

## **5. Alternatives to the Proposed Project**

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The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. The California Environmental Quality Act (CEQA) Guidelines set forth the intent and extent of alternatives analysis to be provided in an environmental impact report (EIR). Section 15126.6(a) of the CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives, which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

### **5.1 PURPOSE**

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

### **5.2 SELECTION OF A REASONABLE RANGE OF ALTERNATIVES**

Section 15126.6(c) of the CEQA Guidelines states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice

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of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

### 5.2.1 PROJECT OBJECTIVES

Pursuant to CEQA Guidelines Section 15126.6(c), the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the proposed project. As listed in Chapter 3, *Project Description*, of this Draft EIR, the City has identified objectives, which build on the framework of the Santa Rosa Vision and reflect the community's desires for the future of Santa Rosa to serve as the project objectives for the EIR. As described in Chapter 3 of the Draft EIR, the primary purpose of the proposed project is to plan for the growth and conservation of Santa Rosa over an approximately 25-year time horizon while achieving the vision. The project objectives to realize the Santa Rosa Vision are related specifically to growth in the 21 Areas of Change, the majority of which capitalize on infill opportunities in and around Priority Development Areas (PDAs) and Transit Priority Areas (TPAs). Development of infill sites near transit makes the most of existing infrastructure and allows for the streamlining of future development in a manner that is consistent with the proposed General Plan 2050. Meeting the vision also includes making major improvements to the transportation network, which focus on bridging east and west and enhancing multimodal connectivity and safety citywide. Achieving the vision also entails creating complete streets and complete neighborhoods to activate the Areas of Change. Further, it includes creating a cross-sector approach to integrating greenhouse gas reduction into all parts of the general plan; creating new opportunities for a vital thriving downtown and entertainment district; preserving community character and environmental, historic and cultural resources as the city develops and becomes denser; and creatively blending old and new development to create a cohesive urban fabric and public realm. A complete list of project objectives is provided in Section 3.6, *Project Objectives*, of Chapter 3 of this Draft EIR. Achieving these objectives requires extending the buildout horizon to year 2050 and updating goals, policies, and actions so that they meet current State requirements and community priorities, as articulated during an extensive public engagement process conducted for the project (<https://www.santarosafoward.com/engagement>).

### 5.2.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

All the potential environmental impacts associated with adoption and implementation of the proposed project were found to be either less than significant without mitigation or less than significant with mitigating General Plan 2050 policies and actions, except for impacts to agricultural resources (AG), air quality (AIR), noise (NOI), transportation (TRAN), and wildfire (WF), which were found to be significant and unavoidable at the program level. As described in the impact discussions of these chapters, although the proposed project results in significant and unavoidable impacts, the identification of these program-level impacts does not preclude the finding of less-than-significant impacts for subsequent development proposals analyzed at the project level that do not exceed the applicable project-level thresholds. The program-level significant and unavoidable impacts include the following:

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- **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.
  - **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<sub>x</sub>) and particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>).
  - **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<sub>2.5</sub>) 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.

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- **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.

### 5.2.3 ALTERNATIVES CONSIDERED AND REJECTED AS BEING INFEASIBLE

Pursuant to CEQA Guidelines Section 15126.6(c) of the State CEQA Guidelines, EIRs should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of alternatives considered and rejected, along with the reasons they were not included in the analysis.

#### 5.2.3.1 REDUCED HOUSING ALTERNATIVE

The City considered alternatives that would reduce the construction-related impacts of the proposed project by reducing the proposed buildout potential, including the amount of potential housing development. The City rejected any alternative that would reduce the amount of housing due to the ongoing housing crisis.

The State of California has enacted several laws intended to address California's housing needs. The California Housing Accountability Act was initially passed in 1982 and has been revised in recent years. Under the Housing Accountability Act, so long as a project complies with applicable objective General Plan and zoning standards, a local agency may not deny a project or approve it at a lower density unless the agency finds that the project would have specific, adverse, unavoidable impacts on public health or safety. Pursuant to Government Code Section 65589.5(j), a local agency may only require a reduction in housing density as a condition of approval if the proposed project has a specific adverse effect on public health and safety that can only be mitigated by lowering the residential density. Accordingly, for many housing projects with no specific, adverse, unavoidable impacts on public health or safety, local agencies find reduced housing alternatives to be infeasible.

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The City finds that with implementation of proposed General Plan 2050 goals, policies, and actions that require the evaluation and mitigation of impacts on public health and safety from potential future development, including the construction and operation of the potential future housing, a reduction in housing is not necessary to avoid a public health and safety impact. Therefore, due to the well-documented housing crisis and the lack of housing in Santa Rosa and the requirements to evaluate and mitigate impacts to public health and safety as a result of any future housing, a reduced housing alternative should be considered infeasible. Furthermore, while the reduced housing alternative would reduce impacts from construction and operation when compared to the proposed project, it would not entirely avoid significant mitigable environmental impacts.

Lastly, a reduced housing alternative would not fully achieve the project objectives that seek to provide and ensure that a diverse mix of high-quality, safe, thoughtfully designed, efficiently planned, and well-served housing at all affordability levels is available throughout the community to accommodate everyone, including formerly homeless, immigrants, local workers, multigenerational households, seniors, students, and formerly incarcerated people, within neighborhoods that are increasingly walkable/bikeable.

### 5.2.3.2 INCREASED PLANNING AREA ALTERNATIVE

During the scoping process, the expansion of the Urban Growth Boundary (UGB) and/or Sphere of Influence (SOI) was considered. The City rejected any alternative that would expand the UGB or SOI because, as described in Chapter 3, *Project Description* of this Draft EIR, the expansion of the city into surrounding lands is no longer a focus of City planning efforts. Growth and change in the city will be tailored to support maintenance and development of complete neighborhoods, particularly in Areas of Change. These are places where the City will focus efforts to address housing, services, connectivity, and/or infrastructure needs and help provide complete neighborhoods with goods and services that are easily available. The proposed General Plan 2050 identifies 21 Areas of Change, as shown on Figure 3-6, *Proposed General Plan 2050 Areas of Change*, in Chapter 3 of this Draft EIR.

The City finds that with implementation of the proposed General Plan 2050 land use map and the goals, policies, and actions that require the evaluation and mitigation of impacts from potential future development, the expansion of the UGB and/or SOI is not required to accommodate the proposed potential buildout or to reduce any potentially significant impacts. Rather, the City finds that the potential expansion of the UGB or SOI to accommodate growth in areas would potentially increase impacts caused by developing on undisturbed lands and on lands further away from core services areas such that VMT could be increased when compared to the proposed project.

Lastly, an expanded UGB and/or SOI alternative would not fully achieve the project objectives that seek to provide and ensure the primary purpose of the proposed project, which is to plan for the growth and conservation of Santa Rosa over an approximately 25-year time horizon while achieving the Santa Rosa Vision. Expansion of the planning area would not support the vision to ensure that natural resources are restored, protected, and expanded to provide accessible green space for everyone in all neighborhoods, mitigate drought, and minimize GHG.

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An expansion of the City would not support an increasingly dense urban core or streamline future development by focusing on infill sites near transit to make the most of existing infrastructure; nor would it ensure strong connections between land use, transportation, utilities, and other infrastructure. Additionally, this alternative would not focus development in the 21 Areas of Change, the majority of which capitalize on infill opportunities in and around PDAs and TPAs, so that implementing the plan supports the City in reaching its climate mandates and supports regional strategies to reduce greenhouse gas (GHG) emissions and improve air quality.

Finally, the Increased Planning Area alternative would not support the activation of the Areas of Change by developing complete neighborhoods that are walkable/bikeable and increasingly protected from environmental hazards nor support the cross-sector approach to integrating GHG reduction into all parts of the general plan.

### 5.2.3.3 SELECTED ALTERNATIVES

Two project alternatives and the comparative merits of the alternatives are discussed in this section in accordance with the CEQA Guidelines. The alternatives to be analyzed in comparison to the proposed project include:

- **Alternative A:** No Project Alternative (Current General Plan 2035)
- **Alternative B:** Increased Density Alternative

The first alternative is the CEQA-required “No Project” Alternative, which assumes the current General Plan 2035 and the City’s 2012 Community-wide Climate Action Plan (CCAP) remain in effect and are not replaced by the proposed project. The second alternative is the Increased Density Alternative. This alternative assumes the same amount 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 through the redesignation of certain medium low density residential parcels as medium high density residential.

### 5.2.4 ASSUMPTIONS AND METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the proposed project. The development intensity for the alternatives varies from the proposed project. The estimated growth under each alternative, as well as the proposed project, is provided in Table 5-1, *Forecast Additional Growth for the Proposed Project and the Alternatives to the Proposed Project*.

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**TABLE 5-1 FORECAST ADDITIONAL GROWTH FOR THE PROPOSED PROJECT AND THE ALTERNATIVES TO THE PROPOSED PROJECT**

Category	Proposed Project	Alternative A: No Project <sup>a</sup>	Alternative B: Increased Density
Residential Units	24,090	3,996 <sup>b</sup>	24,090
Population	65,760	17,270 <sup>b</sup>	65,760
Jobs	14,090	-30,000 <sup>b</sup>	14,090

Notes:

a. Based on a review of existing conditions and projected trends, the City is not on track to meet the 2035 buildout estimates of the current General Plan 2035 and is accordingly revising local growth projections to be more in line with regional growth.

b. City of Santa Rosa, March 2009, *General Plan 2035 Environmental Impact Report*, Table 3-1, *Buildout Changes Between the 2020 to 2035 General Plans*, <https://www.srcity.org/DocumentCenter/View/3096/Draft-General-Plan-Environmental-Impact-Report-Santa-Rosa-2035-PDF>.

Source: City of Santa Rosa, 2023.

The alternatives analysis assumes that the proposed General Plan 2050 goals, policies, and actions would apply to Alternative B, including the mitigating policies and actions, but would not apply to Alternative A. The following discussion compares the environmental impacts of the alternatives with those of the proposed project for each of the environmental topics analyzed in detail in Chapter 4.0, *Environmental Analysis*, of this Draft EIR. The impacts of each alternative are classified as less than (<), similar or comparable to (=), or greater than (>) the level of impacts associated with the proposed project. Table 5-2, *Impact Comparison of the Proposed Project and Alternatives by Environmental Topic*, summarizes the relative impacts of each environmental topic of the alternatives compared to the proposed project.

**TABLE 5-2 IMPACT COMPARISON OF THE PROPOSED PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC**

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

Note:

a. The impact conclusions in this column represent the highest significance determination for each respective standard of significance.

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**TABLE 5-2 IMPACT COMPARISON OF THE PROPOSED PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC**

Environmental Topic	Impact Conclusion of the Proposed Project <sup>a</sup>	Impact Conclusion Compared to the Proposed Project	
		Alternative A: No Project	Alternative B: Increased Density
LTS	Less Than Significant	<	Less impact in comparison to the proposed project
LTS/M	Less Than Significant with Mitigation	=	Similar impact in comparison to the proposed project
SU	Significant and Unavoidable	>	Greater impact in comparison to the proposed project

As previously stated, the alternatives were selected because of their potential to further reduce and avoid the significant and unavoidable impacts listed in Section 5.2.2. Table 5-3, *Comparison of Significant and Unavoidable Impacts of the Proposed Project and the Alternatives by Environmental Topic and Standard of Significance*, summarizes the relative impacts of each environmental topic of the alternatives compared to the proposed project.

**TABLE 5-3 COMPARISON OF SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC AND STANDARD OF SIGNIFICANCE**

Environmental Topic	Impact Statement	Proposed Project	Alternative A: No Project	Alternative B: Increased Density
<b>Agricultural Resources</b>	<b>Impact AG-1:</b> 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.	SU	<	<
	<b>Impact AG-2:</b> Implementation of the proposed project could result in the loss of agricultural land under the Williamson Act.	SU	<	<
	<b>Impact AG-4:</b> 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.	SU	<	<
<b>Air Quality</b>	<b>Impact AIR-2b:</b> 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 <sub>x</sub> ) and particulate matter (PM <sub>2.5</sub> and PM <sub>10</sub> ).	SU	>	<
	<b>Impact AIR-3b:</b> 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 <sub>2.5</sub> ) concentrations and exceed the Bay Area Air Quality Management District’s (BAAQMD) project-level and cumulative significance thresholds.	SU	>	<

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**TABLE 5-3 COMPARISON OF SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT AND THE ALTERNATIVES BY ENVIRONMENTAL TOPIC AND STANDARD OF SIGNIFICANCE**

Environmental Topic	Impact Statement	Proposed Project	Alternative A: No Project	Alternative B: Increased Density	
	<b>Impact AIR-5:</b> 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.	SU	>	<	
Noise	<b>Impact NOI-1a:</b> Construction activities associated with potential future development could expose sensitive receptors to excessive noise from construction equipment.	SU	>	<	
	<b>Impact NOI-1b:</b> Operational vehicle traffic noise increases could exceed the City's significance thresholds with implementation of the proposed project.	SU	>	<	
	<b>Impact NOI-4:</b> 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.	SU	>	<	
Transportation	<b>Impact TRAN-2a:</b> Implementation of the proposed project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.	SU	>	<	
	<b>Impact TRAN-2b:</b> 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.	SU	>	<	
	<b>Impact TRAN-5:</b> 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).	SU	>	<	
Wildfire	<b>Impact WF-2:</b> 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.	SU	>	<	
	<b>Impact WF-5:</b> 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.	SU	>	<	
Notes:	<	Less impacts in comparison to the proposed project			
SU	Significant and Unavoidable	=	Similar impact in comparison to the proposed project		
		>	Greater impact in comparison to the proposed project		

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### 5.3 ALTERNATIVE A: NO PROJECT (GENERAL PLAN 2035)

#### 5.3.1 DESCRIPTION

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the no project alternative will be the continuation of the existing plan. Under Alternative A, potential future development in Santa Rosa would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing General Plan 2035. Alternative A would not implement the amendments to the North Station Area Specific Plan (NSASP), Downtown Station Area Specific Plan (DSASP), or Santa Rosa City Code (SRCC) associated with the proposed General Plan 2050 and Land Use Map. Alternative A would also not adopt the proposed GHG Reduction Strategy to serve as the strategic plan for how the City will reduce GHG emissions and foster a sustainable community through 2050 and beyond.

As described in Chapter 3, *Project Description*, of this Draft EIR, the existing General Plan was adopted in 2009 and included a horizon year of 2035. A number of State and federal laws guiding general plan policies have also been updated during this time. Many of the community issues vetted in the General Plan 2035 are still relevant, well addressed, and do not require major changes. However, Alternative A would not incorporate new topics that are now required by State law, such as environmental justice, and would not revise relevant policies and actions to meet those requirements.

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(C), the City of Santa Rosa, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. Implementation of the No Project Alternative assumes that development growth throughout the city would remain unchanged until the buildout horizon year 2050, which is consistent with other regional plans, including *Plan Bay Area 2050*.

Future development permitted under the No Project Alternative would not increase development potential in Santa Rosa beyond what was considered in the existing General Plan 2035 and analyzed in the associated EIR (State Clearinghouse No. 2008092114), but rather assumes the remaining development growth shown in Table 5-1 would occur through 2050. No General Plan land use designations changes or zoning amendments would be required to accommodate these uses.

Table 5-4, *2019 to 2050 Growth Under the Proposed Project and Alternative A*, shows the difference between 2019 to 2050 growth of the proposed project compared to Alternative A. As shown in Table 5-4, Alternative A would result in less residential and job growth when compared to the proposed project.

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**TABLE 5-4 2019 TO 2050 GROWTH UNDER THE PROPOSED PROJECT AND ALTERNATIVE A**

Category	Proposed Project	Alternative A: No Project	Difference between the Proposed Project and Alternative A
Residential Units	24,090	3,996 <sup>a</sup>	20,094 more residential units
Population	65,760	17,270 <sup>a</sup>	48,490 more population
Jobs	14,090	-30,000 <sup>a</sup>	44,090 more jobs

Notes:

a. City of Santa Rosa, March 2009, *General Plan 2035 Environmental Impact Report*, Table 3-1, *Buildout Changes Between the 2020 to 2035 General Plans*, <https://www.srcity.org/DocumentCenter/View/3096/Draft-General-Plan-Environmental-Impact-Report-Santa-Rosa-2035-PDF>. Source: City of Santa Rosa, 2023.

### 5.3.2 IMPACT DISCUSSION

The potential environmental impacts associated with Alternative A when compared to the proposed project are described herein.

#### 5.3.2.1 AESTHETICS

As described in Chapter 4.1, *Aesthetics*, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics.

While there are no officially designated scenic vistas in the EIR Study Area, the City has officially designated certain roadways in Santa Rosa as scenic roads in the General Plan. The EIR Study Area also includes portions of State Route (SR) 12 which have been designed as “eligible” for and “officially designated” as a State Scenic Highway.

Like the proposed project, potential future development in the EIR Study Area under Alternative A is anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. The proposed General Plan 2050 reinforces existing uses, heights, and densities in most locations, with allowances for greater intensity only in a limited number of locations and therefore would not substantially increase building height beyond what is previously accounted for under the current General Plan 2035.

Potential future development under both the proposed project and Alternative A would be required to comply with SRCC regulations, including those for the Scenic Road Combining District and Design Review. *Santa Rosa Design Guidelines* would also apply to all projects that require design review, including most new buildings, subdivisions, infill development, and public improvements. Potential future development in the city would also be subject to the various planning documents that govern scenic quality in the city, such as the *Citywide Creek Master Plan*, *Sebastopol Road Urban Vision and Corridor Plan*, and Street Light Design Standards.

Similar to the proposed project, Alternative A would result in new lighting sources that could result in sources of glare. Potential future development under both scenarios would be required to comply with best management practices in CALGreen, the SRCC, the Street Light Design Standards, and other adopted

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plans. Potential future development would be reviewed for consistency with the lighting standards regarding the appropriate use of lighting and avoidance of glare from lighting and other sources.

While there is less development potential under Alternative A when compared to the proposed project, potential future development under both scenarios would be subject to the same regulations; therefore, impacts related to aesthetics would be *similar* under Alternative A when compared to the proposed project.

### 5.3.2.2 AGRICULTURAL RESOURCES

As determined in Chapter 4.2, *Agricultural Resources*, of this Draft EIR, the proposed project would result in significant and unavoidable impacts related to the loss of agricultural lands due to the potential conversion to non-agricultural land uses. Through the proposed General Plan 2050 goal, policies, and actions, impacts related to the conversion of qualifying agricultural lands would be reduced, but not to a less-than-significant level.

The EIR Study Area contains 43 acres of Prime Farmland, 660 acres of Farmland of Statewide Importance, and 54 acres of Unique Farmland. There is a total of 97 acres of land that are under Williamson Act contracts within the EIR Study Area. Under both scenarios, there is the potential for these agricultural lands to be converted to non-agricultural uses. However, there is less development potential under Alternative A when compared to the proposed project; therefore, impacts related to agricultural resources would be *less* under Alternative A when compared to the proposed project.

### 5.3.2.3 AIR QUALITY

As described in Chapter 4.3, *Air Quality*, of this Draft EIR, the proposed project would result in less than significant impacts related to construction with implementation of proposed General Plan 2050 \*Action 3-6.31, \*Action 3-6.32, and \*Action 6-1.5. However, significant and unavoidable impacts related to operational emissions of reactive organic compounds (ROG), nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and exposure of air quality-sensitive receptors to substantial toxic air contaminants (TAC) and PM<sub>2.5</sub> concentrations, despite implementation of proposed General Plan 2050 \*Action 3-6.31, \*Action 6-1.5, and \*Action 6-1.6. This significant and unavoidable impact is only related to the programmatic nature of the proposed project that precludes the availability of mitigation measures at the project level.

Alternative A would continue development as allowed under the current General Plan 2035, which would result in less development in the EIR Study Area compared to the proposed project. Therefore, less direct and indirect criteria air pollutant emissions from energy (e.g., natural gas use) and area sources (e.g., aerosols and landscaping equipment) would occur. Additionally, there would be less of an elevation in concentrations of toxic air contaminants in the vicinity of sensitive land uses.

Potential future development under both the proposed project and Alternative A would be subject to the Bay Area Air Quality Management District's (BAAQMD's) rules and regulations, including those related to fugitive dust and odor, and would be required to prepare a detailed air quality impact assessment on a project-by-project basis. However, Alternative A would not include the updated policy framework of the proposed project that ensures adequate planning occurs to accommodate the future population increase

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and potential future development, thereby conflicting with the BAAQMD 2017 Clean Air Plan. Furthermore, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions or the proposed GHG Reduction Strategy to further reduce potential VMT and GHG emissions. Therefore, impacts related to air quality would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.4 BIOLOGICAL RESOURCES

As described in Chapter 4.4, *Biological Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to biological resources with implementation of proposed General Plan 2050 \*Action 3.5-7, \*Action 3-5.10, \*Action 3-5.11, \*Action 3-5.12, \*Action 3-5.13, \*Action 3-5.19, and \*Action 3-5.20.

The EIR Study Area is not within any local, regional, or State Habitat Conservation Plan areas. Therefore, neither the proposed project nor Alternative A would conflict with the conservation strategy in any Habitat Conservation Plan or Natural Community Conservation Plan. The City of Santa Rosa General Plan is the overriding planning document for the City of Santa Rosa and would therefore not conflict with local policies and ordinances protecting biological resources.

Like the proposed project, potential future development in the EIR Study Area under Alternative A could potentially affect animal and plant species identified as candidate, sensitive, or special-status species but would primarily occur as infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, which reduces the likelihood that special-status plant and animal species could be impacted. Infill development also reduces the likelihood that the riparian habitats, wetlands, and wildlife movement corridors could be impacted. Potential future development under both scenarios would be required to adhere to all federal, state, and local regulations relating to biological resources.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require consultation with the California Department of Fish and Wildlife to preserve populations of plants and animals, continued implementation of existing regulations and procedures, preparation of a biological resource assessments as part of project approval, avoidance of nests of native birds and implementation of protection measures, establishment of ecological buffer zones, and maintenance of adequate setbacks.

While development in the EIR Study Area would be less than the proposed project, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to biological resources would be *greater* under Alternative A when compared to the proposed project.

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### 5.3.2.5 CULTURAL RESOURCES

As described in Chapter 4.5, *Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural resources with implementation of proposed General Plan 2050 \*Action 3-5.19, \*Action 3-5.20, \*Action 4-2.1, \*Action 4-2.2, \*Action 4-2.3, \*Action 4-2.4, \*Action 4-3.2, \*Action 4-3.6, \*Action 4-3.7, and \*Action 4-3.9.

The EIR Study Area contains existing prehistoric, architectural, historical, or archaeological resources that could be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or Alternative A. Like the proposed project, potential future development under Alternative A would be subject to the regulations of the SRCC for historic and cultural preservation and the Historic Combining District. *Santa Rosa Design Guidelines* would also apply to all historic structures and neighborhoods that have been adopted by the city. In the event of the discovery of human remains, procedures of conduct mandated by Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and the California Code of Regulations (CCR) Section 15064.5(e) would be adhered to.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require continued review of proposed developments in conjunction with appropriate entities to determine the presence of historic and archeological resources and mitigation to protect such resources, examination of project areas with significant archaeological resources by a qualified consulting archaeologist with recommendations for protection and preservation, and continued compliance with existing regulations.

While development in the EIR Study Area would be less than the proposed project, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to cultural resources would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.6 ENERGY

As described in Chapter 4.6, *Energy*, of this Draft EIR, the proposed project would not result in any significant impacts related to energy.

All development that occurs in the State is required to comply with best management practices regulated in the California Green Building Code and Building and Energy Efficiency Standards, which ensure new development would not result in the wasteful or inefficient use of energy. Additionally, neither the proposed project nor Alternative A would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

Less development would occur under Alternative A, so energy consumption from construction would be less when compared to the proposed project. Energy use from building electricity, natural gas, and transportation would also be less under Alternative A because there is less development potential when compared to the proposed project. However, as the standard of significance for energy impact is focused

## ALTERNATIVES TO THE PROPOSED PROJECT

on efficiency and not on amount, it is assumed that the net benefits from the proposed General Plan 2050 goals, policies, and actions and the proposed GHG Reduction Strategy would result in more efficient and less wasteful energy use when compared to Alternative A. Because Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions or the proposed GHG Reduction Strategy, impacts related to energy would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.7 GEOLOGY AND SOILS

As described in Chapter 4.7, *Geology and Soils*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to geology and soils with implementation of proposed General Plan 2050 \*Policy 5-1.1, \*Action 5-1.1, and \*Action 5-1.2.

Potential future development under both the proposed project and Alternative A would be subject to the same the SRCC regulations, including the requirement for any project within a State Geologist-delineated earthquake fault zone to obtain specialized approval, compliance with the California Building Code and hillside development standards, and implementation of grading, erosion, and sediment control. Potential future development under both scenarios would also be required to comply with the federal Paleontological Resources Preservation Act that limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency and the PRC Section 5097 that prohibits the removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require avoidance and mitigation of seismic and geological hazards. Geologic studies and analyses are required to be deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer, and where it is determined that hazards cannot be effectively mitigated, development shall be restricted.

While development in the EIR Study Area would be less than the proposed project, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to geology and soils would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.8 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.8, *Greenhouse Gas Emissions*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to GHG emissions and consistency with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Potential future development under both the proposed project and Alternative A would experience emission reductions from implementation of State measures and strategies to reduce Statewide GHG emissions. The GHG emissions from new buildings constructed would be subject to the triennial updates of California's Building and Energy Efficiency Standards, which would presumably improve over time and thereby result in more energy efficient buildings.

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Under Alternative A, there would be less development, resulting in an overall decrease in energy usage from construction and operation of potential future development. However, Alternative A would be implemented under the current General Plan 2035, which does not include the new mix of land uses that increase density to reduce VMT. Furthermore, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions or the proposed GHG Reduction Strategy to further reduce potential GHG emissions to achieve State GHG reduction goals consistent with the BAAQMD CEQA Guidelines. Therefore, impacts related to GHG emissions would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.9 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.9, *Hazards and Hazardous Materials*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials. With respect to impacts related to TACs during construction and operation, which could occur within 0.25 miles of a school, the implementation of proposed General Plan 2050 \*Action 6-1.5 and \*Action 6-1.6 were found to be less than significant as discussed in Chapter 4.3, *Air Quality*, of this Draft EIR.

The Charles M. Schulz Sonoma County Airport AIA is located northwest of, but greater than two miles outside of, the EIR Study Area. Therefore, neither the proposed project nor Alternative A would result in a safety hazard or excessive noise for people residing or working in an area within an airport land use plan.

Potential future development within the EIR Study Area under both scenarios would involve the routine use, transport, and handing of hazardous materials throughout the city, and could occur on properties that possibly are contaminated and inactive, undergoing evaluation, and/or undergoing corrective action. There is a total of 596 hazardous materials sites listed on databases compiled pursuant to Government Code Section 65962.5, 103 of which are designated as active and the remaining 493 sites are designated as “closed” or “completed–case closed.” Potential future development under both the proposed project and Alternative A would be required to comply with all federal, State, regional, and local regulations regarding the safe handling, transport, disposal, and use of hazardous materials, as well as those regarding emergency response and evacuation to minimize impacts.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require the preparation of construction and operational health risk assessments to ensure that potential future development would not emit hazardous emissions or handle hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.

While development in the EIR Study Area would be less than the proposed project and thereby pose less risk of geological hazards, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to hazards and hazardous materials would be *greater* under Alternative A when compared to the proposed project.

## ALTERNATIVES TO THE PROPOSED PROJECT

### 5.3.2.10 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.10, *Hydrology and Water Quality*, of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality with implementation of proposed General Plan 2050 \*Action 3-5.10, \*Action 3-5.12, Action 3-5.19, \*Action 3-5.20, \*Action 5-2.14, \*Action 5-2.15, \*Action 5-2.17, and \*Action 5-9.30.

Like the proposed project, potential future development under Alternative A would likely occur within previously urbanized areas, connect to existing drainage systems already in place, and be subject to the same existing federal, state, and local regulations relating to hydrology and water quality to ensure that pre- and post-construction impacts to water quality are minimized.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require continued implementation of existing regulations and procedures, preparation of a biological resource assessments as part of project approval, establishment of ecological buffer zones, maintenance of adequate setbacks, maintenance and improvements to the storm drainage system, ensured consistency with City plans, implementation of best management practices to reduce discharges to the storm drain system, and maintained consistency with the MS4 National Pollutant Discharge Elimination System (NPDES) permit.

While development in the EIR Study Area would be less than the proposed project, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to hydrology and water quality would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.11 LAND USE AND PLANNING

As described in Chapter 4.11, *Land Use and Planning*, of this Draft EIR, the proposed project would not result in any significant impacts related to land use and planning.

Like the proposed project, Alternative A would maintain the existing roadway patterns and would not include any new major roadways or other physical features through existing neighborhoods that would create new physical barriers in the EIR Study Area.

Under Alternative A, development would continue to occur throughout the EIR Study Area under the current General Plan 2035 and Zoning Code and would not conflict with these already approved standards. However, Alternative A would not implement the updated land use mix to guide future development in a more sustainable and efficient manner consistent with Plan Bay Area 2050. Alternative A would also not adopt and implement the proposed GHG Reduction Strategy which ensures consistency with Plan Bay Area by supporting the City's trajectory to meet its GHG reduction targets.

Continuing the use of the current General Plan 2035 would conflict with applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect and impacts related to land use and planning would be *greater* under Alternative A when compared to the proposed project.

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### 5.3.2.12 NOISE

As described in Chapter 4.12, *Noise*, of this Draft EIR, the proposed project would result in less-than-significant impacts with respect to land use compatibility, vibration (operation and construction), with implementation of proposed General Plan 2050 \*Action 5-7.1, Action 5-7.2, \*Action 5-7.3, \*Action 5-7.9, and \*Action 5-7.10. Significant and unavoidable impacts related to exposure of noise-sensitive receptors to excessive construction noise and operational vehicle traffic noise, despite implementation of the proposed mitigating General Plan 2050 actions previously listed plus \*Action 5-7.7. These significant and unavoidable impacts are only related to the programmatic nature of the proposed project that precludes the availability of mitigation measures at the project level.

The City boundaries lie outside the 55 dBA CNEL/L<sub>dn</sub> contour line of the Charles M. Schulz-Sonoma County Airport located more than two miles northwest of the city. Therefore, neither the proposed project nor Alternative A would expose people residing or working within two miles of a private airstrip or airport to excessive noise levels.

Future development allowed under both the proposed project and Alternative A would be subject to the standards of the SRCC. Because less development would occur under Alternative A and fewer vehicular trips would be generated, noise and vibration from construction and operation of potential future development would be less under Alternative A when compared to the proposed project.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require conducting acoustical studies, implementing conditions of approval or mitigation to reduce noise exceeding normally acceptable levels primarily through site planning, using the Federal Transit Authority's construction noise and vibration thresholds to assess impacts and identify mitigation, working with Caltrans to evaluate and develop traffic noise mitigation programs, and adopting construction best management practices.

While development in the EIR Study Area would be less than the proposed project, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to noise would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.13 POPULATION AND HOUSING

As described in Chapter 4.13, *Population and Housing*, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing.

The proposed General Plan 2050 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 project 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. The projected growth under the proposed project accounts for future Regional Housing Needs Allocation (RHNA) cycles.

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Alternative A would not include the updated policy framework of the proposed project that ensures adequate planning occurs to accommodate the future population increase and future development to extended buildout year through 2050. While Alternative A would result in a net increase in housing, like the proposed project, it would not be enough to cover the next RHNA cycle and could result in displacement and require replacement housing. Therefore, impacts related to population and housing would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.14 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.14, *Public Services and Recreation*, of this Draft EIR, impacts under the proposed project to fire protection services, police services, parks, schools, and libraries were found to be less than significant.

Alternative A would result in less residents and jobs in the EIR Study Area compared to the proposed project, and therefore, would result in less demand on the public service providers that serve the EIR Study Area. Potential future development under Alternative A would be required to comply with all existing City regulations adopted to ensure that development pays its fair share of the cost of delivering services, providing park space and libraries, while payment of property taxes would ensure that future development pays its fair share towards schools. Overall, impacts related to public services and recreation would be *less* under Alternative A than those of the proposed project.

### 5.3.2.15 TRANSPORTATION

As described in Chapter 4.15, *Transportation*, of this Draft EIR, the proposed project would result in significant and unavoidable impacts related to VMT generation of the proposed project exceeding the City's thresholds, despite implementation of proposed General Plan 2050 \*Action 3-1.1. This significant and unavoidable impact is only related to the programmatic nature of the proposed project that precludes the availability of mitigation measures at the project level.

Any potential new transportation facilities built under both the proposed project and Alternative A, whether constructed as part of private developments or by agencies, including the City of Santa Rosa, to improve circulation consistent with City plans, would be designed and constructed to local, regional, and federal standards. These include, but are not limited to, the *California Manual on Uniform Traffic Control Devices*, the Caltrans *Highway Design Manual*, and the City of Santa Rosa's *Street Design and Construction Standards*, all of which have been developed to minimize the potential for safety conflicts and hazards.

Like the proposed project, potential future development in the EIR Study Area under Alternative A is anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, generation of VMT would be lower than if development were proposed in areas not served by public transportation and a network of sidewalks and bicycle facilities. However, Alternative A would be implemented under the current General Plan 2035, which does not include the new mix of land uses that increase density to reduce VMT.

## ALTERNATIVES TO THE PROPOSED PROJECT

Several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require analysis of project VMT and mitigation as part of the project review process. However, because VMT 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.

While the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project would not fully mitigate VMT impacts of the proposed project, Alternative A would not realize these proposed goals, policies, or actions and would not include the new mix of land uses that increase density to reduce VMT. Therefore, impacts related to transportation would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.16 TRIBAL CULTURAL RESOURCES

As described in Chapter 4.16, *Tribal Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to tribal cultural resources (TCR) with implementation of proposed General Plan 2050 \*Action 3-5.19, \*Action 3-5.20, \*Action 4-2.1, \*Action 4-2.2, and \*Action 4-2.4. Note, as discussed in Chapter 4.5, *Cultural Resources*, of this Draft EIR, that \*Action 4-2.3 would reduce impacts to archeological resources, which could be identified as TCRs, to less-than-significant levels.

The EIR Study Area does not contain any known TCR; however, there is the potential for TCRs to be identified as part of project-specific development over the course of the implementation of the proposed project. Like the proposed project, potential future development under Alternative A would be subject to the federal and state laws regarding TCRs. In the event of the discovery of human remains, procedures of conduct mandated by Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and the California Code of Regulations (CCR) Section 15064.5(e) would be adhered to.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require continued review of proposed developments in conjunction with appropriate entities to determine the presence of TCRs and mitigation to protect such resources, examination of project areas with significant archaeological resources by a qualified consulting archaeologist with recommendations for protection and preservation, and continued compliance with existing regulations.

While development in the EIR Study Area would be less than the proposed project, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to TCRs would be *greater* under Alternative A when compared to the proposed project.

### 5.3.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, *Utilities and Service Systems*, of this Draft EIR, impacts to water, wastewater, stormwater, solid waste, and energy infrastructure under the proposed project, were found to be less than significant with the compliance of all applicable regulations.

## ALTERNATIVES TO THE PROPOSED PROJECT

Like the proposed project, potential future development under Alternative A would be required to comply with all existing federal, state, and local regulations. Demand and consumption trends generally demonstrate that advances in water-efficient regulations in building and landscaping, stricter stormwater retention requirements and recycling and solid waste reduction requirements would reduce impacts from existing conditions. Additionally, Alternative A would result in less residents and jobs in the EIR Study Area compared to the proposed project, and therefore, would result in less demand on the utilities infrastructures that serve the EIR Study Area. Overall, impacts related to utilities and service systems would be *less* under Alternative A when compared to the proposed project.

### 5.3.2.18 WILDFIRE

As described in Chapter 4.18, *Wildfire*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to evacuation with implementation of proposed General Plan 2050 \*Action 5-5.14, \*Action 5-5.15, \*Action 5-5.16, and \*Action 5-5.17. However, even with implementation of proposed General Plan 2050 \*Action 5-3.8, the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks and resulting in impacts that are significant and unavoidable.

Like the proposed project, potential future development under Alternative A would be required integrate applicable emergency operation and evacuation requirements as necessary into development to continue its facilitation in evacuation for people in wildfire-prone areas. Potential future development, regardless of whether it includes new development or redevelopment, would also be required to comply with adopted local, regional, and State plans and regulations addressing emergency access, response, and evacuation and wildfire hazards. Future development in the Wildland-Urban Interface Fire Area (WUIFA) or Very High fire hazard severity zones (FHSZ) would be required to comply with the Very High FHSZ Fire Safe Regulations, the California Building Code (CBC), the California Fire Code (CFC), and the SRCC, which have emergency access, building fire safety, and perimeter wildfire protection measures.

However, several new and modified General Plan 2050 policies and actions serve as means to mitigate environmental impacts under CEQA. Such proposed policies and actions require updates to the Community Wildfire Protection Plan identify slope stability and wildfire hazard areas and mitigation strategies and the preparation of fire protection plans for new development and major remodels in the WUIFA.

While development in the EIR Study Area would be less than the proposed project and thereby pose less risk of wildfire hazards, Alternative A would not realize the new or modified General Plan 2050 goals, policies, or actions that were prepared as part of the proposed project, and as such, impacts related to wildfire would be *greater* under Alternative A when compared to the proposed project.

### 5.3.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

Under Alternative A, the proposed project would not be implemented, and therefore this alternative would not accomplish any of the project objectives.

## ALTERNATIVES TO THE PROPOSED PROJECT

### 5.4 ALTERNATIVE B: INCREASED DENSITY

#### 5.4.1 DESCRIPTION

Alternative B assumes the General Plan would be updated as well as the associated amendments to the NSASP, DSASP, and SRCC associated with the proposed General Plan 2050 and Land Use Map. Accordingly, Alternative B, like the proposed project, would focus future commercial and residential growth in PDAs and/or TPAs and in the Areas of Change that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities. Alternative B assumes the same number of households, residential units, population, and jobs 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 (8.0-13.0 units per gross acre) in Areas of Change that are in or adjacent to PDAs and/or TPAs would be redesignated to Medium High density residential (8.0-18.0 units per gross acre).

As shown in Table 4-1, *Proposed General Plan 2050 Areas of Change by PDA/TPA*, in Chapter 4.0, *Environmental Analysis*, of this Draft EIR, there are 11 Areas of Change that are within or directly adjacent to a PDA and/or TPA. Out of these 11 Areas of Change, there are three that have parcels with Medium Low density land use designations. These are the Marlow Center and Lance Drive Annexation (#4), Downtown Station Area (#7), and Hearn Corridor (#17) Areas of Change (see Figure 3-7, *Proposed General Plan 2050 Areas of Change*, in Chapter 3). While potential future development under this alternative could occur throughout the 21 Areas of Change, under Alternative B, the parcels in these three Areas of Change with a Medium Low density land use designation would be changed to Medium High density land use designation to allow for more opportunities for the development of more dense housing than what is allowed under the proposed project. However, if a parcel has a Medium Low density land use designation and is within a Historic District, that parcel would not be redesignated to ensure the potential impacts to historic resources would not be greater in Alternative B when compared to the proposed project. The specific purpose of this alternative is to reduce the significant and unavoidable impacts associated with transportation. As described in Chapter 4.15, *Transportation*, of this Draft EIR, the VMT modeling results indicate that the proposed project's residential uses would be above the standard of significance that is used to measure residential VMT per capita. Accordingly, to reduce residential VMT per capita, Alternative B would allow for higher residential densities in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities. By allowing more dense housing development in areas that can meet community needs, Alternative B would accommodate the same amount of growth as the proposed General Plan 2050, but in a smaller footprint, and promote active and public transportation to reduce VMT.

The alternatives analysis assumes that the proposed General Plan 2050 goals, policies, and actions would apply to Alternative B, including the mitigating policies and actions.

#### 5.4.2 IMPACT DISCUSSION

The potential environmental impacts associated with Alternative B when compared to the proposed project are described herein.

## ALTERNATIVES TO THE PROPOSED PROJECT

### 5.4.2.1 AESTHETICS

As described in Chapter 4.1, *Aesthetics*, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics.

While there are no officially designated scenic vistas in the EIR Study Area, the City has officially designated certain roadways in Santa Rosa as scenic roads in the General Plan. The EIR Study Area also includes portions of SR 12 which have been designed as “eligible” for and “officially designated” as a State Scenic Highway.

Like the proposed project, potential future development in the EIR Study Area under Alternative B is anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. However, Alternative B would allow for greater density in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities. Increased building height would have the potential to affect scenic vistas or scenic roadways in the EIR Study Area, but such development would be focused in infill urban areas.

Potential future development under both the proposed project and Alternative B would be required to comply with SRCC regulations, including those for the Scenic Road Combining District and Design Review. *Santa Rosa Design Guidelines* would also apply to all projects that require design review, including most new buildings, subdivisions, infill development, and public improvements. Potential future development in the city would also be subject to the various planning documents that govern scenic quality in the city, such as the *Citywide Creek Master Plan*, *Sebastopol Road Urban Vision and Corridor Plan*, and Street Light Design Standards.

Similar to the proposed project, Alternative B would result in new lighting sources that could result in sources of glare. Potential future development under both scenarios would be required to comply with best management practices in CALGreen, the SRCC, the Street Light Design Standards, and other adopted plans. Potential future development would be reviewed for consistency with the lighting standards regarding the appropriate use of lighting and avoidance of glare from lighting and other sources.

While Alternative B would allow for greater density and increased building height, potential future development would be subject to the same regulations as those under the proposed project; therefore, impacts related to aesthetics would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.2 AGRICULTURAL RESOURCES

As determined in Chapter 4.2, *Agricultural Resources*, of this Draft EIR, the proposed project would result in significant and unavoidable impacts related to the loss of agricultural lands. Through the proposed General Plan 2050 goal, policies, and actions, impacts related to the conversion of qualifying agricultural lands would be reduced, but not to a less-than-significant level.

## ALTERNATIVES TO THE PROPOSED PROJECT

The EIR Study Area contains 43 acres of Prime Farmland, 660 acres of Farmland of Statewide Importance, and 54 acres of Unique Farmland. There is a total of 97 acres of land that are under Williamson Act contracts within the EIR Study Area.

Alternative B allows for more dense infill development potential, reducing the amount of the farmlands—Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and lands under Williamson Act contracts—to be converted to non-agricultural uses. While the loss of any of these lands through the conversion to non-agricultural uses would result in a significant impact, because less qualifying agricultural lands could be converted, impacts related to agricultural resources would be *less* under Alternative B when compared to the proposed project.

### 5.4.2.3 AIR QUALITY

As described in Chapter 4.3, *Air Quality*, of this Draft EIR, the proposed project would result in less than significant impacts related to construction with implementation of proposed General Plan 2050 \*Action 3-6.31, \*Action 3-6.32, and \*Action 6-1.5. However, significant and unavoidable impacts related to operational emissions of reactive organic compounds (ROG), nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and exposure of air quality-sensitive receptors to substantial toxic air contaminants (TAC) and PM<sub>2.5</sub> concentrations, despite implementation of proposed General Plan 2050 \*Action 3-6.31, \*Action 6-1.5, and \*Action 6-1.6. This significant and unavoidable impact is only related to the programmatic nature of the proposed project that precludes the availability of mitigation measures at the project level.

Alternative B would result in the same level of development compared to the proposed project. Therefore, direct and indirect criteria air pollutant emissions from energy (e.g., natural gas use) and area sources (e.g., aerosols and landscaping equipment) would be similar to the proposed project, as would be the concentrations of TACs and PM<sub>2.5</sub> to which sensitive receptors are exposed. The additional housing opportunities in these three Areas of Change would have the potential to put more housing where there are known, but mitigable, environmental hazards when compared to the proposed project. However, Alternative B allows for more dense infill development potential, specifically in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities to reduce VMT and therefore automobile emissions in support of the goals of the BAAQMD 2017 Clean Air Plan.

Potential future development under both the proposed project and Alternative B would be subject to the Bay Area Air Quality Management District's (BAAQMD) rules and regulations, including those related to fugitive dust and odor, and would be required to prepare a detailed air quality impact assessment on a project-by-project basis. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions and the proposed GHG Reduction Strategy to further ensure protection of air quality.

Overall, because Alternative B would result in increased infill opportunities and would be expected to decrease the number and length of driving trips, impacts related to air quality would be *less* under Alternative B when compared to the proposed project.

## ALTERNATIVES TO THE PROPOSED PROJECT

### 5.4.2.4 BIOLOGICAL RESOURCES

As described in Chapter 4.4, *Biological Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to biological resources with implementation of proposed General Plan 2050 \*Action 3-5.7, \*Action 3-5.10, \*Action 3-5.11, \*Action 3-5.12, \*Action 3-5.13, \*Action 3-5.19, and \*Action 3-5.20.

The EIR Study Area is not within any local, regional, or State Habitat Conservation Plan areas. Therefore, neither the proposed project nor Alternative B would conflict with the conservation strategy in any Habitat Conservation Plan or Natural Community Conservation Plan. The City of Santa Rosa General Plan is the overriding planning document for the City of Santa Rosa and would therefore not conflict with local policies and ordinances protecting biological resources.

Like the proposed project, the same federal, state, and local regulations related to biological resources would apply under Alternative B. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further ensure protection of biological resources. However, Alternative B allows for more dense infill development potential, reducing the potential for disturbance of undeveloped lands and biological resources compared to the proposed project.

Therefore, while development would be more intensive in some land use designations under Alternative B, development would be concentrated in infill urban areas, and impacts related to biological resources would be *less* under Alternative B when compared to the proposed project.

### 5.4.2.5 CULTURAL RESOURCES

As described in Chapter 4.5, *Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural resources with implementation of proposed General Plan 2050 \*Action 3-5.19, \*Action 3-5.20, \*Action 4-2.1, \*Action 4-2.2, \*Action 4-2.3, \*Action 4-2.4, \*Action 4-3.2, \*Action 4-3.6, \*Action 4-3.7, and \*Action 4-3.9.

The EIR Study Area contains existing prehistoric, architectural, historical, or archaeological resources that could be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or Alternative B. Like the proposed project, potential future development under Alternative B would be subject to the regulations of the SRCC for historic and cultural preservation and the Historic Combining District. *Santa Rosa Design Guidelines* would also apply to all historic structures and neighborhoods that have been adopted by the city. While no parcels designated as Medium Low density that are within a Historic District would be redesignated to Medium High density, due to the age of the existing buildings, there would be a greater potential for properties to qualify as historic or for historic districts to become established over the 2050 buildout horizon. Accordingly, there is the potential to cause greater impacts to historic resources.

In the event of the discovery of human remains, procedures of conduct mandated by Health and Safety Code Section 7050.5, PRC Section 5097.98, and 14 CCR Section 15064.5(e) would be adhered to. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals,

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policies, and actions to further ensure protection of cultural resources. However, Alternative B allows for more dense infill development potential, reducing the potential for disturbance of undeveloped lands and archaeological resources compared to the proposed project.

Therefore, because development would be more intensive where historic buildings may be identified in the future under Alternative B, impacts related to cultural resources overall would be *greater* under Alternative B when compared to the proposed project.

### 5.4.2.6 ENERGY

As described in Chapter 4.6, *Energy*, of this Draft EIR, the proposed project would not result in any significant impacts related to energy.

All development that occurs in the State is required to comply with best management practices regulated in the California Green Building Code and Building and Energy Efficiency Standards, which ensure new development would not result in the wasteful or inefficient use of energy. Additionally, neither the proposed project nor Alternative B would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

The same amount of development would occur under Alternative B, so energy consumption from construction would be similar when compared to the proposed project. Energy use from building electricity and natural gas would also be similar under Alternative B. However, energy use from transportation would be less under Alternative B because there would be greater density in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities to reduce VMT.

As the standard of significance for energy impact is focused on efficiency and not on amount, it is assumed that the net benefits from more compact development, in addition to the proposed General Plan 2050 goals, policies, and actions and the proposed GHG Reduction Strategy, would result in more efficient and less wasteful energy use when compared to the proposed project. Therefore, impacts related to energy would be *less* under Alternative B when compared to the proposed project.

### 5.4.2.7 GEOLOGY AND SOILS

As described in Chapter 4.7, *Geology and Soils*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to geology and soils with implementation of proposed General Plan 2050 \*Policy 5-1.1, \*Action 5-1.1, and \*Action 5-1.2.

Potential future development under both the proposed project and Alternative B would be subject to the same the SRCC regulations, including the requirement for any project within a State Geologist-delineated earthquake fault zone to obtain specialized approval, compliance with the California Building Code and hillside development standards, and implementation of grading, erosion, and sediment control. Potential future development under both scenarios would also be required to comply with the federal Paleontological Resources Preservation Act that limits the collection of vertebrate fossils and other rare

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and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency and the PRC Section 5097 that prohibits the removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further minimize geologic hazards.

Since the same development potential would occur under Alternative B as the proposed project and the same regulations would apply, impacts related to geology and soils would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.8 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.8, *Greenhouse Gas Emissions*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to GHG emissions and consistency with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Potential future development under both the proposed project and Alternative B would experience emission reductions from implementation of State measures and strategies to reduce Statewide GHG emissions. The GHG emissions from new buildings constructed would be subject to the triennial updates to California's Building and Energy Efficiency Standards, which would presumably improve over time and thereby result in more energy efficient buildings. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions and the proposed GHG Reduction Strategy to further reduce GHG emissions.

The same amount of development would occur under Alternative B so GHG emissions from building electricity and natural gas would also be similar when compared to the proposed project. However, Alternative B but would allow for greater density in infill urban areas in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities to reduce VMT, so GHG emissions from energy consumption during construction and from transportation would be less when compared to the proposed project.

In summary, overall impacts from GHG emissions would be *less* under Alternative B when compared to the proposed project because there would be greater density in infill urban areas in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities, and the net benefits of the proposed General Plan 2050 goals, policies, and actions and the proposed GHG Reduction Strategy that improve energy efficiency and reduce VMT would be realized.

### 5.4.2.9 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.9, *Hazards and Hazardous Materials*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials. With respect to impacts related to TACs during construction and operation, which could occur within 0.25 miles of a school, the implementation of proposed General Plan 2050 \*Action 6-1.5 and \*Action 6-1.6 were found to be less than significant as discussed in Chapter 4.3, *Air Quality*, of this Draft EIR.

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The Charles M. Schulz Sonoma County Airport AIA is located northwest of, but greater than two miles outside of, the EIR Study Area. Therefore, neither the proposed project nor Alternative B would result in a safety hazard or excessive noise for people residing or working in an area within an airport land use plan.

Potential future development within the EIR Study Area under both scenarios would involve the routine use, transport, and handling of hazardous materials throughout the city, and could occur on properties that possibly are contaminated and inactive, undergoing evaluation, and/or undergoing corrective action. A total of 596 hazardous materials sites are listed on databases compiled pursuant to Government Code Section 65962.5, 103 of which are designated as active; the remaining 493 sites are designated as “closed” or “completed—case closed.” Potential future development under both the proposed project and Alternative B would be required to comply with all federal, State, regional, and local regulations regarding the safe handling, transport, disposal, and use of hazardous materials, as well as those regarding emergency response and evacuation to minimize impacts. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further minimize hazards.

Since the same development potential would occur under Alternative B as the proposed project and the same regulations would apply, impacts related to hazards and hazardous materials would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.10 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.10, *Hydrology and Water Quality*, of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality with implementation of proposed General Plan 2050 \*Action 3-5.10, \*Action 3-5.12, Action 3-5.19, \*Action 3-5.20, \*Action 5-2.14, \*Action 5-2.15, \*Action 5-2.17, and \*Action 5-9.30.

Like the proposed project, potential future development under Alternative B would likely occur within previously urbanized areas, connect to existing drainage systems, and be subject to the same existing federal, state, and local regulations relating to hydrology and water quality to ensure that pre- and post-construction impacts to water quality are minimized. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further protect hydrology and water quality.

Since the same development potential would occur under Alternative B as the proposed project and the same regulations would apply, impacts related to hydrology and water quality would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.11 LAND USE AND PLANNING

As described in Chapter 4.11, *Land Use and Planning*, of this Draft EIR, the proposed project would not result in any significant impacts related to land use and planning.

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Like the proposed project, Alternative B would maintain the existing roadway patterns and would not include any new major roadways or other physical features through existing neighborhoods that would create new physical barriers in the EIR Study Area.

Under Alternative B, development would occur throughout the EIR Study Area under the proposed General Plan 2050. Such development, but with more dense infill development potential, would be the same as under the proposed project and therefore implementation of either scenario would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts related to land use and planning would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.12 NOISE

As described in Chapter 4.12, *Noise*, of this Draft EIR, the proposed project would result in less-than-significant impacts with respect to land use compatibility, vibration (operation and construction), with implementation of proposed General Plan 2050 \*Action 5-7.1, Action 5-7.2, \*Action 5-7.3, \*Action 5-7.9, and \*Action 5-7.10. Significant and unavoidable impacts related to exposure of noise-sensitive receptors to excessive construction noise and operational vehicle traffic noise, despite implementation of the proposed mitigating General Plan 2050 actions previously listed plus \*Action 5-7.7. These significant and unavoidable impacts are only related to the programmatic nature of the proposed project that precludes the availability of mitigation measures at the project level.

The city boundaries lie outside the 55 dBA CNEL/L<sub>dn</sub> contour line of the Charles M. Schulz-Sonoma County Airport located more than two miles northwest of the city. Therefore, neither the proposed project nor Alternative B would expose people residing or working within two miles of a private airstrip or airport to excessive noise levels.

Future development allowed under both the proposed project and Alternative B would be subject to the standards of the SRCC. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further minimize noise impacts.

However, Alternative B would result in increased infill opportunities but would not increase overall development potential, which would result in the same construction but less VMT. Because construction is temporary, the reduced VMT from Alternative B would result in less vehicular noise from the operational phase of potential future development. Therefore, impacts related to noise would be *less* under Alternative B when compared to the proposed project.

### 5.4.2.13 POPULATION AND HOUSING

As described in Chapter 4.13, *Population and Housing*, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing.

The proposed General Plan 2050 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 project would not directly induce

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growth, but rather is a response to growth that is likely to occur whether the proposed project is adopted or not. The projected growth under the proposed project accounts for future RHNA cycles.

Alternative B would result in the same population, housing, and jobs as the proposed project; thus, the regional projections would be the same as the proposed project. Alternative B would also include the updated policy framework of the proposed project, which ensures adequate planning occurs to accommodate the future population increase and future development. Therefore, impacts related to population and housing would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.14 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.14, *Public Services and Recreation*, of this Draft EIR, impacts under the proposed project to fire protection services, police services, parks, schools, and libraries were found to be less than significant.

Alternative B would result in the same amount of growth in residents and jobs in the EIR Study Area as the proposed project, and therefore, would result in the same demand on the public service providers that serve the EIR Study Area. Potential future development under Alternative B would be required to comply with all existing City regulations adopted to ensure that development pays its fair share of the cost of delivering services, providing park space and libraries, while payment of property taxes would ensure that future development pays its fair share towards schools. Overall, due to the same level of growth, impacts related to public services and recreation would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.15 TRANSPORTATION

As described in Chapter 4.15, *Transportation*, of this Draft EIR, the proposed project would result in significant and unavoidable impacts related to VMT generation of the proposed project exceeding the City's thresholds, despite implementation of proposed General Plan 2050 \*Action 3-1.1. This significant and unavoidable impact is only related to the programmatic nature of the proposed project that precludes the availability of mitigation measures at the project level.

Any potential new transportation facilities built under both the proposed project and Alternative B, whether constructed as part of private developments or by agencies, including the City of Santa Rosa, to improve circulation consistent with City plans, would be designed and constructed to local, regional, and federal standards. These include, but are not limited to, the *California Manual on Uniform Traffic Control Devices*, the *Caltrans Highway Design Manual*, and the City of Santa Rosa's *Street Design and Construction Standards*, all of which have been developed to minimize the potential for safety conflicts and hazards. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further promote safe and efficient paths of travel and active and public transportation.

Like the proposed project, potential future development in the EIR Study Area under Alternative B is anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, generation of VMT would be lower than

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if development were proposed in areas not served by public transportation and a network of sidewalks and bicycle facilities. However, Alternative B would allow for greater density in Areas of Change that are in or adjacent to PDAs and/or TPAs that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities to reduce VMT.

While Alternative B would result in the same level of development as the proposed project, potential future development under Alternative B would be more compact with greater infill intensity, likely resulting in less VMT. Therefore, impacts related to transportation would be *less* under Alternative B when compared to the proposed project.

### 5.4.2.16 TRIBAL CULTURAL RESOURCES

As described in Chapter 4.16, *Tribal Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to TCRs with implementation of proposed General Plan 2050 \*Action 3-5.19, \*Action 3-5.20, \*Action 4-2.1, \*Action 4-2.2, and \*Action 4-2.4. Note, as discussed in Chapter 4.5, Cultural Resources, that \*Action 4-2.3 would reduce impacts to archeological resources, which could be identified as TCRs, to less-than-significant levels.

The EIR Study Area does not contain any known TCRs, however, there is the potential for TCRs to be identified as part of project-specific development over the course of the implementation of the proposed project. Like the proposed project, potential future development under Alternative A would be subject to the federal and state laws regarding TCRs. In the event of the discovery of human remains, procedures of conduct mandated by Health and Safety Code Section 7050.5, PRC Section 5097.98, and 14 CCR Section 15064.5(e) would be adhered to. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further ensure protection of TCRs. However, Alternative B allows for more dense infill development potential, reducing the potential for disturbance of undeveloped lands and archaeological resources compared to the proposed project.

Therefore, while development would be more intensive in some land use designations under Alternative B, development would be concentrated in infill urban areas, and impacts related to TCRs would be *less* under Alternative B when compared to the proposed project.

### 5.4.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, *Utilities and Service Systems*, of this Draft EIR, impacts to water, wastewater, stormwater, solid waste, and energy infrastructure under the proposed project, were found to be less than significant with the compliance of all applicable regulations.

Like the proposed project, potential future development under Alternative B would be required to comply with all existing federal, state, and local regulations. Demand and consumption trends generally demonstrate that advances in water-efficient regulations in building and landscaping, stricter stormwater retention requirements and recycling and solid waste reduction requirements would reduce impacts from existing conditions. Because Alternative B would result in the same number of residents and jobs in the EIR Study Area compared to the proposed project, demand on the utilities infrastructures that serve the EIR Study Area would be similar when compared to the proposed project. Overall, impacts related to

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utilities and service systems would be *similar* under Alternative B when compared to the proposed project.

### 5.4.2.18 WILDFIRE

As described in Chapter 4.18, *Wildfire*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to evacuation with implementation of proposed General Plan 2050 \*Action 5-5.14, \*Action 5-5.15, \*Action 5-5.16, and \*Action 5-5.17. However, even with implementation of proposed General Plan 2050 \*Action 5-3.8, the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks and resulting in impacts that are significant and unavoidable.

Like the proposed project, potential future development under Alternative B would be required to integrate applicable emergency operation and evacuation requirements as necessary into development to facilitate evacuation for people in wildfire-prone areas. Potential future development, regardless of whether it includes new development or redevelopment, would also be required to comply with adopted local, regional, and State plans and regulations addressing emergency access, response, and evacuation and wildfire hazards. Future development in the WUIFA or Very High FHSZ would be required to comply with the Very High FHSZ Fire Safe Regulations, the CBC, the CFC, and the SRCC, which have emergency access, building fire safety, and perimeter wildfire protection measures. Potential future development under Alternative B would also be subject to the proposed General Plan 2050 goals, policies, and actions to further minimize wildfire hazards.

While the same development potential would occur under Alternative B as the proposed project and the same regulations would apply, Alternative B would provide greater opportunities for infill development that is not in the Very High Fire Hazard Severity Zone and/or the Wildland-Urban Interface Fire Area.. Therefore, impacts related to wildfire would be *less* under Alternative B when compared to the proposed project.

### 5.4.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

The primary purpose of the proposed project is to plan for the growth and conservation of Santa Rosa over a 25-year time horizon and to achieve a more equitable, sustainable, and prosperous future for all residents. This requires extending the buildout horizon to year 2050 and updating goals, policies, and actions so that they meet current State requirements and community priorities on the framework of the Santa Rosa Vision and reflect the community's desires for the future of Santa Rosa. Because Alternative B would increase opportunities for infill development to support the reduction of VMT and GHG emissions and reduce the amount of qualifying agricultural lands that could be converted to non-agricultural uses, Alternative B would generally meet the project objectives but not to the same degree as the proposed project. For example, Alternative B would eliminate any Medium Low density residential (8.0-13.0 units per gross acre) in the Marlow Center and Lance Drive Annexation (#4), Downtown Station Area (#7), and Hearn Corridor (#17) Areas of Change. Therefore, it would not provide the same range of housing types to meet the needs of all Santa Rosa residents as the proposed project. The additional housing opportunities in these three Areas of Change would have the potential to put more housing where there are known, but mitigable, environmental hazards when compared to the proposed project. Lastly, because these Areas of

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Change have older buildings, there is a greater potential for sites to be identified as historic buildings and districts over the 2050 buildout horizon, and therefore, this alternative would not preserve historic and cultural resources as the city develops and becomes denser, at the same level as the proposed project. Therefore, although this alternative would further some of the objectives of the proposed project, it would do so less than would the proposed project.

### 5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of Santa Rosa. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown in Table 5-2 and Table-5-3, Alternative B would, in comparison to the proposed project, result in greater impacts to cultural resources and reduced environmental impacts related to agricultural resources, air quality, biological resources, energy, GHG emissions, noise, transportation, TCRs, and wildfire. Therefore, as shown in Table 5-2 and Table 5-3, Alternative B would be the environmentally superior alternative.

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