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MEMORANDUM

From: Thomas A. Robertson

To: Adam Ross, Sr. Planner, City of Santa Rosa Planning Division

Re: Specific Plan Consistency Analysis for 425 Humboldt Project

INTRODUCTION

A. The Santa Rosa Downtown Station Area Specific Plan adopted October 2020 (“Specific Plan”) lays out plans for development of the approximately 720 acres that comprise the City of Santa Rosa’s downtown (“Plan Area”); Specific Plan, 1-2. The Specific Plan designated the Plan Area as a Priority Development Area. Specific Plan, 1-4. A major goal of the Specific Plan is to increase the residential uses and employment within walking distance of the Sonoma-Marín Area Rail Transit station (“SMART”) in Railroad Square and the city and county Transit Mall through intensified land use in the Plan Area. Specific Plan, 1-5. The new Specific Plan seeks to concentrate development to create a vibrant city center, enhancing its character with diverse uses, transit-oriented residential development, and pedestrian-friendly connections. Id.

B. The 425 Humboldt Street Project Description

425 Humboldt, LLC seeks design review approval for a multi-family mixed-use project located at 425 Humboldt Street between Riley and Humboldt Streets in Santa Rosa’s downtown (the “Project”). The Project includes a two-story parking podium with stalls for 71 cars and six residential floors in two towers above with 94 dwelling units. There is 2,000 s.f., two level commercial space located off the main lobby on Humboldt Street. The garage’s two access points are along the building’s westerly facade along Riley Street.

The Project location is within the Plan Area; specifically it is located in the Courthouse Square Sub-Area two and one half blocks north of Courthouse Square and one half block north Fifth Street. The Courthouse Square Sub-Area is the commercial heart of downtown of Santa Rosa, a major employment, retail and government center, as well as the location of SMART and the Transit Mall for the city and entire county. Specific Plan, Map INTRO 1: Planning Area, 1-3.

We have reviewed the Specific Plan and offer for consideration the following analysis of the Project's consistency with the applicable goals and policies set according to the Specific Plan.

### C. PROJECT ANALYSIS

The Project's compatibility with the applicable goals, objectives, and policies of the Specific Plan is set forth below in the Consistency Analysis with the Specific Plan.

The Project furthers the Specific Plan's goal of diverse uses by adding 94 new residential units which will support a wide range of existing and potentially new services and amenities. Specific Plan, 2-4. A larger residential base will generate increased transit use, including for city and county bus lines and the SMART line. The Project adds to the range of dwelling choices available. The Project is located less than one half mile from the downtown transit hub and within a 1/2 mile of SMART's downtown station. Major City of Santa Rosa bus lines runs north and south on B Street two blocks west of the Project.

A major Specific Plan goal is substantially more housing. Id. (RA 2) The land use designation for the Sub-Area also is Retail & Business Services, (RA3) including restaurants. (Id). (RA4) The Project will support the Specific Plan Land Use Chapter because it adds high-density housing. Specific Plan, 2-4.

The front entrance of the Project faces Humboldt Street, which is categorized as an "Avenue." It offers access to Fourth Street, the main downtown commercial street, and to the Cherry Street Neighborhood to the north. The Project's garage is accessed from Riley Street. Riley is categorized as a "Minor Street" and is essentially a service alleyway for access to the rear of commercial businesses along Mendocino Avenue and their associated parking, as well as to residential buildings on the easterly side of Riley near Seventh Street. The Project is consistent with these street types and their current and future uses.

The Project is consistent with the relevant goals, objectives, and policies of the Specific Plan; Specific Plan, 1-4. It complies with the guidelines for private development and existing uses along Humboldt Street; Specific Plan, Figure L-1:Existing Land Use, 2-3, 2-4.

The Project is consistent with the updated parking policies; Specific Plan, 3-19 and 3-20. It is one block from City of Santa Rosa Garage #3 with 708 parking spaces. Both sides of Humboldt and Riley Streets have metered on street spaces. Residents may park for free from 6 p.m. to 9 a.m., outside working hours and when such parking will be most needed. Because it has a parking deficit of over 23 spaces (71 space garage for 94 residential units and no onsite parking for its 1,500 s.f. commercial space) it requires unbundled parking that will increase the use of the nearby city garage, transit, and encourage walking and bicycle use.

The Specific Plan identifies required utilities and public services for the Plan Area. Some utility and public service goals may require the Project applicant to contribute monetarily to infrastructure, such as undergrounding overhead utility lines and widening sidewalks.

The Project generally will be consistent with all Specific Plan’s goals and policies and will comply with all conditions set forth as part of Project’s entitlements.

#### CONSISTENCY ANALYSIS WITH DOWNTOWN AREA SPECIFIC PLAN

Goals, Policies, and Guidelines	Consistency Determination	Analysis
Land Use		
Goal SP-LU-1: Ensure land uses that promote use of transit.	CONSISTENT	The Project site is located within ¼ mile of the the downtown Transit Mall and within 1/2 mile of SMART. There are bus lines with stops two blocks west on B Street. It is likely to increase transit use.
<ul style="list-style-type: none"> <li>• Policy SP-LU-1.2: Improve pedestrian, bicycle and bus transit connections from surrounding areas to the Downtown SMART station site as well as between neighborhoods surrounding the SMART station site.</li> </ul>	CONSISTENT	The Project is within walking distance of both the downtown SMART station and the downtown Transit Mall. It will have parking for 24 bicycles in a secure room with room to expand that number. It is directly on the Humboldt Street, Class II bike route, linking it to Class III bike routes that extend both to the SMART and the Transit Mall. The Project is also two blocks from major bus lines on B Street.
<ul style="list-style-type: none"> <li>• Policy SP-LU-1.3: Create pedestrian friendly environments and provide convenient connections to the transit facility for all modes of transportation.</li> </ul>	CONSISTENT	The Project is within walking distance of the downtown SMART station and the Transit Mall. The Project’s units, with street-facing windows and balconies, and the Humboldt Street Commercial space, along with its lobby, will create “eyes on the street” and improve pedestrian safety on Humboldt and Riley Streets. The Project is served by nearby Class II and

		Class III bike routes crossing the downtown to the SMART Station and the Transit Mall, and a Class II north south bike lane on Humboldt Street connecting the Project with neighborhoods to the north and major employment centers such as Santa Rosa Community College, the County of Sonoma Administrative Center, and the Kaiser Permanente hospital and clinics.
Goal SP-LU-2: Encourage variety in new housing development.	CONSISTENT	As proposed, the Project is an eight-story, multi-family, mixed-use development with 94 dwelling units and a commercial space. The downtown is badly in need of market rate housing and residents with median or higher incomes who can patronize downtown retail shops and restaurants to improve a downtown economy badly hurt by the recent wildfires and the pandemic.
• Policy SP-LU-2.1: Provide a variety of housing types and densities in the Specific Plan Area.	CONSISTENT	As proposed, the Project is an eight-story, multi-family, mixed-use development consisting of 94 market rate dwelling units on a 0.508-acre site, or 168 dwelling units per acre.
• Policy SP-LU-2.3: Utilize existing City programs and policies to encourage and facilitate development of affordable housing within the Specific Plan Area	CONSISTENT	The Project offers market rate units. The Project’s sponsors will pay in lieu fees for low and moderate income housing and also hope to offer some workforce housing as defined by the Redevelopment Enterprise District grant guidelines.
Goal SP-LU-3: Encourage new development that incorporates sustainable building principles.	CONSISTENT	All appliances will be Energy Star-rated. Plumbing fixtures will be low-flow. Kitchen appliances and heating will be electric only. LED lighting will be installed throughout Project. The mass timber structural components minimize construction waste and maximize construction efficiency. Mass timber construction shortens the construction period and, because it is manufactured and sized offsite, greatly reduces noise, dust, and general disturbance during construction. As indicated the Project will include bicycle parking to encourage non-auto travel.
• Policy SP-LU-3.1: Promote site and building design that improves energy efficiency by incorporating natural	CONSISTENT	In addition to low energy project appliances and mechanical infrastructure, the Project’s solar generation will reduce

cooling and passive solar heating. This may include extended eaves, window overhangs, awnings, and tree placement for natural cooling, and building and window orientation to take advantage of passive solar heating.		use of power from the grid by up to 50%. Windows will expose units to sunlight will produce passive solar heating during colder months and HVAC use. Window treatments will reduce summer solar gain and HVAC use. The building's MPE systems will meet or exceed Title 24 energy requirements.
<ul style="list-style-type: none"> <li>• Policy SP-LU-3.2: Support the use of green or sustainable building materials, including recycled content materials that are consistent with the underlying architectural style and character of the building.</li> </ul>	CONSISTENT	Use of mass timber will not only reduce construction time, and therefore noise and dust, but greatly reduce onsite waste compared to standard structural and interior framing and subflooring sawn onsite. The Project's contractor will be directed to utilize other green building materials. Sponsors hope to achieve LEED status. The Project's advertising slogan will be "Live Green, Live Downtown."

<ul style="list-style-type: none"> <li>• Policy SP-LU-3.3: Encourage green site design by utilizing native trees and plants where possible, incorporating permeable paving and designing resource-efficient landscapes and gardens.</li> </ul>	CONSISTENT	The Project will incorporate low-water use, plants, native and otherwise. The streetscape will be attractively planted, with such plants and appropriate trees. Virtually the entire project site is currently paved or covered by two existing structures. The Project's narrow property line setbacks to the north and south will either be paved with permeable pavers or left in their natural state, slightly increasing permeable surfaces.
<ul style="list-style-type: none"> <li>• Policy SP-LU-3.4: Utilize the Santa Rosa Build it Green (SR BIG) Program/Green Build Guidelines or equivalent and comparable guidelines for commercial and multifamily development as comprehensive guides for achieving sustainable building design and building practices.</li> </ul>	CONSISTENT	Project design complies with or exceeds City of Santa Rosa green building guidelines. Among other green building features, the project will have solar arrays on the roof and southerly facades, generating up to 50% of the Project's electrical power.
Goal SP-LU-4: Develop a cohesive network of travel routes by guiding new development toward appropriate uses and design.	CONSISTENT	The Project fulfills the policies supporting this Goal.

<ul style="list-style-type: none"> <li>• Policy SP-LU-4.3: Support the creation of a pedestrian-oriented environment along Humboldt and Riley Streets, improved street furnishings and other pedestrian amenities.</li> </ul>	<p>CONSISTENT</p>	<p>New Landscaping and street furniture will improve both Humboldt and Riley Streets. The Project’s units, with street-facing windows and balconies and visibility from the Humboldt Street commercial space and the lobby, will create “eyes on the street” and promote pedestrian safety on Humboldt. The Project is served by bike routes to the downtown, and SMART and the Transit Mall, and a Class II bike lane directly on Humboldt Street connecting it to the center of the downtown and neighborhoods to the north with major employment centers such as Santa Rosa Community College, the County of Sonoma Administrative Center, and the Kaiser Permanente hospital and clinics. The Project will enhance the downtown’s pedestrian oriented streetscapes.</p>
<p>Goal SP-LU-5: Create identifiable places while seeking to preserve and enhance the character of existing neighborhoods within the Plan Area.</p>	<p>CONSISTENT</p>	<p>The Project complies with all applicable development standards and design guidelines in this regard. The large, moderate and lower income apartment project between the Project and Seventh Street has created a new scale for buildings in the neighborhood with which the Project will be consistent.</p>
<p>Policy SP-LU-5.1: New development shall be designed to reinforce and enhance the distinctive and unique qualities of the Sub-Area it is located within.</p>	<p>CONSISTENT</p>	<p>The Project will comply with all applicable development standards and design guidelines.</p>
<p>Goal SP-LU-6: Encourage development projects that will improve the quality of life in the Plan Area and draw new residents into the core of Santa Rosa.</p>	<p>CONSISTENT</p>	<p>The Project provides 94 new housing units in the Courthouse Square Sub-Area.</p>
<p><b>Development Guidelines and Streetscape Standards</b></p>		
<p>Urban Center Goal: The Urban Center street frontage should also provide a comfortable and safe pedestrian environment for the high volume of people traveling in and out of the Sub-Area on a daily basis.</p>	<p>CONSISTENT</p>	<p>New residents in 94 will increase activity at night, provide more street life and improve pedestrian safety. Specific Plan, p. 4-3. Note: apartment dwellers and office employees, as well as visitors to public spaces, provide “eyes on the street.” Landscaping along street frontages will improve the pedestrian experience and the new building will help to complete the built landscape on Humboldt and Riley Streets with a handsome new structure including multi-story facades consistent with recent and future development on both streets. It</p>

		will replace a parking lot and an undistinguished one-story office building with very few windows along the sidewalk.
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Development Height and Orientation: New buildings shall include a minimum of two stories and a maximum of eight stories.	CONSISTENT	The Project has eight stories in compliance with the Specific Plan's new 8:1 FAR rules for the Courthouse Square Sub Area.
Building Placement: Any proposed recess or setback shall be associated with entries or public space. Uses shall be activity generating and retail uses are encouraged. The ground floor frontage shall have a minimum of 60% transparency, and entries must face this street frontage.	CONSISTENT	The Project's street façades will be built to the lot lines. The Project will further comply with all applicable development standards, including ground level floor to ceiling windows along more than 60% of the Humboldt Street façade to add visual interest at the sidewalk level and visibility of the sidewalk from interior spaces. Riley Street currently offers no retail or commercial uses and does not require 50% window glass adjacent to the sidewalk. While such commercial uses may occur on the westerly side of Riley, they are not planned along the easterly side of Riley Street where the Project is located.

<b>Transportation</b>		
Goal SP-T-1: Ensure new development provides adequate vehicular circulation improvements.	CONSISTENT	The Project proposes undergrounding utility lines on both Humboldt and Riley Streets for emergency fire vehicle access. Otherwise the garage openings along Riley Street provide adequate vehicular access on a street with little current traffic.
• Policy SP-T-1.1: Condition new development in Specific Plan Area, as appropriate, to implement street improvements consistent with site-specific recommendations contained in Section A.2 of this chapter.	CONSISTENT	While the Project does not propose any major roadway improvements, the Project applicant will comply with all agreed conditions of approval, including fair-share assessments, as part of entitling the Project.

Goal SP-T-3: Ensure new development and streetscape projects provide pedestrian and bicycle circulation improvements.	CONSISTENT	The Project provides 24 long-term, secure bicycle spaces inside the building with room for expansion. The Project is located on an existing bicycle route which links it to the city bike route network.
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		The Project will construct streetscape improvements, including landscaping and wider sidewalks along its Riley street frontage that will enhance the pedestrian experience. The Project's sponsors are cooperating with the nearby Art House project with respect to such sidewalk design.
Goal SP-T-4: Ensure appropriate levels of parking are provided in association with new development.	CONSISTENT	The project will not generate peak time vehicle trips beyond the minimum allowed by the City of Santa Rosa. Please see the traffic engineer's letter from Fehr & Peers, traffic engineers, included as part of the Project's DR application.
<ul style="list-style-type: none"> <li>• Policy SP-T-4.1: Ensure that parking requirements in the Plan Area stimulate transit-oriented development by supporting and encouraging shared parking where possible and by allowing reductions to on-site parking requirements when supported by a parking study.</li> </ul>	CONSISTENT	While no parking is now required in the Courthouse Square Sub-Area for residential projects, the project includes 71 onsite parking spaces. It also is one block from City Garage #3 with 708 spaces and over 200 available monthly permits. Humboldt and Riley street offer metered parking on both sides which is free from 6 p.m. to 9 a.m. The Project exceeds downtown parking requirements.
<ul style="list-style-type: none"> <li>• Policy SP-T-4.4: Encourage provision of shared-parking facilities in larger private development projects that can be made available to fulfill parking requirements of projects on smaller, more constrained sites.</li> </ul>	CONSISTENT	Those residents without use of one of the 71 onsite parking spaces will be offered the opportunity to permanent monthly parking permits which will give them parking to the City's nearby garage #3. Any unused spaces in the Project Garage will be rented to nonresidents.
<ul style="list-style-type: none"> <li>• Policy SP-T-4.5: The largest mixed-use projects should be given incentives to provide additional shared parking spaces that benefit the surrounding area, especially in the southern Courthouse Square Sub-Area and Railroad Square Sub-Area.</li> </ul>	CONSISTENT	The Project applicant will consider parking incentives proposed by the City. However, the Project is located in the northerly part of the Sub Area with abundant structured parking in both Garage #1 on Seventh Street and Garage #3 on Fifth Street, as well as on street parking.

<ul style="list-style-type: none"> <li>• Policy SP-T-4.11: Allow private residential development projects to provide "unbundled" parking.</li> </ul>	CONSISTENT	The Project is slightly under parked, providing 71 spaces for 94 units, with no parking for the Project's commercial space, unbundling a significant number of potential parking spaces for the project and
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		encouraging transit use and other alternate modes of transportation.
<b>Chapter 5: [Utilities] Public Services and Sustainability</b>		
Goal SP-UPS-1: Provide funding for public services and utilities in the Plan Area.	CONSISTENT	The Project applicant will work with the City to determine whether payment of a fair share is necessary and appropriate. The Project also will generate significant new property taxes and result in increased transit use and more fares. Funds from those sources can be used to pay for public transit or other public services.
<ul style="list-style-type: none"> <li>• Policy SP-UPS-1.1: Ensure that private development provides its fair share of funding for necessary improvements to public services and utilities in the Plan Area.</li> </ul>	CONSISTENT	The Project applicant will work with the City to determine whether payment of a fair share is necessary and appropriate. The Project also will generate significant new property taxes and result in increased transit use and more fares. Funds from those sources can be used for improvements to public services and utility improvements
Goal SP-UPS-2: Ensure adequate water supply is available to serve existing and new development in the Plan Area.	CONSISTENT	The Water Supply Assessment for the Specific Plan determined that the City's water supplies are and will continue to be sufficient to meet present and future demand associated with the Sub Area. Specific Plan, 5-7. Existing water lines on Riley Street are adequate to serve the project.
Policy SP-UPS-2.4: New development within the Specific Plan Area shall be required to comply with the City's Water Efficient Landscape Policy.	CONSISTENT	The Project will utilize low flow, drip irrigation consistent with the city policy.

Goal SP-UPS-4: Solid waste disposal needs of existing and new development in the Plan Area should be met while providing opportunities for reduction, reuse and recycling.	CONSISTENT	The Project will utilize a multiple bin waste system to enable recycling.
<ul style="list-style-type: none"> <li>• Policy SP-UPS-4.1: Expand recycling efforts in multifamily and commercial projects in the</li> </ul>	CONSISTENT	The Project will utilize a multiple bin waste system to enable and encourage recycling. Residents will be able to recycle waste on each floor by utilizing a

Plan Area, and continue to encourage recycling by all residents.		dedicated chute to a recycling bin at ground level. They will not have to carry recycling down to the garage or street.
• Policy SP-UPS-4.2: New development requiring demolition of existing structures in the Plan Area should reuse and recycle materials to the greatest extent possible.	CONSISTENT	Demolition and reuse and recycling of materials removed from the two structures to be demolished will follow this policy guideline.
Goal SP-UPS-5: Manage, maintain and improve stormwater drainage capacity in the Plan Area.	CONSISTENT	The Project will provide stormwater drainage consistent with the city's Standard Storm Water Mitigation Plan

GOAL SP-UPS-7: Provide fire and police services that ensure the safety of the Plan Area community.	CONSISTENT	The Project will comply with all agreed conditions of approval, including fair-share assessments as may be required pursuant to the Project's entitlements. The Project is within the Downtown Action Organization ("DAO") business improvement district and will pay a significant assessment to the DAO, part of which is used to hire security personnel for the downtown.
Mitigation Monitoring and Reporting Plan Requirements (MMRP) for Air Quality  Development under the Proposed Plan would expose sensitive receptors to substantial pollutant concentrations.	CONSISTENT	Two such sites are listed in the City of Santa Rosa MMRP, the BoDean, Inc at 1060 N. Dutton, and Superior Supplies company at 40 Ridgway, both in Santa Rosa and both more than a mile from the Project site, well outside the 1,000' requirement for air quality safety.
Proposed Plan could cause a substantial adverse change in the significance of a historical resource, as defined as physical demolition, destruction,	CONSISTENT	See Historic Resource Evaluation 431 Humboldt Street, Santa Rosa, Sonoma County, California 95404 previously submitted.

<p>relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired (Guidelines Section 15064.5).</p>		
<p>Implementation of the Proposed Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, or need for new or physically altered park facilities, construction of which could cause significant environmental impacts.</p>	<p>CONSISTENT</p>	<p>The Project is not adjacent to any public park or space and will not require the alteration or provision of any public park or space.</p>