6. CEQA-Required Conclusions

This chapter provides an overview of the impacts of the proposed project based on the analyses presented in Chapter 4.0, *Environmental Analysis*, and its subchapters 4.1 through 4.18, of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include impacts found not to be significant, growth-inducing impacts, and significant irreversible changes to the environment. For a more detailed analysis of the proposed project's environmental effects and the proposed General Plan 2050 mitigating policies and actions to minimize significant impacts, see Chapter 4.0 and its subchapters 4.1 through 4.18, of this Draft EIR.

6.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128, *Effects Not Found to Be Significant*, allows environmental issues to be "scoped out" if there is no likelihood of a significant impact, and they do not need to be analyzed further in the EIR. This section explains the reasoning for the determination that the proposed project would have no effect within an entire environmental topic or under specific criteria within an environmental topic. As shown below, there would be no impacts to mineral resources as a whole pursuant to the CEQA standards; therefore, this topic is not evaluated in Chapter 4.0, *Environmental Analysis*, of this Draft EIR. Furthermore, there would be no impacts to some of the criteria for forestry resources. These specific criteria are identified in the corresponding subsection of this chapter and are not required to be evaluated in this EIR.

6.1.1 FORESTRY RESOURCES

The following standards of significance are not evaluated in this EIR:

- Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

This EIR does not analyze impacts to forestry resources because the Santa Rosa City Code (SRCC) does not contain a zoning district for forest land or timberland production. Further, there are no State or national forest lands in the EIR Study Area. Consequently, the proposed project would not result in any impacts to forestry resources, and this topic is not discussed further in this EIR.

6.1.2 MINERAL RESOURCES

The following standards of significances are not evaluated in this EIR:

- Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

According to the California Geological Survey, Department of Conservation, there are no known significant mineral resources within the EIR Study Area.[1] Furthermore, there are no active/permitted mining or designated land in the City. As such, these standards have been screened out from further evaluation. Consequently, there would be no impacts to mineral resources as a result of adoption and implementation of the proposed project.

6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that "direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." Chapter 2, *Executive Summary*, of this Draft EIR contains Table 2-1, *Summary of Significant Impacts and Mitigating Policies and Actions,* which summarizes the significant impacts, mitigating proposed General Plan 2050 policies and actions, and levels of significance with and without mitigating policies and actions. While mitigating General Plan 2050 policies and actions would reduce the level of impact, the following impacts would remain significant and unavoidable after mitigating policies and actions are applied. The identification of these 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 thresholds of significance. As detailed in Chapter 4.2, *Agricultural Resources*, Chapter 4.3, *Air Quality*, Chapter 4.4, *Biological Resources*, Chapter 4.12, *Noise*, Chapter 4.15, *Transportation*, and Chapter 4.18, *Wildfire*, of this Draft EIR, environmental impacts associated with the proposed project were found to be significant and unavoidable, as listed:

- Agricultural Resources
  - 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.
  - Impact AG-2: Implementation of the proposed project could result in the loss of agricultural land under the Williamson Act.

[1] California Geological Survey, Department of Conservation, 2013, *Special Report 205: Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California*, accessed April 13, 202, https://maps.conservation.ca.gov/mineralresources/3.

- **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.

- Air Quality
  - **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}).
  - **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.
  - **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.
- Noise
  - **Impact NOI-1a:** Construction activities associated with potential future development could expose sensitive receptors to excessive noise from construction equipment.
  - **Impact NOI-1b:** Operational vehicle traffic noise increases could exceed the City's significance thresholds with implementation of the proposed project.
  - **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.
- Transportation
  - **Impact TRAN-2a:** Implementation of the proposed project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.
  - **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.
  - **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).
- Wildfire
  - **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.

- 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.

6.3 GROWTH INDUCEMENT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth-inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development.

This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(d) requires, "[it] must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." In other words, negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts consist of growth induced in the region by additional demands for housing, goods, and services associated with the population increase caused by, or attracted to, a new project.

As discussed in detail in Chapter 4.13, *Population and Housing*, of this Draft EIR, the General Plan is the policy document that plans ahead to accommodate the amount of reasonably foreseeable growth given past growth trends and the ability of existing services and infrastructure to support future growth. Therefore, the proposed General Plan 2050 would not directly induce growth, but rather is a response to growth that is likely to occur whether the proposed project is adopted or not. Because the proposed General Plan 2050 also includes recommendations for future roadway and infrastructure extension, as it is required to do by state law, it has the potential to indirectly induce growth. However, the proposed General Plan 2050 itself is the City's effort to adequately plan for this growth.

Additionally, this additional growth would likely occur incrementally over a period of approximately 25 years and a policy framework is in place to ensure adequate planning occurs to accommodate it regardless of the development timeline. The proposed project results in mixed-use development and employment centers and implements energy and water conservation requirements related to existing and new development, thereby minimizing consumption of non-renewable resources to the extent practicable.

6.3.1 DIRECT IMPACTS

The proposed project is a plan-level document and does not propose any specific development; however, implementation of the proposed project would induce growth by increasing the development potential in the EIR Study Area, as shown in Table 3-6, *Proposed 2050 Buildout Projections in the EIR Study Area*, in Chapter 3, *Project Description*, of this Draft EIR. As shown in Table 3-6, the 2050 forecast for the EIR Study Area is approximately 263,740 total population, 99,940 housing units, and 91,680 jobs.

State law requires the City to promote the production of housing to meet its fair share of the regional housing needs distribution made by the Association of Bay Area Governments. While the City provides adequate sites to meet its fair-share housing obligations, the additional housing capacity provided by the proposed project would meet the additional demand generated by new job growth.

In addition, the proposed project would result in regional benefits by promoting growth that encourages less automobile dependence, which could have associated air quality and GHG benefits. Encouraging infill growth in designated areas would help to reduce development pressures on lands outside the City Limits.

6.3.2 INDIRECT IMPACTS

The proposed project could be considered growth inducing because it includes policies and actions that encourage new growth in the urbanized areas of Santa Rosa. Development in these areas would consist of infill development on underutilized sites, sites that have been previously developed, and that are vacant and have been determined to be suitable for development. However, infrastructure is largely in place, and growth would be required to comply with the City's General Plan, zoning regulations, and standards for public services and utilities; secondary effects associated with this growth do not represent a new significant environmental impact that has not already been addressed in the individual resource chapters of this EIR. Additional population and employment growth would likely occur incrementally over a period of approximately 25 years and would be consistent with the regional planning objectives established for the Sonoma County region.

6.4 SIGNIFICANT AND IRREVERSIBLE CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which the proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed herein.

6.4.1 CHANGES IN LAND USE THAT COMMIT FUTURE GENERATIONS

As described in detail in Chapter 3, *Project Description*, of this Draft EIR, the proposed project maintains the land use pattern of the existing General Plan. Development is encouraged in existing urban areas, and new development is required to be contiguous with the existing City Limits. The current General Plan 2035 provided development allocations for buildout of the city through the year 2035. Some future

development under the proposed project would be on land that is generally urbanized or on infill sites and sites in developed areas that are underutilized. However, some potential future development may occur on vacant non-urban sites that are already designated for development. Once future development under the proposed project occurs, it would not be feasible to return the developed land to its existing (pre-project) condition. Therefore, there is potential that some of the development allowed under the proposed project would lead to irreversible changes in land use.

6.4.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities; however, compliance with the applicable regulations and proposed General Plan 2050 goals, policies, and actions as discussed in Chapter 4.9, *Hazards and Hazardous Materials*, of this Draft EIR would ensure these impacts would be less than significant. Therefore, irreversible damage is not expected to result from the adoption and implementation of the proposed project.

6.4.3 LARGE COMMITMENT OF NONRENEWABLE RESOURCES

Future development allowed under the proposed project would result in the commitment of limited, renewable resources, such as lumber and water. In addition, development under the proposed project would irretrievably commit nonrenewable resources for the construction of buildings, infrastructure, and roadway improvements. These nonrenewable resources include mined minerals, such as sand, gravel, steel, lead, copper, and other metals. Future buildout under implementation of the proposed project also represents a long-term commitment to the consumption of fossil fuels such as natural gas and gasoline. Increased energy demands would be used for construction, lighting, heating, and cooling of residences, and transportation of people within, to, and from Santa Rosa. However, as shown in Chapter 4.6, *Energy,* and in Section 4.17.1, *Water*, and Section 4.17.4, *Solid Waste*, of Chapter 4.17, *Utilities and Service Systems*, of this Draft EIR, several regulatory measures and proposed General Plan 2050 goals, policies, and actions encourage energy and water conservation, alternative energy use, waste reduction, alternatives to automotive transportation, and green building. Future development under the proposed project would be required to comply with all applicable building and design requirements, including those set forth in Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, future development would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. Therefore, while the construction and operation of future development, as a result of increased development allocations under the proposed project, would involve the use of nonrenewable resources, compliance with applicable standards and regulations and implementation of proposed General Plan 2050 goals, policies, and actions would reduce the use of nonrenewable resources to the maximum extent practicable; therefore, the proposed project would not represent a large commitment of nonrenewable resources in comparison to a business-as-usual situation.