Impacts from cumulative growth are considered in the context of their consistency with regional planning efforts in the Sonoma County region.
- Public Services and Recreation: Cumulative impacts are considered in the context of projected growth in the rest of Sonoma County and the surrounding region, as forecast by the *Plan Bay Area*, and contiguous with the service area boundaries of the service providers evaluated in this section.
- Transportation: The analysis of the proposed project addresses cumulative impacts to the transportation network in the surrounding area.
- Tribal Cultural Resources: Cumulative impacts to tribal cultural resources could occur from projected growth in the surrounding region.
- Utilities and Service Systems: Cumulative impacts are considered in the context of the estimated growth in each utility's service area.
- Wildfire: The analysis of the proposed project includes a discussion of how cumulative development in the region may exacerbate wildfire risk in Santa Rosa and the surrounding area.

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