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DRAFT
Subsequent Environmental Impact Report
General Plan Circulation Element Update Project
City of Cloverdale, Sonoma County, California

State Clearinghouse Number 2024010982

Prepared for:
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Date: September 13, 2024

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
BAAQMD	Bay Area Air Quality Management District
Caltrans	California Department of Transportation
CAO	Clean Up and Abatement Orders
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CCR	California Code of Regulations
CDO	Cease and Desist Orders
CEQA	California Environmental Quality Act
CRA	Cultural Resources Assessment
CRHR	California Register of Historical Resources
CTP	Comprehensive Transportation Plan
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EV	Electric Vehicle
FAR	floor area ratio
FCS	FirstCarbon Solutions
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
HSIP	Highway Safety Improvement Program
LEED®	Leadership in Energy and Environmental Design
LOS	Level of Service
LRA	Local Responsibility Area
LRSP	Local Roadway Safety Plan
LUST	Leaking Underground Storage Tank
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
mph	miles per hour
MPO	Metropolitan Planning Organization
MTC	Metropolitan Transportation Commission
MUTCD	Manual on Uniform Traffic Control Devices for Streets and Highways

NCCP	Natural Communities Conservation Plan
NOC	Notice of Completion
NOP	Notice of Preparation
OHV	Off-Highway Vehicle
OPR	Governor's Office of Planning and Research
PDA	Priority Development Areas
PRC	Public Resources Code
PV	photovoltaics
RTP	Regional Transportation Plan
SB	Senate Bill
SCBC	Sonoma County Bicycle Coalition
SCH	State Clearinghouse
SCTA	Sonoma County Transportation Authority
SCTM	Sonoma County Transportation Authority Travel Demand Model
SHS	State Highway System
SMART	Sonoma-Marin Area Rail Transit
SOI	Sphere of Influence
SP	Service Population
SR	State Route
SRA	State Responsibility Area
SRTS	Safe Routes to School
State Water Board	California State Water Resources Control Board
STN	State Transportation Network
TAM	Transit Asset Management
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
TIP	Transportation Improvement Program
TISG	Transportation Impact Study Guide
TPM	Transportation Performance Management
US-101	United States Highway 101
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled

EXECUTIVE SUMMARY

Purpose

This Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the implementation of the General Plan Circulation Element Update Project (proposed Circulation Element Update) (State Clearinghouse No. 2024010982). This document is prepared in conformance with CEQA (Public Resources Code [PRC] § 21000, *et seq*.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000, *et seq*.).

The purpose of this Draft Subsequent EIR is to inform decision-makers, representatives of affected and responsible agencies, the public, and other interested parties of the potential environmental effects that may result from implementation of the proposed Circulation Element Update. This Draft Subsequent EIR describes potential impacts relating to a wide variety of environmental issues and methods by which these impacts can be mitigated or avoided.

Project Summary

Project Location

The project site is located in the City of Cloverdale (City), in Sonoma County, California (Exhibit 2-1 in Chapter 2, Project Description). The City is situated at the northern end of Alexander Valley, where the Mayacamas Mountains meet the Coast Range.

The City encompasses 2.5 square miles (approximately 1,601 acres), while the City's Sphere of Influence (SOI) encompasses approximately 2.3 additional square miles beyond the City limits.

Prevalent land uses in the City include Low Density Residential, Destination Commercial, Conservation, and Medium Density Residential. Existing land uses are mapped in Exhibit 2-3 in Chapter 2, Project Description.

Regional access to the City is provided via highways and major roadways, including United States Highway 101 (US-101), State Route (SR) 128, and Cloverdale Boulevard. In addition, Sonoma County Transit SR-60 provides daily bus service to and from the City with connections to the greater Sonoma County area.[1] The Amtrak Bus Thruway Service provides bus service to the City via Cloverdale Depot, located at Citrus Fair Drive and Asti Road.

Existing Circulation Element

The City of Cloverdale General Plan (General Plan) was adopted by the City Council on May 13, 2009, and was last amended on November 10, 2021. The current Circulation Element utilizes Level of Service (LOS) as a threshold of significance rather than Vehicle Miles Traveled (VMT).

[1] City of Cloverdale. Transit Services. Website: https://www.cloverdale.net/267/Transit-Services. Accessed July 1, 2024.

Project Description

The City proposes to update the Circulation Element of the General Plan to address Senate Bill (SB) 743 and the transition of CEQA transportation analysis from congestion-based metrics, such as LOS, to the State-mandated metric of VMT.

The proposed Circulation Element Update would ensure consistency with State law regarding Complete Streets, would develop updated roadway cross-sections for arterials and collectors, and would incorporate elements from the current City Bicycle and Pedestrian Plan. The Circulation Element Update would also include new goals and policies related to VMT analysis and reductions considering the City's Climate Emergency Declaration (Resolution Number 91-2019) of September 11, 2019. The Declaration calls for a transition away from fossil fuels and an urgent collaborative mobilization effort focused on enacting policies, such as several transportation measures that would help reduce emissions, including employing an electrified fleet mix and clean vehicles, updating the Bicycle and Pedestrian Master Plan, utilizing the Complete Streets model to support multimodal transit, and continuing implementation of Safe Routes to School (SRTS).

General Plan Amendment

The Draft Subsequent EIR addresses the environmental impacts related to implementation of the proposed Circulation Element Update. In accordance with State law, the City proposes to adopt a General Plan Amendment to update the General Plan's existing Circulation Element, including identifying updated goals, policies, and actions.

Project Objectives

The underlying purpose of the proposed Circulation Element Update is to address the current and future needs of residents, businesses, employees, and visitors to the City. The objectives of the proposed Circulation Element Update are to:

- Update City policies in the Circulation Element to comply with State law, including State regulations related to conformance with SB 743.
- Support the City's compliance with State-mandated requirements to implement Complete Streets and make efforts to reduce VMT in the community.
- Implement Complete Streets throughout the City.
- Recognize the importance of reducing VMT in the City.
- Encourage the range of options for travel to work, shopping, and leisure destinations.
- Prioritize the efficiency of goods movement.
- Adopt policies that guide the direction of physical development in the City in a way that encourages economic vitality and promotes quality of life.

Significant Unavoidable Adverse Impacts

The proposed Circulation Element Update would result in the following significant unavoidable impacts:

- **Project-level Vehicle Miles Traveled:** While the proposed Circulation Element Update would result in decreases for Home-based VMT per Resident, Home-based Work VMT per Employee, and VMT per Service Population, the expected VMT per Service Population would not fall below the 15 percent VMT reduction threshold. As such, Mitigation Measure (MM) TRANS-2a, MM TRANS-2b, and MM TRANS-2c would require future individual development projects that do not screen out from a VMT impact analysis to provide a quantitative VMT analysis. If results indicate that the VMT associated with the individual development project would be above the threshold, it would be required to mitigate to a less than significant level. Projects consistent with the General Plan would be required to implement a Transportation Demand Management (TDM) Program and/or a regional VMT impact fee program (when it is available). Because the effectiveness of TDM measures for future individual development projects cannot be quantified in this analysis and the VMT impact fee program is not yet in place, the impact would remain significant and unavoidable.

- **Cumulative Vehicle Miles Traveled:** Cumulative projects in the City and County will generate new VMT, which would be added to the roadway network within the geographic context. All cumulative projects would be reviewed for compliance with applicable federal, State, and local regulations, including General Plan policies that address VMT, as well as required to mitigate their fair share of impacts related to VMT. Nonetheless, the proposed Circulation Element Update, in conjunction with other reasonably foreseeable past, present, and future projects, would have a cumulatively significant impact related to VMT. Development consistent with the General Plan and the proposed Circulation Element Update would result in a significant and unavoidable cumulatively considerable contribution to the existing cumulative VMT impact, creating a potentially significant impact. Even with the incorporation of MM TRANS-2a, MM TRANS-2b, and MM TRANS-2c, the City may not achieve the overall VMT threshold reduction level due to uncertainty in the cumulative effectiveness of the measures included in MM TRANS-2a MM TRANS-2b, and MM TRANS-2c, as well as unknowns related to transit service levels, transportation technology, and travel behavior. Moreover, these policies and measures primarily apply to new developments; existing land uses that have already been approved and are under construction are generally not affected. Because of the programmatic nature of the proposed Circulation Element Update, no additional mitigation measures are available, and the cumulative impact is considered significant and unavoidable.

Summary of Project Alternatives

Below is a summary of the alternative to the proposed Circulation Element Update considered in Chapter 5, Alternatives, to the proposed Circulation Element Update.

No Project Alternative/Existing General Plan

Under the No Project Alternative/Existing General Plan, the Circulation Element would not be updated with new policies and no General Plan Amendment would occur. Future development and land uses would occur in accordance with the current Circulation Element policies. Under this alternative, the current goals, policies, and actions would remain in place.

Areas of Controversy

Pursuant to CEQA Guidelines Section 15123(b), a summary section must address areas of controversy known to the lead agency, including issues raised by agencies and the public, and it must also address issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

- Transportation and Traffic

A Notice of Preparation (NOP) for the proposed Circulation Element Update was issued on January 31, 2024. The NOP describing the original concept for the proposed Circulation Element Update and issues to be addressed in the EIR was distributed to the State Clearinghouse, responsible agencies, and other interested parties for a 30-day public review period extending from January 31, 2024, through March 1, 2024. The NOP identified the potential for significant impacts on the environment related to the following topical areas:

- Transportation and Traffic

Disagreement Among Experts

This Draft Subsequent EIR contains substantial evidence to support all the conclusions presented herein. It is possible that there will be disagreement among various parties regarding these conclusions, although the City of Cloverdale is not aware of any disputed conclusions at the time of this writing. Both the CEQA Guidelines and case law clearly provide the standards for treating disagreement among experts. Where evidence and opinions conflict on an issue concerning the environment, and the lead agency knows of these controversies in advance, the EIR must acknowledge the controversies, summarize the conflicting opinions of the experts, and include sufficient information to allow the public and decision-makers to make an informed judgment about the environmental consequences of the proposed Circulation Element Update.

Potentially Controversial Issues

Below is a list of potentially controversial issues that may be raised during the public review and hearing process of this Draft Subsequent EIR:

- Transportation and Traffic

It is also possible that evidence will be presented during the 45-day statutory Draft Subsequent EIR public review period that may create disagreement. Decision-makers would consider this evidence during the public hearing process.

In rendering a decision on a project where there is disagreement among experts, the decision-makers are not obligated to select the most environmentally preferable viewpoint. Decision-makers are vested with the ability to choose whatever viewpoint is preferable and need not resolve a dispute among experts. In their proceedings, decision-makers must consider comments received concerning the adequacy of the Draft Subsequent EIR and address any objections raised in these comments. However, decision-makers are not obligated to follow any directives, recommendations, or suggestions presented in comments on the Draft Subsequent EIR and can certify the Final EIR without needing to resolve disagreements among experts.

Public Review of the Draft Subsequent EIR

Upon completion of the Draft Subsequent EIR, the City of Cloverdale filed a Notice of Completion (NOC) with the State Office of Planning and Research to begin the public review period (PRC § 21161). Concurrent with the NOC, this Draft Subsequent EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Draft Subsequent EIR in accordance with Public Resources Code 21092(b)(3). During the public review period, the Draft Subsequent EIR, including the technical appendices, is available for review at the City of Cloverdale offices. The address is provided below:

City of Cloverdale
Planning and Community Development Department
124 North Cloverdale Boulevard
Cloverdale, CA 95425
Hours:
Monday through Thursday
9:00 a.m.–12:00 p.m. and 1:00 p.m.–5:00 p.m.

Agencies, organizations, and interested parties have the opportunity to comment on the Draft Subsequent EIR during the 45-day public review period. Written comments on this Draft Subsequent EIR should be addressed to:

Kevin Thompson, Assistant City Manager
City of Cloverdale
Planning and Community Development Department
124 North Cloverdale Boulevard
Cloverdale, CA 95425
Phone: 707.894.1723
Email: kthompson@ci.cloverdale.ca.us

Submittal of electronic comments in Microsoft Word or Adobe PDF format is encouraged. Upon completion of the public review period, written responses to all significant environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to the public hearing before the City of Cloverdale on the proposed Circulation Element Update, at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the proposed Circulation Element Update.

Executive Summary Matrix

Table ES-1 below summarizes the impacts, mitigation measures, and resulting levels of significance after mitigation for the relevant environmental issue areas evaluated for the proposed Circulation Element Update. The table is intended to provide an overview; narrative discussions for the issue areas are included in the corresponding section of this EIR. Table ES-1 is included in the EIR as required by CEQA Guidelines Section 15123(b)(1).

Table ES-1: Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.1—Transportation and Traffic		
Impact TRANS-1: The proposed Circulation Element Update would not conflict with a program plan, ordinance, or policy of the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	None required.	Not applicable.
Impact TRANS-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	**MM TRANS-2a:** When the City of Cloverdale (City) receives an application for a project subject to the California Environmental Quality Act (CEQA), it shall apply the "Screening Thresholds for Land Use Projects" set forth in the California Governor's Office of Planning and Research (OPR) Technical Advisory for Evaluating Transportation Impacts in CEQA. If the project would exceed the screening thresholds, or other evidence demonstrates a potentially significant Vehicle Miles Traveled (VMT) impact, the City shall require the applicant to prepare a quantitative project-level VMT analysis. **MM TRANS-2b:** For projects consistent with the General Plan, if the project-level Vehicle Miles Traveled (VMT) analysis, prepared as a result of MM TRANS-2a, shows that the project would not meet or exceed the applicable numeric threshold of significance (a reduction of 6.3 percent VMT per service population), the City shall require the applicant to prepare and implement a Transportation Demand Management (TDM) Program. Prior to issuance of building permits, project applicants shall develop a TDM Program for proposed projects, including any anticipated phasing, and shall submit the TDM Program to the City of Cloverdale for review and approval. The TDM Program shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Program shall be incorporated into and implemented as part of the project. Trip reduction strategies may include, but are not limited to, the following: • Provision of bus stop improvements or on-site mobility hubs • Provision of bus stop improvements or on-site mobility hubs • Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.	Significant and unavoidable impact.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program • Enhancements to citywide bicycle network • Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes • Cash allowances, passes, or other public transit subsidies and purchase incentives • Enhancements to bus service • Implementation of shuttle service • Establishment of carpool, bus pool, or vanpool programs • Vanpool purchase incentives • Low emission vehicle purchase incentives/subsidies • Compliance with a future County VMT/TDM ordinance • Participation in a future County VMT impact fee program • Participate in future VMT exchange or mitigation bank programs As these TDM strategies are heavily dependent on context, a matrix, included as Table 3.1-4 of the Subsequent Draft EIR, details which TDM strategies may be most effective when taking into account local contexts, called Site Groups. The TDM Program shall illustrate that VMT impacts would be reduced by at least 6.3 percent VMT per service population. **MM TRANS-2c:** Upon implementation of a Sonoma County Transportation Authority (SCTA) Regional VMT Mitigation Bank and/or regional Vehicle Miles Traveled (VMT) impact fee program, future individual development projects that would not meet or exceed the applicable number threshold of significance (a reduction of 6.3 percent VMT per service population) for VMT would have the option to contribute VMT impact fees to SCTA in addition to or in place of Transportation Demand Management (TDM) Program strategies.	
Impact TRANS-3: The proposed Circulation Element Update would not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	None required.	Not applicable.

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact TRANS-4: The proposed Circulation Element Update would not result in inadequate emergency access.	None required.	Not applicable.
Cumulative Impact: The proposed Circulation Element Update would have a significant and unavoidable cumulative impact related to transportation and traffic.	[MM TRANS-2]	Significant and unavoidable impact.

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CHAPTER 1: INTRODUCTION

1.1 - Overview of the CEQA Process

This Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the implementation of the General Plan Circulation Element Update Project (State Clearinghouse Number 2024010982). This document is prepared in conformance with CEQA (California Public Resources Code [PRC], § 21000, *et seq*.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000, *et seq*.). This Draft Subsequent EIR is intended to serve as an informational document for the public agency decision-makers and the public regarding the proposed General Plan Circulation Element Update Project (Circulation Element Update).

1.1.1 - Overview

The proposed Circulation Element Update consists of updating the Circulation Element of the City of Cloverdale General Plan (General Plan) to address Senate Bill (SB) 743 and the transition of CEQA transportation analysis from congestion-based metrics, such as Level of Service (LOS), to the State-mandated metric of Vehicle Miles Traveled (VMT).

The proposed Circulation Element Update would ensure consistency with State law regarding Complete Streets, would develop updated roadway cross sections for arterials and collectors, and would incorporate elements from the current City Bicycle and Pedestrian Plan. The Circulation Element Update would also include new goals and policies related to VMT analysis and reductions considering the City's Climate Emergency Declaration (Resolution Number 91-2019) on September 11, 2019. Chapter 2, Project Description, provides a complete description of the proposed Circulation Element Update.

1.1.2 - Purpose and Authority

This Draft Subsequent EIR provides a project-level analysis of the environmental effects of the General Plan Circulation Element Update Project. The environmental impacts of the proposed Circulation Element Update are analyzed in the Draft Subsequent EIR to the degree of specificity appropriate, in accordance with CEQA Guidelines Section 15146. This document addresses the potentially significant adverse environmental impacts that may be associated with the planning, construction, or operation of the proposed Circulation Element Update. It also identifies appropriate and feasible mitigation measures and alternatives that may be adopted to significantly reduce or avoid these impacts. CEQA requires that an EIR contain, at a minimum, certain specific elements. These elements are contained in this Draft Subsequent EIR and include:

- Table of Contents
- Introduction
- Executive Summary
- Project Description

- Environmental Setting, Significant Environmental Impacts, and Mitigation Measures
- Cumulative Impacts
- Significant Unavoidable Adverse Impacts
- Alternatives to the Proposed Project
- Growth-Inducing Impacts
- Effects Found not to be Significant
- Areas of Known Controversy

1.1.3 - Lead Agency Determination

The City of Cloverdale is designated as the Lead Agency for the proposed Circulation Element Update. CEQA Guidelines Section 15367 defines the lead agency as ". . . the public agency, which has the principal responsibility for carrying out or approving a project." Other public agencies may use this Draft Subsequent EIR in the decision-making or permit process and consider the information in this Draft Subsequent EIR along with other information that may be presented during the CEQA process.

This Draft Subsequent EIR was prepared by FirstCarbon Solutions (FCS), an environmental consultant. Prior to public review, it was extensively reviewed and evaluated by the City of Cloverdale. This Draft Subsequent EIR reflects the independent judgment and analysis of the City of Cloverdale as required by CEQA. Lists of organizations and persons consulted and the report preparation personnel is provided in Chapter 7 of this Draft Subsequent EIR.

1.2 - Scope of the Draft Subsequent EIR

This Draft Subsequent EIR addresses the potential environmental effects of the proposed Circulation Element Update. The City of Cloverdale issued a Notice of Preparation (NOP) for the proposed Circulation Element Update on January 31, 2024, which circulated between January 31, 2024, and March 1, 2024, for the statutory 30-day public review period. The scope of this Draft Subsequent EIR includes the potential environmental impacts identified in the NOP and issues raised by agencies and the public in response to the NOP. The NOP is contained in Appendix A of this Draft Subsequent EIR.

Three comment letters were received in response to the NOP. They are listed in Table 1-1 and provided in Appendix A of this Draft Subsequent EIR.

Table 1-1: NOP Comment Letters

Agency/Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft Subsequent EIR
Public Agencies				
Native American Heritage Commission (NAHC)	Cameron Vela, Cultural Resources Analyst	February 6, 2024	Summarizes California Environmental Quality Act (CEQA) requirements and	N/A

Agency/Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft Subsequent EIR
			background information.	
			Summarizes Assembly Bill (AB) 52 and Senate Bill (SB) 18 requirements for cultural and tribal cultural resources.	Section 4, Effects Found not to be Significant
			Provides recommendations for Cultural Resource Assessments (CRAs)	Section 4, Effects Found not to be Significant
County of Sonoma	Johannes Hoevertsz	February 26, 2024	The commenter has no comments on the proposed Circulation Element Update.	N/A
California Department of Transportation (Caltrans)	Liesel Ayon, Associated Transportation Planner; and Yunsheng Luo, Branch Chief, Local Development Review	March 1, 2024	Provides information regarding the screening criteria and components of a Vehicle Miles Traveled (VMT) analysis	Section 3.1, Transportation and Traffic
			Suggests referencing the Caltrans District 4 Pedestrian Plan and the Caltrans District 4 Bike Plan in the Draft Subsequent Environmental Impact Report (Draft Subsequent EIR)	Section 3.1, Transportation and Traffic
			Encourages equitable and ongoing public engagement in the proposed Circulation Element Update process.	Chapter 1, Introduction
Source: Compiled by FirstCarbon Solutions (FCS). 2024.				

At the virtual public Scoping Meeting held on February 13, 2024, an individual commenter, Brooke Greene, identified the following potential area of concern:

Restoring school bus service

1.2.1 - Environmental Issues Determined not to be Significant

The NOP identified topical areas that were determined not to be significant. An explanation of why each area is determined not to be significant is provided in Chapter 4, Effects Found not to be Significant. These topical areas are as follows:

- Aesthetics, Light, and Glare
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

1.2.2 - Potentially Significant Environmental Issues

The NOP found that the following topical area may contain potentially significant environmental issues that will require further analysis in the Draft Subsequent EIR.

Transportation and Traffic

1.3 - Organization of the Draft Subsequent EIR

This Draft Subsequent EIR is organized into the following main sections:

- **Chapter ES: Executive Summary.** This chapter includes a summary of the proposed Circulation Element Update and alternatives to be addressed in the Draft Subsequent EIR. A brief description of the areas of controversy and issues to be resolved and overview of the Mitigation Monitoring and Reporting Program (MMRP), in addition to a table that summarizes the impacts, mitigation measures, and levels of significance after mitigation, are also included in this section.
- **Chapter 1: Introduction.** This chapter provides an introduction and overview describing the purpose of this Draft Subsequent EIR, its scope and components, and its review and certification process.
- **Chapter 2: Project Description.** This chapter includes a detailed description of the proposed Circulation Element Update, including its location, site, and project characteristics. A discussion of the project objectives, intended uses of the Draft Subsequent EIR, responsible agencies, and approvals that are needed for the proposed Circulation Element Update are also provided.
- **Chapter 3: Environmental Impact Analysis.** This chapter analyzes the environmental impacts of the proposed Circulation Element Update. Impacts are organized into major topic areas. Each topic area includes a description of the environmental setting, methodology, significance

criteria, impacts, mitigation measures, and significance after mitigation. The specific environmental topics that are addressed within Chapter 3 are as follows:

- **Section 3.1—Transportation and Traffic:** Addresses potential impacts related to the local and regional roadway system and public transportation, bicycle, and pedestrian access.

- **Chapter 4: Effects Found not to be Significant.** This chapter contains analysis of the topical sections not addressed in Chapter 3.
- **Chapter 5: Other CEQA Considerations.** This chapter provides a summary of significant irreversible environmental impacts, including unavoidable and growth-inducing impacts and mandatory findings of significance.
- **Chapter 6: Alternatives to the Proposed Project.** This chapter compares the impacts of the proposed Circulation Element Update with the No Project Alternative/Existing General Plan. In addition, alternatives initially considered but rejected from further consideration are discussed.
- **Chapter 7: Persons and Organizations Consulted/List of Preparers.** This chapter contains a full list of persons and organizations that were consulted during the preparation of this Draft Subsequent EIR. This chapter also contains a full list of the authors who assisted in the preparation of the Draft Subsequent EIR, by name and affiliation.
- **Appendices.** The Draft Subsequent EIR appendices includes all notices and other procedural documents pertinent to the Draft Subsequent EIR as well as all technical material prepared to support the analysis.

1.4 - Documents Incorporated by Reference

As permitted by CEQA Guidelines Section 15150, this Draft Subsequent EIR has referenced several technical studies, analyses, and previously certified environmental documentation. Information from the documents, which have been incorporated by reference, has been briefly summarized in the appropriate section(s). The relationship between the incorporated part of the referenced document and the Draft Subsequent EIR has also been described. The documents and other sources that have been used in the preparation of this Draft Subsequent EIR include but are not limited to:

- City of Cloverdale General Plan
- City of Cloverdale General Plan Final Environmental Impact Report
- City of Cloverdale Circulation Element Update
- City of Cloverdale Municipal Code

In accordance with CEQA Guidelines Section 15150(b), the General Plan and the referenced documents and other sources used in the preparation of the Draft Subsequent EIR are available for review at the City of Cloverdale Planning and Community Development Department at the address shown in Section 1.6 below.

1.5 - Review of the Draft Subsequent EIR

Upon completion of the Draft Subsequent EIR, the City of Cloverdale filed a Notice of Completion (NOC) with the State Office of Planning and Research to begin the public review period (PRC § 21161). Concurrent with the NOC, this Draft Subsequent EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Draft Subsequent EIR in accordance with Public Resources Code 21092(b)(3). During the public review period, the Draft Subsequent EIR, including the technical appendices, is available for review at the City of Cloverdale Planning and Community Development Department. The address for each location is provided below:

City of Cloverdale
Planning and Community Development Department
124 North Cloverdale Boulevard
Cloverdale, CA 95425

The Draft Subsequent EIR is also available for review at the following website: https://www.cloverdale.net/243/Long-Range-Planning.

Agencies, organizations, and interested parties have the opportunity to comment on the Draft Subsequent EIR during the 45-day public review period. Written comments on this Draft Subsequent EIR should be addressed to:

Kevin Thompson, Assistant City Manager
City of Cloverdale
Planning and Community Development
Cloverdale, CA 95425
Phone: 707.894.1723
Email: kthompson@ci.cloverdale.ca.us

Submittal of electronic comments in Microsoft Word or Adobe PDF format is encouraged. Upon completion of the public review period, written responses to all significant environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to the public hearing before the City Council on the proposed Circulation Element Update, at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the proposed Circulation Element Update.

CHAPTER 2: PROJECT DESCRIPTION

This Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) analyzes the potential environmental effects of the proposed General Plan Circulation Element Update Project (Circulation Element Update) in the City of Cloverdale.

2.1 - Project Location and Setting

2.1.1 - Location

The project site is located in the City of Cloverdale (City), in Sonoma County, California (Exhibit 2-1). The City is situated at the northern end of Alexander Valley, where the Mayacamas Mountains meet the Coast Range. Additionally, the City is located approximately 34 miles northwest of Santa Rosa, 25 miles south of Ukiah, and approximately 67 miles southeast of the town of Mendocino (Exhibit 2-2).

The City encompasses 2.5 square miles (approximately 1,601 acres), while the City's Sphere of Influence (SOI) encompasses approximately 2.3 additional square miles beyond the city limits. The Russian River flows through the center of the Alexander Valley, and the developed portion of the City is located on the valley floor west of the Russian River and east of the Coast Range.

Prevalent land uses in the City include Low Density Residential, Destination Commercial, Conservation, and Medium Density Residential. Existing land uses are mapped in Exhibit 2-3. Regional access to the City is provided via highways and major roadways, including United States Highway 101 (US-101), State Route (SR) 128, and Cloverdale Boulevard. In addition, Sonoma County Transit SR-60 provides daily bus service to and from the City with connections to the greater Sonoma County area.[1] The Amtrak Bus Thruway Service provides bus service to the City via Cloverdale Depot, located at Citrus Fair Drive and Asti Road.[2]

There are two active Cleanup and Abatement Orders listed on the Cortese List within the City.[3] The first facility is Masonite Corporation Cloverdale, related to contaminated ground water; the Cleanup and Abatement Order was put into effect on June 1, 1983. The second facility is Krasilsa Pacific Farms LLC, related to miscellaneous facility waste sources; the Cleanup and Abatement Order was put into effect on October 21, 2019.

[1] City of Cloverdale. Transit Services. Website: https://www.cloverdale.net/267/Transit-Services. Accessed October 26, 2023.
[2] Ibid.
[3] California State Water Resources Control Board (State Water Board). List of "active" Cease and Desist Orders (CDO) and Clean Up and Abatement Orders (CAO) from State Water Board. Website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx. Accessed December 14, 2023.

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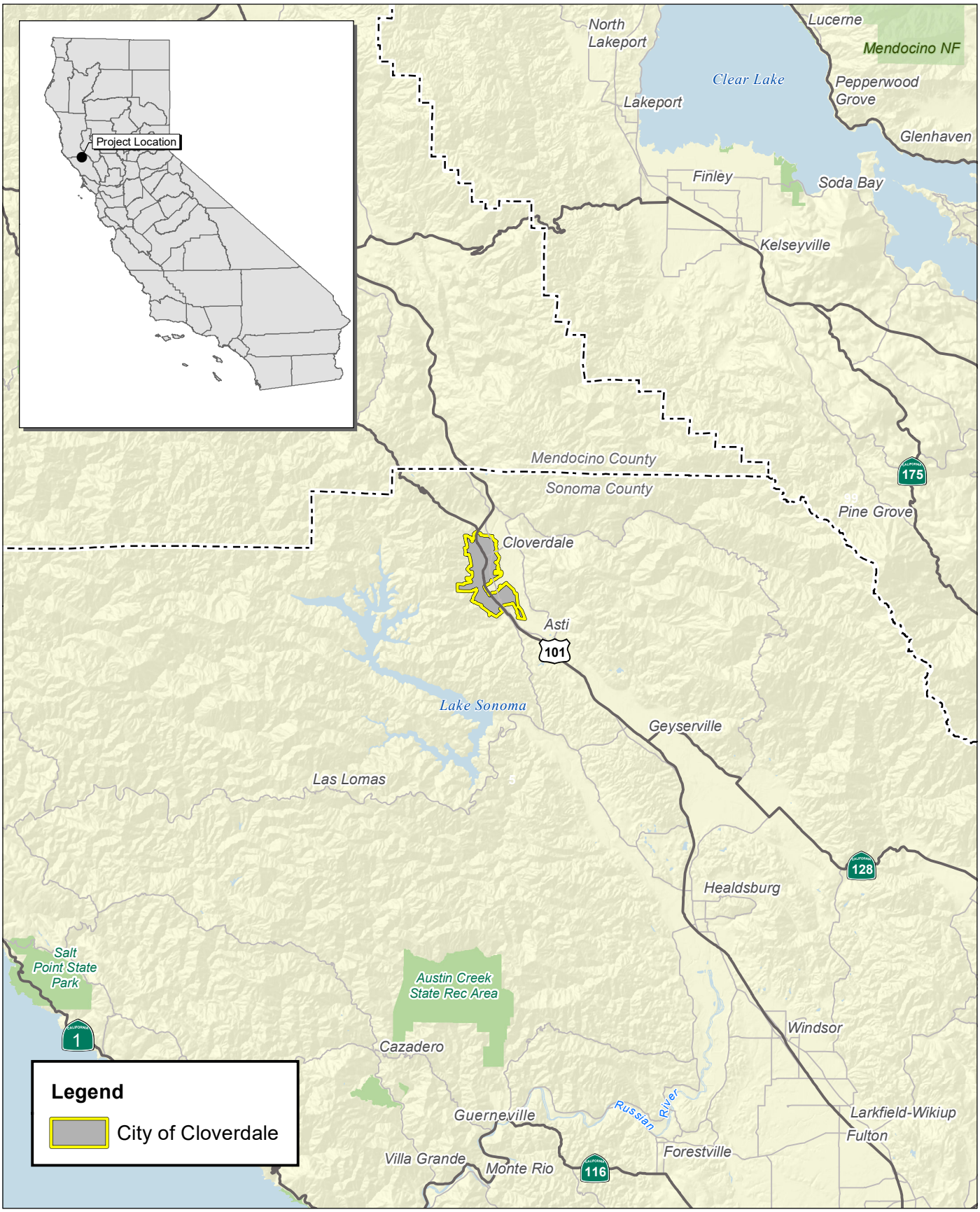

Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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5 2.5 0 5 Miles

Exhibit 2-1
Regional Location Map

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CITY OF CLOVERDALE
GENERAL PLAN CIRCULATION ELEMENT UPDATE PROJECT
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

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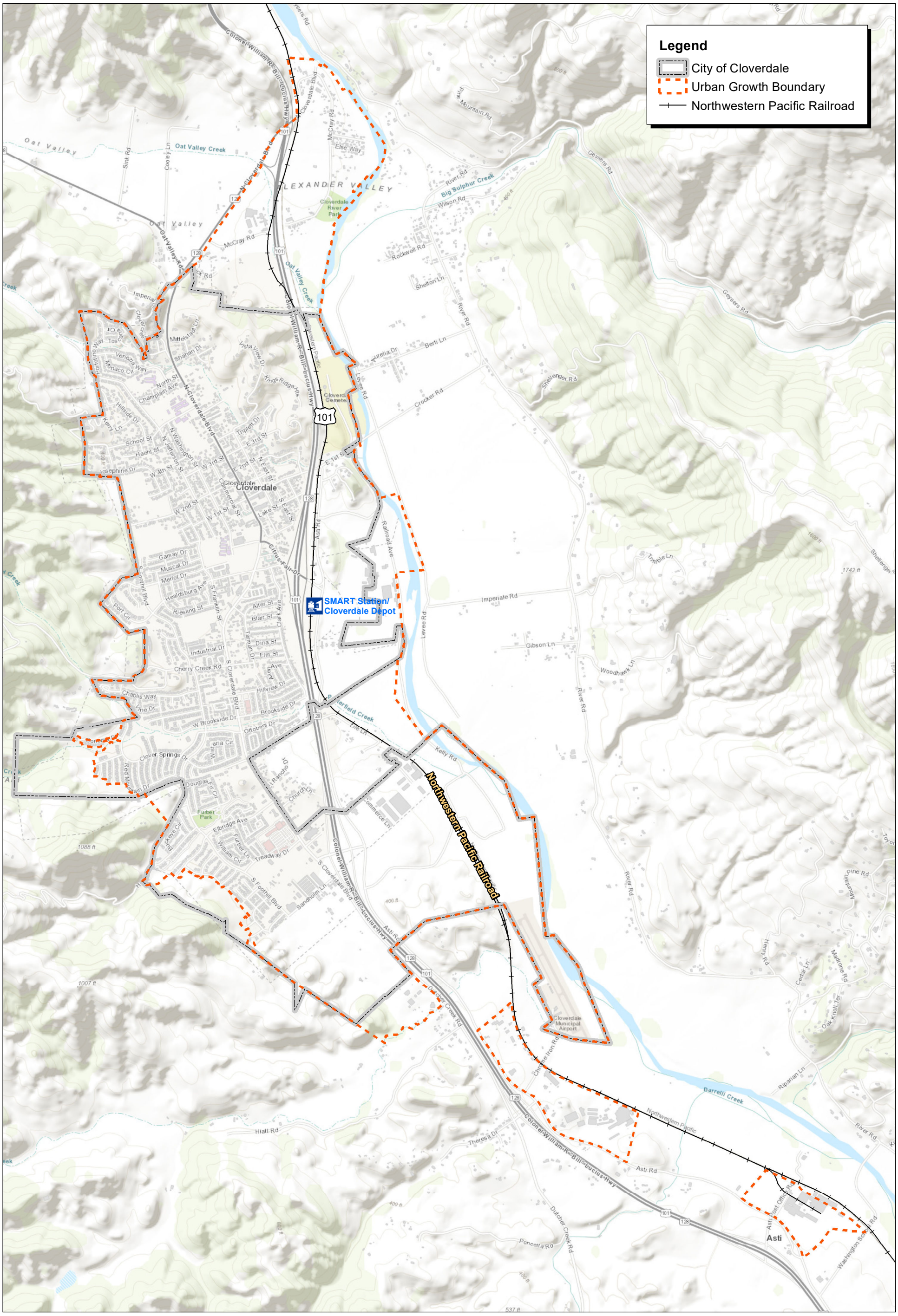

Source: ESRI World Topographic Map.

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2,000 1,000 0 2,000 Feet

Exhibit 2-2
Local Vicinity Map

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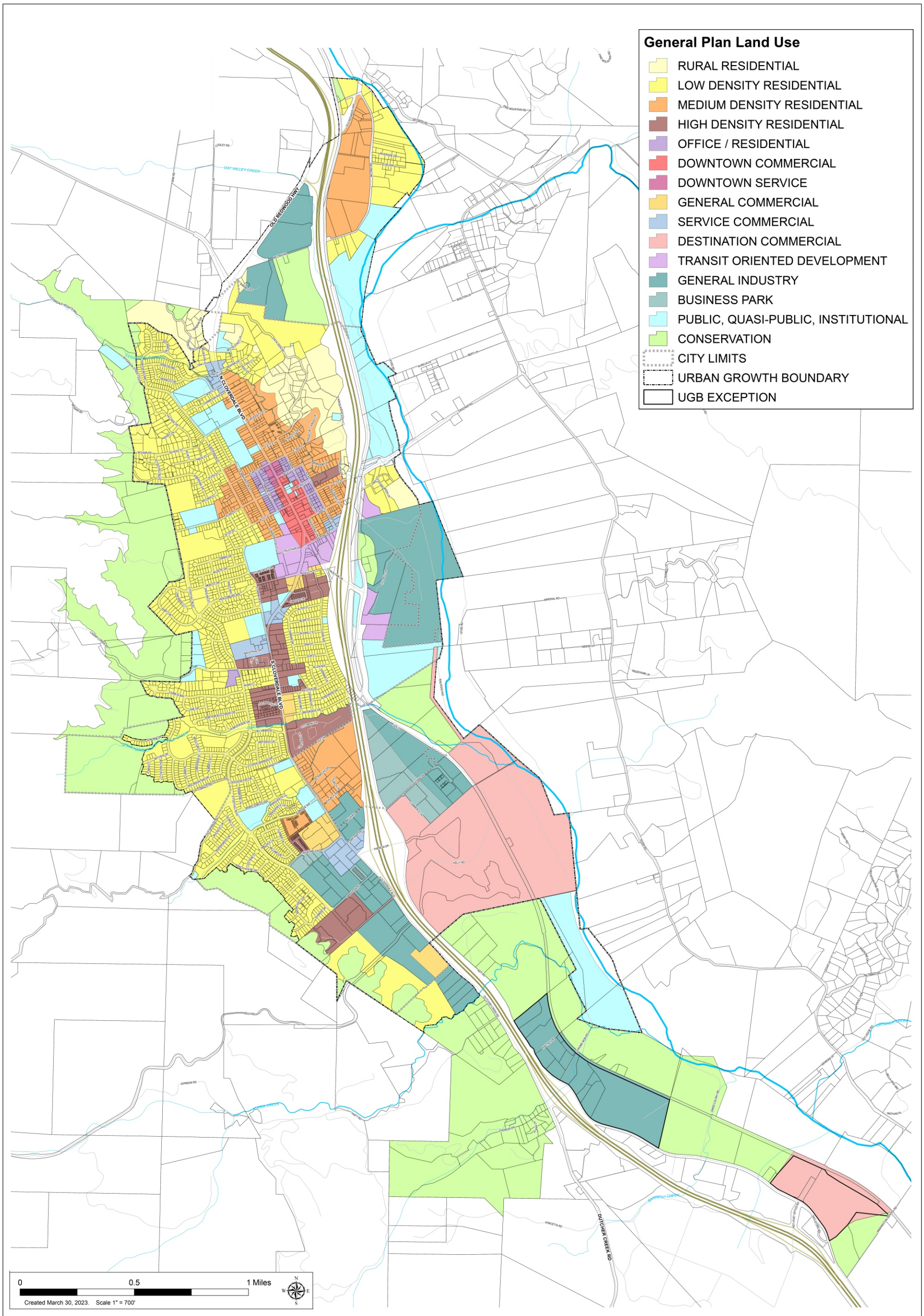

Source: City of Cloverdale.

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Exhibit 2-3
General Plan Land Use Map

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There are no active hazardous waste and substance sites listed in the California Department of Toxic Substances Control (DTSC) EnviroStor database within the City, and there are 48 Leaking Underground Storage Tank (LUST) sites within the City according to the California State Water Resources Control Board's (State Water Board's) GeoTracker database. However, all 48 of these sites are listed as Completed–Case Closed.[4,5]

2.1.2 - Existing Circulation Element

The City of Cloverdale General Plan (General Plan) was adopted by the City Council on May 13, 2009, and was last amended on November 10, 2021. The current General Plan includes a Circulation Element that identifies guiding principles for moving people and goods within the City and identifies the infrastructure necessary to ensure that the transportation network can adequately serve the City at General Plan buildout.

The current Circulation Element utilizes Level of Service (LOS) as a threshold of significance rather than Vehicle Miles Traveled (VMT). The traditional measure of circulation system performance has been LOS, which rates roadway traffic flow characteristics from Level A (free-flowing traffic) to Level F (gridlock). LOS generally serves as an indicator of the performance of the circulation system. Poor LOS (typically Levels D, E, and F) has historically been defined as an environmental impact requiring mitigation).

2.2 - Proposed Circulation Element

2.2.1 - Purpose of a Circulation Element

State law dictates that each city and county in California prepare a Circulation Element as part of the local government's long-range General Plan, which serves as a guide for the physical development of the community. The Circulation Element of a local government's General Plan must identify the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, military airports and ports, and other local public utilities and facilities. The Circulation Element must also plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the General Plan.

2.2.2 - Circulation Element Update Process

The Circulation Element Update process consists of the following steps:

- Reviewing existing transportation conditions and policies;
- Developing updated transportation goals, policies, and programs;

[4] Department of Toxic Substances Control (DTSC). List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database. Website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29. Accessed December 14, 2023.

[5] California State Water Resources Control Board (State Water Board). List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database. Website: https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search. Accessed December 14, 2023.

- Preparing the City's planned transportation network maps;
- Developing strategies to manage transportation demand and congestion;
- Updating the City's transportation study guidelines;
- Preparing draft and final Circulation Element updates;
- Conducting public outreach;
- Analyzing potential environmental impacts pursuant to the California Environmental Quality Act (CEQA).

Notice of Preparation and Public Scoping Meeting

The Notice of Preparation (NOP) of a Subsequent EIR for the General Plan Update was circulated from January 31, 2024, to March 1, 2024, to commenting agencies, the State Clearinghouse (SCH), and the public to share information about the proposed Circulation Element Update and receive input on the scope of the environmental issues to be addressed in the Draft Subsequent EIR. A Scoping Meeting was held on February 13, 2024, which was attended by one member of the public. The City received three comment letters on the NOP and one public comment at the Scoping Meeting. Copies of these letters are provided in Appendix A of this Draft Subsequent EIR, and the comments are summarized in Section 1.2, Scope of the Draft Subsequent EIR.

2.3 - Project Characteristics

2.3.1 - Proposed Circulation Element Update

The City proposes to update the Circulation Element of the General Plan to address Senate Bill (SB) 743 and the transition of CEQA transportation analysis from congestion-based metrics, such as LOS, to the State-mandated metric of VMT.

The proposed Circulation Element Update would ensure consistency with State law regarding Complete Streets, would develop updated roadway cross-sections for arterials and collectors, and would incorporate elements from the current City Bicycle and Pedestrian Master Plan. The Circulation Element Update would also include new goals and policies related to VMT analysis and reductions considering the City's Climate Emergency Declaration (Resolution Number 91-2019) on September 11, 2019. The Declaration calls for a transition away from fossil fuels and an urgent collaborative mobilization effort focused on enacting policies, such as several transportation measures that would help reduce emissions, including employing an electrified fleet mix and clean vehicles, updating the Bicycle and Pedestrian Master Plan, utilizing the Complete Streets model to support multimodal transit, and continuing implementation of safe routes to school.

2.3.2 - Circulation Element Update Policies and Programs

The proposed Circulation Element Update identifies the guiding principles for moving people and goods within the City and identifies the infrastructure necessary to ensure that the transportation network will serve the City at General Plan buildout. The goals, policies, and implementation actions would support the City's compliance with the State-mandated requirements to implement Complete Streets and make efforts to reduce VMT in the community.

The proposed Circulation Element Update supports a multimodal transportation system that serves the mobility needs of all residents and manages traffic congestion as the City grows and changes. Policies in the proposed Circulation Element Update would continue the City's commitment to a Complete Streets strategy to provide residents, employees, and visitors with a range of options for travel by supporting existing and planned bicycle and pedestrian facilities and addressing transit services within the City and region. Additionally, the proposed Circulation Element Update identifies the roadway system necessary for automobile traffic by setting LOS goals, VMT goals, a hierarchy of roads, and areas where road improvements are necessary.

Furthermore, since the last General Plan update, California has changed the way that environmental impacts associated with the circulation system are defined and analyzed under CEQA. As described above, the current Circulation Element uses LOS as an environmental threshold and measure of circulation system performance. On July 1, 2020, SB 743 became effective. Implementing SB 743, the City's environmental thresholds recognize that VMT is generally the most appropriate measure of transportation impacts. VMT is a measure of the amount of travel for all vehicles in a geographic region. Accordingly, the proposed Circulation Element Update would change the focus of the Circulation Element from widening roadways and intersections to reducing the total vehicle travel within the community. The proposed goals, policies, and programs can be reviewed in Appendix B.

State law does permit the City to use LOS standards and policies when evaluating development projects and planning required transportation improvements to such development; therefore, the proposed Circulation Element Update includes goals and policies that support congestion relief (LOS), as well as reduction of total VMT.

2.3.3 - General Plan Amendment

The Draft Subsequent EIR addresses the environmental impacts related to implementation of the proposed Circulation Element Update. In accordance with State law, the City proposes to adopt a General Plan Amendment to update the General Plan's existing Circulation Element, including identifying updated goals, policies, and actions.

2.4 - Project Objectives

The underlying purpose of the Circulation Element Update is to address the current and future needs of residents, businesses, employees, and visitors to the City. The objectives of the proposed Circulation Element Update are as follows:

- Update City policies in the Circulation Element to comply with State law, including State regulations related to conformance with SB 743.
- Support the City's compliance with State-mandated requirements to implement Complete Streets and make efforts to reduce VMT in the community.
- Implement Complete Streets throughout the City.
- Recognize the importance of reducing VMT in the City.
- Encourage a range of options for travel to work, shopping, and leisure destinations.

- Prioritize the efficiency of goods movement.
- Adopt policies that guide the direction of physical development in the City in a way that encourages economic vitality and promotes quality of life.

2.5 - Intended Uses of this Draft Subsequent EIR

This Draft Subsequent EIR is being prepared by the City of Cloverdale to assess the potential environmental impacts that may arise in connection with actions related to implementation of the proposed Circulation Element Update. Pursuant to CEQA Guidelines Section 15367, the City of Cloverdale is the lead agency for the proposed Circulation Element Update and has discretionary authority over the proposed Circulation Element Update and project approvals. The Draft Subsequent EIR is intended to address all public infrastructure improvements and all future development that are within the parameters of the proposed Circulation Element Update.

2.5.1 - Discretionary and Ministerial Actions

Discretionary approvals and permits are required by the City for implementation of the proposed Circulation Element Update. The proposed Circulation Element Update would require the following discretionary approvals and actions:

- General Plan Amendment
- Adopt Circulation Element Update
- Certify Subsequent EIR

2.5.2 - Responsible and Trustee Agencies

There are no Responsible Agencies identified for the proposed Circulation Element Update. However, a number of other agencies, including Trustee agencies, may potentially provide information as commenting agencies, pursuant to Public Resources Code Section 21080.4(a) and CEQA Guidelines Section 15375. The Draft Subsequent EIR will provide environmental information to these agencies and other public agencies which may be required to grant approvals or coordinate with other agencies as part of project implementation. These agencies may include, but are not limited to, the following:

- California Department of Transportation (Caltrans)
- Bay Area Air Quality Management District (BAAQMD)

CHAPTER 3: ENVIRONMENTAL IMPACT ANALYSIS

3.1 - Organization of Issue Areas

This Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) provides analysis of impacts for those environmental topics where it was determined in the Notice of Preparation (NOP), or through subsequent analysis, that the proposed General Plan Circulation Element Update Project (Circulation Element Update) would result in "potentially significant impacts." Section 3.1 discusses the environmental impacts that may result with approval and implementation of the proposed Circulation Element Update.

3.2 - Issues Addressed in this Draft Subsequent EIR

The following environmental issues are addressed in Chapter 3:

- Transportation and Traffic

3.3 - Level of Significance

Determining the severity of project impacts is fundamental to achieving the objectives of the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15091 requires that decision-makers mitigate, as completely as is feasible, the significant impacts identified in the Draft Subsequent EIR. If the Draft Subsequent EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision-makers, in approving a project, to adopt a statement of overriding considerations that explains why the benefits of the project outweigh the adverse environmental consequences identified in the Draft Subsequent EIR.

The level of significance for each impact examined in this Draft Subsequent EIR was determined by considering the predicted magnitude of the impact against the applicable threshold. Thresholds were developed using criteria from the CEQA Guidelines and checklist; State, federal, and local regulatory schemes; local/regional plans and ordinances; accepted practice; consultation with recognized experts; and other professional opinions.

3.4 - Impact Analysis and Mitigation Measure Format

The format adopted in this Draft Subsequent EIR to present the evaluation of impacts is described and illustrated below.

Summary Heading of Impact

Impact TRANS-1:	**An impact summary heading appears immediately preceding the impact description (Summary Heading of Impact in this example). The impact number identifies the section of the report (TRANS for Transportation and Traffic in this example) and the sequential order of the impact (1 in this example) within that section. To the right of the impact number is the impact statement, which identifies the potential impact.**

Impact Analysis

A narrative analysis follows the impact statement. In some cases, the impact discussion will reference State and federal regulations and agency policies that would fully or partially reduce the impact. In addition, policies and programs from applicable local land use plans that partially or fully address impacts may be cited and the proposed project would be evaluated in the context of these requirements.

Level of Significance Before Mitigation

This section identifies the level of significance of the impact before any mitigation is proposed.

Mitigation Measures

Project-specific mitigation measures, beyond requirements contained in other documents or applicable by law, are set off with a summary heading and described using the format presented below:

MM TRANS-1 Project-specific mitigation is identified that would reduce the impact to the lowest degree feasible. The mitigation number links the particular mitigation to the impact it is associated with (**TRANS-1** in this example); mitigation measures are numbered sequentially.

Level of Significance After Mitigation

This section identifies the resulting level of significance of the impact following mitigation.

3.1 - Transportation and Traffic

3.1.1 - Introduction

This section describes existing conditions related to transportation in the project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to transportation that could result from implementation of the proposed General Plan Circulation Element Update Project (Circulation Element Update).

This analysis examines the potential impacts to the City of Cloverdale's (City's) overall transportation system and evaluates the effects related to transportation including conflicts with applicable plans and policies, hazards, changes in Vehicle Miles Traveled (VMT) per capita, and emergency vehicle access that may result from the implementation of the proposed Circulation Element Update. Future projects consistent with the proposed Circulation Element Update would be evaluated for project-specific impacts related to transportation at the time they are proposed and in accordance with California Environmental Quality Act (CEQA) statutes and guidelines.

The descriptions and analysis in this section are based, in part, on statements, data, and figures provided by the following reference materials:

- City of Cloverdale website[1]
- City of Cloverdale General Plan[2]
- Sonoma County Comprehensive Transportation Plan (CTP): Moving Forward 2050 (Moving Forward 2050)[3]
- Sonoma County Transportation Authority (SCTA) Travel Demand Model (SCTM)
- Plan Bay Area 2050: A Vision for the Future (Plan Bay Area 2050)[4]

The following public comments were received during the Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) Notice of Preparation (NOP) scoping period related to transportation:

- Request to restore school bus service.
- Information regarding the screening criteria and components of a VMT analysis.
- Suggestion to reference the California Department of Transportation (Caltrans) District 4 Pedestrian Plan and the Caltrans District 4 Bike Plan in the Draft Subsequent EIR.

3.1.2 - Environmental Setting

Roadway Facilities

The following describes roadway facilities within and adjacent to the City of Cloverdale (Exhibit 3.1-1).

[1] City of Cloverdale. 2024. Transit Services. Website: https://www.cloverdale.net/267/Transit-Services. Accessed March 19, 2024.
[2] City of Cloverdale. 2009. General Plan. Revised January 28, 2015.
[3] Sonoma County Transit Authority. 2021. Sonoma County Comprehensive Transportation Plan: Moving Forward 2050. September.
[4] Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). 2021. Plan Bay Area 2050: A Vision for the Future (Plan Bay Area 2050). October.

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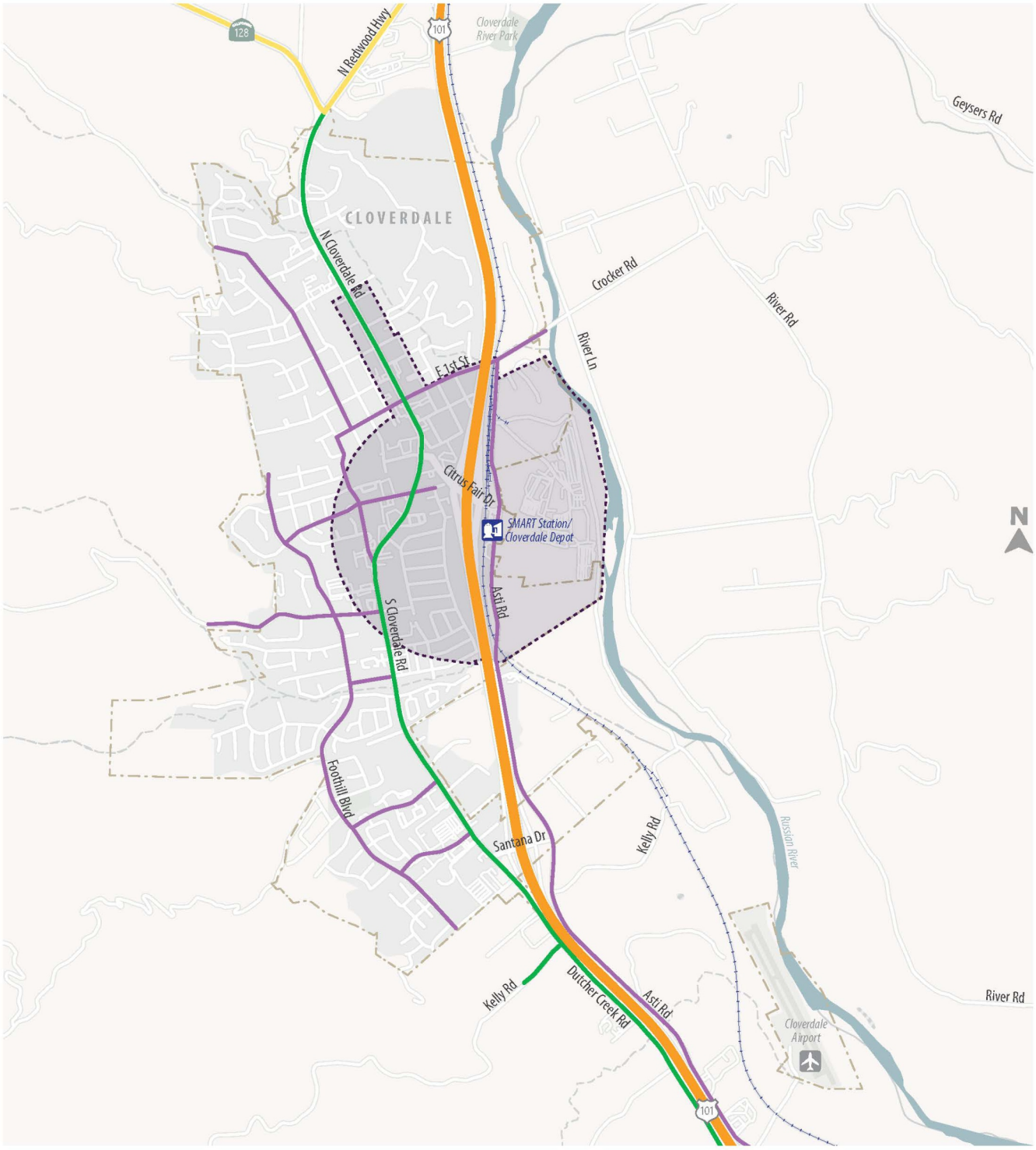

Source: Fehr & Peers, 04/2024

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Exhibit 3.1-1
Street Classifications

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Regional

United States Highway 101

United States Highway 101 (US-101) is a four-lane highway that extends north to south within the eastern side of the City. US-101 is a heavily traveled highway connecting San Francisco to coastal regions to the north (Marin County and Sonoma County), south (San Mateo County and Santa Cruz County), and beyond. Three US-101 interchanges serve the City, located at California State Route (SR) 128 (referred to as North Redwood Highway), Citrus Fair Drive, and Santana Drive.

State Route 128

SR-128 is a two-lane highway that extends northwest from the City connecting to North Cloverdale Boulevard just north of the city limits. East of North Cloverdale Boulevard, SR-128 is referred to as North Redwood Highway, and west of North Cloverdale Boulevard, it is referred to as Oat Valley Road.

Local

Arterials

Arterials are generally classified by the City as roadways carrying large volumes over long distances. Various arterials within and adjacent to the City are described below.

Dutcher Creek Road

Dutcher Creek Road is a north–south arterial with one lane, running just west of US-101. It connects Cloverdale Boulevard in the north to Dry Creek Road, south of the City.

Kelly Road

A segment of Kelly Road connecting to Dutcher Creek Road is an east–west arterial with one lane.[5]

Cloverdale Boulevard

Cloverdale Boulevard is a north–south arterial, generally with one to two lanes in each direction, connecting SR-128 in the north to Dutcher Creek Road in the south.

Collectors

The City generally classifies collectors as roadways that carry local area traffic to the arterial system. Various collectors within the City are described below.

Asti Road

Asti Road is a north–south collector running just east of US-101. It connects East First Street to Geyserville Avenue southeast of the City. The speed limit is 45 miles per hour (mph).

1st Street

1st Street is an east–west collector with one lane in each direction connecting South Franklin Street in the west to Crocker Road in the east. The speed limit is 25 mph.

[5] Kelly Road is currently being improved as new development is being constructed off it and will ultimately be a two-lane road.

North Jefferson Street

North Jefferson Street is primarily a north–south collector with one lane in each direction connecting the western city limits to East 1st Street in the south.

South Franklin Street

South Franklin Street is a north–south collector with one lane in each direction connecting North Franklin Street and 1st Street to South Cloverdale Boulevard.

Healdsburg Avenue

Healdsburg Avenue is an east–west collector with one lane in each direction connecting Port Circle in the east to South Cloverdale Boulevard in the west.

West Cherry Creek Road

West Cherry Creek Road is a one-lane, east–west collector connecting the western city limits to South Cloverdale Boulevard.

West Brookside Drive

The segment of West Brookside Drive connecting South Foothill Boulevard to South Cloverdale Boulevard is an east–west collector with one lane in each direction.

Elbridge Avenue

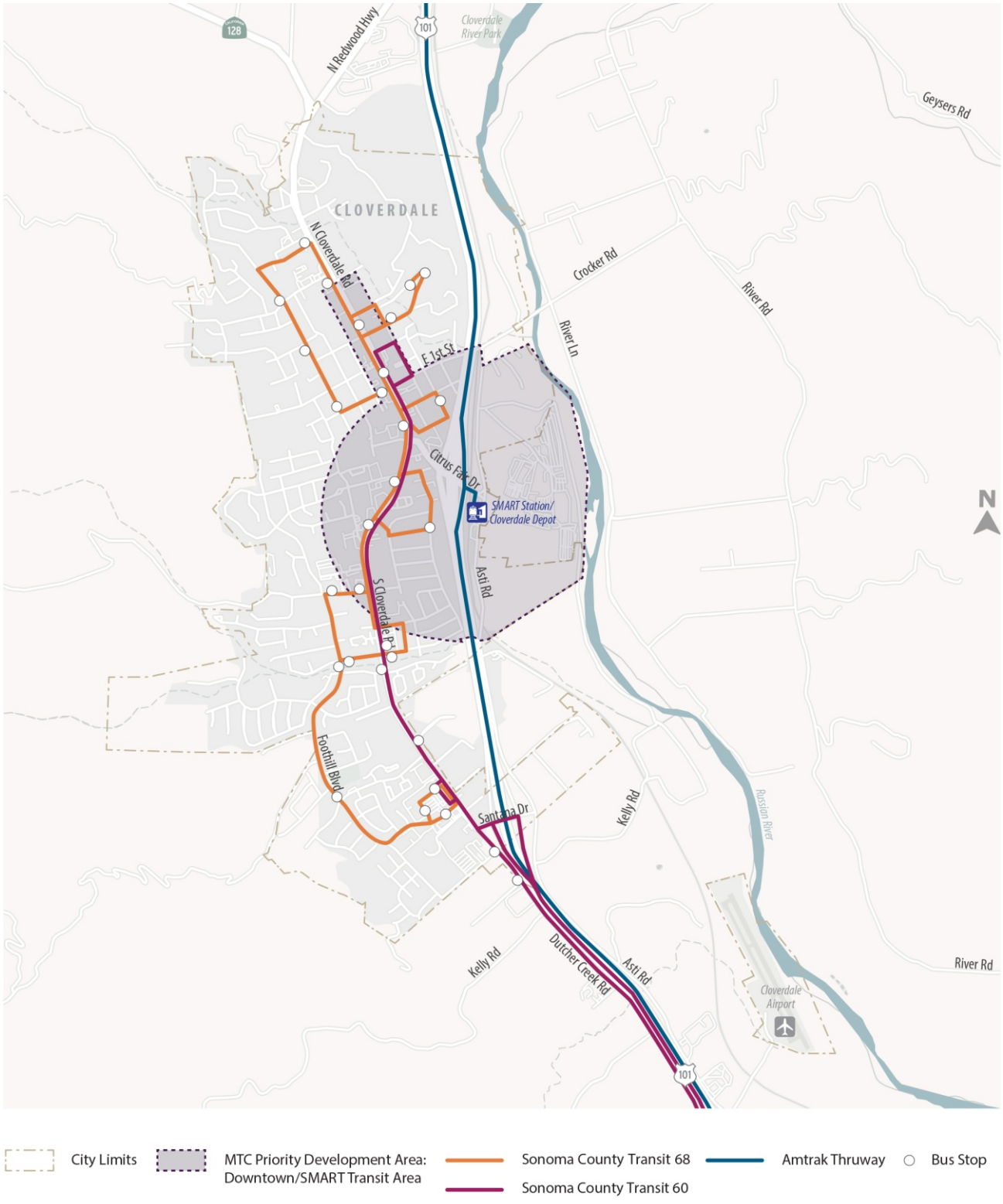
The segment of Elbridge Avenue connecting South Foothill Boulevard to South Cloverdale Boulevard is an east–west collector with one lane in each direction.

Treadway Drive

The segment of Treadway Drive connecting South Foothill Boulevard to South Cloverdale Boulevard is an east–west collector with one lane in each direction.

Existing Public Transit Service and Facilities

City bus service is provided by SCTA. Table 3.1-1 displays operational information for these services. Exhibit 3.1-2 illustrates the existing transit system.



Source: Fehr & Peers, 2024.

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Exhibit 3.1-2
Existing Transit System

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Table 3.1-1: Public Transit Service and Facilities

Service	Description
Cloverdale Shuttle, Local 68	Provides local weekday shuttle service within the City. Route 68 primarily travels along Cloverdale Boulevard beginning in the north at Champlain Avenue and ending in the south at Treadway Drive.
Sonoma County Transit, Route 60	Provides daily bus service to and from the City with connections to the greater Sonoma County Area.
Amtrak Thruway Service	Provides intercity bus service to the City via the Cloverdale Depot located at Citrus Fair Drive and Asti Road.
Planned Sonoma-Marin Area Rail Transit (SMART)	SMART consists of 70 miles of rail service connecting Sonoma and Marin Counties and serving 16 stations from Cloverdale in Sonoma County to the San Francisco-bound ferry terminal in Larkspur, Marin County. Currently, SMART serves various stations in Larkspur, San Rafael, Marin, Novato, Petaluma, Cotati, Rohnert Park, Santa Rosa, and Sonoma County. Windsor, Healdsburg, Petaluma North, and Cloverdale facilities are planned but not completed currently. The Cloverdale station is expected to be completed as funding becomes available, the timing of which is unknown.
Source: City of Cloverdale. 2024. Sonoma County Transit. 2024.	

Bicycle Facilities

The Caltrans Highway Design Manual[6]classifies bikeways into four categories:

- Class I Bikeway (Bike Path)–Provides a completely separate facility for the exclusive use of bicycles and pedestrians with crossflow by vehicles minimized.
- Class II Bikeway (Bike Lane)–Provides a striped lane for one-way bike travel on a street or highway.
- Class III Bikeway (Bike Route)–Provides for shared use with pedestrian or motor vehicle traffic.
- Class IV Bikeway (Separated Bikeway)–Provides for the exclusive use of bicycles and includes a separation (e.g., grade separation, flexible posts, inflexible physical barrier, or on-street parking) required between the separated bikeway and the through vehicular traffic.

The City has several dedicated bike lanes to provide bicycle circulation throughout the City (Exhibit 3.1-3). A Class I Bikeway is located along the Russian River and a portion of the Cloverdale River Park Trail is located in the northeastern portion of the City; additionally, a Class I Bikeway connects Foothill Boulevard to Shady Lane in the western portion of the City. Class II Bicycle Lanes are located along portions of Asti Road, Santana Drive, South Cloverdale Boulevard, Foothill Boulevard, Citrus Fair Drive, Treadway Drive, Jefferson Street, North Main Street, and West Brookside Drive. Class III Bikeways are located along portions of Foothill Boulevard, East 1st Street, North East Street, North Cloverdale Boulevard, Railroad Avenue, East 2nd Street, and East 3rd Street.

[6] California Department of Transportation (Caltrans). 2019. Highway Design Manual. Website: https://dot.ca.gov/-/media/dot-media/programs/design/documents/hdm-complete-12312020a11y.pdf. Accessed March 19, 2024.

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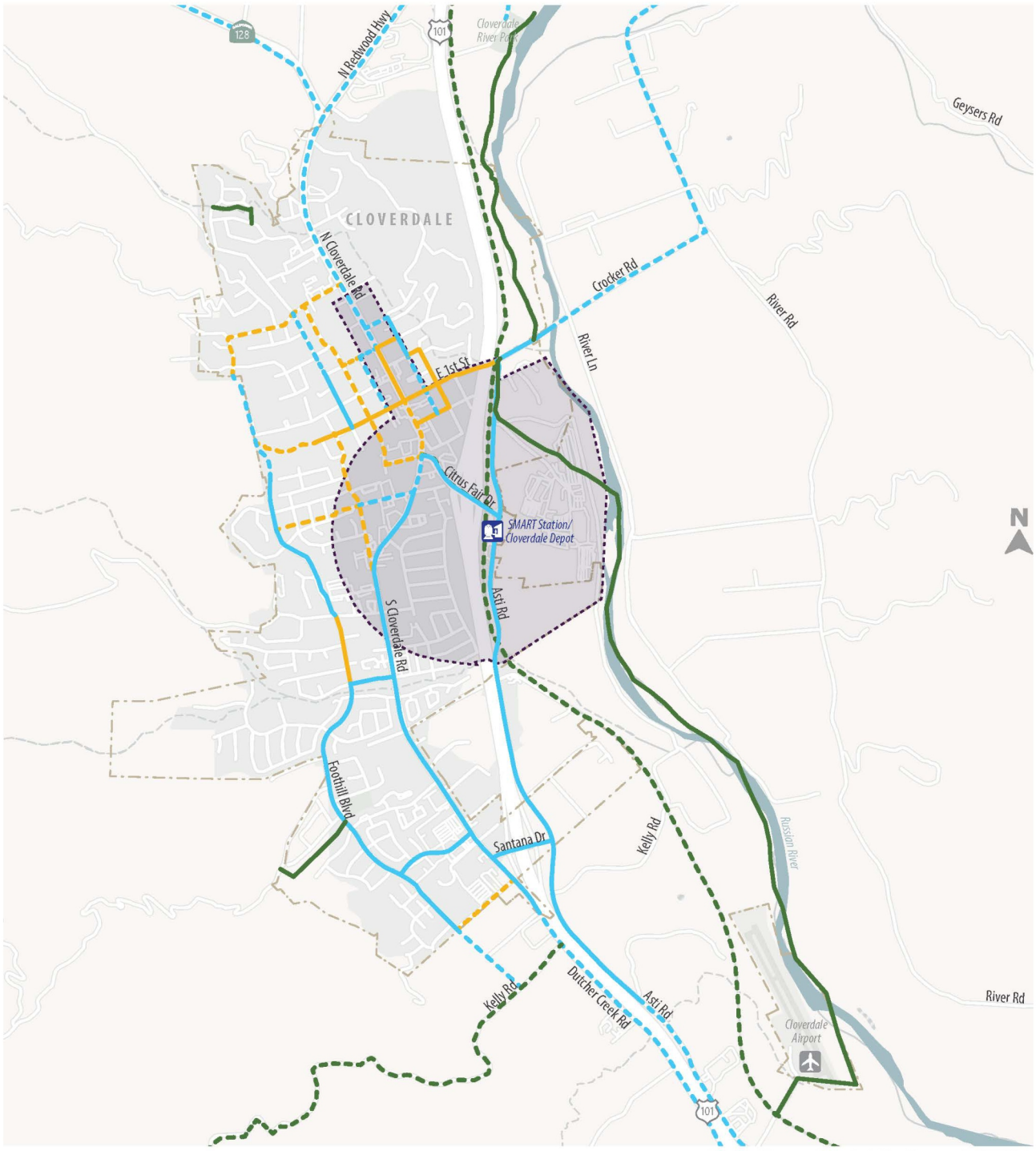

Source: Fehr & Peers, 04/2024

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Exhibit 3.1-3
Existing and Proposed Bicycle and Pedestrian Facilities

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Pedestrian Facilities

Pedestrian facilities are present throughout the City to varying degrees. They consist of sidewalks, trails, crosswalks, curb ramps, and signals. Pedestrian-oriented land uses, street widths, lighting, and landscaping also contribute to the quality of the pedestrian environment.

Vehicle Miles Traveled

Th City's existing VMT was calculated using the SCTA SCTM, which uses land use, socioeconomic, and road network data to estimate travel patterns, roadway traffic volumes, and transit volumes.

VMT is calculated by multiplying the number of trips generated by the total distance of each of those trips. One vehicle (regardless of the number of passengers) traveling 1 mile constitutes one "vehicle mile." This is typically evaluated for the sum of the lengths of all daily weekday trips and can be reported as total VMT or as an efficiency metric, such as VMT per Employee or VMT per Resident. Both VMT metrics were produced for this Draft Subsequent EIR. VMT estimates include all vehicle types ranging from motorcycle and passenger vehicles to light-duty and heavy-duty trucks. Per capita VMT[7] tends to increase as a result of greater overall economic activity in the region, higher levels of per-household automobile ownership, and/or a jobs/housing imbalance that contributes to longer average commute distances, as well as in less urban/suburban areas. Table 3.1-2 provides VMT information for the 2019 base year as well as the 2024 baseline.

Table 3.1-2: Existing Conditions VMT

Category	2019 Base Year	2024 Baseline[1]
Total City Generated VMT[2]	415,451	434,314
Total City VMT Per Service Population[3]	28.8	28.0
Home-Based VMT per Resident[4]	16.0	15.1
Home-Based VMT per Employee[5]	9.5	9.1

Notes:
VMT = Vehicle Miles Traveled
1 2024 baseline data was interpolated from 2019 Base Year Data from the Sonoma County Transportation Authority (SCTA).
2 Total City Generated VMT = All VMT from trips with a start or end in Cloverdale
3 City VMT per Service Population = Total City Generated VMT divided by the number of residents plus employees
4 Home-based VMT per Resident = All VMT from trips with a start or end at a residence in Cloverdale, divided by the number of residents
5 Home-based Work VMT per Employee = All VMT from "commute" trips between home and work (or work and home), divided by the number of employees. Source: Fehr & Peers. 2024.

7 In this document, VMT per Service Population is used to represent VMT per capita.

3.1.3 - Regulatory Framework

Federal

Federal Highway Administration/Federal Transit Administration

The Moving Ahead for Progress in the 21st Century Act (MAP-21) established new requirements for Metropolitan Planning Organizations (MPOs) to set Transportation Performance Management (TPM) targets and to integrate those targets and plans into their planning documents by certain dates. The Bipartisan Infrastructure Law carries forward performance-based planning requirements. Beginning in 2018, federal rules require that state Departments of Transportation and MPOs implement federal performance measures. In response, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have worked with state and regional agencies to identify performance measures that meet the requirements. In California, Caltrans is directly responsible for submitting performance targets and periodic progress reports to federal agencies in a timely manner. MPOs are required to establish targets for the same performance measures on all public roads in the MPO planning area within 180 days after the State establishes each target. MPOs may elect to support the Statewide targets, establish numerical targets specific to their region, or use a combination of both approaches. Furthermore, each MPO must incorporate these short-range targets into their planning and programming processes, including the long-range plan and Transportation Improvement Program (TIP). Transportation performance measures are managed through different metrics, including safety, bridge and pavement conditions, congestion/system performance, Transit Asset Management (TAM), and transit agency safety plan. States and MPOs must integrate performance-based planning and programming into the long-range transportation plans. Regional transportation plans must include performance measures and targets, as well as a description of progress toward the targets. In addition, the TIP must provide a description on how investment in the TIP will contribute toward achieving those targets in the Regional Transportation Plan (RTP).

The FHWA defines TPM as a strategic approach that uses system information to make investment and policy decisions to achieve national performance goals by setting and tracking the targets. TPM is systematically applied, a regular ongoing process that provides key information to help decision-makers, allowing them to understand the investment consequences across transportation assets or modes. It ensures that the targets and measures are developed in cooperative partnerships among decision-makers, stakeholders, and the traveling public, and that those targets are based on data and objective information. The Statewide and Non-metropolitan Transportation Planning and Metropolitan Planning Final Rule establishes that states and MPOs must coordinate their respective targets with each other to ensure consistency to the maximum extent practical. The individual state Departments of Transportation and MPOs are expected to use information and data generated to inform their transportation planning and programming decisions. TPM provides a means to achieve national transportation goals, increase federal aid programs' accountability and transparency, and improve project decision-making through performance-based planning and programming.

State

California Department of Transportation LOS Goals

Caltrans builds, operates, and maintains the State Highway System (SHS), including the interstate highway system. Caltrans's mission is to improve mobility Statewide. The department operates under

strategic goals to provide a safe transportation system, optimize throughput and ensure reliable travel times, improve the delivery of State highway projects, provide transportation choices, and improve and enhance the State's investments and resources. Caltrans controls the planning of the SHS and accessibility to the system. Caltrans does not have a standard of significance relative to traffic operation as this is no longer a CEQA issue. The new VMT Focused Transportation Impact Study Guide (TISG), published in May 2020, replaced the Guide for the Preparation of Traffic Impact Studies, 2002. As indicated in the TISG, Caltrans is transitioning away from requesting Level of Service (LOS) or other vehicle operations analyses of land use projects and will instead focus on VMT. Caltrans requires encroachment permits from agencies or new development before any construction work may be undertaken within the State's right-of-way.

Senate Bill 743

In November 2017, the California Governor's Office of Planning and Research (OPR) released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in Senate Bill (SB) 743. Also in November 2017, OPR released the proposed text for Section 15064.3, Determining the Significance of Transportation Impacts, which summarized the criteria for analyzing transportation impacts for land use projects and transportation projects and directs lead agencies to "choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure." OPR recommends that for most instances a per service population threshold should be adopted and that a 15 percent reduction below that of existing development would be a reasonable threshold.

As noted in the OPR Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The deadline for adopting policies to implement SB 743 was July 2020; the change to VMT was formally adopted as part of updates to the CEQA Guidelines in December 2018.

The updated guidelines eliminate the use of automobile delay metrics, such as LOS, from determining significant environmental impacts from vehicle travel. VMT has been identified as the most appropriate metric to evaluate a project's transportation impacts as projects that result in lower=than average VMT support goals of reducing greenhouse gas (GHG) emissions, while projects that result in higher than average levels of vehicle travel contribute to an increasing rate of GHG emissions.

Projects that are within 0.5 mile of an existing major transit stop, which is defined as a rail transit station, ferry terminal served by bus or rail transit, or at the intersection of two or more major bus routes with service frequencies of 15 minutes or less during the morning and afternoon peak commute periods, are presumed to have less than significant impacts if the project has the following characteristics:

- Floor area ratio (FAR) greater than 0.75.
- Does not include more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking).

- Is consistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the MPO).
- Does not replace affordable residential units with a smaller number of moderate- or high-income residential units.

If a project meets the screening requirements, it is presumed to have a less than significant impact related to VMT.

Complete Street Acts

On September 30, 2008, former Governor Schwarzenegger signed into law Assembly Bill (AB) 1358, the California Complete Streets Act of 2008. As of January 2011, AB 1358 requires any substantive revision of the circulation element of a city or county's general plan to identify how it will safely accommodate the circulation of all users of the roadway including pedestrians, bicyclists, children, seniors, individuals with disabilities, and transit riders, as well as motorists.

Regional Regulations

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county Bay Area, including Sonoma County where Cloverdale is located. It also functions as the federally mandated MPO for the region. It is responsible for regularly updating the RTP, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities.

SB 375 was adopted as the means for achieving regional transportation-related GHG targets. Among the requirements of SB 375 is the creation of a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and RTP must be consistent with one other, including action items and financing decisions. MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission. The current RTP, Plan Bay Area 2050, is described below.

The MTC has established its policy on Complete Streets in the Bay Area. The policy states that projects funded all, or in part, with regional funds (e.g., federal and State TIP and bridge tolls) must consider the accommodation of bicycle and pedestrian facilities, as described in Caltrans Deputy Directive 64. These recommendations do not replace locally adopted policies regarding transportation planning, design, and construction. Instead, these recommendations facilitate the accommodation of pedestrians, including wheelchair users, and bicyclists into all projects where bicycle and pedestrian travel is consistent with current adopted regional and local plans.

Plan Bay Area 2050: A Vision for the Future

The Association of Bay Area Governments (ABAG) is the official comprehensive planning agency for the San Francisco Bay region, which is composed of the nine counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. On October 21, 2021, ABAG and the MTC, the region's MPO, adopted Plan Bay Area 2050: A Vision for the Future (Plan Bay Area 2050), an integrated transportation and land use strategy through 2050. Defined by 35

strategies for housing, transportation, economic vitality, and the environment, Plan Bay Area 2050 lays out a $1.4 trillion vision for policies and investments to make the nine-county region more affordable, connected, diverse, healthy, and economically vibrate for all its residents through 2050 and beyond. The transportation strategies in Plan Bay Area 2050 fall into three categories:

1. Maintain and optimize the existing system.
2. Create healthy and safe streets.
3. Build a next-generation transit system.

As part of the implementing framework for the Plan Bay Area 2050, local governments have identified Priority Development Areas (PDAs) and Transit-Rich Areas (TRAs) to focus growth. PDAs are transit-oriented, infill development opportunity areas within existing communities. TRAs are areas near rail, ferry, or frequent bus service that were not already identified as PDAs. Specifically, these are areas where at least 50 percent of the area is within 0.5 mile of either an existing rail station or ferry terminal (with bus or rail service), a bus stop with peak service frequency of 15 minutes or less, or a planned rail station or planned ferry terminal (with bus or rail service). The central portion of the City is designated as the Downtown/SMART Transit Area PDA.[8]

Sonoma County Transportation Authority

The MTC requires the local transportation authority, in this case the SCTA, to establish transportation plans that are incorporated into the larger RTP. In Sonoma County, the SCTA carries out the general functions of a Congestion Management Agency, such as preparing a comprehensive TIP among local jurisdictions that describes the strategies to reduce traffic congestion and improve land use decision-making.

SCTA is required to prepare, update, and monitor the CTP. The CTP consists of monitoring, performance measurement, and a capital improvement plan for roadways, bicycle and pedestrian facilities, and transit services. As required by State legislation, SCTA maintains a travel demand model to forecast proposed changes to the transportation network.

The Sonoma County CTP: Moving Forward 2050 outlines projects and strategies that promote alternate modes of transportation and thereby help to reduce traffic congestion and improve air quality. Local governments have an opportunity to ensure that Transportation Demand Management (TDM) measures are adequately factored into the decision-making process as they review new development proposals and make key decisions on planning and zoning matters. Local governments may also choose to support (through resolution or other means) regional TDM measures, including carpool lanes and ride sharing facilities and programs, which could be implemented by other agencies, such as MTC.

[8] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG). 2023. Priority Development Areas (Plan Bay Area 2050). Website: https://opendata.mtc.ca.gov/datasets/4df9cb38d77346a289252ced4ffa0ca0/explore?location=38.797521%2C-123.014925%2C13.12. Accessed March 19, 2024.

District 4 Bike Plan for the Bay Area

The Caltrans District 4 Bike Plan (Bike Plan) identifies infrastructure improvements that can enhance bicycle safety and mobility throughout District 4 and remove some of the barriers to bicycling in the region. The Bike Plan was developed in cooperation with local and regional partners to ensure that the improvements on the SHS complement proposals for local networks.

The Bike Plan considers all potential bicycle trips but prioritizes utilitarian bicycle travel to work, school, shopping, and other similar purposes or to connect to transit. State highways that serve as recreational or touring routes for bicyclists are also considered in the Bike Plan to meet the safety needs of all highway users. The Bike Plan helps inform investments on the State Transportation Network (STN) by Caltrans and other jurisdictions. Caltrans is required to accommodate the needs of bicyclists in Caltrans projects wherever possible. Many funding programs also require consideration of complete streets improvements as part of a project, such as sidewalks, bike lanes, and crossing improvements. It identifies high priority projects in all Bay Area counties, including Sonoma County.

District 4 Pedestrian Plan for the Bay Area

The Pedestrian Plan implements the Vision Statement and Goals in Toward an Active California, the Statewide Bicycle and Pedestrian Plan,[9] and is part of a comprehensive planning process to identify locations with bicycle and pedestrian needs in each Caltrans district across California. The Pedestrian Plan is used by Caltrans staff, as well as regional and local agency partners, to address high priority needs along and across the STN, which includes the SHS and all other multimodal facilities owned and operated by Caltrans, including parallel paths, frontage roads, and other facilities not directly on a SHS mainline.

Local Regulations

City of Cloverdale General Plan

The proposed Circulation Element Update includes the following relevant policies and actions that assist in reducing or avoiding impacts related to transportation:

Goal CE 1	Develop and maintain a balanced vehicular and multimodal transportation system to meet the mobility needs consistent with General Plan land use goals and policies and aligns with California's SB 743 environmental requirements defined and analyzed under the California Environmental Quality Act. Provide a balance of land uses within the General Plan Study Area for housing, jobs, economic development, recreation, and destination commercial uses.
Policy CE 1-1	Develop and maintain the Circulation Plan network of freeway/highways, arterials, collectors, and local streets. The proposed

[9] California Department of Transportation (Caltrans). 2017. Toward and Active California State Bicycle and Pedestrian Plan. Website: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/f0020350-activeca-final-plan-2017-05-18-a11y.pdf. Accessed June 10, 2024.

streets should be designed to serve the functions they are intended to serve, with adequate capacity and safety and address complete streets.

Implementation CE 1-1.a Design, construct, upgrade, and maintain the automobile, bicycle, and pedestrian circulation system according to the functions they are intended to serve, as shown in Exhibit 3.1, 3.2, 3.3 of the Circulation Element Update and the trails systems in Exhibit 5.1 of the Parks and Recreation Element. Ensure active transportation connections among neighborhoods.

Implementation CE 1-1.b Update design to align with new standards and maintain the existing circulation network through the Capital Improvement Program and Development Impact Fees. The City shall strive to maximize the efficiency of the roadway system within the existing roadway widths, prioritizing strategies such as investing and maintaining advanced traffic signal synchronization systems over roadway widening projects.

Implementation CE 1-1.c Coordinate with the County of Sonoma and Caltrans in addressing regional transportation issues.

Implementation CE 1-1.d Provide funding to repair streets and bicycle facilities that are deteriorated and sidewalks that are in poor repair.

Implementation CE 1-1.e Regularly review and establish designated truck routes in the City to minimize noise impacts on residential areas. Construction truck routes shall be specified to minimize noise impacts. Coordinate with local businesses to identify preferred truck routes to access key destinations in the City. (See Policy CE 8-1).

Policy CE 1-2 Plan and reserve in advance of development, the street alignments, right-of-way and building setbacks necessary to handle anticipated future growth, traffic and bicycle and pedestrian requirements.

Implementation CE 1-2.a Develop and adopt plan lines, if needed, for arterial and collector streets shown in Exhibit 3.1 and Exhibit 3.4 of the Circulation Element Update. Place plan lines in the Zoning Ordinance and require setbacks to be measured from adopted plan lines.

Implementation CE 1-2.b Require new development and expansions of existing development to provide necessary street improvements for the demand of all transportation modes.

Implementation CE 1-2.c Develop and maintain an up-to-date comprehensive street improvement fee for new development to finance General Plan roadway improvements necessary to serve the City at General Plan buildout.

Policy CE 1-3	Design street systems in residential areas to minimize through traffic, to encourage internal movement by bicycling and walking, to provide connected safer and quieter neighborhoods, to minimize vehicular conflicts at intersections and to ensure that the impact of recreational traffic on local residents is minimized. (See Policy CE 8-1).
Implementation CE 1-3.a	Identify and provide directional signs to active transportation and recreational uses that maximize use of arterial and collector streets and minimize or eliminate traffic through residential areas.
Policy CE 1-4	Increase Electric Vehicle (EV) Adoption and Infrastructure.
Implementation CE 1-4.a	Develop an EV Readiness Plan that is consistent with Sonoma County EV planning. This plan should establish a path forward to increase EV infrastructure within the City, promote equitable mode shift to EVs, and identify funding for implementation of public charging infrastructure in key locations.
Implementation CE 1-4.b	The City shall encourage commercial areas and new multifamily developments to provide dedicated parking for electric vehicles. Create incentives for electric vehicle adoption by providing EV parking only spots in high-traffic convenience locations and public parking EV chargers. Develop a parking space ratio requirement for new and redeveloped commercial, multifamily, residential subdivision, and condominium projects to have a specified amount of EV only parking with chargers.
Implementation CE 1-4.c	The City shall require new nonresidential development projects to include the installation of electric vehicle charging stations consistent with the State of California Green Building Code (CALGreen). The charging stations should be sited to provide prioritized access to building entrances.
Implementation CE 1-4.d	The City shall require new residential development projects to be "electric vehicle charging ready," including the installation of higher-voltage electric systems to serve for the Level 2 charging of electric vehicles consistent with the California Green Building Code.
Implementation CE 1-4.e	The City shall transition the City municipal vehicle fleet to alternative fuel vehicles provided that the alternative fuel vehicle can meet the performance standards required for its use. (See Policy CDO 8-1 of the Conservation, Design, and Open Space Element).
Goal CE 2	Maintain a satisfactory Level of Service for automobile traffic for efficient operational flow not required by CEQA analysis.

Policy CE 2-1 The City shall strive to achieve Level of Service (LOS) D operation as the planned operating condition at intersections, except for intersections that are operating at LOS E or lower at the time an application for a proposed development project or a specific plan is submitted if no feasible improvements exist to improve the LOS. For public safety, signalization warrants shall be evaluated using MUTCD standards. For projected future conditions the LOS is to be calculated using the average traffic demand over the highest 60-minute period. For all types of control, the Level of Service standard is to be applied to the average intersection delay, and not for any single movement or approach. Exceptions to meeting this standard include:

- Stop-controlled minor street approaches to either collector or arterial streets;
  - Locations where the City Engineer deems improvement to be technically, financially, or environmentally infeasible;
  - Locations where improvements are needed to meet LOS standards but are not warranted based on volumes;
- Conditions where no feasible improvements exist in order to support safe bike, pedestrian, or transit access to downtown area or the SMART station; or
- Locations where attainment would cause loss of the unique character of the downtown, identified historic resources or neighborhood character, distinctive tree canopy, or distinctive watercourses.

Implementation CE 2-1.a The City shall require proposed development projects that could result in increased traffic to include improvements that assure LOS levels do not fall below the established minimum standard. The developer shall analyze the operational benefits of large-scale, automobile capacity-focused improvements to assure that they are balanced against the induced Vehicle Miles Traveled (VMT) resulting from the improvements. The City shall ensure that improvements are coordinated with roadway improvements programmed for funding through transportation-related impact fees.

Implementation CE 2-1.b Signalize or convert to roundabout control the Healdsburg Avenue and Cloverdale Boulevard Intersection.

Implementation CE 2-1.c Evaluate roundabout or traffic signal configurations and pedestrian and bicycle facilities at the Citrus Fair Drive interchange to promote multimodal safety and accommodate traffic levels related to the overcrossing, offramps, and Asti Road and South Cloverdale Boulevard to achieve LOS D. Alternative designs may be considered if pedestrian and bicycle facilities and LOS D can be achieved by those designs.

Implementation CE 2-1.d	Identify and evaluate potential locations for roundabouts to promote multimodal safety and operations.
Policy CE 2-2	Create a "country road" appearance for Cloverdale Boulevard, First Street east of the freeway, and Asti Road where possible, including narrow pavement, shade trees adjoining travel lanes, parking only where necessary, and protected bicycle and pedestrian ways.
Implementation CE 2-2.a	Prepare design plans for Cloverdale Boulevard, First Street east of the freeway, and Asti Road prior to major improvements to those roads.
Goal CE 3	Promote and support an integrated network of pedestrian and bicycle facilities, as shown in Exhibit 3.2 of the Circulation Element Update, that allows safe and convenient travel for all users as an alternative to automobile traffic and for community health and enjoyment. Design all streets as complete streets, including arterial and collector roadways, which integrate walking, biking, transit use, and green infrastructure, and natural features (such as creeks and greenways).
Policy CE 3-1	Ensure that streets safety serve all users and provide a network connecting residences, employment areas, services, health care, schools, parks, retail area and public facilities.
Implementation CE 3-1.a	Implement programs for bicycle and pedestrian trails in the Parks and Recreation Element.
Implementation CE 3-1.b	Maintain an up-to-date bikeways plan in conjunction with the Sonoma County Transportation Agency Countywide bikeways plan.
Implementation CE 3-1.c	Integrate bicycle and pedestrian routes with transit stops.
Policy CE 3-2	Provide continuous sidewalks or pedestrian paths along all streets. Maintain sidewalks in good repair. Integrate sidewalks and the pedestrian trails network in the Recreation and Open Space Element.
Implementation CE 3-2.a	Explore a program to fund sidewalk improvement or installation where no sidewalks exist, including sharing of costs with property owners, loans payable at time of sale, etc.
Implementation CE 3-2.b	Identify major pedestrian routes and, where they adjoin streets, prepare roadway sections that encourage pedestrian use including intersection crossings, mid-block pedestrian crossings and upgrading pedestrian facilities to current ADA requirements.
Implementation CE 3-2.c	Repair or install sidewalks or pedestrian paths on all streets in conjunction with public works and private development projects.

	Where roadway modifications are proposed and the City owns an existing right-of-way that exceeds the required roadway width, the City shall use the excess width to create bikeways, pedestrian paths, and streetscape features. Require new street connections to implement planned bicycle and pedestrian facilities as outlined in the General Plan and other transportation planning policy documents.
Implementation CE 3-2.d	Where possible, use traditional sidewalk design on both sides of streets with a planter strip between the curb and sidewalk and low-impact development features.
Policy CE 3-3	Provide trees or other shade sources along pedestrian routes. Where street widening would remove substantial shade trees, investigate alternative roadway configurations that would preserve the shade trees.
Goal CE 4	Promote transit service and use, as shown in Exhibit 3.3 of the Circulation Element Update, to serve Cloverdale land use goals.
Policy CE 4-1	Participate in efforts to establish passenger rail service on the SMART right-of-way.
Implementation CE 4-1.a	Encourage passage of rail bonds and develop appropriate land uses that will support rail ridership. (See Policy CDO 3-8 of the Conservation, Design, and Open Space Element).
Implementation CE 4-1.b	Develop designs for Citrus Fair Drive and Asti Road (south interchange to First Street) to serve as attractive access routes to the SMART station. Elements shall include traffic calming, shaded pedestrian walkways, protected bicycle lanes, and small convenience commercial spaces near the station.
Policy CE 4-2	Develop a Plan around the Cloverdale SMART station to coordinate pedestrian access with the downtown, provide a source of transit riders within a half-mile radius of the station, and establish destination uses to attract transit riders to Cloverdale.
Implementation CE 4-2.a	Monitor and update Station Area Precise Plan prior to development of major properties within a half mile of the Cloverdale SMART passenger rail station.
Policy CE 4-3	Support bus service locally, countywide, and beyond county borders.
Implementation CE 4-3.a	Encourage use of the Cloverdale Shuttle (Sonoma County Transit 68) by maintaining schedules that serve the community and by considering the use of distinctive vehicles to bring visibility to the service.

Policy CE 4-4	Encourage ride sharing to reduce commute trips.
Goal CE 5	**To Reduce Automobile Dependency and Associated Impacts.** State law requires that the City consider Vehicle Miles Traveled (VMT) in any CEQA analysis. Because the General Plan is the City's blueprint for future development, incorporating strategies that reduce VMT within the General Plan will support compliance with CEQA. Trip reduction strategies will also help reduce traffic congestion, energy consumption and greenhouse gas emissions, which support overall community health.
Policy CE 5-1	Encourage and support the SCTA in establishing a Regional VMT Mitigation Bank and/or Regional VMT Impact Fee Program that can be used to fund effective VMT reduction strategies at a regional level, while also establishing a mechanism for private development to offset their VMT impacts.
Implementation CE 5-1.a	Coordinate with regional VMT efforts.
Policy CE 5-2	As part of CEQA project review require new development projects to achieve a reduction in vehicle miles traveled compared to baseline conditions. Support SCTA's efforts in maintaining the regional travel demand model, which will be used to adjust baseline VMT levels over time and allow the City to establish updated VMT benchmarks for project applicants.
Policy CE 5-3	Coordinate with property owners, employers in existing and developing employment centers and the Cloverdale Chamber of Commerce to implement Transportation Demand Management (TDM) strategies.
Implementation CE 5-3.a	Coordinate with local employers, property owners and Chamber of Commerce to establish TDM strategies.
Policy CE 5-4	Encourage and support car or bike share programs within Cloverdale through partnership with car sharing or bike sharing entities and create pick up and drop off locations throughout the City, including employment and shopping areas, park-and-ride lots and neighborhood parks.
Implementation CE 5-4.a	Coordinate with car and bike share vendors.
Policy CE 5-5	Encourage and support shuttle, alternative transportation options, or on-demand transit service to create connections between existing transit services and to provide "last mile" solutions for transit users.
Implementation CE 5-5.a	Coordinate with regional and county transit providers.

Goal CE 6	Enhance and improve the safety of all users of the transportation system. At the core of the California Complete Streets Act is the concept of safety. To ensure that people are willing to travel by means other than the automobile, it is critical to support and facilitate a safe and comfortable environment for all users.
Policy CE 6-1	Regularly review multi modal collision and traffic speed data as part of a systemic process to determine the location of high injury collisions involving pedestrians and bicyclists, which impact the public's perception of safety along the multimodal transportation network.
Implementation CE 6-1.a	Collaborate with SCTA in their Vision Zero efforts to eliminate traffic fatalities and severe injuries. Vision Zero is a strategy to eliminate all traffic fatalities and severe injuries while also increasing safe, healthy, and equitable mobility for all.
Implementation CE 6-1.b	Collaborate with Sonoma County Bicycle Coalition (SCBC) in creating and implementing the Sonoma County Safe Routes to Schools Program. Safe Routes to School (SRTS) is an approach that promotes walking and bicycling to school safely through a combination of infrastructure improvements, traffic enforcement, safety education, and incentives. SRTS initiatives aim to improve safety and increase levels of physical activity.
Implementation CE 6-1.c	The City shall implement lighting, signage, and traffic calming improvements.
Policy CE 6-2	Bicycle and pedestrian education and outreach.
Implementation CE 6-2.a	Work with organizations, with the appropriate expertise, to develop educational and outreach materials and programs for cyclists, pedestrians, and drivers that promote safe bicycling and walking, particularly for children.
Policy CE 6-3	Bicycle and pedestrian network comfort considerations.
Implementation CE 6-3.a	Maintain a backbone bicycle and pedestrian network that seeks to accommodate bicycle and pedestrian users of all comfort levels (i.e., low level of traffic stress). Bicycle level of traffic stress assesses the perceived comfort of a bicyclist on a bike path shared with cars. For some bicyclists, sharing the road with automobiles is uncomfortable and they do not feel safe. As a result, they may choose to drive over bicycling if there is no safer or more comfortable alternative.
Policy CE 6-4	Local Roadway Safety Plan.

Implementation CE 6-4.a	Adopt a Local Roadway Safety Plan (LRSP) to promote multimodal safety and to allow the City to better compete for safety-related grant funding programs such as the Caltrans Highway Safety Improvement Program (HSIP).
Policy CE 6-5	Evaluate potential evacuation routes.
Implementation CE 6-4.a	Evaluate potential evacuation routes to be compliant with State law and legislation in addition to the established US-101 and State Route 128. (See Goal PS 3 and Policy PS 6-1 of the Public Health and Safety Element) related to Multi Hazard Emergency Plan.
Goal CE 7	To provide a citywide comprehensive parking system that is integrated with alternate modes of transportation options to efficiently serve the needs of residents, visitors, and businesses.
Policy CE 7-1	Re-evaluate its minimum parking standards and seek to "right-size" parking to meet demand by taking into account shared mobility and micro-mobility trends and available alternative modes of transportation.
Implementation CE 7-1.a	Keep apprised of ongoing technological advancements.
Policy CE 7-2	Encourage park-and-ride activity, shared parking facilities and shared public parking.
Implementation CE 7-2.a	Collaborate with downtown businesses and SMART in creating and implementing parking options. The adopted Downtown Plan (See Policy CDO 3-2 of the Conservation, Design, and Open Space Element) includes a more walkable and bikeable City core, which also takes advantage of the proximity to the SMART passenger rail station.
Implementation CE 7-2.b	Develop variable parking standards that reflect the level of parking demand based on land use, proximity to transit, and VMT reduction goals.
Policy CE 7-3	Encourage new residential developments in higher density areas to separate the cost of parking from the cost of renting or purchasing living space (i.e., unbundling).
Implementation CE 7-3.a	Collaborate with the development community and Community Development in evaluating unbundled parking strategy.
Policy CE 7-4	Support the safe use of shared mobility and micro-mobility options (e.g., bike share, scooters) to connect residences, businesses to key destinations in the City, including SMART station and other public transit nodes and assess the integration of autonomous vehicles into the transportation system.

Implementation CE 7-4.a	Keep apprised of ongoing technological advancements.
Policy CE 7-5	Develop and leverage curb space management techniques in central Cloverdale in proximity to the SMART station to balance pick-up and drop-off activities with business related loading and unloading zones and monitor on- and off-street parking and loading areas to promote desired curb space usage.
Implementation CE 7-5.a	Collaborate with downtown businesses and SMART in creating and implementing curb space management techniques.
Goal CE 8	To promote the safe and efficient movement of goods through the City to support business and commercial activity.
Policy CE 8-1	Truck delivery routes.
Implementation CE 8-1.a	The City shall work with local businesses to identify preferred truck delivery routes to access key destinations in the City but also discourage trucks from using local streets. Regularly review and establish designated truck routes in the City to minimize noise impacts on residential areas. (See Policy CE 1-1).
Policy CE 8-2	Promote the safe and efficient movement of goods by rail through the City to support business and commercial activity. The rail line that runs through Cloverdale has historically been used for freight service and SMART passenger service is planned in the future.
Implementation CE 8-2.a	The City shall engage with SMART to facilitate the safe and efficient movement of goods by rail through the City, including decreasing train speeds through the City.
Implementation CE 8-2.b	The City shall establish and monitor the effectiveness of railroad quiet zones and make appropriate modifications to minimize noise and promote public safety. (See Goal NE 1 of the Noise Element).
Policy CE 8-3	Promote safe and efficient airport operations through the City to serve the growing population. (See Goal PS 7 of the Public Health and Safety Element).
Implementation CE 8-3.a	The Cloverdale Municipal Airport, owned and operated by the City of Cloverdale, serves as a general aviation hub for the area. The City shall collaborate with the County and Sonoma County Airport Land Use Commission and reference the *Cloverdale Municipal Airport Master Plan 2025,* adopted in 2008, as the guiding plan for airport improvements and land use regulations.

City of Cloverdale Municipal Code

Title 10: Vehicles and Traffic

The Vehicles and Traffic Code contains regulations for design, operation, and enforcement of the local roadway network and users of the network. This code covers traffic control devices, traffic enforcement, traffic rules, pedestrian regulations, truck routes, parking design and enforcement, and speed limits.

3.1.4 - Methodology

Impacts related to transportation resulting from the implementation of the proposed Circulation Element Update are discussed below. The impact analysis is based on a review of published information and reports regarding local and regional transportation trends and changes.

The proposed Circulation Element Update does not propose or entitle any specific site development, and future development within the City would be required to comply with the policies of the General Plan and the proposed Circulation Element Update, as well as applicable federal, State, and local regulations. Where existing regulatory requirements or permitting requirements that are law and binding on responsible agencies and project applicants exist, it is reasonable to assume that they would be implemented, thereby reducing impacts.

3.1.5 - Thresholds of Significance

The lead agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to determine whether transportation and traffic impacts are significant environmental effects. Would the project:

a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

d) Result in inadequate emergency access?

3.1.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed Circulation Element Update and provides mitigation measures where necessary.

Conflict with Circulation Policy or Ordinance

Impact TRANS-1:	**The proposed Circulation Element Update would not conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities.**

Impact Analysis

The proposed Circulation Element Update has been developed within the framework provided by several State and regional plans and regulations, including the Bay Area region's RTP, Plan Bay Area 2050. Plan Bay Area 2050 includes 35 strategies for housing, transportation, economic vitality, and the environment. The transportation strategies in Plan Bay Area 2050 fall into three categories: (1) Maintain and optimize the existing system, (2) Create healthy and safe streets, and (3) Build a next-generation transit system. As detailed below, the proposed Circulation Element Update would optimize the existing system by establishing LOS and VMT thresholds; providing for repairs of existing streets, sidewalks, and bicycle facilities; and collaborating with regional and County transit providers. The proposed Circulation Element Update would focus on providing safe streets and facilities for all modes of transportation and encouraging the use and expansion of public transportation services.

Furthermore, the proposed Circulation Element Update would strengthen the City's existing policies, including those related to transit, roadway, bicycle, and pedestrian facilities.

Roadway

The proposed Circulation Element Update would strengthen the City's existing policies addressing roadways through consistency with the Complete Streets Act. The proposed Circulation Element Update also seeks to reduce roadway emissions and minimize traffic congestion.

Under the Complete Streets Act, general plans of California cities are required to include planning for complete streets—that is, streets that meet the needs of all users of the roadway, including pedestrians, bicyclists, users of public transit, motorists, children, the elderly, and people with disabilities.

The proposed Circulation Element Update contains a number of policies and implementation actions that contribute toward the provision of a circulation network that is consistent with the Complete Streets Act. Proposed Policy CE 1-1 requires the development and maintenance of the network of freeways, arterials, collectors, and local streets with adequate capacity and safety to address complete streets. Implementation CE 1-1.a, CE 1-1.b, CE 1-1.c, CE 1-1.d, and CE1-1.e would also require the City to design, upgrade, and maintain the circulation system according to the functions the streets and facilities are intended to serve, update designs to align with new standards, provide funding to repair streets that are in poor condition, and establish designated truck routes. Proposed Policy CE 1-2 would require the City to plan street alignments, right-of-way, and building setbacks to handle anticipated growth and improvements. Implementation CE 1-2.b would require new development and expansions of existing development to provide necessary street improvements for the demand of all transportation modes, and proposed Policy CE 1-3 would require the design of street systems in residential areas to minimize through traffic and minimize vehicular conflicts at intersections.

Because the proposed Circulation Element Update has been created to be consistent with and implement applicable regulations regarding roadways (such as the Complete Streets Act, Plan Bay Area 2050, Sonoma County CTP, etc.), there would be no conflict between the proposed Circulation Element Update and existing programs, plans, ordinances, and policies addressing roadways. Future

development in the City would be required to comply with the proposed Circulation Element Update. Therefore, there would be no impacts.

Bicycle and Pedestrian Facilities

The proposed Circulation Element Update would continue and strengthen existing programs, plans, ordinances, and policies to support bicycle and pedestrian facilities. These include the prioritization of multimodal systems, maintenance of a network of complete streets to provide safe mobility access for all users, implementation of additional complete streets improvements as appropriate for the communities in which they are proposed, development and maintenance of local and regional bicycle networks, and promotion of bicycle safety when infrastructure improvements are made in accordance with the objectives of Plan Bay Area 2050, the Complete Streets Act, and the Caltrans District 4 Bike and Pedestrian Plans.

The proposed Circulation Element Update includes a range of policies and programs to ensure that bicycle and pedestrian facilities are maintained, improved, and expanded. For example, proposed Implementation CE 1-1.a would require the City to design, construct, upgrade, and maintain the bicycle and pedestrian circulation system according to the functions they are intended to serve. Implementation CE 1-1d would require the provision of funding to repair bicycle facilities and sidewalks that are deteriorated or in poor repair, and Policy CE 1-2 would require the City to plan and reserve the street alignments, right-of-way, and building setbacks necessary to handle anticipated growth, bicycle, and pedestrian requirements. Policy CE 1-3 would require the street systems in residential areas to encourage internal movement by bicycling and walking. Implementations CE 3-1.a, CE 3-1.b, and CE 3-1.c would further require the City to implement programs for bicycle and pedestrian trails in the Parks and Recreation Element of the adopted General Plan, maintain an up-to-date bikeways plan, and integrate bicycle and pedestrian routes with transit stops.

Additionally, Goal CE 3, Policies CE 3-1 and CE 3-2, and Implementations CE 3-1.a, CE 3-1.b, CE 3-1.c, CE 3-2.a, CE 3-2.b, CE 3-2.c, and CE 3-2.d would require all streets to be designed as complete streets, which integrate walking, biking, transit uses, green infrastructure, and natural features. These policies would require the maintenance of an up-to-date bikeways plan and the identification of major pedestrian routes within the City. Thus, the proposed Circulation Element Update would promote increased use by pedestrians and bicyclists of all ages and abilities without a degradation of safety or access for public transit users or motorists, ensuring consistency with the Complete Streets Act.

Future development would be required to comply with the proposed Circulation Element Update. Because the proposed Circulation Element Update has been created to be consistent with and implement applicable regulations regarding roadways (such as the Complete Streets Act, Plan Bay Area 2050, SCTA CTP, etc.), the proposed Circulation Element Update would not conflict with a program, plan, ordinance, or policy related to bicycle and pedestrian facilities. There would be no impacts.

Transit Facilities

Consistent with the Complete Streets Act, Plan Bay Area 2050, and the SCTA CTP, the proposed Circulation Element Update contains objectives, policies, and programs that would promote the use

of public transit and improve public transit service for existing and future populations through the City's own initiations and through cooperation with the public transit providers who serve the City.

The proposed Circulation Element Update includes a range of policies and programs to promote transit service and use. Proposed Goal CE 4 aims to promote transit service and use within the City to serve the land use goals. Proposed Policies CE 4-1 and CE 4-2, as well as Implementation CE 4-1.a, CE 4-1.b, and CE 4-2.a, are included in the proposed Circulation Element Update to encourage efforts to establish passenger rail service through SMART, encourage land uses that support rail ridership, and develop designs and plans to coordinate access to the SMART station. Proposed Policy CE 4-3 and Implementation CE 4-3.a would encourage the use of the Cloverdale Shuttle by maintaining schedules to serve the community and bringing visibility to the service. Proposed Policy CE 5-5 and Implementation CE 5-5.a would encourage shuttle, alternative transportation options, and on-demand transit services to create connections between existing transit services through coordination with regional and county transit providers. Because the proposed Circulation Element Update has been created to be consistent with and implement applicable regulations regarding roadways (such as the Complete Streets Act, Plan Bay Area 2050, Sonoma County CTP, etc.), the proposed Circulation Element Update would not conflict with a program, plan, ordinance, or policy related to public transit facilities. Impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None required.

Conflict with CEQA Guidelines Section 15064.3, Subdivision (b)

Impact TRANS-2: The proposed Circulation Element Update would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Impact Analysis

CEQA Guidelines Section 15064.3 requires an analysis of transportation impacts based on VMT. The following analysis considers the VMT impacts of the implementation of the proposed Circulation Element Update as part of General Plan buildout for operation.

CEQA Guidelines Section 15064.3, subdivision (b), gives local agencies discretion to select the most appropriate methodologies and significance thresholds for evaluating VMT.

The City has not adopted citywide numeric significance thresholds for operational VMT. Therefore, for purposes of evaluating this project, this analysis is based on OPR guidance, which recommends setting VMT thresholds generally at 15 percent below baseline VMT per capita.

To provide a quantitative VMT evaluation, the City used the SCTM to estimate the VMT generated by land uses under existing conditions and at General Plan buildout. Based on SCTM, existing and projected future VMT for the City is shown in Table 3.1-3.

Table 3.1-3: Existing and Projected Future VMT

Category	2019 Base Year	2024 Baseline[1]	Year 2040 General Plan Buildout	Percent Change (2040 General Plan Buildout vs. 2024 Baseline)
Total City Generated VMT[2]	415,451	434,314	494,677	+13.90%
Total City VMT per Service Population[3]	28.8	28.0	25.4	-9.25%
Home-Based VMT per Resident[4]	16.0	15.1	12.2	-19.18%
Home-Based VMT per Employee[5]	9.5	9.1	7.9	-13.37%

Notes:
VMT = Vehicle Miles Traveled
[1] 2024 baseline data was interpolated from 2019 Base Year Data from the Sonoma County Transportation Authority (SCTA).
[2] Total City Generated VMT = All VMT from trips with a start or end in Cloverdale
[3] City VMT per Service Population = Total City Generated VMT divided by the number of residents plus employees
[4] Home-based VMT per Resident = All VMT from trips with a start or end at a residence in Cloverdale, divided by the number of residents.
[5] Home-based Work VMT per Employee = All VMT from "commute" trips between home and work (or work and home), divided by the number of employees.
Source: Fehr & Peers. 2024.

Also shown in Table 3.1-3, partial VMT data was developed for vehicle trips generated by housing (Home-based VMT per Resident) and employment (Home-based VMT per Employee) uses and are also evaluated against the 15 percent VMT reduction threshold. However, for the purposes of this analysis, VMT per service population is used as the primary metric because it considers both Employee and Residential VMT and thereby provides a more complete VMT calculation. Home-based VMT per Resident and Employee data is provided herein for informational purposes only.

As shown in Table 3.1-3, the SCTM projects that the General Plan buildout scenario will result in an approximately 9.25 percent decrease in VMT per service population. This would not meet the applicable threshold of significance requiring a 15 percent reduction in VMT per capita as compared to existing conditions.

In summary, while the proposed Circulation Element Update would contribute to a reduced total VMT per service population within the City upon General Plan buildout, it would not result in a decrease that meets or exceeds the 15 percent VMT reduction threshold. This would be a potentially significant impact.

Future VMT Screening and Analysis

Policy CE 5-2 of the proposed Circulation Element Update would require new development projects to achieve a reduction in VMT compared to baseline conditions. Consistent with this policy, all future individual development projects would be required to comply with MM TRANS-2a. MM TRANS-2a

requires that, when the City receives an application for a project subject to CEQA, it shall apply the "Screening Thresholds for Land Use Projects" set forth in the OPR Technical Advisory for Evaluating Transportation Impacts in CEQA. If the project would exceed the screening thresholds, or other evidence demonstrates a potentially significant VMT impact, the City shall require the applicant to prepare a quantitative, project-level VMT analysis.

As shown in Table 3.1-3, the proposed Circulation Element Update would result in a reduction in VMT per service population of 9.25 percent. In order to achieve 15 percent below baseline total VMT per service population, an additional 6.3 percent reduction would be required for projects that are consistent with the General Plan.[10] For projects consistent with the General Plan that do not meet the applicable numeric threshold of significance (a 6.3 percent reduction in VMT) as indicated in the project-level VMT analysis prepared in accordance with MM TRANS-2a, MM TRANS-2b and/or MM TRANS-2c would also apply.

Transportation Demand Management

MM TRANS-2b requires reductions of operational VMT impacts to the greatest extent feasible via a TDM Program that includes various trip reduction strategies.

TDM strategies are project site and building tenant dependent and are too speculative to analyze in a planning level document such as this. There are a multitude of TDM measures to reduce VMT. The Sonoma County Vehicle Miles Traveled Mitigation and Reduction Calculator (VMT Tool) was developed by SCTA and Sonoma County jurisdictions in order to assist member agencies in their efforts to reduce VMT. It can be used to evaluate the effectiveness of mitigation measures on the transportation effects of land use projects. The VMT Tool includes all allowable TDM measures and their relative effectiveness. Based on the percentage of participation selected by the user, the VMT Tool calculates the resulting VMT reduction. The various TDM measures in the VMT Tool include school carpool programs, bike sharing programs, car sharing programs, trip reduction marketing/educational campaigns, parking cash-out, subsidized transit, telecommuting, alternative work schedules, shuttles, pay to park, ride sharing, unbundled parking, and subsidized vanpools. Nonetheless, the effectiveness of the TDM reduction measures for future individual development projects would be too speculative to quantify at this time.

As the above TDM strategies are heavily dependent on context, a matrix detailing which TDM strategies may be most effective when taking into account local contexts, called Site Groups, has been included as Table 3.1-4. The seven areas are shown in Exhibit 3.1-4.

[10] The baseline VMT for the year 2024 is 28.0. The proposed Circulation Element Update would result in a VMT per service population of 25.4, which is 9.25 percent. A 15 percent reduction would result in a VMT per Service population of 23.8. 25.4 VMT minus 23.8 VMT is equal to 1.6 VMT. 1.6 VMT is equal to 6.3 percent of 25.4. As such, an additional 6.3 percent of VMT reduction is needed to reduce impacts to a less than significant level for projects consistent with the General Plan.

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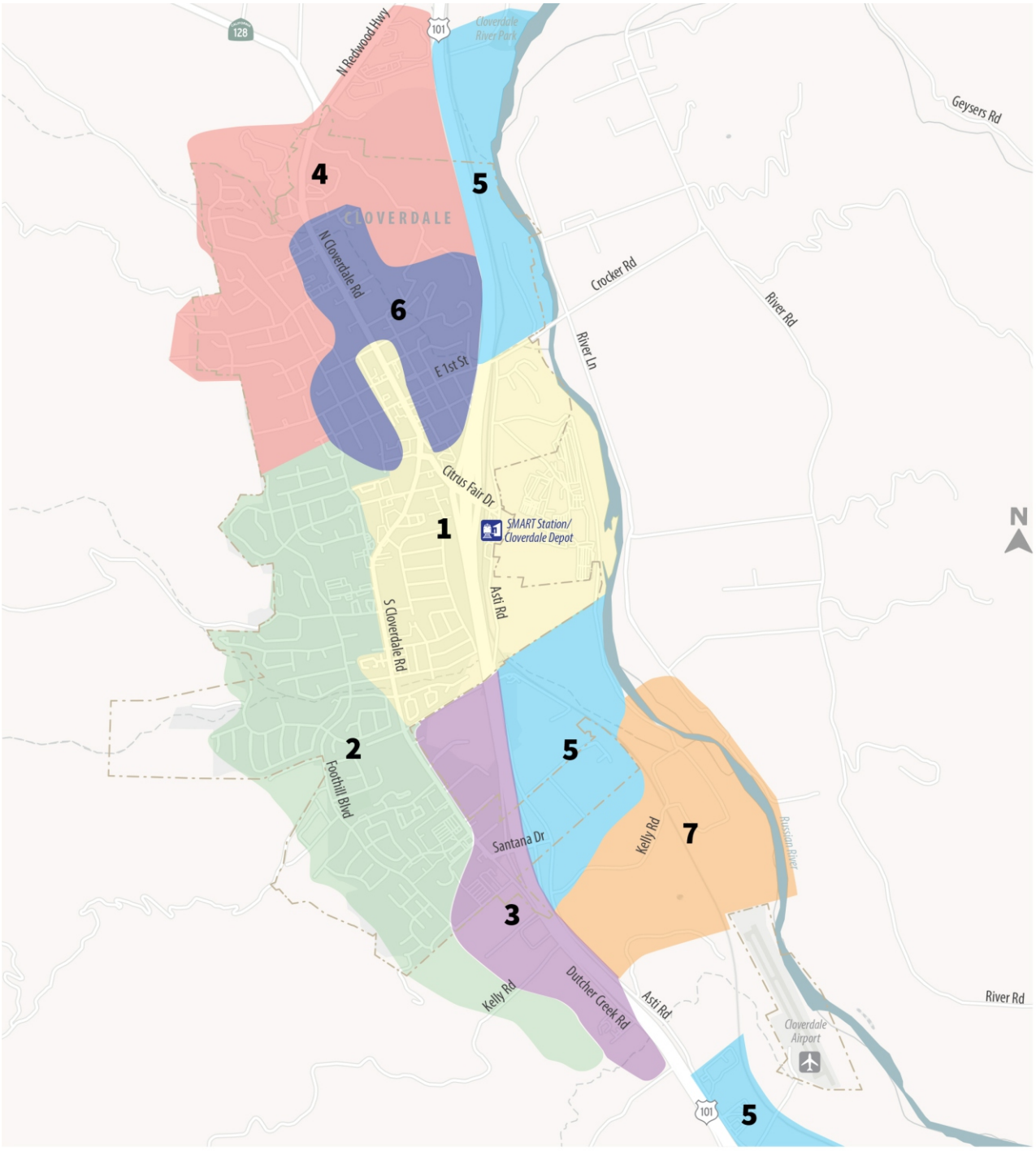

Source: Fehr & Peers, 2024.

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Exhibit 3.1-4
Potential Site Groups

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Table 3.1-4: Potential Effectiveness of TDM Strategies by Site Group

TDM Strategy	Effectiveness						
Site Group	1-TOD Station Area	2-Downtown Neighborhood Transition Areas	3-South Cloverdale Boulevard Area	4-Northwest Residential Area	5-Industrial Area	6-Commercial/ Office/ Service Areas	7-Alexander Valley Resort Specific Plan Area
Provision of bus stop improvements or on-site mobility hubs	H	H	M	M	M	H	M
Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.	H	H	M	M	M	H	M
Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program	H	H	M	M	M	M	M
Enhancements to countywide bicycle network	H	M	M	M	M	M	M
Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes	H	H	M	L	L	M	M
Cash allowances, passes, or other public transit subsidies and purchase incentives	H	H	M	M	L	M	M
Enhancements to bus service	H	H	H	M	M	H	M
Implementation of shuttle service	H	M	M	L	L	M	M
Establishment of carpool, bus pool, or vanpool programs	M	M	M	L	L	M	M

TDM Strategy	Effectiveness						
Vanpool purchase incentives	L	L	L	L	L	L	L
Low emission vehicle purchase incentives/subsidies	H	H	H	H	H	H	H
Compliance with a future County VMT/TDM ordinance	H	H	H	M	M	H	H
Participation in a future County VMT fee program	H	H	H	M	M	H	H
Participate in future VMT exchange or mitigation bank programs	H	H	H	M	M	H	H

Notes:
Potential effectiveness ratings:
L = low
M = medium
H = high

Based on California Air Pollution Control Officers Association (CAPCOA) research, global maximum Vehicle Miles Traveled (VMT) reduction using all Transportation Demand Management (TDM) measures for projects in rural and suburban contexts is 5-10 percent potential effectiveness of strategies based on Potential Site Group density, access to transit, and nearby destinations within walking or bicycling distance.

Source: Fehr & Peers. May 2024

VMT Mitigation Bank and/or Impact Fee Contribution

MM TRANS-2c allows for projects that do not achieve an additional 6.3 percent VMT reduction per MM TRANS-2b to participate in a Regional VMT Mitigation Bank and/or Regional VMT Impact Fee Program. This is consistent with Policy CE 5-1 in the proposed Circulation Element Update, which would require the City to encourage and support the SCTA in establishing a Regional VMT Mitigation Bank and/or Regional VMT Impact Fee Program that can be used to fund effective VMT reduction strategies at a regional level and establishing a mechanism for private development to offset their VMT impacts. As of the time of this Draft Subsequent EIR, SCTA is collecting proposals to prepare a Community Based Transportation Plan for areas in Sonoma County, including the City of Cloverdale, which would include a regional VMT impact fee program. As such, for projects that do not achieve an additional 6.3 percent reduction in VMT, MM TRANS-2c would allow future individual development projects to participate in the Regional VMT Mitigation Bank and/or Regional VMT Impact Fee Program when it is implemented in lieu of or in combination with MM TRANS-2b. However, because this program has not yet been established, it would not ensure impacts would be reduced to a less than significant level.

Conclusion

Because it would be too speculative to quantify impacts of project-level TDM plans for future individual development projects and the VMT Mitigation Bank/impact fee program has not yet been established, future VMT reduction cannot be confirmed at this time. As such, the impact would remain significant and unavoidable with mitigation incorporated.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM TRANS-2a When the City of Cloverdale (City) receives an application for a project subject to the California Environmental Quality Act (CEQA), it shall apply the "Screening Thresholds for Land Use Projects" set forth in the California Governor's Office of Planning and Research (OPR) Technical Advisory for Evaluating Transportation Impacts in CEQA. If the project would exceed the screening thresholds, or other evidence demonstrates a potentially significant Vehicle Miles Traveled (VMT) impact, the City shall require the applicant to prepare a quantitative, project-level VMT analysis.

MM TRANS-2b For projects consistent with the General Plan, if the project-level Vehicle Miles Traveled (VMT) analysis, prepared as a result of MM TRANS-2a, shows that the project would not meet or exceed the applicable numeric threshold of significance (a reduction of 6.3 percent VMT per service population), the City shall require the applicant to prepare and implement a Transportation Demand Management (TDM) Program.

Prior to issuance of building permits, project applicants shall develop a TDM Program for proposed projects, including any anticipated phasing, and shall submit the TDM Program to the City of Cloverdale for review and approval. The TDM Program shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Program shall be incorporated into and implemented as part of the project. Trip reduction strategies may include, but are not limited to, the following:

- Provision of bus stop improvements or on-site mobility hubs
- Provision of bus stop improvements or on-site mobility hubs
- Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.
- Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program
- Enhancements to citywide bicycle network
- Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes
- Cash allowances, passes, or other public transit subsidies and purchase incentives
- Enhancements to bus service

- Implementation of shuttle service
- Establishment of carpool, bus pool, or vanpool programs
- Vanpool purchase incentives
- Low emission vehicle purchase incentives/subsidies
- Compliance with a future County VMT/TDM ordinance
- Participation in a future County VMT impact fee program
- Participate in future VMT exchange or mitigation bank programs

As these TDM strategies are heavily dependent on context, a matrix, included as Table 3.1-4 of the Subsequent Draft EIR, details which TDM strategies may be most effective when taking into account local contexts, called Site Groups. The TDM Program shall illustrate that VMT impacts would be reduced by at least 6.3 percent VMT per service population.

MM TRANS-2c Upon implementation of a Sonoma County Transportation Authority (SCTA) Regional Vehicle Miles Traveled (VMT) Mitigation Bank and/or regional VMT impact fee program, future individual development projects that would not meet or exceed the applicable number threshold of significance (a reduction of 6.3 percent VMT per service population) for VMT would have the option to contribute VMT impact fees to SCTA in addition to or in place of Transportation Demand Management (TDM) Program strategies.

Level of Significance After Mitigation

Significant and unavoidable impact.

Hazards

Impact TRANS-3: The proposed Circulation Element Update would not substantially increase design hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis

The proposed Circulation Element Update does not propose or entitle any specific site development or physical environmental changes. As such, development within the City would continue to occur in accordance with the adopted General Plan including the policies of the proposed Circulation Element Update. The proposed Circulation Element Update would retain the existing roadway patterns and does not propose any new major roadways or other physical features that would substantially increase hazards and incompatible uses. Proposed development, land use activities, and roadway network improvements that occur pursuant to the General Plan would be reviewed for compliance with State and local requirements that reduce design hazards, as relevant (e.g., site distance). As such, the proposed Circulation Element Update would not substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and there would be no impacts.

Level of Significance Before Mitigation

No impact.

Mitigation Measures

None required.

Emergency Access

Impact TRANS-4: The proposed Circulation Element Update would not result in inadequate emergency access.

Impact Analysis

The proposed Circulation Element Update does not propose or entitle any specific site development or physical environmental changes. As such, the development within the City would continue to occur in accordance with the adopted General Plan and would require compliance with the policies of the proposed Circulation Element Update.

The proposed Circulation Element Update includes policies and implementation actions to ensure that adequate emergency access is provided and maintained during future development. Policy CE 6-5 would require the City to evaluate potential evacuation routes, and Implementation CE 6-5.a would require the City to ensure potential evacuation routes (beyond the established US-101 and SR-128 route) are compliant with State law and legislation. Furthermore, the adopted General Plan includes policies related to emergency access and evacuation, such as Policy PS 5-3, which ensures roadways are adequate in terms of width, radius, and grade to facilitate emergency access.

In conclusion, the proposed Circulation Element Update does not propose any changes to land use patterns or the roadway network such that potential impairments to emergency access would be created (road closures, road narrowing, new roadways with steep grades, etc.). Future development and land use activities within the City would be reviewed for compliance with State and local requirements for emergency access by the City. As such, the proposed Circulation Element Update would not result in inadequate emergency access. There would be no impacts.

Level of Significance Before Mitigation

No impact.

Mitigation Measures

None required.

3.1.7 - Cumulative Impacts

This analysis evaluates whether the impacts of the proposed Circulation Element Update, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to transportation. This analysis then considers where the incremental contribution of the impacts associated with the implementation of the proposed Circulation Element Update would be significant. Both conditions must apply in order for a project's cumulative effects to rise to the level of a significant impact.

Except where noted, the geographic context for this analysis includes the City's Planning Area and the surrounding unincorporated areas within Sonoma County. Past, present, and future development projects contribute to transportation impacts. If there is a cumulative impact, and if the project is determined to have a significant transportation impact, it is concluded that the proposed Circulation Element Update's incremental contribution to the cumulative impact is cumulatively considerable.

Compliance with Policies, Plans, and Ordinances

Past, present, and reasonably foreseeable regional growth within the City and unincorporated Sonoma County would result in increased traffic volumes on area roadways, VMT, and demand for transit, bicycle, and pedestrian facilities. All cumulative projects would be reviewed by the City and/or County to determine compliance with regional and local ordinances, General Plan policies, and proposed Circulation Element Update policies that address potential impacts related to transportation. Any approved development would have to be consistent with the General Plan, Municipal Code, and Zoning Ordinance. Therefore, it is assumed that all projects would comply with regulations required in regional and local ordinances and policies or be mitigated to demonstrate compliance. Accordingly, cumulative impacts related to compliance with policies, plans and ordinances would be less than significant. Moreover, the proposed Circulation Element Update does not propose any changes to land use patterns or the roadway network. For these reasons, the proposed Circulation Element Update's incremental contribution to the less than significant cumulative impacts with respect to compliance with program plan, ordinance, or policy of the circulation system would not be cumulatively considerable.

Cumulative VMT Impacts

The proposed Circulation Element Update's incremental contribution to cumulative traffic impacts would be significant and unavoidable. OPR guidance recommends setting VMT thresholds generally at 15 percent below baseline VMT per capita. Past, present, and reasonably foreseeable development in the geographic area would exceed 15 percent. As shown in Table 3.1-3, the SCTM projects that the General Plan buildout scenario will result in an approximately 9.25 percent decrease in VMT per service population. This would not meet the applicable threshold of significance requiring a 15 percent reduction in VMT per capita as compared to existing conditions. Therefore, there is a cumulative impact.

The proposed Circulation Element Update would have a cumulatively considerable contribution to the cumulative impact even with implementation of MM TRANS-2a, MM TRANS-2b, and MMTRANS-2c that require procedures for future individual development projects as well as mitigation measures for future projects consistent with the General Plan. Therefore, development associated with the General Plan would result in a significant and unavoidable VMT impact and the proposed Circulation Element Update's incremental contribution to the cumulative impact is significant. Accordingly, development consistent with the proposed Circulation Element Update would have a cumulatively considerable contribution to cumulative VMT impacts even with implementation of identified mitigation measures, resulting in a significant and unavoidable cumulative impact related to VMT.

Design Hazards and Emergency Access

The geographic scope for design hazards and emergency access is limited to the City's Planning Area. Past, present, and reasonably foreseeable development is submitted to police and fire for review and approval to ensure adequate emergency access. Accordingly, cumulative impacts are less than significant. Moreover, the proposed Circulation Element Update's incremental contribution to the less than significant impact would not be cumulatively considerable. As discussed under Impact TRANS-3, the proposed Circulation Element Update would not substantially increase design hazards due to a geometric design feature or incompatible uses, and, as discussed under Impact TRANS-4, the proposed Circulation Element Update would not result in inadequate emergency access. Therefore, impacts of the proposed Circulation Element Update's contribution to cumulative design hazards and emergency access impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Implement MM TRANS-2a and MM TRANS-2b.

Level of Cumulative Significance After Mitigation

Significant and unavoidable impact.

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CHAPTER 4: EFFECTS FOUND NOT TO BE SIGNIFICANT

4.1 - Introduction

This chapter is based on the Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) Notice of Preparation (NOP), dated January 31, 2024, and contained in Appendix A of this Draft Subsequent EIR. The NOP was prepared to identify the potentially significant effects of the proposed General Plan Circulation Element Update Project (Circulation Element Update) and was circulated for public review between January 31, 2024, and March 1, 2024. In the course of the NOP evaluation, certain impacts were found to be less than significant because implementation of the proposed Circulation Element Update would not result in such impacts. This chapter provides a brief description of effects found not to be significant or less than significant based on the NOP, NOP public comments received, or more detailed analysis conducted as part of the Draft Subsequent EIR preparation process. Note that Transportation and Traffic impacts that are found to be less than significant are addressed in Section 3.1 of this Draft Subsequent EIR to provide more comprehensive discussion of why impacts are less than significant and to better inform decision-makers and the general public.

4.2 - Environmental Effects Found not to be Significant

4.2.1 - Aesthetics, Light, and Glare

The proposed Circulation Element Update is limited to policy changes and does not propose any specific development or physical environmental changes. Therefore, it does not have the potential to result in a substantial adverse effect on a scenic vista or a scenic highway, degrade existing visual character or quality of a specific project site, or create new sources of light and glare. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.2 - Agriculture Resources and Forestry Resources

The proposed Circulation Element Update is limited to policy changes and does not propose any specific development or physical environmental changes. Therefore, the proposed Circulation Element Update would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; conflict with existing zoning for agricultural use; impact any site subject to a Williamson Act Contract; result in a conversion of farmland to nonagricultural use; result in the loss of forest land; convert forest land to non-forest use; or impact farmland or land designated as forest land. Therefore, the proposed Circulation Element Update would have no impact on farmland or forest land and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.3 - Air Quality

The proposed Circulation Element Update is limited to policy changes and does not propose any specific development or physical environmental changes. The purpose of these policies is to improve circulation throughout the City as well as reduce Vehicle Miles Traveled (VMT), which would have at least a minimal reduction in mobile source emissions. These conditions preclude the possibility of impacts on air quality. Furthermore, the proposed Circulation Element Update would not include the

development of odor-producing land uses and would not increase criteria pollutants or pollutant concentrations because no development would occur. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.4 - Biological Resources

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. This type of policy change would not have the potential to impact candidate, sensitive, or special-status species, wetlands, wildlife corridors, or an adopted Habitat Conservation Plan (HCP)/Natural Communities Conservation Plan (NCCP) since it would not result in site-specific physical changes. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.5 - Cultural Resources

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. As such, this type of policy change would not have the potential to impact historical resources, archaeological resources, or human remains. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.6 - Energy

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. This type of policy change would not have the potential to result in environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources and would not have the potential to conflict with or obstruct a plan for renewable energy or energy efficiency. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.7 - Geology, Soils, and Seismicity

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. This type of policy change would not have the potential to result in physical changes that would be impacted by a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, or other geologic conditions, such as ground shaking, liquefaction, landslides, soil erosion, or subsidence. Furthermore, there are no documented fault zones, liquefaction zones, or landslide zones located within the City.[1] Therefore, no impact would occur and this topic will not be reviewed further in the Draft Subsequent EIR.

[1] California Department of Conservation. 2021. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 1, 2024.

4.2.8 - Greenhouse Gas Emissions

The proposed Circulation Element Update is limited to policy changes and does not propose any specific development, physical environmental changes, or ground-disturbing activities. The purpose of these policies is to improve circulation throughout the City and to reduce impacts related to VMT, which would have at least a minimal reduction in mobile source emissions. These conditions preclude the possibility of impacts on greenhouse gas (GHG) emissions. Therefore, no impact would occur and this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.9 - Hazards and Hazardous Materials

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. Therefore, the proposed Circulation Element Update would not result in impacts related to the release of or exposure to a hazard or hazardous material due to the routine transport, use, or disposal of hazardous materials; accidental release of hazardous materials; emitting or handling hazardous materials within 0.25 mile of a school; locating development within an airport land use plan or on sites listed on the Cortese List; impairing implementation of an emergency response plan; and/or exposure to risks involving wildland fires. Therefore, no impact would occur and this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.10 - Hydrology and Water Quality

The proposed Circulation Element Update does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. Therefore, this type of policy change does not have the potential to result in physical changes that would result in water quality impacts due to erosion or flooding or in groundwater or groundwater quality impacts. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.11 - Land Use

The proposed Circulation Element Update is limited to policy changes and does not propose any changes in land use or zoning designations, nor does it propose any specific development, physical environmental changes, or ground-disturbing activities. These conditions preclude the possibility for impacts related to physically dividing an established community or causing a significant environmental impact due to a conflict with land use plans, policies, or regulations adopted to avoid or mitigate environmental effects. Therefore, this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.12 - Mineral Resources

The proposed Circulation Element Update does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. Therefore, the proposed Circulation Element would not impact mineral resources that would be of value to the region or the residents of the State and this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.13 - Noise

The proposed Circulation Element Update is limited to policy changes and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. Implementation of the proposed Circulation Element Update would not generate temporary or permanent increases in ambient noise level, generate excessive groundborne vibration or noise levels, or expose people residing or working in the City to excessive noise levels from public or private airstrips because no physical development would occur. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.14 - Population and Housing

The proposed Circulation Element Update is a policy-level document which does not propose new residential or business uses within the City. Implementation of the proposed Circulation Element Update would not induce substantial population growth either directly or indirectly, involve the displacement of existing housing, or involve the displacement of substantial numbers of people, thereby necessitating the construction of replacement housing. Therefore, no impact would occur and this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.15 - Public Services and Utilities

The proposed Circulation Element Update is a policy-level document and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. As such, the proposed Circulation Element Update would not have the potential to create the need for additional services for fire protection, police protection, schools, parks, and other public facilities, such as libraries. Therefore, no impact would occur and this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.16 - Recreation

The proposed Circulation Element Update is a policy-level document and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. As such, the proposed Circulation Element Update would not directly create a demand for recreation facilities, nor will it contribute to the deterioration of existing recreational facilities. No impact on existing recreational facilities is projected to occur. Therefore, this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.17 - Tribal Cultural Resources

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. As such, this type of policy change would not have the potential to impact Tribal Cultural Resources (TCRs) defined in Public Resources Code Section 21074, listed or eligible for listing in the California Register of Historical Resources (CRHR), or determined to be significant by the Lead Agency. Therefore, no impact would occur and these topics will not be reviewed further in this Draft Subsequent EIR.

4.2.18 - Utilities and Service Systems

The proposed Circulation Element Update is a policy-level document and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. Therefore, the proposed Circulation Element does not have the potential to result in physical changes or create new development that would result in the need for or impact existing utilities and service systems, such as water, wastewater, stormwater, telecommunications, or electricity facilities and/or providers. As such, no impact would occur and this topic will not be reviewed further in this Draft Subsequent EIR.

4.2.19 - Wildfire

The proposed Circulation Element Update is limited to policy updates and does not propose or entitle any specific development, physical environmental changes, or ground-disturbing activities. Therefore, the proposed Circulation Element Update would not have the potential to substantially impair an adopted emergency response plan, exacerbate wildfire risks, expose residents to pollutant concentrations from a wildfire, or require the installation of infrastructure that would exacerbate fire risks. There would be no impacts and this topic will not be reviewed further in the Draft Subsequent EIR.

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CHAPTER 5: OTHER CEQA CONSIDERATIONS

California Environmental Quality Act (CEQA) Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) must also identify: (1) significant environmental effects of the proposed Circulation Element Update; (2) significant environmental effects which cannot be avoided if the proposed Circulation Element Update would be implemented; (3) significant irreversible environmental changes which would be involved in the proposed Circulation Element Update should it be implemented; (4) growth-inducing impacts of the proposed Circulation Element Update; (5) mitigation measures proposed to minimize the significant effects; and (6) alternatives to the proposed Circulation Element Update.

This chapter provides a discussion of other CEQA-mandated topics, including significant unavoidable impacts, growth-inducing impacts, mandatory findings of significance, and significant irreversible environmental changes which would be involved in the proposed Circulation Element Update should it be implemented. Chapter 3, Environmental Impact Analysis, describes the significant environmental effects of the proposed Circulation Element Update and provides mitigation measures proposed to minimize significant effects. Chapter 6, Alternatives to the Proposed Project, discusses alternatives to the proposed Circulation Element Update.

5.1 - Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(a)(c) requires an EIR to identify and focus on the significant environmental effects of the proposed Circulation Element Update, including effects that cannot be avoided if the proposed Circulation Element Update should be implemented.

The proposed Circulation Element Update would result in the following significant unavoidable impacts:

- **Project-level Vehicle Miles Traveled:** While the proposed Circulation Element Update would result in decreases for Home-based Vehicle Miles Traveled (VMT) per Resident, Home-based Work VMT per Employee, and VMT per Service Population, the expected VMT per Service Population would not fall below the 15 percent VMT reduction threshold. As such, Mitigation Measure (MM) TRANS-2a, TRANS-2b, and TRANS-2c would require future individual development projects that do not screen out from a VMT impact analysis to provide a quantitative VMT analysis. If results indicate that the VMT associated with the individual development project would be above the threshold, it would be required to mitigate to a less than significant level. Projects consistent with the General Plan would be required to implement a Transportation Demand Management (TDM) Program and/or a Regional VMT impact fee program (when it is available). Because the effectiveness of the TDM measures for future individual development projects cannot be quantified in this analysis and the VMT impact fee program is not yet in place, the impact would remain significant and unavoidable.

- **Cumulative Vehicle Miles Traveled:** Cumulative projects in the City and County will generate new VMT, which would be added to the roadway network within the geographic context. All cumulative projects would be reviewed for compliance with applicable federal, State, and local regulations, including General Plan policies that address VMT, as well as mitigate their fair share of impacts related to VMT. Nonetheless, the proposed Circulation Element Update, in conjunction with other reasonably foreseeable past, present, and future projects, would have a cumulatively significant impact related to VMT. Development consistent with the General Plan and the proposed Circulation Element Update would result in a significant and unavoidable cumulatively considerable contribution to the existing cumulative VMT impact, creating a potentially significant impact. Even with the incorporation of MM TRANS-2a, MM TRANS-2b, and MM TRANS-2c, the City may not achieve the overall VMT threshold reduction level due to uncertainty in the cumulative effectiveness of the measures included in MM TRANS-2a MM TRANS-2b, and MM TRANS-2c as well as unknowns related to transit service levels, transportation technology, and travel behavior. Moreover, these policies and measures primarily apply to new developments; existing land uses that have already been approved and are under construction are generally not affected. Because of the programmatic nature of the proposed Circulation Element Update, no additional mitigation measures are available and the cumulative impact is considered significant and unavoidable.

5.2 - Growth-inducing Impacts

There are two types of growth-inducing impacts that a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines § 15126.2(e)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if the project would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing unplanned population growth or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the developments they facilitate and serve. Projects that physically remove obstacles to

growth, or projects that indirectly induce growth, may provide a catalyst for future unrelated development in an area, such as a new residential community that requires additional commercial uses to support residents.

The City had 3,239 total housing units as if 2019 (the most recent available data).[1] The proposed Circulation Element Update does not propose or entitle any specific development that would directly increase growth. Additionally, the proposed Circulation Element Update does not anticipate any new housing units as a result of its implementation. Under the proposed Circulation Element Update, development and growth within the City would continue to occur according to the City's adopted General Plan, which planned for up to 4,700 housing units and 12,000 residents in 2025.[2] Therefore, the proposed Circulation Element Update would not result in direct population growth and no impacts would occur.

The City currently has 1,849 jobs and approximately 4,039 residents in the workforce.[3] Because the proposed Circulation Element Update would not include specific development, such as new businesses or infrastructure, implementation of the proposed Circulation Element would not result in indirect population growth and no impacts would occur.

5.3 - Mandatory Findings of Significance

Public Resources Code Section 21083 requires lead agencies to make a finding of a "significant effect on the environment" if one or more of the following conditions exist:

1) A project has the potential to degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.
2) The possible effects of a project are individually limited but cumulatively considerable.
3) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Finding No. 1: No impact.

The proposed Circulation Element Update does not propose or entitle any specific site development, physical environmental changes, or ground-disturbing activities. Therefore, the proposed Circulation Element Update would not have the potential to degrade the quality of the environment, reduce fish and wildlife habitat, threaten to eliminate a plant or animal community, or eliminate important examples of the major periods of history or prehistory.

[1] City of Cloverdale. 2023. City of Cloverdale Housing Element Update 2023-2031: Technical Background Report and Appendices. September 26.
[2] City of Cloverdale. 2009. General Plan. May 13. Amended January 28, 2015.
[3] City of Cloverdale. 2023. City of Cloverdale Adopted Housing Element Update, 2023-2031. September 26.

Finding No. 2: Significant and unavoidable impact.

As discussed in Section 3.1, Transportation and Traffic, of this Draft Subsequent EIR, the proposed Circulation Element Update would have less than significant cumulative impacts related to transportation and traffic, with the exception of project-level and cumulative VMT impacts. The proposed Circulation Element Update would result in significant and unavoidable impacts related to VMT, both at the project level and cumulatively.

The proposed Circulation Element Update does not propose or entitle any specific site development, physical environmental changes, or ground-disturbing activities. Accordingly, as discussed in Chapter 4, Effects Found not to be Significant, no impacts were found related to Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas (GHG) Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Mineral Resources, Population and Housing, Public Services and Utilities, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Therefore, these aforementioned topical areas would have no cumulative impacts.

Finding No. 3: No impact.

The proposed Circulation Element Update does not propose or entitle any specific site development, physical environmental changes, or ground-disturbing activities. Future development in the City would continue to occur in accordance with the City's adopted General Plan and individual projects would undergo environmental review pursuant to CEQA and would implement applicable mitigation measures to reduce substantial adverse effects on human beings. Furthermore, the proposed Circulation Element Update would include new goals and policies related to VMT analysis and reductions considering the City's Climate Emergency Declaration (Resolution Number 91-2019), thereby reducing impacts related to GHG emissions and corresponding indirect adverse impacts on human beings. Therefore, the proposed Circulation Element Update would not have an adverse impact on human beings.

5.4 - Significant Irreversible Environmental Changes

As mandated by State CEQA Guidelines Section 15126.2(d), the Draft Subsequent EIR must address significant irreversible environmental changes which would be caused by the proposed Circulation Element Update should it be implemented. Specifically, such an irreversible change would occur if:

- The proposed Circulation Element Update would involve a large commitment of nonrenewable resources;
- Primary and secondary impacts would generally commit future generations to similar uses;
- The proposed Circulation Element Update involves uses in which irreversible damage could result from any potential environmental accidents associated with the proposed Circulation Element Update; or
- The proposed consumption of resources is not justified (e.g., the proposed Circulation Element Update results in wasteful use of energy).

Under the proposed Circulation Element Update, development and growth within the City would continue to occur according to the City's adopted General Plan. No site-specific development or physical environmental changes would occur. As such, the proposed Circulation Element Update would not include the consumption of resources that are not replenishable or which may renew so slowly to be considered nonrenewable. The proposed Circulation Element Update also encourages transit-oriented development consistent with the policies adopted within the General Plan to reduce impacts related to consumption of nonrenewable resources.

Implementation of the proposed Circulation Element Update would not result in an irreversible commitment of existing land uses to new land uses because no land use changes are proposed. Therefore, future generations would not be committed to changes in land uses as a result of this project and no irreversible long-term environmental changes would occur related to land use.

The proposed Circulation Element Update includes goals and policies to reduce automobile dependency and reduce energy consumption and GHG emissions, such as Goal CE 5, Policy CE 5-4, and Policy CE 5-5, which encourage alternative transportation and public transit services. Future development under the proposed Circulation Element Update would be required to comply with the City's policies related to energy preservation and conservation, meeting State energy efficiency regulations that include Title 24 Part 6 building energy efficiency standards that require new residential uses to meet a net zero energy use standard, which is met through installation of rooftop solar photovoltaics (PV) systems, enhanced insulation, and energy-efficient appliances. Since development and growth within the City would continue to occur according to the City's adopted General Plan, the proposed Circulation Element Update would not result in a wasteful use of energy or an unjustified consumption of resources.

In fact, the proposed Circulation Element Update would likely be beneficial in the conservation of energy and nonrenewable resources. The proposed goals and policies would reduce energy use through increasing vehicle efficiency and encouraging transit-oriented development. Therefore, the proposed Circulation Element Update does not include any development that would entail a wasteful commitment of energy or nonrenewable resources. The proposed Circulation Element Update would likely reduce long-term energy demand and the corresponding impacts.

The proposed Circulation Element Update would not have the potential to cause significant environmental accidents through hazardous material releases into the environment because it does not propose or entitle any specific development. While there are two active Cleanup and Abatement Orders listed on the Cortese List within the City, the proposed Circulation Element Update does not propose or entitle any development on these sites. Two areas on the western boundary of the City are classified as Very High Fire Hazard Severity Zones (VHFHSZ) within a Local Responsibility Area (LRA), and there is one portion of the City within a Moderate Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area (SRA). However, the proposed Circulation Element Update does not propose or entitle any development within these FHSZs. Therefore, the proposed Circulation Element Update would not involve uses in which irreversible damage could result from any potential environmental accidents.

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CHAPTER 6: ALTERNATIVES TO THE PROPOSED PROJECT

6.1 - Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this Draft Subsequent Environmental Impact Report (Draft Subsequent EIR) contains a comparative impact assessment of alternatives to the proposed General Plan Circulation Element Update Project (Circulation Element Update). The primary purpose of this section is to provide decision-makers and the general public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives while avoiding or reducing any of the proposed Circulation Element Update's significant adverse environmental effects. Important considerations for these alternatives analyses are noted below (as stated in CEQA Guidelines § 15126.6).

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives;
  - Infeasibility; or
  - Inability to avoid significant environmental effects.

6.1.1 - Significant Unavoidable Impacts

The proposed Circulation Element Update would result in the following significant unavoidable impacts:

- **Project-level Vehicle Miles Traveled:** While the proposed Circulation Element Update would result in decreases for Home-based Vehicle Miles Traveled (VMT) per Resident, Home-based Work VMT per Employee, and VMT per Service Population, the expected VMT per Service Population would not fall below the 15 percent VMT reduction threshold. As such, Mitigation Measure (MM) TRANS-2a, MM TRANS-2b, and MM TRANS-2c would require future individual development projects that do not screen out from a VMT impact analysis to provide a quantitative VMT analysis. If results indicate that the VMT associated with the individual development project would be above the threshold, it would be required to mitigate to a less than significant level. Projects consistent with the General Plan would be required to implement a Transportation Demand Management (TDM) Program and/or a regional VMT impact fee program (when it is available). Because the effectiveness of the TDM measures for future individual development projects cannot be quantified in this analysis and the VMT impact fee program is not yet in place, the impact would remain significant and unavoidable.
- **Cumulative Vehicle Miles Traveled:** Cumulative projects in the City and County will generate new VMT, which would be added to the roadway network within the geographic context. All cumulative projects would be reviewed for compliance with applicable federal, State, and local regulations, including General Plan policies that address VMT, as well as to mitigate their

fair share of impacts related to VMT. Nonetheless, the proposed Circulation Element Update, in conjunction with other reasonably foreseeable past, present, and future projects, would have a cumulatively significant impact related to VMT. Development consistent with the General Plan and the proposed Circulation Element Update would result in a significant and unavoidable cumulatively considerable contribution to the existing cumulative VMT impact, creating a potentially significant impact. Even with the incorporation of MM TRANS-2a, MM TRANS-2b, and MM TRANS-2c, the City may not achieve the overall VMT threshold reduction level due to uncertainty in the cumulative effectiveness of the measures included in MM TRANS-2a, MM TRANS-2b, and MM TRANS-2c as well as unknowns related to transit service levels, transportation technology, and travel behavior. Moreover, these policies and measures primarily apply to new developments; existing land uses that have already been approved and are under construction are generally not affected. Because of the programmatic nature of the proposed Circulation Element Update, no additional mitigation measures are available, and the cumulative impact is considered significant and unavoidable.

6.1.2 - Alternatives to the Proposed Project

Several Alternatives were considered for the proposed Circulation Element Update, the majority of which were rejected due to lack of feasibility. See Section 6.7 for more information. One alternative to the proposed Circulation Element Update is analyzed in this section is as follows:

- **No Project Alternative/Existing Circulation Element:** Under the No Project Alternative/Existing Circulation Element, the Circulation Element would not be updated with new policies and no General Plan Amendment would occur. Future development and land uses would occur in accordance with the current Circulation Element policies. Under this alternative, the current goals, policies, and actions would remain in place.

The alternative analysis compares the impacts of the alternative to those of the proposed Circulation Element Update. In several cases, the description of the impact may be the same under the alternative when compared with the CEQA Thresholds of Significance (i.e., both the project and the alternative would result in a less than significant impact). The actual degree of impact may be slightly different between the proposed Circulation Element Update and the alternative, and this relative difference is the basis for a conclusion of greater or lesser impacts.

6.2 - Project Objectives

The underlying purpose of the proposed Circulation Element Update is to address the current and future needs of residents, businesses, employees, and visitors to the City. As stated in Chapter 2, Project Description, the objectives of the proposed Circulation Element Update are to:

- Update City policies in the Circulation Element to comply with State law, including State regulations related to conformance with SB 743.
- Support the City's compliance with State-mandated requirements to implement Complete Streets and make efforts to reduce VMT in the community.

- Implement Complete Streets throughout the City.
- Recognize the importance of reducing VMT in the City.
- Encourage the range of options for travel to work, shopping, and leisure destinations.
- Prioritize the efficiency of goods movement.
- Adopt policies that guide the direction of physical development in the City in a way that encourages economic vitality and promotes quality of life.

6.3 - Alternative 1—No Project Alternative/Existing Circulation Element

Under the No Project Alternative, the Circulation Element would not be updated with new policies and no General Plan Amendment would occur. Future development and land uses would occur in accordance with the current Circulation Element policies. Under this alternative, the current goals, policies, and actions would remain in place.

6.3.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to aesthetics, light, and glare because the proposed Circulation Element Update does not propose or entitle any specific development. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect aesthetics, light, or glare. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Agriculture Resources

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to agriculture resources because the proposed Circulation Element Update does not propose or entitle any specific development or physical environmental changes. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect agriculture resources. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Air Quality

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to air quality because the proposed Circulation Element Update does not propose or entitle any specific development or physical environmental changes. Similarly, the No Project Alternative/Existing Circulation Element does not propose or entitle any specific development of physical environmental changes. However, this alternative would not include updates that would result in reductions in mobile source emissions related to VMT. Therefore, while this alternative would result in no impact (similar to the proposed

Circulation Element Update), the benefits of air quality impact reductions would not be realized and, as such, the project objectives would not be realized.

Biological Resources

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to biological resources because the proposed Circulation Element Update does not propose or entitle any specific development or ground-disturbing activities. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect biological resources. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Cultural Resources

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to cultural resources because the proposed Circulation Element Update does not propose or entitle any specific development or ground-disturbing activities. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect cultural resources. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Energy

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to energy because the proposed Circulation Element Update does not propose or entitle any specific development. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect energy. However, this alternative would not include updates that would result in reductions in VMT, which would also decrease the use of fuel and other energy sources. Therefore, while this alternative would result in no impact (similar to the proposed Circulation Element Update) the benefits of energy reductions would not be realized and, as such, the project objectives would not be realized.

Geology, Soils, and Seismicity

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to geology, soils, and seismicity because the proposed Circulation Element Update does not propose or entitle any specific development or ground-disturbing activities. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect geology, soils, and seismicity. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Greenhouse Gas Emissions

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to greenhouse gas (GHG) emissions because the proposed Circulation Element Update does not propose or entitle any specific development. However, this alternative would not include updates that would result in reductions in in VMT and mobile source emissions. Therefore, while this alternative would result in no impact (similar to the proposed Circulation Element Update) the benefits of GHG emissions reductions would not be realized and, as such, the project objectives would not be realized.

Hazards and Hazardous Materials

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to hazards and hazardous materials because the proposed Circulation Element Update does not propose or entitle any specific development or physical environmental changes. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect hazards and hazardous materials. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Hydrology and Water Quality

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to hydrology and water quality because the proposed Circulation Element Update does not propose or entitle any specific development or ground-disturbing activities. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect hydrology and water quality. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Land Use and Planning

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to land use because the proposed Circulation Element Update does not propose or entitle any specific development or land use changes. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect land use and planning. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Noise

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to noise because the proposed Circulation Element Update does not propose or entitle any specific development or physical environmental changes. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect noise. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Public Services

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to public services because the proposed Circulation Element Update does not propose or entitle any specific development. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect public services. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Transportation

As noted in Section 3.1, Transportation and Traffic, of this Draft Subsequent EIR, the proposed Circulation Element Update would have less than significant impacts related to consistency with programs, plans, ordinances, and policies of the circulation system, hazards due to geometric design features or incompatible uses, and emergency access. However, the proposed Circulation Element Update would have significant and unavoidable impacts related to VMT, both at the project level and cumulatively. The proposed Circulation Element Update would result in reductions in VMT at 2040 General Plan buildout compared to the 2024 baseline estimates. The No Project Alternative/Existing Circulation Element does not propose or entitle any specific development of physical environmental changes. However, this alternative would not include updates that would result in reductions in mobile source emissions related to VMT. Therefore, while this alternative would result in no impact (similar to the proposed Circulation Element Update), the benefits of air quality impact reductions would not be realized and, as such, the project objectives would not be realized.

Tribal Cultural Resources

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to Tribal Cultural Resources (TCRs) because the proposed Circulation Element Update does not propose or entitle any specific development or ground-disturbing activities. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect TCRs. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Utilities and Service Systems

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to utilities and service systems because the proposed Circulation Element Update does not propose or entitle any specific development. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect utilities and service systems. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

Wildfire

As noted in Chapter 4, Effects Found not to be Significant, of this Draft Subsequent EIR, the proposed Circulation Element Update would not have impacts related to wildfire because the proposed Circulation Element Update does not propose or entitle any specific development or ground-

disturbing activities. The No Project Alternative/Existing Circulation Element would maintain current policies and would not propose any physical development that could affect wildfire. As such, the No Project Alternative/Existing Circulation Element would similarly result in no impacts.

6.3.2 - Conclusion

The No Project Alternative/Existing Circulation Element would have similar impacts to the proposed Circulation Element Update's no impact conclusion associated with aesthetics, light, and glare; agriculture resources; air quality; biological resources; cultural resources; energy; geology, soils, and seismicity; GHG emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; utilities and service systems; and wildfire. Similarly, the No Project Alternative/Existing Circulation Element does not propose or entitle any specific development of physical environmental changes. However, this alternative would not include updates that would result in reductions in mobile source emissions related to VMT. Therefore, while this alternative would result in no impact (similar to the proposed Circulation Element Update), the benefits of air quality impact reductions would not be realized and, as such, the project objectives would not be realized. Furthermore, the No Project Alternative/Existing Circulation Element would result in unrealized project objectives.

6.4 - Environmentally Superior Alternative

The qualitative environmental effects of each alternative in relation to the proposed Circulation Element Update are summarized in Table 6-1.

Table 6-1: Summary of Alternatives

Environmental Topic Area	No Project Alternative/Existing Circulation Element
Aesthetics, Light, and Glare	=
Agriculture Resources	=
Air Quality	≥
Biological Resources	=
Cultural Resources and Tribal Cultural Resources	=
Energy	≥
Geology, Soils, and Seismicity	=
Greenhouse Gas Emissions	≥
Hazards and Hazardous Materials	=
Hydrology and Water Quality	=
Land Use	=
Minerals	=
Noise	=

Environmental Topic Area	No Project Alternative/Existing Circulation Element
Population and Housing	=
Public Services	=
Transportation	≥
Utilities	=
Wildfire	=

Notes:
= = Impact is similar to the proposed Circulation Element Update
≤ = Impact is less than or equal to the proposed Circulation Element Update
≥ = Impact is greater than or equal to the proposed Circulation Element Update

Source: FirstCarbon Solutions (FCS). 2024.

CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the No Project Alternative is environmentally superior, CEQA requires selection of the "environmentally superior alternative other than the No Project Alternative" from among the project and the alternatives evaluated.

As described above, the No Project Alternative/Existing Circulation Element would result in similar, but greater, impacts related to transportation and traffic, air quality, energy, and GHG emissions than the proposed Circulation Element Update. As such, the No Project Alternative/Existing Circulation Element would be environmentally inferior to the proposed Circulation Element Update. Furthermore, as described below, there are no other feasible alternatives that would reduce impacts as compared to the proposed Circulation Element Update.

6.5 - Alternatives Rejected From Further Consideration

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible for detailed study, and briefly explain the reasons underlying the lead agency's determination. Furthermore, Section 15126(f)(1) states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries . . . " and whether the proponent can reasonably acquire or control or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

6.5.1 - Employment and Population Growth Alternative

An alternative that included land use changes to increase residential units and employment centers in the same areas was considered; however, this alternative was deemed infeasible because it is outside of the scope of the proposed Circulation Element Update, requiring updates to other General Plan Elements. This alternative would include changes to the land use designations of the General Plan in order to ensure population and employment growth within the City, thereby

reducing VMT for residents and employees who regularly shop and work outside of the city limits. However, this alternative was rejected from further consideration because the proposed Circulation Element Update would only include policy changes to the Circulation Element of the General Plan and would not have the ability to develop or enforce land use changes within the City.

6.5.2 - Major Transit Enhancement Alternative

The potential for City funding of a regional transit system composed of regional bus service and local funding of construction of the Sonoma-Marin Area Rail Transit (SMART) extension to Cloverdale was considered; however, this alternative was deemed infeasible. The proposed Circulation Element Update cannot guarantee the construction and operation of the SMART extension, although the City would support the extension and future grant-funding opportunities. A regional transit system expansion to serve the City would come with high costs and require substantial further coordination with other agencies. Funding for the regional transit expansion is uncertain and may be infeasible. As such, this alternative was rejected from further consideration.

6.5.3 - Alternative Location

CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that if a lead agency concludes that no feasible alternative locations exist for the proposed action, it must disclose its reasons for that conclusion. In this case, an alternative location does not constitute a feasible alternative because the project in question consists of a proposed Circulation Element Update, which would update the City's General Plan. A General Plan serves as the comprehensive land use planning document for the jurisdiction that adopts it; as such, the geographical area encompassed by the plan is an immutable, fundamental characteristic. Thus, it is not possible to evaluate an alternative location for the proposed Circulation Element Update.

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CHAPTER 7: PERSONS AND ORGANIZATIONS CONSULTED/LIST OF PREPARERS

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