DOWNTOWN STATION AREA SPECIFIC PLAN PROGRAM EIR

State Clearinghouse Number: 2006072104

Submitted to
City of Santa Rosa June 29, 2007

Prepared by:
City of Santa Rosa, Advanced Planning and Public Policy Department

Lead EIR Consultant:
DESIGN, COMMUNITY & ENVIRONMENT
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I INTRODUCTION

A. Purpose of the Environmental Impact Report

This document is a Final EIR Addendum to the Draft Environmental Impact Report (EIR) for the Downtown Station Area Specific Plan.

The Draft EIR identified the likely environmental consequences associated with the project and identified policies contained in the Specific Plan that help to reduce potentially significant impacts.

This Final EIR Addendum responds to comments on the Draft EIR and makes revisions to the Draft EIR as necessary in response to these comments. No change to the Draft EIR identified in this Final EIR Addendum resulted in the need to re-circulate the document.

This document, together with the Draft EIR, will constitute the Final EIR when the City of Santa Rosa City Council certifies it as complete and adequate under the California Environmental Quality Act (CEQA).

B. Environmental Review Process

According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project, and to provide the general public and project applicant with an opportunity to comment on a Draft EIR that is prepared for a project. This Final EIR Addendum has been prepared to respond to those comments received on the Draft EIR and to clarify any errors, omissions or misinterpretations of discussions of findings in the Draft EIR.

The Draft EIR was made available for public review on February 5, 2007. The Draft EIR was distributed to local and State responsible and trustee agencies, while the general public was advised of the availability of the Draft EIR through public notice published in the local newspaper and posted by the City Clerk as required by law. The CEQA-mandated 45-day public comment period ended on March 21, 2007. The City of Santa Rosa extended the man-
dated comment period to April 6, 2007, to allow for additional comment submittals.

Copies of all written comments received on the Draft EIR are contained in this document. Each substantive comment on the Draft EIR receives a written response.

A public hearing on the Draft EIR was held before the Planning Commission during the comment period, on March 29, 2007. This document includes the minutes from the hearing, including the comments made at the hearing and a written response to them.

This Final EIR Addendum will be presented to the Planning Commission, who will advise the City Council on certification of the EIR as a full disclosure of potential impacts, mitigation measures and alternatives.

The Planning Commission will not take final action on the EIR or the proposed project. Instead, the City Council will consider the Planning Commission’s recommendations on the Final EIR and the Downtown Station Area Specific Plan and associated General Plan amendments during a noticed public hearing. The City Council will make the final action in regards to certification of the Final EIR and adoption of the Downtown Station Area Specific Plan and associated General Plan amendments.

C. Document Organization

This document is organized into the following chapters:

- **Chapter 1: Introduction.** This chapter discusses the use and organization of this Final EIR Addendum.

- **Chapter 2: Report Summary.** This chapter is a summary of the findings of the Draft and the Final EIR. It has been reprinted from the Draft EIR. Underline text represents language that has been added to the EIR; text with strikethrough has been deleted from the EIR.
Chapter 3: Revisions to the Draft EIR. Corrections to the text and graphics of the Draft EIR are contained in this chapter. Underline text represents language that has been added to the EIR; text with strike-through has been deleted from the EIR.

Chapter 4: List of Commentors. Names of agencies and individuals who commented on the Draft EIR are included in this chapter.

Chapter 5: Comments and Responses. This chapter contains reproductions of the letters received from agencies and the public on the Draft EIR. The responses are keyed to the comments which precede them.
This is a summary of the findings of the Draft and Final EIR. It has been reprinted from the Draft EIR. Underline text represents language that has been added to the EIR; text with strikethrough has been deleted from the EIR.

This summary presents an overview of the analysis contained in Chapter 4 of the Draft EIR: Environmental Evaluation. CEQA requires that this chapter summarize the following: 1) areas of controversy; 2) significant impacts; 3) unavoidable significant impacts; 4) implementation of mitigation measures; and 5) alternatives to the project.

A. Project Under Review

This EIR provides an assessment of the potential environmental consequences of implementing the Santa Rosa Downtown Station Area Specific Plan. The City of Santa Rosa created the Specific Plan for the mixed use and re-development of a 647-acre area in and around the downtown area of Santa Rosa.

The Specific Plan Area is generally located within Santa Rosa’s downtown on the western side of the City and is roughly bounded by College Avenue to the north, Sebastopol Road to the south, Santa Rosa Avenue and E Street to the east and North Dutton Avenue to the west.

The Santa Rosa Downtown Station Area Specific Plan includes the adoption of proposed General Plan amendments to the City of Santa Rosa General Plan that would establish one or more new Downtown Mixed Use land use designations, as well as Specific Plan policies and design guidelines that would ensure consistency between the Specific Plan and the City of Santa Rosa General Plan.

The Specific Plan intended to provide a comprehensive plan for development of the Specific Plan Area including land uses with their configurations and
intensity, property development regulations and design guidelines. Circulation and infrastructure needs and improvements are also identified in the Specific Plan to support phases of development as needed. The adopted Specific Plan, along with the proposed General Plan policies, would become the regulatory framework for the review of future development in the Specific Plan Area. The Specific Plan also provides a means for achieving overall design compatibility and consistency for the property. Key components of the Specific Plan include the following:

- Land Use Regulations
- Development Guidelines and Streetscape Standards
- Transportation and Parking
- Public Services and Utilities
- Implementation and Financing

The Downtown Station Area Specific Plan is the result of a community based vision for the downtown area of the City of Santa Rosa. Centered on the proposed Sonoma-Marin Area Rapid Transit (SMART) station site, the Specific Plan defines the framework for future development in the Plan Area to support its role as a healthy, vibrant regional center. The Specific Plan Area is a lively city center with a mix of shopping and employment opportunities, with an attractive natural creek environment and historic residential neighborhoods close to the city center. The Specific Plan vision includes bicyclists, pedestrians, transit users and drivers sharing an attractive network of streets. The Specific Plan includes a mix of housing, shopping and jobs in a compact area and includes features to preserve the history, character and natural benefits of the existing environment while allowing for change. This vision is consistent with the Santa Rosa 2020: General Plan as well as other comprehensive plans and codes governing change in the downtown area.

The Specific Plan proposes seven distinct planning areas known as “Sub-Areas.” The land uses proposed for each of the Sub-Areas are outlined fully in Chapter 3, Project Description, of the Draft EIR.
Additionally, the Specific Plan seeks to amend the current Santa Rosa General Plan. The proposed General Plan Amendments are outlined in Chapter 3, Project Description, of the Draft EIR.

B. Areas of Controversy

The City held a public scoping meeting on August 9 and August 16, 2006 to present the Specific Plan and receive responses. Public comment focused primarily on the following issues:

♦ Increased traffic on the local roadways
♦ Compatibility of development with existing community
♦ Availability of adequate parking
♦ Bicycle and pedestrian connectivity

Scoping comments are intended to suggest issues that the EIR should address. This EIR assesses all relevant environmental impacts of the Specific Plan.

C. Significant Impacts

Under CEQA, a significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Specific Plan, including land, air, water, minerals, flora, fauna, ambient noise and objects of historic and aesthetic significance.

The Specific Plan has the potential to generate environmental impacts in a number of areas that could be significant:

♦ Aesthetics
♦ Air Quality
♦ Biological Resources
♦ Cultural Resources
♦ Geology and Soils (includes Mineral Resources)
Hazards and Hazardous Materials
Hydrology and Water Quality
Noise
Traffic and Circulation

As shown in Table 2-1, most of the significant impacts in these areas would be reduced to a **less than significant** level if the mitigation measures recommended in this report were implemented or with the policies included in the Specific Plan. Impacts that would remain significant and unavoidable regardless of Specific Plan policies are discussed below in Section E.

**D. Mitigation Measures**

The Draft EIR suggests mitigation measures that would reduce many of the impacts in the areas identified above to **less than significant** levels, as summarized in Table 2-1. Additionally, the Draft EIR includes Specific Plan policies that are intended to serve as mitigation measures that would reduce specific impacts in some of the areas identified above to a **less than significant** level. Monitoring of recommended mitigation measures along with the Specific Plan policies, identified in the Draft EIR as mitigation, will form the basis of a project-specific Mitigation Monitoring Program to be implemented in accordance with State law.

**E. Unavoidable Significant Impacts**

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As described in Chapter 4 of the Draft EIR, most of the potential impacts from the Specific Plan are either less than significant, or could be mitigated to less than significant levels by the implementation of mitigation measures. Significant unavoidable impacts were identified in the areas of air quality and transportation and circulation.
F. Alternatives to the Project

The Draft EIR analyzed alternatives to the Specific Plan. Three alternatives to the Specific Plan were considered:

♦ No Project Alternative. Under this alternative, which is required under CEQA, the Specific Plan would not be implemented and the area would be left in its current state.

♦ Reduced Growth Alternative. Under this alternative, the overall potential for additional development to occur within the Specific Plan Area would be reduced, thereby resulting in less development than the Specific Plan.

♦ Reallocated Growth Alternative. This alternative would result in the same amount of future development as the Specific Plan; however, it would be distributed differently within the Specific Plan Area.

G. Summary Table

Table 2-1 presents a summary of impacts and mitigation measures identified in this report. It is organized to correspond with the environmental issues discussed in Chapter 4 of the Draft EIR.

The table is arranged in four columns: 1) environmental impacts; 2) significance prior to mitigation; 3) mitigation measures; and 4) significance after mitigation. A series of mitigation measures is noted where more than one mitigation may be required to achieve a less-than-significant impact. For a complete description of potential impacts and suggested mitigation measures, please refer to the specific discussions in Chapter 4 of the Draft EIR. Additionally, this summary does not detail the timing of mitigation measures. Timing will be further detailed in the Mitigation Monitoring Program.
### TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

<table>
<thead>
<tr>
<th>Significant Impact</th>
<th>Significance Before Mitigation</th>
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<tr>
<td><strong>AESTHETICS</strong></td>
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<tr>
<td>Impact AES-1: Development of multi-story buildings along the Highway 101 and Highway 12 corridors could result in new sources of glare for vehicles traveling along these highways. This would be a significant impact.</td>
<td>S</td>
<td>Mitigation Measure AES-1: For construction of structures along the designated Scenic Highways 12 and 101, the City shall require the use of building materials designed to reduce lighting glare. Examples of these types of materials include, but are not limited to, windows treated with glare reductive coating or film covering, matte-finish tiles, marble, or sheet metal and non-reflective flashing material.</td>
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<tr>
<td><strong>AIR QUALITY</strong></td>
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<tr>
<td>Impact AQ-1: Construction activity during development within the Specific Plan Area would generate air pollutant emissions that could expose sensitive receptors to substantial pollutant concentrations. This is a significant impact.</td>
<td>S</td>
<td>Mitigation Measure AQ-1: Implement control measures for construction and demolition-related air emissions to ensure that each project sponsor and contractor reduces particulate, ROG and NOx emissions by complying with the BAAQMD policies and guidelines. Each project sponsor and contractor shall implement the following control measures: ♦ Provide transit information kiosks. ♦ Cover all trucks hauling construction and demolition debris from the site. ♦ Water on a continuous as-needed basis all earth surfaces during clearing, grading, earthmoving and other site preparation activities. ♦ Use watering to control dust generation during demolition of structures or break-up of pavement.</td>
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LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
<table>
<thead>
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<th>Significant Impact</th>
<th>Significance Before Mitigation</th>
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<tr>
<td>AQ-1 continued</td>
<td></td>
<td>♦ Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved parking areas and staging areas. ♦ Sweep daily (with water sweepers) all paved areas and staging areas. ♦ Provide daily clean up of mud and dirt carried onto paved streets from the site. ♦ Renovation, demolition activities, removal or disturbances of any material that contain asbestos, lead paint or other hazardous pollutants will be conducted in accordance with BAAQMD rules and regulations. ♦ Properly maintain all construction equipment. ♦ Reduce equipment idling time. For construction near sensitive receptors: ♦ Install wheel washers for all exiting trucks, or wash off the tires or tracks of trucks and equipment leaving the site. ♦ Suspend dust-producing activities during periods when instantaneous gusts exceed 25 mph when dust control measures are unable to avoid visible plumes. ♦ Limit the area subject to excavation, grading and other construction or demolition activity at any one time. For sites greater than 4 acres: ♦ Apply soil stabilizers to previously graded portions of the site inactive for more than ten days, or cover or seed these areas.</td>
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LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
### Table 2-1 Summary of Impacts and Mitigation Measures (continued)

<table>
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<th>Significant Impact</th>
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| AQ-1 continued     | S                              | ♦ Water or cover stockpiles of debris, soil, sand, or other materials that can be blown by the wind.  
♦ Limit traffic speeds on unpaved roads to 15 mph.  
♦ Replant vegetation in disturbed areas as quickly as possible. | SU |
| Impact AQ-2: The Downtown Station Area Specific Plan would contribute to increased vehicular and residential area emissions that would exceed BAAQMD thresholds. This is a significant impact. | S | Mitigation Measure AQ-2: Developers shall implement emissions control measures, where applicable, to development activities within the Specific Plan Area in order to reduce overall emissions from traffic and area sources. The emissions control measures could include the following:  
♦ Where practical, future development proposals shall include physical improvements, such as sidewalk improvements, landscaping and the installation of bus shelters and bicycle parking, that would act as incentives for pedestrian, bicycle and transit modes of travel.  
♦ New or modified roadways should include bicycle lanes where reasonable and feasible.  
♦ Provide transit information kiosks.  
♦ Where practical, employment-intensive development proposals (i.e. office and retail) shall include measures to encourage use of public transit, ridesharing, van pooling, use of bicycles and walking, as well as to minimize single passenger motor vehicle use.  
♦ Offices or retail uses that have 50 or more employees and provide parking should implement a parking cash-out program (where non-driving employees receive transportation allowance equivalent to the value of subsidized parking). | SU |

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<td>AQ-2 continued</td>
<td>♦ Develop parking enforcement and fee strategies that encourage alternative modes of transportation. ♦ Parking lots or facilities should provide preferential parking for electric or alternatively fueled vehicles. ♦ Require energy efficient building designs that exceed State Title 24 building code requirements. ♦ Discourage use of gasoline-powered landscape equipment. ♦ Implement and enforce truck idling restrictions of three minutes. ♦ Only allow low-emitting fireplaces for residential uses, such as those that only burn natural gas.</td>
<td>S</td>
<td>LTS</td>
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<td>Impact AQ-3: The development of new residences within the Specific Plan Area could expose sensitive receptors to unhealthy levels of TACs emitted by traffic on Highway 101. This would be a significant impact.</td>
<td>Mitigation Measure AQ-3: Buffers for emission sources and sensitive land uses shall be required for residential uses proposed within 170 feet of the freeway and shall undergo detailed analysis to identify site specific health risks associated with DPM emitted from Highway 101. These buffers shall provide appropriate buffers between potential air pollution and odor impacts from land uses that may emit pollution and/or odors when locating (a) air pollution sources, and (b) residential and other pollution-sensitive land users in the vicinity of air pollution sources which may include freeways, gasoline fueling stations and dry cleaning operations that use solvents.</td>
<td>S</td>
<td>LTS</td>
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<td>Impact AQ-4: Siting of new residences or sensitive receptors along Highway 101 within 170 feet of travel lanes could result in a significant impact.</td>
<td>Mitigation Measure AQ-4: Implementation of buffers for emission sources and sensitive land uses shall be required for the Specific Plan.</td>
<td>S</td>
<td>LTS</td>
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### TABLE 2-1  SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

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<td><strong>BIOLOGICAL RESOURCES</strong></td>
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<td><strong>Impact BIO-1:</strong> The Specific Plan proposes to relocate the planned creek crossing at Imwalle Gardens, and it is likely that creek restoration projects would be conducted in conjunction with creekside developments. The implementation of the Specific Plan could impact, either directly or through habitat modifications, some endangered, rare, or threatened species within the Santa Rosa Creek. This would be a significant impact.</td>
<td>S</td>
<td>Mitigation Measure BIO-1: Development shall be designed to minimize disturbance to waterways and riparian vegetation in order to avoid potential impacts to federally listed salmonids. For work in or in close proximity to Santa Rosa Creek, in-stream work shall not start before June 15 and shall be completed by October 15, unless otherwise approved by appropriate agencies. The City shall consult with NOAA Fisheries and CDFG and implement protection measures specified in consultation with those agencies.</td>
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<td><strong>Impact BIO-2:</strong> Tree removal, demolition of old buildings and bridge structures, as well as construction disturbances could have a substantial adverse effect on any species identified as a candidate, sensitive, or special-status species. This would be a significant impact.</td>
<td>S</td>
<td>Mitigation Measure BIO-2: If there is the potential for destruction of a nest or substantial disturbance to nesting birds or bats due to construction activities, a plan to monitor nesting birds or bats during construction shall be prepared and submitted to the USFWS and CDFG for review and approval. The City shall comply with all USFWS or CDFG guidance for protection of nesting birds. If vegetation, buildings or bridges that potentially provide nesting sites must be removed, a qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified to species and the approximate distance from the closest work site to the nest estimated. No additional measures need be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is deter</td>
<td>LTS</td>
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### Summary of Impacts and Mitigation Measures (continued)

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<td>BIO-2 continued</td>
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<td>mined that nesting is complete and the young have fledged. Bats shall be absent or flushed from roost locations prior to demolition of buildings. If flushing of bats from buildings is necessary, it shall be done by the biologist during the non-breeding season from October 1 to March 31. When flushing bats, structures shall be moved carefully to avoid harming individuals, and torpid bats given time to completely arouse and fly away. During the maternity season from April 1 to September 30, prior to building demolition or construction, a qualified biologist shall determine if a bat nursery is present at any sites identified as potentially housing bats. If an active nursery is present, disturbance of bats shall be avoided until the biologist determines that breeding is complete and young are reared.</td>
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**Impact BIO-3:** Removal of riparian habitat and restoration efforts along Santa Rosa Creek could have a substantial adverse effect on any riparian habitat or other sensitive natural communities. This would be a **significant** impact.

Mitigation Measure BIO-3: See Mitigation Measure BIO-1.

<table>
<thead>
<tr>
<th>Impact BIO-3</th>
<th>S</th>
<th>Mitigation Measure BIO-3: See Mitigation Measure BIO-1.</th>
<th>LTS</th>
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**Impact BIO-4:** The implantation of the Specific Plan could interfere substantially with the movement of migratory fish such as Central California Coast Steelhead and California Coast Chinook salmon. Nesting birds, including special-status species such as Allen’s hummingbird, could also be affected by the removal of trees and other vegetation. The nurseries of the Yuma myotis bat and the Townsend's western big-eared bat could also be disturbed by demolition or construction during nesting season.

Mitigation Measure BIO-4a: See Mitigation Measure BIO-1.

Mitigation Measure BIO-4b: See Mitigation Measure BIO-2.

<table>
<thead>
<tr>
<th>Impact BIO-4</th>
<th>S</th>
<th>Mitigation Measure BIO-4a: See Mitigation Measure BIO-1.</th>
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<td>Mitigation Measure BIO-4b: See Mitigation Measure BIO-2.</td>
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### TABLE 2-1  SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

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<td><strong>CULTURAL RESOURCES</strong></td>
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<td><strong>Impact CULT-1:</strong> New development and construction activities, including the widening of existing thoroughfares, that involve ground disturbance could destroy or significantly alter buried archaeological deposits. This would be a significant impact.</td>
<td>S</td>
<td>Mitigation Measure CULT-1a: Prior to the issuance of any entitlements, the City shall refer all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any cultural resources. Archaeological monitoring shall be conducted during earth-disturbing activities in the areas of potential impact. If an archaeological site has been identified in the close vicinity of a construction project, project specific mitigation shall be developed. The adverse impact shall be mitigated by conducting Phase I archaeological testing in order to determine the boundaries of the site, and to ensure site avoidance before the commencement of construction activities. If construction personnel locate buried cultural materials, work shall be halted or shifted to another area and a qualified archaeologist shall be contacted to determine proper treatment of the find.</td>
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<td>Mitigation Measure CULT-1b: In areas with known resources or are sensitive for archaeological resources, as determined through review by the NWIC, a qualified archaeologist with knowledge of prehistoric and historic-era archaeology shall prepare and carry out an Archaeological Testing, Monitoring, and Data Recovery</td>
<td></td>
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CITY OF SANTA ROSA  
DOWNTOWN STATION AREA SPECIFIC PLAN  
FINAL EIR  
REPORT SUMMARY

### Table 2-1  SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

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<tr>
<td>CULT-1 continued</td>
<td></td>
<td>Plan (ATMDRP) for the site prior to the issue of entitlements. This ATMDRP will emphasize the existing conditions of the proposed project area; examine the sensitivity for intact archaeological deposits in light of specific project designs; and provide treatment options in order to protect archaeological resources that meet the eligibility criteria of the CRHR. The scale and scope of the ATMDRP shall be appropriate to that of the project and its potential effects to cultural resources. The City, or their authorized qualified consultant, shall review the ATMDRP for adequacy. The ATMDRP may include some level of worker orientation program shall to be conducted prior to and during earth-disturbing activities in sensitive area. The program shall This type of program would summarize relevant laws and regulations that protect archaeological resources, and review applicable avoidance and minimization measures to protect archaeological resources. Other protective measures such as Exclusionary plastic mesh fencing shall be installed and maintained to prohibit the general public from disturbing sub-surface soils and impacting possible archaeological deposits may also be included as monitoring tools in the ATMDRP.</td>
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### CULT-1 continued

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<tr>
<td>CULT-1 continued</td>
<td></td>
<td>Mitigation Measure CULT-1c: The City shall require initiation of consultation with Native American tribes whenever necessary prior to the issuance of entitlement applications for land divisions and/or new construction to ensure the respectful treatment of Native American sacred places. Consultation shall explicitly be initiated with the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians in order to establish the likelihood and potential of any adverse impacts to Native American cultural or sacred places, including human burials; and to establish the appropriate treatment of such resources. Consultation is defined as meaningful and timely discussion and careful consideration of the views of each party, in a manner that is cognizant of all parties' cultural values, and, where feasible, seeking agreement. Potential Specific mitigation measures of potential impacts shall be considered at the project specific level, and may include but are not limited to site avoidance, site capping, integration of the site into a recreation space, or data recovery excavations.</td>
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### Impact CULT-2: Any new development or construction activities, including the widening of existing thoroughfares, in the vicinity of a historical structure that is listed or eligible for listing on local, State or national registers could impact or alter the historic structure, historical resource and/or the character or setting of the area. This would be a significant impact.

| Impact CULT-2 | S | Mitigation Measure CULT-2a: Prior to the issuance of any entitlements, the City shall submit all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any known or unknown cultural resources. |

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### TABLE 2-1  SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

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**CULT-2 continued**

Mitigation Measure CULT-2a: Adverse impacts of new design elements on the character of a historic building or area shall be evaluated on a case-by-case basis in accordance with the various local, State and federal laws and regulations protecting these resources. Prior to construction, large format camera Historic American Landscape Survey (HALS) Level II black and white 8-by-10 inch archival quality prints produced by a professional photographer shall be accompanied by a report by a professional architectural historian. A minimum of twenty views shall be documented and two sets of prints shall be sent to the California State Library in Sacramento. Potential adverse impacts to the significance of a historical resource shall be evaluated on a project specific level in accordance with applicable local, State, and federal laws and regulations protecting these resources, including the environmental review process. Strategies such as restoration, rehabilitation, and adaptive reuse shall be encouraged. Photographic documentation is generally not adequate to mitigate a significant adverse impact to a historical resource and therefore large format camera Historic American Landscape Survey (HALS) Level II photographs accompanied by a report by a professional architectural historian shall not be considered a common and acceptable mitigation for demolition of a historical resource.

Mitigation Measure CULT-2b: Specific thoroughfare widening projects within the Specific Plan Area shall be designed so that projects do not detract from the character of the historic building or property. The SRCHB should review such projects for adequate mitigation measures before they are implemented.

LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
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<tr>
<th>Significant Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
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<td>CULT-2 continued</td>
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<td>Impact CULT-3:</td>
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LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
# Summary of Impacts and Mitigation Measures (continued)

<table>
<thead>
<tr>
<th>Significant Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance With Mitigation</th>
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<tbody>
<tr>
<td><strong>GEOLOGY AND SOILS</strong></td>
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<tr>
<td><strong>Impact GEO-1</strong>: Development allowed under the Specific Plan would be subject to seismic ground shaking. This is considered a <em>significant</em> impact.</td>
<td>S</td>
<td>Mitigation Measure GEO-1a: All structures in the Specific Plan Area shall be designed in accordance with currently adopted building codes and ordinances of the City of Santa Rosa, including the 2001 California Building Code. A Final Design Review shall be performed by a licensed civil/structural engineer for adherence to the seismic design criteria within the Specific Plan Area.</td>
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<td>Mitigation Measure GEO-1b: A subsurface geotechnical investigation shall be performed to evaluate soils in the subsurface at each proposed development or redevelopment site. The investigation shall include the following elements.</td>
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<td>1. The investigation shall be performed under the direction of a state licensed Geotechnical Engineer and/or a Certified Engineering Geologist.</td>
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<td>2. The subsurface investigation shall include drilling, logging and sampling of boreholes to a minimum depth of 25 feet below the ground surface to evaluate soils for their susceptibility to seismically induced ground failure.</td>
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<td>3. If a seismically unstable subsurface material is encountered, the engineer shall identify specific measures to mitigate the impact of seismic ground shaking. Mitigation measures may include soil stabilization techniques such as pressure grouting, specific foundation design measures such as pile foundations, or other methods identified by the engineer.</td>
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### Table 2-1  Summary of Impacts and Mitigation Measures (continued)

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<td><strong>GEO-1 continued</strong></td>
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<td>4. A written report shall be prepared summarizing the methods used, results of the investigation and specific design measures recommended.</td>
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<td>5. Results of the investigation shall be reviewed by the City, or by a qualified independent consultant retained by the City.</td>
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<td>6. The City shall require developers to incorporate the mitigation measures into new development.</td>
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<td><strong>Impact GEO-2</strong>: Liquefaction leading to structural damage or collapse of structures could occur within the Specific Plan Area. This is considered a significant impact.</td>
<td>S</td>
<td>Mitigation Measure GEO-2: Development of sites within the Specific Plan Area shall require investigation of the potential for soil liquefaction during seismic ground shaking that could result in damage to structures, pavements and utilities. A subsurface geotechnical investigation shall be performed to evaluate soils in the subsurface at each proposed development or redevelopment site. The investigation shall include those elements outlined under Mitigation Measure GEO-1b. The City shall require developers to incorporate the mitigation measures into new development.</td>
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<td><strong>Impact GEO-3</strong>: Seismically-induced slope failure and instability adjacent to Santa Rosa Creek may be present in the Specific Plan Area for sites located adjacent to Santa Rosa Creek. This is considered a significant impact.</td>
<td>S</td>
<td>Mitigation Measure GEO-3: Any new structures planned within 50 feet from the top of the bank of Santa Rosa Creek shall complete a streambank stability analysis to examine the effect of a new structure on bank stability. Structures to be evaluated shall include paved parking areas, retaining walls, buildings and other site improvements. A licensed Civil Engineer or Certified Engineering Geologist shall complete the slope stability analysis.</td>
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<td>GEO-4 continued</td>
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<td>Analysis shall include the effect of increased or concentrated run-off on bank erosion, likelihood of foundation pressure causing bank failure and the impact of grading next to the creek bank in terms of future settlement and erosion. Recommendations from the analysis to be incorporated into development plans shall include use of energy dissipaters or other techniques to reduce outflow velocities of storm drains discharging into Santa Rosa Creek, building setback from the creek and stable grading setback from the creek.</td>
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<td>Impact GEO-4: Expansive soils may be present in the Specific Plan Area. Expansive soils may cause damage to pavements, concrete slabs and foundations. This is considered a significant impact.</td>
<td>S</td>
<td>Mitigation Measure GEO-4: A subsurface geotechnical investigation shall be performed to evaluate soils in the subsurface at each proposed development or redevelopment site. The investigation shall include those elements outlined under Mitigation Measure GEO-1b. The City shall require developers to incorporate the mitigation measures into new development.</td>
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<td>HAZARDS AND HAZARDOUS MATERIALS</td>
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<td>Impact HAZ-1: The increased risk from an accidental spill, fire, or other accident associated with the increase in development is considered a significant impact.</td>
<td>S</td>
<td>Mitigation Measure HAZ-1a: Each sub-development in the Specific Plan Area shall be required to prepare and implement a post-development Stormwater Pollution Prevention Plan (SWPPP) to prevent runoff from dumpsters, maintenance areas and other areas where potentially hazardous or hazardous materials are stored or used from discharging into site waterways and into Santa Rosa Creek. This plan shall be approved by the City in conjunction with design approval for the project. The SWPPP plan shall include, but not be limited to the following:</td>
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### Summary of Impacts and Mitigation Measures (Continued)

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<td>HAZ-1 continued</td>
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1. Location of dumpsters and the location of hazardous and potentially hazardous materials storage, including paints, cleaning agents, petrochemicals, and any other potentially hazardous materials storage facilities. The plan shall include details showing coverings and berms to prevent intrusion of rainwater and prevent escape of runoff. Location of signs prohibiting littering and illegal dumping, as well as signs detailing garbage collection services and emergency contacts in the event of a spill.

2. Maintenance and cleanup schedule. This shall include procedures and schedules for sweeping, protecting storm drain inlets from contaminated runoff, cleaning up spills, and eliminating the majority of litter and debris washing into storm drains that may enter local waterways. Regular sweeping is a simple and effective BMP aimed at reducing the amount of litter in storm drain inlets (to prevent clogging) and public waterways (for water quality). The project applicant shall enter into an agreement with the City of Santa Rosa to ensure this maintenance is completed.

**Mitigation Measure HAZ-1b:** Registration and compliance with the Hazardous Materials Business Plan (HMBP), Hazardous Waste Generator Program and Accidental Release Program, wherever applicable, is required for businesses with the following quantities of hazardous materials: at least 55 gallons (liquids), 500 pounds (solids) or 200 cubic feet (gases).

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<td>Impact HAZ-2: Development of sites on hazardous materials lists is considered a <em>significant</em> impact.</td>
<td>S</td>
<td>Mitigation Measure HAZ-2a: Developers shall be required to complete a Phase 1 environmental site assessment for each property to be redeveloped. Should the Phase 1 ESA determine a need for additional sampling and testing to determine the extent of any contamination then a Phase 2 shall be completed with sampling and testing of soil and groundwater if applicable. <em>The Santa Rosa Fire Department shall review the Phase I ESA to determine if a Phase II ESA is required.</em> All Phase II ESA investigations shall include the collection and testing of groundwater samples. All discharges to land or water shall be reported to the Santa Rosa Fire Department and the Regional Water Quality Control Board. Development plans for properties where discharges of contaminants have occurred or in close proximity to sites where discharges have occurred shall be reviewed by the Santa Rosa Fire Department and the Regional Water Quality Control Board. Should contamination be found at potentially harmful levels the developer shall complete site remediation in accordance with Mitigation Measure HAZ-2b. <em>Sites containing significant contamination will also be required to prepare a Soil and Groundwater Management Plan as discussed under Mitigation Measure HAZ-2b.</em></td>
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| HAZ-2 continued    |                               | Mitigation Measure HAZ-2b: Developers shall complete site remediation in accordance with OSHA Standards, Santa Rosa Fire Department, Sonoma County Environmental Health Department and State Regional Water Resources Quality Control Board Guidelines. Discharges must be characterized, defined and remediated in accordance with local and State laws, regulations and guidelines. The Department of Toxic Substances Control (DTSC) may become involved wherever toxic levels of contamination are found that pose an immediate hazard. Remediation shall reduce human exposure risk and environmental hazards both during and after construction. The remediation plan shall be prepared in accordance with recommendations of the environmental consultant and established procedures for safe remediation. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. Requirements shall include, but not be limited to the following:  
1. Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for Underground Storage Tanks (UST’s) and contaminant concentrations.  
2. A site specific Health and Safety Plan (HASP) to be prepared by all contractors at the project site, where applicable. This includes a HASP for all demolition, grading and excavation. |}

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### Table 2-1  **Summary of Impacts and Mitigation Measures (continued)**

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**HAZ-2 continued**

- Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site.
- Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable. This shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines.
- Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a State licensed landfill facility.
- Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development, and prohibition of groundwater development should it be determined from test results.

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### Table 2-1: Summary of Impacts and Mitigation Measures (continued)

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<td>7. Completion of an approved remediation plan should land use restrictions be insufficient to allow development to proceed safely. Remediation measures may include excavation and replacement of contaminated soil with clean fill, pumping and treatment of groundwater, thermal treatment, etc.</td>
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<td>8. A Site Soil and Groundwater Management Plant shall be required for all sites with significant soil and/or groundwater contamination. Soil impacts must be removed or effectively treated prior to development and property development must not interfere with groundwater investigations and cleanup projects.</td>
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<td>Impact HAZ-3: Environmental impact of potential interference with an emergency access or evacuation plan is considered a significant impact.</td>
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<td>Mitigation Measure HAZ-3a: The Fire Department shall review construction plans for roadway modifications, and establish temporary alternative emergency routes necessary for the duration of the construction project. During design review the City shall ensure that roads and driveways are established that meet ordinance and uniform building code requirements for emergency access. The Fire Department shall also review building plans for compliance with the Fire Code and establish future inspection schedule for continuing compliance.</td>
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<td>Mitigation Measure HAZ-3b: The City shall revise the current City of Sonoma and County Emergency Services Plan to reflect new development. It is recommended that any adopted emergency response or evacuation plan include training provisions such as those adopted through the Community Emergency Response Team (CERT) program.</td>
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<td>HYDROLOGY AND WATER QUALITY</td>
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| **Impact HYDRO-1: Demolition and construction for future development and redevelopment proposed in the Specific Plan could potentially violate water quality standards or waste discharge requirements. This would be a significant impact.** | S | Mitigation Measure HYDRO-1: Pursuant to the City of Santa Rosa Stormwater Management Plan (SWMP); grading, erosion control and stormwater ordinances; and National Pollutant Discharge Elimination System (NPDES) requirements, each developer shall develop and implement a Storm Water Pollution Prevention Plan(s) (SWPPP) for each individual development or redevelopment project site to protect water quality during and after construction. The Project SWPPP shall include the following mitigation measures for the construction period:  
  ♦ Erosion control/soil stabilization techniques such as straw mulching, erosion control blankets, erosion control matting, and hydro-seeding, shall be utilized, in accordance with the regulations and recommendations outlined in the Santa Rosa Area Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by the City of Santa Rosa, Sonoma County, and the Sonoma County Water Agency. Silt fences used in combination with fiber rolls shall be installed down slope of all graded slopes. Fiber rolls shall be installed in the flow path of graded areas receiving concentrated flows and around storm drain inlets. | LTS |
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<th>Significant Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
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<tr>
<td>HYDRO-1 continued</td>
<td>♦ “Best management practices” (BMPs) shall be implemented for preventing the discharge of other construction-related NPDES pollutants beside sediment (i.e. paint, concrete, etc) to downstream waters. ♦ After construction is completed, all drainage facilities shall be inspected for accumulated sediment, and these drainage structures shall be cleared of debris and sediment.</td>
<td>Long-term mitigation measures to be included in the Project SWPPP shall include, but are not limited to, the following: ♦ Description of potential sources of erosion and sediment at the proposed project site. Industrial activities and significant materials and chemicals that could be used at the project site should be described. This will include a thorough assessment of existing and potential pollutant sources. ♦ Identification of BMPs to be implemented at the project site based on identified industrial activities and potential pollutant sources. Emphasis shall be placed on source control BMPs, with treatment controls used as needed. ♦ Development of a monitoring and implementation plan. Maintenance requirements and frequency shall be carefully described including vector control, clearing of clogged or obstructed inlet or outlet structures, vegetation/landscape maintenance, replacement of media filters, regular sweeping of</td>
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### TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

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<tr>
<td>HYDRO-1 continued</td>
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<td>parking lots and other paced areas, etc. Wastes removed from BMPs may be hazardous, therefore, maintenance costs should be budgeted to include disposal at a proper site. Parking lot areas shall be cleared of debris that may enter the storm drain system on a daily basis. ♦ The monitoring and maintenance program shall be conducted at the frequency agreed upon by the RWQCB and/or City of Santa Rosa. Monitoring and maintenance shall be recorded and submitted annually to the SWRCB. The SWPPP shall be adjusted, as necessary, to address any inadequacies of the BMPs. ♦ The applicant shall prepare informational literature and guidance on industrial and commercial BMPs to minimize pollutant contributions from the proposed development. This information shall be distributed to all employees at the project site. At a minimum the information shall cover: a) proper disposal of commercial cleaning chemicals; b) proper use of landscaping chemicals; c) clean-up and appropriate disposal of hazardous materials and chemicals; and d) prohibition of any washing and dumping of materials and chemicals into storm drains.</td>
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Impact HYDRO-2: Increased levels of non-point source pollutants may enter the storm drains of the area and ultimately enter Santa Rosa Creek if not controlled through proper Stormwater Pollution Prevention. This would be a significant impact.  

Mitigation Measure HYDRO-2: Developers will be required to preparation and implement a Specific Plan Area Storm Water Pollution Prevention Program (SWPPP), pursuant to NPDES requirements, as detailed in Mitigation Measure HYDRO-1.
<table>
<thead>
<tr>
<th>Impact HYDRO-3: Development in the Specific Plan Area may create an increase in flood potential in downstream waters by increasing runoff levels. This would be a significant impact.</th>
<th>Significant Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
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<td>Significance</td>
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<tr>
<td>Mitigation Measures</td>
<td>HYDRO-3: In accordance with the Santa Rosa Area Standard Urban Storm Water Mitigation Plan (SUSMP) and Sonoma County Water Agency flood control criteria, developers shall develop a Storm Drain Master Plan for individual projects that includes design drawings and calculations of the capacity of the proposed storm drain system for the project. SUSMP-recommended BMPs such as on-site storm water detention, storm drain line upgrades, or infiltration areas shall be incorporated into the project design, as well as storm water treatment controls such as catch basins, storm water separators and/or other SUSMP-recommended treatment BMPs. The Storm Drain Plan shall also include hydraulic analysis prepared consistent with Sonoma County Water Agency flood control design criteria to establish whether the existing municipal system has capacity to accommodate any increased flows resulting from the proposed project. The analysis shall include Rational Method calculations of pre-and post-development 10-year peak flows and shall take into account drainpipe slope and elevations, drainpipe size(s), and system head losses. The Storm Drain Plan shall be submitted to the City of Santa Rosa and the Sonoma County Water Agency for review prior to approval.</td>
<td>LTS</td>
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**LAND USE**

The Specific Plan would not result in significant impacts related to land use, therefore, no mitigation measures are required.
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<tr>
<td><strong>NOISE</strong></td>
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<td>Impact NOI-1: Although construction noise would be localized to the individual construction sites, businesses and residences throughout the Specific Plan Area would be intermittently exposed to high levels of noise throughout the construction period. Construction would elevate noise levels at adjacent businesses and residences by 15 to 20 dBA or more. This would be a significant impact.</td>
<td>S</td>
<td><strong>Mitigation Measure NOI-1:</strong> Developers shall ensure that construction equipment be well maintained and used judiciously to be as quiet as practical. The following measures, when applicable, will be required from developers to reduce noise from construction activities:  ♦ Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.  ♦ Utilize “quiet” models of air compressors and other stationary noise sources where technology exists.  ♦ Locate stationary noise-generating equipment as far as feasible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.  ♦ Prohibit unnecessary idling of internal combustion engines.  ♦ Pre-drill foundation pile holes to minimize the number of impacts required to seat the pile.  ♦ Construct solid plywood fences around construction sites adjacent to operational business, residences or noise-sensitive land uses.  ♦ A temporary noise control blanket barrier shall be erected, if necessary, along building facades facing construction sites. This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.</td>
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LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
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<td>NOI-1 continued</td>
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<td>♦ Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.</td>
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<td>♦ Ensure that construction activities (including the loading and unloading of materials and truck movements) are limited to the hours of 7:00 a.m. to 7:00 p.m.</td>
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<td>♦ Businesses, residences or noise-sensitive land uses adjacent to construction sites shall be notified of the construction schedule in writing. Designate a “construction liaison” that will be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site.</td>
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**Impact NOI-2:** The future residential units in the Specific Plan would be exposed to outdoor noise levels in excess of 60 Ldn and indoor levels in excess of 45 Ldn. Future commercial uses along Highway 101, Highway 12 and major arterial roadways would be exposed to outdoor noise levels in excess of 70 Ldn. These noise levels would exceed the City and State established land use compatibility thresholds. This would be a **significant** impact.

**Mitigation Measure NOI-2a:** In areas where new residential development would be exposed to an LAeq of greater than 60 dB, site-specific noise studies shall be conducted to determine the area of impact and present appropriate mitigation measures to reduce noise levels to within established allowable levels, which may include the following:

♦ Utilize site planning to minimize noise in shared residential outdoor activity areas by locating the areas behind the buildings, in courtyards, or orienting the terraces to alleyways rather than streets, whenever possible.

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<tr>
<td>NOI-2 continued</td>
<td>♦ Mechanical ventilation satisfactory to the City of Santa Rosa should be provided in all units so that windows can remain closed at the choice of the occupants to maintain interior noise levels below 45 dBA L_{dn}.</td>
<td>♦ Sound rated windows and construction methods necessary to provide the requisite noise control for residential units proposed along Highway 101, Highway 12 and NWPR tracks where noise levels could exceed 70 dBA L_{dn}.</td>
<td>♦ Adopt a policy to limit typical instantaneous maximum noise levels caused by railroad trains to 55 dBA L_{max} inside new housing units proposed along the NWPR tracks.</td>
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<td>♦ New development shall incorporate the identified mitigation measures contained in the noise study, as approved by the City.</td>
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Mitigation Measure NOISE-2b: Avoid locating noise sensitive outdoor commercial areas (i.e., outdoor dining, childcare facilities, etc.) adjacent to Highway 101, Highway 12 or major arterial roadways unless they are shielded by sound barriers or structures. Mechanical ventilation should be provided in all noise sensitive commercial uses (i.e., offices, childcare, art galleries, libraries, etc) adjoining Highway 101, Highway 12 or major arterial roadways. Sound rated windows and construction methods may also be necessary.

LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
**Table 2-1  Summary of Impacts and Mitigation Measures (continued)**

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<tr>
<td><strong>Impact NOI-3:</strong></td>
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<td>Mitigation Measure NOI-3a: Developers shall reduce vibration from construction activities by implementing the following during construction: ♦ Avoid impact pile driving where possible and use drilled piles when possible since drilled piles causes lower vibration levels where geological conditions permit their use. ♦ Avoid using vibratory rollers and tampers near sensitive areas.</td>
<td>LTS</td>
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<tr>
<td>Structures in the vicinity of development allowed in the Specific Plan Area could be exposed to construction-related vibration during the excavation and foundation work associated with projects implementing the Specific Plan. This would be a significant impact.</td>
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### TABLE 2-1  SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

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<tr>
<td>NOI-3 continued</td>
<td>♦ Development of a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits and address the need to conduct photo, elevation and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits. ♦ At a minimum, vibration monitoring shall be conducted during initial demolition activities and during pile driving activities. Monitoring results may indicate the need for more or less intensive measurements. ♦ When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures. ♦ Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.</td>
<td>Appropriate mitigation shall be approved and required by the City prior to commencement of construction.</td>
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### POPULATION AND HOUSING

*The Specific Plan would not result in significant impacts related to population and housing; therefore, no mitigation measures are required.*

LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
### PUBLIC SERVICES AND RECREATION

*The Specific Plan would not result in significant impacts related to public services and recreation; therefore, no mitigation measures are required.*

### TRANSPORTATION AND CIRCULATION

**Impact TRANS-1**: Buildout of the Specific Plan in the future would exacerbate unacceptable LOS F traffic conditions in both directions on Highway 101, and unacceptable LOS E conditions on westbound State Highway 12. This would be a significant impact.

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<td>TRANS-1</td>
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**Mitigation Measure TRANS-1**: There are no known freeway capacity projects that would result in acceptable operation in the future, and correspondingly no means for fair-share payments for impacts to Highway 101 to be collected.

### UTILITIES AND INFRASTRUCTURE

*The Specific Plan would not result in significant impacts related to utilities and infrastructure; therefore, no mitigation measures are required.*

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LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact
3 REVISIONS TO THE DRAFT EIR

This chapter presents specific changes to the text of the Draft EIR that are being made in response to comments made by the public and/or reviewing agencies. In each case, the revised page and location on the page is set forth, followed by the textual, tabular or graphical revision. None of the changes constitute significant changes to the Draft EIR, so the Draft EIR does not need to be recirculated.

The second diamond on page 3-12 of the Draft EIR is hereby amended as follows:

- **Imwalle Gardens Sub-Area.** North and south of West Third Street and west of North Dutton Avenue, is the last urban farm in Santa Rosa, which has been in operation since 1886. The gardens are organic, so pesticides and other harmful chemicals are not likely to present problems for surrounding residents. The City’s General Plan acknowledges the role of the Sub-Area as an Urban Area and contains policies supporting city-centered growth and land use intensification.

The second diamond on page 3-13 of the Draft EIR is hereby amended as follows:

- **Historic Residential Sub-Areas.** Santa Rosa has a rich historical heritage and many historical resources historic buildings and older neighborhoods still remain intact in and around the downtown area. Residential preservation districts located within or adjacent to the Specific Plan Area include: St. Rose, Cherry Street, West End, Olive Park and Burbank Gardens. These preservation historic districts add to the character and quality of the downtown area by providing distinctive architecture and a glimpse into Santa Rosa’s history. There would be no change to existing land-use designations or densities in these Sub-Areas under the Specific Plan.
The second paragraph under Section a on page 4.4-3 of the Draft EIR is hereby amended as follows:

The CRHR includes properties that are listed or have been formally determined to be eligible for listing in the NRHP, State Historical Landmarks and eligible Points of Historical Interest. Other resources require nomination for inclusion in the CRHR. These may include resources contributing to the significance of a local historic district, individual historical resources, historical resources identified in historic resource surveys conducted in accordance with SHPO procedures, cultural historic resources or districts designated under a local ordinance and local landmarks or historic properties designated under local ordinance.1

The paragraph under Section b on page 4.4-3 through 4.4-4 of the Draft EIR is hereby amended as follows:

Section 15064.5 of the State CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on nonfederal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism and inadvertent destruction; establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the ability to make recommendations for treatment of the remains within 48 hours of being granted access to the site; and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Two additional policies under Goal HP-B on page 4.4-6 through 4.4-7 of the Draft EIR are added as follows:

♦ **Policy HP-B-4**: Allow for the adaptive reuse of historic landmark structures for institutional, office, or limited commercial uses, incorporating improvements to minimize negative impacts on existing neighborhoods to the extent feasible.

♦ **Policy HP-B-7**: In establishing zoning designations for historic properties, consider historic uses and establish provisions to encourage retention of the historic use and/or setting.

The paragraph under Section c on page 4.4-8 of the Draft EIR is hereby amended as follows:

The 1988 Preservation Ordinance was created by the City’s Cultural Heritage Board. Santa Rosa’s on-going support of preservation planning is also mentioned in the City’s General Plan, which includes a separate Historic Preservation Element for Historic Resources. Railroad Square is called out as an example of a preservation district historic landmark.

The first paragraph under Section 1 on page 4.4-8 of the Draft EIR is hereby amended as follows:

In the Specific Plan Area, there are five Historic Preservation Districts, eight Historic Landmarks, seven archaeological sites and fifteen historic structures that are listed or eligible for listing on the various local, State and national registers.

The last paragraph on page 4.4-8 of the Draft EIR is hereby amended as follows:

Literature reviews and cultural surveys were conducted to identify cultural archaeological and historical resources in the Specific Plan Area. It should be noted that the literature review for historical resources was
made for the entire Specific Plan Area, whereas the pedestrian archaeological and historic structure survey was conducted only in Specific Plan Areas identified as higher priority at the time of the survey. The record search for these cultural resources was conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System, which is housed at Sonoma State University. The records search included a review of all site records and study reports on file within a 0.5-mile radius of the Specific Plan Area. Included in the review were the California Inventory of Historical Resources (California Department of Parks and Recreation 1976)\(^2\) and the California Office of Historic Preservation’s (CA-OHP) Five Views: An Ethnic Historic Site Survey for California,\(^3\) California Historical Landmarks,\(^4\) California Points of Historical Interest\(^5\) and the Historic Properties Directory Listing.\(^6\) Depending on the location and type of site, a combined pedestrian and/or windshield survey was performed in the Specific Plan Area by an archaeologist and an architectural historian from Garcia and Associates.

The first paragraph under Section 3 on page 4.4-9 of the Draft EIR is hereby amended as follows:

Exceptionally significant buildings have been designated Landmarks, and historic neighborhoods have been designated Preservation Districts (PDs)


by the City of Santa Rosa's Cultural Heritage Board (SRCHB). Eight historic PDs have been identified in the City of Santa Rosa, of which five are located within the Specific Plan Area: Olive Park PD, St. Rose PD, Cherry Street PD, Railroad Square PD, and West End PD and Burbank Gardens PD. Five preservation districts are situated within the Historic Residential Sub-Areas and one preservation district is in the Railroad Square Sub-Area. A portion of the Burbank Gardens PD is included in the Park and Gardens Sub-Area.

The first paragraph on page 4.4-10 of the Draft EIR is hereby amended as follows:

The City of Santa Rosa has designated nineteen historic landmarks within the City. Eight of these are located in the Specific Plan Area, as shown in Table 4.4-2.

The last paragraph on page 4.4-10 of the Draft EIR is hereby amended as follows:

Other significant historical resources are those listed or eligible for listing on the NRHP and the CRHR. NRHP- and CRHR-listed properties within the Sub-Areas are shown in Table 4.4-3.

The paragraph under Section 4 on page 4.4-11 of the Draft EIR is hereby amended as follows:

The historic resources survey of buildings and structures, focusing only on high priority locations within the Specific Plan Area at the time of the survey, identified fifteen potentially significant historic resources not previously listed as NRHP, CRHR, or Santa Rosa Historic Landmarks. The findings are listed in Table 4.4-4. The potentially significant buildings are in three of the seven Sub-Areas: Imwalle Gardens, Railroad Corridor and

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Railroad Square. Due to the generalized level of surveying, there may also be other buildings with in the Specific Plan Area that would be considered potentially significant.

The paragraph under Section 4 on page 4.4-11 of the Draft EIR is hereby amended as follows:

The historic resources survey of buildings and structures identified fifteen potentially significant historical resources not previously listed as NRHP, CRHR, or Santa Rosa Historic Landmarks. The findings are listed in Table 4.4-4. The potentially significant historical resources buildings are in three of the seven Sub-Areas: Imwalle Gardens, Railroad Corridor and Railroad Square. Due to the generalized level of surveying, there are likely may also be other resources buildings with in the Specific Plan Area that would be considered potentially significant pursuant to CEQA.

The title for Table 4.4-4 on page 4.4-13 of the Draft EIR is hereby amended as follows:

**Table 4.4-4 POTENTIALLY ELIGIBLE HISTORIC RESOURCES OBSERVED IN HIGH PRIORITY LOCATIONS WITHIN THE SPECIFIC PLAN AREA**

The second paragraph under Section a on page 4.4-15 through 4.4-16 of the Draft EIR is hereby amended as follows:

To address these potential risks, there are existing regulations that would help protect archaeological resources. Such measures include the Secretary of the Interior’s Standards for Identification (Standards I and II), which requires survey activities to be conducted to document the information necessary to achieve defined preservation goals. Adherence to the Standards from the Secretary of the Interior guidelines are required by Policy HP-B-1 under the General Plan. In addition, General Plan Policy HP-B-8 requires sites to be preserved that are eligible for the National Register of Historic Places and pursue listing eligible sites in the Register.
Additionally, the CNAHCSSA and Policies HP-A-2 and HP-A-3 under the General Plan require for proper notification of experts upon discovery of human remains, significant artifact, or cultural resources for proper assessment and to determine the necessity for construction or excavation activity to cease. Moreover, proper implementation of regulations from the Public Resources Code, specifically Section 21083.2, would diminish the potential impacts from any project involving the demolition or adverse change of an archaeological site that is listed on the NRHP or CRHR or is eligible for listing.

The first paragraph under Section b on page 4.4-16 of the Draft EIR is hereby amended as follows:

Given the concentration of several historical resources in the Specific Plan Area, development allowed under the proposed Specific Plan could involve the destruction and/or adverse alteration of the physical characteristics of a historical resource structure. In addition, the demolition, construction, renovation or relocation of buildings may adversely impact the historical character or setting significance of a historic district. Building and renovation staging areas may also have short-term impacts on the resources by detracting from the character of the historical districts.

The last paragraph on page 4.4-16 of the Draft EIR is hereby amended as follows:

However, existing regulations, policies and standards diminish these potential impacts. For example, the Secretary of the Interior’s Standards for Identification (Standards I and II) require survey activities to be conducted to document the information necessary to achieve defined preservation goals. Adherence to the Standards from the Secretary of the Interior guidelines are required by Policy HP-B-1 under the General Plan. Additionally, The City’s Preservation Ordinance of 1988 and General Plan Policies HP-B-2 to HP-B-8 are designed to preserve and enhance the City’s historical resources structures and neighborhoods. For the for-
mer, the City’s Santa Rosa’s Cultural Heritage Board’s existing reviews authority extends to properties with the historic overlay (–H) or on a case by case referral basis. The CHB may review projects as necessary to evaluate impacts on properties without the –H overlay at the discretion of Staff completing the environmental review and/or the decision-making review body all proposed adverse impacts to historic structures and provides proper mitigation measures. Also, Goal HP-C under the General Plan, and all of its supporting policies, seek to increase public participation in the historic preservation process. Implementation of these policies would reduce the impact of deterioration by increasing the awareness of Santa Rosa’s historic wealth and encouraging public participation in the stewardship of these invaluable resources.

The first two complete paragraphs on page 4.4-17 of the Draft EIR are hereby amended as follows:

While the Specific Plan would need to comply with these regulations, any new construction activities, in the vicinity of a historical resource structure that is listed or eligible for listing on local, State or national registers could impact or alter the significance of the historical resource structure and/or the character or setting of the area. This would be a significant impact.

In addition, the use of excessive vibration-causing equipment during construction adjacent to historic structures could adversely affect historical resources. This would be a significant impact.

The first paragraph under Section d on page 4.4-17 through 4.4-18 of the Draft EIR is hereby amended as follows:

No human remains are known to exist in the Specific Plan Area based on the negative results from the literature search and the consultation with the NAHC. Although the likelihood of encountering human remains is low, existing regulations, policies and standards diminish these potential impacts. For example, the Secretary of the Interior’s Standards for Iden-
tification (Standards I and II) require survey activities to be conducted to document the information necessary to achieve defined preservation goals. Adherence to the Standards from the Secretary of the Interior guidelines are required by Policy HP-B-1 under the General Plan. Additionally, the CNAHCSA and Policies HP-A-2 and HP-A-3 under the General Plan require for proper notification of experts upon discovery of human remains and for construction or excavation activity to cease.

Page 4.4-19 through 4.4-21 of the Draft EIR are hereby amended as follows:

**Impact CULT-1**: New development and construction activities, including the widening of existing thoroughfares, that involve ground disturbance could destroy or significantly alter buried archaeological deposits. This would be a significant impact.

**Mitigation Measure CULT-1a**: Prior to the issuance of any entitlements, the City shall refer all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any cultural resources. Archaeological monitoring shall be conducted during earth-disturbing activities in the areas of potential impact. If an archaeological site has been identified in the close vicinity of a construction project, project specific mitigation shall be developed, the adverse impact shall be mitigated by conducting Phase I archaeological testing in order to determine the boundaries of the site, and to ensure site avoidance before the commencement of construction activities. If construction personnel locate buried cultural materials, work shall be halted or shifted to another area and a qualified archaeologist shall be contacted to determine proper treatment of the find.

**Mitigation Measure CULT-1b**: In areas with known resources or are sensitive for archaeological resources, as determined through review by the NWIC, a qualified archaeologist with knowledge of prehis-
toric and historic-era archaeology shall prepare and carry out an Archaeological Testing, Monitoring and Data Recovery Plan (ATMDRP) for the site prior to the issue of entitlements. This ATMDRP will emphasize the existing conditions of the proposed project area; examine the sensitivity for intact archaeological deposits in light of specific project designs; and provide treatment options in order to protect archaeological resources that meet the eligibility criteria of the CRHR. The scale and scope of the ATMDRP shall be appropriate to that of the project and its potential effects to cultural resources. The City, or their authorized qualified consultant, shall review the ATMDRP for adequacy. The ATMDRP may include some level of worker orientation program shall to be conducted prior to and during earth-disturbing activities in sensitive area. The program shall This type of program would summarize relevant laws and regulations that protect archaeological resources, and review applicable avoidance and minimization measures to protect archaeological resources. Other protective measures such as Exclusionary plastic mesh fencing shall be installed and maintained to prohibit the general public from disturbing sub-surface soils and impacting possible archaeological deposits may also be included as monitoring tools in the ATMDRP.

Mitigation Measure CULT-1c: The City shall require initiate consultation with Native American tribes whenever necessary prior to submittal the issuance of entitlement applications for land divisions and/or new construction to ensure the respectful treatment of Native American sacred places. Consultation shall explicitly be initiated with the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians in order to establish the likelihood and potential of any adverse impacts to Native American cultural or scared places, including human burials; and to establish the appropriate treatment of such resources. Consultation is defined as meaningful and timely discussion and careful consideration of the views of each party, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement.
Significance After Mitigation: Less than significant.

Impact CULT-2: Any new development or construction activities, including the widening of existing thoroughfares, in the vicinity of a historical structure that is listed or eligible for listing on local, State or national registers could impact or alter the historic structure historical resource and/or the character or setting of the area. This would be a significant impact.

Mitigation Measure CULT-2a: Prior to the issuance of any entitlements, the City shall submit all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any known or unknown cultural resources.

Mitigation Measure CULT-2ab: Adverse impacts of new design elements on the character of a historic building or area shall be evaluated on a case-by-case basis in accordance with the various local, State and federal laws and regulations protecting these resources. Prior to construction, large format camera Historic American Landscape Survey (HALS) Level II black and white 8 by 10 inch archival quality prints produced by a professional photographer shall be accompanied by a report by a professional architectural historian. A minimum of twenty views shall be documented and two sets of prints shall be sent to the California State Library in Sacramento. Potential adverse impacts to the significance of a historical resource shall be evaluated on a project specific level in accordance with applicable local, State and federal laws and regulations protecting these resources.
including the environmental review process. Strategies such as restoration, rehabilitation and adaptive reuse shall be encouraged. Photographic documentation is generally not adequate to mitigate a significant adverse impact to a historical resource. Therefore large format Historic American Landscape Survey (HALS) Level II photographs accompanied by a report by a professional architectural historian shall not be considered a common and acceptable mitigation for demolition of a historical resource.

Mitigation Measure CULT-2a: Specific thoroughfare widening projects within the Specific Plan Area shall be designed so that projects do not detract from the character of the historic building or property. The SRO HB should review such projects for adequate mitigation measures before they are implemented.

Mitigation Measure CUTL-2cd: A worker orientation program shall be conducted prior to and during construction activities in sensitive areas as defined at the project specific level. The program shall summarize relevant laws and regulations that protect resources, and review applicable avoidance and minimization measures to protect measures for minimizing impacts to historical resources. Exclusionary plastic mesh fencing shall be installed and maintained to prohibit equipment from impacting significant structures.

Significance After Mitigation: Less than significant.

Impact CULT-3: Excessive vibration-causing equipment in construction areas located less than 25 feet from significant historic masonry buildings and pile-driving within 200 feet of historic structures could have an adverse impact on the integrity of historic resources within the Specific Plan Area. This would be a significant impact.
Mitigation Measure CULT-3a: The use of heavy bulldozers and other excessive vibration-causing equipment in construction zones shall be excluded within 25 feet of significant historic buildings or structures or potentially significant historical resources. A system of spot-check monitoring shall also be performed in these locations to ensure that the historic resources do not sustain damage by an architectural historian at the critical times as defined at the project specific level.

Mitigation Measure CULT-3b: The use of pile-driving equipment during construction activity shall be excluded within 200 feet of all eligible or potentially eligible historic resources; augers shall be used within 200 feet. A system of spot-check monitoring shall also be performed in these locations to ensure that the historic resources do not sustain damage by an architectural historian at the critical times as defined at the project specific level.

Significance After Mitigation: Less than significant.

The second paragraph on page 4.6-11 of the Draft EIR is hereby amended as follows:

Due to the close proximity of sites, there may be an area-wide contamination issue, rather than that constrained to individual sites. The primary factor controlling the spread of subsurface contamination is shallow groundwater and groundwater flow. The flow of groundwater may be constrained through the network of monitoring wells often constructed about sites with contaminated groundwater. The “Geotracker” database maintained by the State of California includes this information, some of which was included in the EDR report. The EDR report also summarized some basic information about groundwater. According to their map, groundwater flow in the area is generally westerly, except near Santa Rosa Creek, where subsurface flow is influenced by seepage into the creek and is therefore southwesterly north of the creek and northwesterly north of the creek. The depth to groundwater in the area is re-
corded at between 7 and 25 feet below the ground surface, but mainly be-
tween 9 and 15 feet in depth.

Table 4.6-1 on page 4.6-13 through 4.6-14 of the Draft EIR is hereby
amended as follows:

<table>
<thead>
<tr>
<th>Sub-Area</th>
<th>Hazardous Material Site</th>
<th>Site Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Courthouse Square</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS 1</td>
<td>Old Hospital Site</td>
<td>437 A Street</td>
</tr>
<tr>
<td>CS 2</td>
<td>Greyhound Bus Depot (former)</td>
<td>416 B Street</td>
</tr>
<tr>
<td>CS 3</td>
<td>AT&amp;T Communications</td>
<td>520 East 3rd Street</td>
</tr>
<tr>
<td>CS 4</td>
<td>National Bank of the Redwoods</td>
<td>90 Santa Rosa Avenue</td>
</tr>
<tr>
<td>Railroad Square</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RS 1</td>
<td>N.W.R.R</td>
<td>20 West 6th Street</td>
</tr>
<tr>
<td>RS 2</td>
<td>Occhipinti One Step Service Center</td>
<td>210 Fifth Street</td>
</tr>
<tr>
<td>RS 3</td>
<td>Shell Gas Station</td>
<td>200 Fourth Street</td>
</tr>
<tr>
<td>Railroad Corridor</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RC 1</td>
<td>Chevron Chemical, Purity Products</td>
<td>1005 Cleveland Avenue</td>
</tr>
<tr>
<td>RC 2</td>
<td>Kaiser Sand and Gravel Company</td>
<td>1060 Maxwell Drive</td>
</tr>
<tr>
<td>RC 3</td>
<td>Purity Products *</td>
<td>4 Maxwell Court</td>
</tr>
<tr>
<td>RC 4</td>
<td>City of Santa Rosa Corporate Yard</td>
<td>819 Donahue Street</td>
</tr>
<tr>
<td>RC 5</td>
<td>Santa Rosa Ice and Cold Storage</td>
<td>806 Donahue Street</td>
</tr>
<tr>
<td>RC 6</td>
<td>Grace Property</td>
<td>802 and 803 Donahue Street</td>
</tr>
<tr>
<td>RC 7</td>
<td>Westside Engine &amp; Machine /</td>
<td>12 W 3rd Street</td>
</tr>
<tr>
<td></td>
<td>Westside Foreign Auto</td>
<td></td>
</tr>
<tr>
<td>Sub-Area</td>
<td>Hazardous Material Site</td>
<td>Site Address</td>
</tr>
<tr>
<td>----------</td>
<td>--------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>RC 8</td>
<td>Mead Clark Lumber Supply</td>
<td>175 Railroad Street</td>
</tr>
<tr>
<td>RC 9</td>
<td>Yellow and Roadway Freight</td>
<td>270 Dutton Avenue</td>
</tr>
<tr>
<td>RC 10</td>
<td>Shell Gas Station</td>
<td>255 Dutton Avenue</td>
</tr>
<tr>
<td>RC 11</td>
<td>DZ Inc, Shell Bulk Plant</td>
<td>257 Dutton Avenue</td>
</tr>
<tr>
<td>RC 12</td>
<td>McGowan Auto Wrecking Yard</td>
<td>112 Holbrook Street</td>
</tr>
<tr>
<td>RC 13</td>
<td>C&amp;D Batteries</td>
<td>265 Roberts Ave</td>
</tr>
<tr>
<td>RC 14</td>
<td>Allefax</td>
<td>1 Sebastopol Road</td>
</tr>
<tr>
<td>RC 15</td>
<td>Pt. St. George Fisheries</td>
<td>8 Sebastopol Avenue</td>
</tr>
<tr>
<td>Park and Gardens</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PG 1</td>
<td>Texaco</td>
<td>421 Santa Rosa Avenue</td>
</tr>
<tr>
<td>PG 2</td>
<td>Groth Motors</td>
<td>505 Santa Rosa Avenue</td>
</tr>
<tr>
<td>Historical Residential</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HR 1</td>
<td>Sonoma County Water Agency</td>
<td>330 Hewett Street</td>
</tr>
<tr>
<td>Residential Areas</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RA 1</td>
<td>10th Street Partnership</td>
<td>24 Tenth Street</td>
</tr>
</tbody>
</table>

Note: For a compete list of hazardous material sites and hazardous material site descriptions see Appendix E.

* This site was identified during a site visit by Questa Engineering Corporation and is not identified in the Environmental Data Resources Report

Source: Environmental Data Resources, Inc., 2006
Figure 4.6-1, Hazardous Material Sites, on page 4.6-15 of the Draft EIR is hereby amended as shown on page 55 of this Final EIR Addendum.

Two additional hazardous material sites, as shown on Table 4.6-1, have been added to the figure.

The paragraph under Section d on page 4.6-18 of the Draft EIR is hereby amended as follows:

The Park and Gardens Sub-Area at the southeast edge of the Specific Plan Area is the only Sub-Area with no reported environmental sites. Probably due to its small area and lack of historical industry or fuel tanks. One site is a Texaco gas station located at 421 Santa Rosa Avenue and the second site is Groth Motors located at 505 Santa Rosa Avenue. Both sites contain contaminated soil from leaking underground fuel tanks that are currently under study and/or have undergone either partial or complete remediation activities.

Mitigation Measure HAZ-2a on page 4.6-28 of the Draft EIR is hereby amended as follows:

Mitigation Measure HAZ-2a: Developers shall be required to complete a Phase 1 environmental site assessment for each property to be redeveloped. Should the Phase 1 ESA determine a need for additional sampling and testing to determine the extent of any contamination then a Phase 2 shall be completed with sampling and testing of soil and groundwater if applicable. The Santa Rosa Fire Department shall review the Phase I ESA to determine if a Phase II ESA is required. All Phase II ESA investigations shall include the collection and testing of groundwater samples. All discharges to land or water shall be reported to the Santa Rosa Fire Department and the Regional Water Quality Control Board. Development plans for properties where discharges of contaminants have occurred or in close proximity to sites where discharges have occurred shall
FIGURE 4.6-1
HAZARDOUS MATERIALS SITES
Mitigation Measure HAZ-2b on page 4.6-28 through 4.6-29 of the Draft EIR is hereby amended as follows:

Mitigation Measure HAZ-2b: Developers shall complete site remediation in accordance with OSHA Standards, Santa Rosa Fire Department, Sonoma County Environmental Health Department and State Regional Water Resources Quality Control Board Guidelines. Discharges must be characterized, defined and remediated in accordance with local and State laws, regulations and guidelines. The Department of Toxic Substances Control (DTSC) may become involved wherever toxic levels of contamination are found that pose an immediate hazard. Remediation shall reduce human exposure risk and environmental hazards both during and after construction. The remediation plan shall be prepared in accordance with recommendations of the environmental consultant and established procedures for safe remediation. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. Requirements shall include, but not be limited to the following:

1. Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for Underground Storage Tanks (UST’s) and contaminant concentrations.

2. A site specific Health and Safety Plan (HASP) to be prepared by all contractors at the project site, where applicable. This includes a HASP for all demolition, grading and excavation on the site, as well as for future subsurface maintenance work. The HASP shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The HASP will be reviewed and approved by a Certified Industrial Hygienist.
3. Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site.

4. Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable. This shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines.

5. Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a State licensed landfill facility.

6. Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development, and prohibition of groundwater development should it be determined from test results.

7. Completion of an approved remediation plan should land use restrictions be insufficient to allow development to proceed safely. Remediation measures may include excavation and replacement of contaminated soil with clean fill, pumping and treatment of groundwater, thermal treatment, etc.

8. A Site Soil and Groundwater Management Plant shall be required for all sites with significant soil and/or groundwater contamination. Soil impacts must be removed or effectively treated prior to development and property development must not interfere with groundwater investigations and cleanup projects.
The paragraph under Section F on page 4.8-28 through 4.8-29 of the Draft EIR is hereby amended as follows:

Imwalle Gardens Sub-Area contains the last larger-scale farm operation within the City’s Urban Boundary and is surrounded by residential subdivisions. Although there is currently no large-scale agriculture production occurring in the Imwalle Gardens Sub-Area, a small portion of the site is used for limited agriculture production in association with the small retail/distribution store location on the property. The remaining gardens are organic, so pesticides and other harmful chemicals are not used. The three parcels that make up the Imwalle Gardens Sub-Area contain the only designated farmland located in Specific Plan Area, and is currently considered to be Prime Farmland by the Farmland Mapping and Monitoring Program by the California Resources Agency. The designated farmland consists of two large parcels north of West 3rd Street that produces field crops. The third, smaller parcel south of West 3rd Street, is an orchard. The City’s General Plan acknowledges the role of the Sub-Area as an Urban Area, and contains policies supporting city-centered growth and land use intensification.

The last paragraph on page 4.12-1 of the Draft EIR is hereby amended as follows:

The California Department of Transportation (Caltrans) maintains a target Level of Service\(^8\) (LOS) at the transition between LOS C and LOS D for freeway facilities, which translates to a service flow rate of approximately 1,680 passenger cars per hour mile per lane. Where an existing freeway is operating at less than the LOS C/D threshold the existing measure of effectiveness should be maintained.

\(^8\) LOS is explained in the Existing Conditions section of this chapter.
The second paragraph under Section iv on page 4.12-8 through 4.12-9 of the Draft EIR is hereby amended as follows:

The Caltrans target of operation at the LOS C/D threshold for freeway facilities translates to a service flow rate of approximately 1,680 passenger cars per hour mile per lane. In determining whether a project would create an adverse impact to a freeway facility already operating at LOS E or F, the forecast service flow rate was compared to ideal freeway capacity to establish a theoretical volume-to-capacity (v/c) ratio. The v/c ratio is calculated using projected flow rates and an ideal capacity of 2,300 vehicles per hour per lane.

Table 4.12-3 on page 4.12-9 of the Draft EIR is hereby amended as follows:

<table>
<thead>
<tr>
<th>LOS</th>
<th>Maximum Service Flow Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>710 pc/mi/hr/ln</td>
</tr>
<tr>
<td>B</td>
<td>1,170 pc/mi/hr/ln</td>
</tr>
<tr>
<td>C</td>
<td>1,680 pc/mi/hr/ln</td>
</tr>
<tr>
<td>D</td>
<td>2,090 pc/mi/hr/ln</td>
</tr>
<tr>
<td>E</td>
<td>2,350 pc/mi/hr/ln</td>
</tr>
<tr>
<td>F</td>
<td>Greater than 2,350 pc/mi/hr/ln</td>
</tr>
</tbody>
</table>

Notes: pc/mi/hr/ln = passenger cars per hour mile per lane
Criteria are for a freeway with 65 mph free-flow speed
Sources: Highway Capacity Manual 2000, Transportation Research Board; Caltrans Guide for the Preparation of Traffic Impact Studies; W-Trans
The paragraph under Section ii on page 4.12-30 of the Draft EIR is hereby amended as follows:

The Joe Rodota/West County Trail is a regional east-west Class I bikeway that extends approximately 13 miles from Roseland to the western Sonoma County communities of Sebastopol, Graton, and Forestville. Connecting the Joe Rodota/West County Trail into the Courthouse Square Sub-Area has been a longstanding priority. A signalized path crossing at Dutton Avenue was completed in 2005. An extension of the trail from Roseland to the Prince Memorial Greenway is now complete scheduled for completion within the next year.

The fourth diamond under Section iii on page 4.12-30 of the Draft EIR is hereby amended as follows:

♦ West Ninth Street – Wilson Street to Link Lane Stony Point Road

The fifth diamond under Section iv on page 4.12-30 through 4.12-31 of the Draft EIR is hereby amended as follows:

♦ Ninth Street – Dutton Avenue Wilson Street to A Street

The paragraph under Section iii on page 4.12-32 of the Draft EIR is hereby amended as follows:

A traffic signal was recently installed at the Joe Rodota-West County Trail crossing of Dutton Avenue, between the Highway 101 interchange and Sebastopol Road, as part of the City’s CIP. Another recently completed project under the CIP links the Joe Rodota-West County Trail with the Prince Memorial Greenway path along Santa Rosa Creek, between Sebastopol Road and West Third Street. The CIP list indicates that an additional project will include linking the Joe Rodota-West County Trail with the Prince Memorial Greenway path along Santa Rosa Creek, between Sebastopol Road and West Third Street.

This
connection will need to be coordinated with SMART and future development on the TORPA Site. Finally, the CIP indicates that a traffic signal will be installed in the future at the intersection of Fourth Street/Davis Street to improve pedestrian crossing conditions.

The first paragraph on page 4.13-11 of the Draft EIR is hereby amended as follows:

The City’s projected residential water use is 110,000 gallons per detached residential unit per year. Attached residential water use includes no landscape irrigation, beyond what is required by the General Plan, City Design Guidelines and Specific Plan Design Guidelines, and averages two-thirds of the detached residential water use. This is based on an analysis of the past ten years of actual residential water use. The REFs for the non-residential use categories are based on land use categories and equivalent water use per Code section 10912(a).

The second paragraph under Section ii on page 4.13-21 of the Draft EIR is hereby amended as follows:

Based on the Water Supply Assessment, it is estimated that water demand for the Specific Plan Area would be 0.895 mgd at buildout in the next 20 years. This number is conservative in that it includes water for irrigation use and the calculations do not net out the existing General Plan assumptions for development within the Specific Plan Area. Thus, the Specific Plan Area may add sewage flow with the implementation of the Specific Plan when compared with the existing General Plan assumptions for development within the Specific Plan Area. Based on the table contained on Map #6 in Appendix G, it is estimated the Specific Plan would add approximately 1.4 mgd ADWF at buildout in the next 20 years to the existing demand, which is in excess of the 25.9 mgd ADWF planned for based on the existing General Plan. This number is conservative in that it uses 3.25 persons per household for calculation purposes for all new residential units. The result is a conservative
estimation of the ultimate generation of additional sewer since a variety of densities are planned for these areas. In addition, the calculations did not net out all existing industrial land uses which would be eventually be replaced by the new infill development proposed by the Specific Plan. In general, there will be an increase of sewer generated with the implementation of the Specific Plan when compared with the existing General Plan assumptions for development within the Specific Plan Area.

The last paragraph on page 4.13-22 of the Draft EIR is hereby amended as follows:

Recognizing the need to plan for additional expansions/upgrades to the collection system and to the Laguna Wastewater Treatment Plant and disposal system, the Specific Plan contains goals and policies designed to ensure that additional planning is completed for the additional growth allowed under the Specific Plan. Specifically, Specific Plan Policy SP-UPS-3.2 ensures that after the City amends its General Plan to incorporate the Specific Plan, that the City’s Utility Master Plan will be revised to include wastewater system improvements needs identified in the Specific Plan. In addition, this will initiate an update of the Laguna Subregional Water Reclamation System Master Plan for the Laguna System to reflect the changes to the General Plan growth projections. The impacts to the treatment plant from the adoption of the Specific Plan will be evaluated in a manner consistent with the method used to calculate the current 2020 General Plan impacts as detailed in the IRWP Master Plan EIR Appendix N.2 Draft Technical Memo 1.

The first paragraph under Section iii on page 4.13-23 of the Draft EIR is hereby amended as follows:

As discussed above, the Specific Plan would result in the need to quantify the additional flow and may or may not need to expand the Laguna wastewater treatment plant and disposal system in excess of what is currently planned. In addition, the Specific Plan would also result in the
need to improve the local collection system for wastewater. The specific improvements to the local collection system are detailed in Appendix G, but mainly consist of upgrades to the pipe size for the Specific Plan.

The title of Section i under Section C on page 4.13-32 of the Draft EIR is hereby amended as follows:

   i. Sonoma County Countywide Integrated Waste Management Plan (CoIWMP)

The first paragraph under Section i on page 4.13-35 through 4.13-36 of the Draft EIR is hereby amended as follows:

Implementation of the Specific Plan would result in an increased production of solid waste generated by construction and development activities as well as residential occupancy and business/retail operations. Based on the 2006 population of 157,145 residents, Santa Rosa produces 0.468 tons of solid waste per capita each year. Development of the Specific Plan would result in an increase of roughly 8,125 new residents, assuming the average household size of 2.5 anticipated for Santa Rosa in 2020. Therefore, buildout of the Specific Plan it is anticipated to contribute an additional 3,800 tons of solid waste per capita each year. However, the increase in solid waste would be reduced through current and expanded waste recycling efforts and would not exceed the disposal capacity limits of SCWMA.

The paragraph under Section B on page 4.13-37 of the Draft EIR is hereby amended as follows:

Development within Sonoma County has the potential to result in a cumulative impact related to solid waste service and disposal. However, the

---

2002 General Plan EIR identified that with the policies included in the General Plan that the potential for development under the General Plan to result in a cumulative impact related to solid waste service and disposal would be reduced to a less-than-significant level with the included General Plan policies. All of the reasonably foreseeable development in the Specific Plan Area is in keeping with the overall intent of the General Plan and is subject to General Plan policies. The Specific Plan policies regarding solid waste service and disposal are designed to guarantee the City works with the SCWMA to ensure adequate solid waste disposal capacity is built in and accounted for in future planning efforts. Thus, the Specific Plan would not contribute to a significant cumulative impact related to solid waste wastewater services.

Table 4.12-14 on page 4.12-45 of the Draft EIR is hereby amended as shown on page 65 of this Final EIR Addendum.

The last paragraph under Section A on page 6-1 through 6-2 of the Draft EIR is hereby amended as follows:

Overall, the Specific Plan’s projected build out would exceed the amount of growth that would occur under the existing General Plan for the Specific Plan Area. However, the overall rate of residential growth in the Specific Plan Area will continue to be controlled by the City’s Growth Management Ordinance. Additionally, the Specific Plan is designed to help the City of Santa Rosa control and direct growth away from green field development and focus on brown field and redevelopment opportunities. Specifically, the Specific Plan encourages the City to utilize its vacant and underutilize parcels more efficiently while encouraging higher density uses in appropriate areas of the City. Implementation of the Specific Plan would therefore absorb some growth expected in outlying areas of the City. By focusing growth within the Urban Growth Boundary, the Specific Plan works toward the City’s goal to prevent urban sprawl by while meeting the housing needs of a range of Santa Rosa residents.
**Table 4.12-14  Specific Plan Trip Generation**

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Quantity</th>
<th>AM Peak Daily Trips</th>
<th>PM Peak Hour</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Rate</td>
<td>Trips</td>
<td>Rate</td>
<td>Trips</td>
</tr>
<tr>
<td>Residential at 8 units/acre</td>
<td>267</td>
<td>7.14</td>
<td>1,906</td>
<td>0.56</td>
<td>150</td>
</tr>
<tr>
<td>Residential at 20 units/acre</td>
<td>550</td>
<td>5.70</td>
<td>3,135</td>
<td>0.45</td>
<td>248</td>
</tr>
<tr>
<td>Residential at 30 units/acre</td>
<td>1,024</td>
<td>5.17</td>
<td>5,294</td>
<td>0.41</td>
<td>420</td>
</tr>
<tr>
<td>Residential at 40 units/acre</td>
<td>526</td>
<td>4.29</td>
<td>2,257</td>
<td>0.34</td>
<td>179</td>
</tr>
<tr>
<td>Residential at 50 units/acre</td>
<td>244</td>
<td>4.06</td>
<td>991</td>
<td>0.32</td>
<td>78</td>
</tr>
<tr>
<td>Residential at 70+ units/acre</td>
<td>638</td>
<td>3.76</td>
<td>2,399</td>
<td>0.29</td>
<td>185</td>
</tr>
<tr>
<td>Total Residential Trips</td>
<td></td>
<td>15,982</td>
<td>1,260</td>
<td>1,690</td>
<td></td>
</tr>
<tr>
<td>General Office (average rates)</td>
<td>197.5 ksf</td>
<td>21.71</td>
<td>4,287</td>
<td>3.07</td>
<td>607</td>
</tr>
<tr>
<td>Specialty Retail</td>
<td>266.0 ksf</td>
<td>44.32</td>
<td>11,789</td>
<td>1.03</td>
<td>274</td>
</tr>
<tr>
<td>Supermarket(^a)</td>
<td>30.0 ksf</td>
<td>44.32</td>
<td>1,067</td>
<td>3.35</td>
<td>98</td>
</tr>
<tr>
<td></td>
<td></td>
<td>64.24</td>
<td>1,840</td>
<td>4.95</td>
<td>59</td>
</tr>
<tr>
<td>Passby/Walking(^1)</td>
<td></td>
<td>-40%</td>
<td>-1,227</td>
<td>-39</td>
<td>-126</td>
</tr>
<tr>
<td>Hotel</td>
<td>75 rooms</td>
<td>8.17</td>
<td>613</td>
<td>0.52</td>
<td>39</td>
</tr>
<tr>
<td>Live Theater</td>
<td>2,500 seats</td>
<td>0.20</td>
<td>500</td>
<td>0.01</td>
<td>25</td>
</tr>
<tr>
<td>Total Non-Residential Trips</td>
<td></td>
<td>19,029</td>
<td>1,004</td>
<td>1,512</td>
<td></td>
</tr>
<tr>
<td>Total Trip Generation</td>
<td></td>
<td>35,011</td>
<td>2,264</td>
<td>3,202</td>
<td></td>
</tr>
</tbody>
</table>

Notes: ksf = thousand square feet; \(^1\) Supermarket rates reflect 40 percent deduction for pass-by and walking trips; total trips include both inbound and outbound vehicles.

Written and public hearing comments were received from the following agencies, organizations and members of the public. The comments are divided according to the nature of their authors, in the following order: State Agencies; Regional, County and Municipal Agencies; Business Associations and Businesses; Associations and Non-Profit Organizations; and Members of the Public. Other than the comment letter from the State Clearinghouse, which is listed first, comments within each category are arranged in chronological order as they were received.

A. Written Comments

State Agencies

Regional, County and Municipal Agencies
8. Heather Hines, City Planner, Department of Community Development. City of Santa Rosa. April 6, 2007.
Business Associations and Businesses

Associations and Non-Profit Organization

Members of the Public
36. Mike Eunice, meunice@sonic.net. March 12, 2007.
41. Phyllis Heagney, fpd@sonic.net. March 26, 2007.
42. Alan Kashiwagi, 7526 Bodega Avenue, Sebastopol, CA 95472. March 26, 2007.
43. Yolanda Leon, P.O. Box 8725, Santa Rosa, CA 95407. March 26, 2007.
44. Paul and Nancy Martinez, 1374 Stroven Lane, Santa Rosa, CA 95407. March 26, 2007.
53. Carol Dean, guydean@sonic.net. March 30, 2007.
55. Larry G. Marks, 659 Cherry Street, Santa Rosa, CA 95404. April 3, 2007.
60. Nick Caston, ncaston@sonic.net. April 6, 2007.

B. Public Hearing Comments

61. Planning Commission Public Hearing
A community meeting was held on March 29, 2007. The following is the number of comments received:

S-1: Julia Prange
S-2: Steve Frye
S-3: Ann Hudgins
S-4: Christine Culver
S-5: Dennis Rosatti
S-6: Ann Seeley
S-7: Jack Macy
S-8: Kay Tokerud
S-9: Joel Woodhull
S-10: Willard Richards
S-11: David Grabill
S-12: Steve Birdlebough
S-13: Caroline Banuelos
S-14: Daisy Pistey-Lyhne
S-15: Scott Stegeman
S-16: Commissioner Walsh
S-17: Commissioner Cisco
S-18: Commissioner Duggan
S-19: Commissioner Caston
S-20: Commissioner Arendt
S-21: Chairman Bartley
S-22: Commissioner Caston
This chapter includes a reproduction of, and response to, each letter received during the public review period. Each letter is reproduced in its entirety and is immediately followed by responses to the comments in it. Letters follow the same order as listed in Chapter 4 of this Final EIR and are categorized by:

- State Agencies;
- Regional, County and Municipal Agencies;
- Business Associations and Businesses;
- Associations and Non-Profit Organizations; and
- Members of the Public

Each comment and response is labeled with a reference number in the margin. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response required revisions to the Draft EIR, these revisions are shown in Chapter 3 of this Final EIR document.
March 22, 2007

Ken MacNab
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Subject: Downtown Santa Rosa Station Area Specific Plan
SCH#: 2006072104

Dear Ken MacNab:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 21, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency
SCH# 2006072104
Project Title Downtown Santa Rosa Station Area Specific Plan
Lead Agency Santa Rosa, City of

Type EIR  Draft EIR
Description The Specific Plan is a long-range land use plan promoting transit supportive uses and improvements in the area generally located within one-half mile of a planned commuter rail station site in downtown Santa Rosa. The Specific Plan would permit a mix of residential retail, office, and civic uses through development or redevelopment in the Specific Plan area. Based on a market analysis and extensive public input, development estimates have been established that indicate what types and amounts of development would most likely occur in the Specific Plan area. In addition to the Specific Plan, the EIR addresses related general plan amendments. No development is proposed at this time.

Lead Agency Contact
Name Ken MacNab
Agency City of Santa Rosa
Phone (707) 543-3187
Fax (707) 543-3218
email kmacnab@srrcity.org
Address 100 Santa Rosa Avenue, Room 3
City Santa Rosa
State CA
Zip 95404

Project Location
County Sonoma
City Santa Rosa
Region
Cross Streets US Hwy. 101 and SR 12
Parcel No. Various
Township
Range
Section
Base

Proximity to:
Highways 12
Airports NWPRR / SMART
Railways
Waterways Santa Rosa Creek
Schools SR City, Roseland
Land Use Various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 1; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Housing and Community Development; Office of Historic Preservation; Department of Fish and Game, Region 3; Department of Water Resources; Department of Conservation; California Highway Patrol; Caltrans, District 4; Department of Toxic Substances Control; Department of Health Services

Date Received 02/05/2007  Start of Review 02/05/2007  End of Review 03/21/2007

Note: Blanks in data fields result from insufficient information provided by lead agency.

1-1: This comment acknowledges that the State Clearinghouse has received the Draft EIR and has circulated copies of the documents to selected State agencies for review. The letter further states that the City of Santa Rosa has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. No further response is necessary.
March 20, 2007

Ken MacNab  
City of Santa Rosa  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404

RE: Downtown Santa Rosa Station Area Specific Plan, SCH# 2006072104

Dear Mr. MacNab:

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the City be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way (ROW).

Safety factors to consider include, but are not limited to, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way. Any project that includes a modification to an exiting crossing or proposes a new crossing is legally required to obtain authority to construct from the Commission. If the project includes a proposed new crossing, the Commission will be a responsible party under CEQA and the impacts of the crossing must be discussed within the environmental documents.

Of specific concern is that vandal resistant fencing along the ROW from 3rd to 6th Street be a requirement for the project.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the City.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles  
Environmental Specialist  
Rail Crossings Engineering Section  
Consumer Protection and Safety Division

2-1: This comment notes the legal requirement for the Public Utilities Commission to authorize any project that includes a modification to an exiting rail crossing or proposes a new rail crossing. It is acknowledged that any development or public improvements along (or across) the rail corridor occurring as a result of the Specific Plan will require review and approval by the Public Utilities Commission. No further action is required in regards to the Draft EIR.

2-2: This comment requests for the Specific Plan to require a vandal resistant fence along the ROW from Third to Sixth Street. The Plan includes potential development of currently-vacant parcels along the railway between Third and Sixth Streets, increasing the likelihood for increased pedestrian activity and crossing demand. Development proposals for these parcel(s) will be subject to PUC review and it is understood that vandal-resistant fencing to direct crossings to the appropriate locations will need to be included.

2-3: This comment recommends for the City to work with the Commission early in the conceptual design phase of new development in the vicinity of the ROW. It is acknowledged that early coordination with the PUC and SMART will be beneficial as development projects are proceeding through the design process, which is aligned with Policy SP-T-3.5 of the Specific Plan. No further action is required in regards to the Draft EIR.
March 21, 2007

Mr. Ken MacNab
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Dear Mr. MacNab:

Downtown Station Area Specific Plan – Program Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Downtown Station Area Specific Plan. We reviewed the program-level DEIR and have the following comments:

Trip Generation

1. For residential densities at 8 units per acre (5,445 square feet per unit) AM & PM daily trip rates of single-family detached housing per ITE Trip Generation 7th edition should be applied.  
2. Table 4.12-4 - URBEMIS Location Adjustments: Total trip generation adjustments of -9.15 percent and -14.86 percent were derived from the URBEMIS model for mid-range and upper-range densities respectively. These reductions appear too high as people who reside in the project area are not necessarily going to work there and vice versa.  
3. Table 4.12-14 - Specific Plan Trip Generation: Provide Supermarket land use trips generated with and without pass-by trips.  
4. Figure 4.12-10 - Future plus Specific Plan Traffic Volumes: Show pass-by trips in this figure.  
5. We would also like to see the traffic impact analysis under Cumulative plus Specific Plan Conditions.

Bicycle Improvements

Page 3-21, first bullet item: We believe it is more accurate to state that “The City requested that the Department remove and not replace the existing bicycle/pedestrian overpass during the widening of Highway 101, as the Prince Memorial Greenway path is an acceptable alternative.”
We are expecting additional comments from our Highway Operations unit and will submit them as soon as they are available.

Should you require further information or have any questions regarding this letter, please call or email Ina Gerhard of my staff at (510) 286-5737 or ina.gerhard@dot.ca.gov.

Sincerely,

[Timothy C. Sable]
TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse

3-1: The analysis applies reductions to residential trip generation rates within the Specific Plan Area using methodologies incorporated into the URBEMIS application. The least-dense residential development included in the Plan is eight units per acre. In contrast, the average residential density included in ITE’s *Trip Generation* is approximately three units per acre and reflects surveys conducted at a myriad of sites including suburban locations. Utilizing the unadjusted ITE rates for detached single-family homes would significantly overstate vehicle trip generation and dismiss the research-supported premise that a larger share of trips will be made by transit, walking and bicycling in an urban mixed-use environment, such as that proposed by the Plan.

3-2: The applied deductions based on the URBEMIS methodologies rely on numerous factors, not just the proximity of housing to jobs. In fact, the deduction to standard ITE single-family housing rates related to residents living near a major employment center, such as downtown Santa Rosa, is only 2.46 percent.

3-3: Table 4.2-14 has been updated to show the supermarket trips with and without the applied pass-by/walking deduction. The revised table is included in Chapter 3 of this Final EIR Addendum.

3-4: The analysis applies standard ITE “Supermarket” trip generation rates, even though these rates are based primarily on auto-oriented suburban locations. The applied rates may, therefore, be overly-conservative for a dense urban environment. The EIR traffic analysis assumes a 40 percent trip deduction for pass-by and walking trips. This is consistent with the ITE *Trip Generation Handbook*, which indicates that pass-by percentages alone would be approximately 41 percent based on similarly-sized supermarkets. The traffic analysis
performed assumes that this deduction would be comprised of both vehicle pass-by and walking trips, again potentially over-stating car trips by not taking separate deductions for both pass-by and walking. Because the conducted analysis is considered to be conservative, combined with the fact that the precise location of a supermarket within the Plan Area is unknown until a specific proposal comes forth, updating Figure 4.12-10 with pass-by volumes would be of little use. No further action is required with regard to the Draft EIR.

3-5: If the request for analysis of Cumulative plus Specific Plan Conditions refers to future buildout conditions, the traffic impact analysis does this in the “Future with Plan” scenario. If the comment refers to a scenario that evaluates currently-approved City projects plus buildout of the Specific Plan, such a scenario could be useful for a project-specific application, but has little applicability for a Specific Plan such as that proposed. This type of analysis would assume the Plan to be fully built out in the next two to three years, which is impossible. No further action is required with regard to the Draft EIR.

3-6: The comment is noted. The description provided in the first bullet on page 3-21 of the Project Description of the Draft EIR is adequate and does not need further revision. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

3-7: This comment does not question the adequacy of the Draft EIR, but rather provides notice that additional comments from the Highway Operations unit may be submitted prior to the closing of the comment period. No further action is required with regard to the Draft EIR.
April 2, 2007

Mr. Ken MacNab
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Dear Mr. MacNab:

Downtown Santa Rosa Station Area Specific Plan – Program Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Downtown Station Area Specific Plan. Please find below additional comments on the program-level DEIR for the Downtown Station Area Specific Plan from our Highway Operations unit. The comments are based on the review of Section 4.12 - Transportation and Circulation of the document.

Highway Operations

1. General comments:

   - The traffic analysis should assess on-ramp queuing and its impacts on intersection operations. Depending on where freeway constraints (bottlenecks) are located, some freeway segments may not have adequate capacity to accommodate all on-ramp demand traffic. If adequate freeway capacity is not available, on-ramp queues could develop and have adverse impacts on the ramp or possibly on other nearby intersections.

   - The document should address the adequacy of off-ramp storage and existing turn lanes on intersection approaches. Inadequate turn lane storage may have a negative impact on intersection operations. Highway Capacity Manual (HCM) methods of determining Level of service (LOS) assume that adequate storage is available.

   - AM peak hour analysis under various scenarios should be evaluated.

2. Table 4.12-16 on Page 4.12-48: The scope and boundaries of the traffic analysis should be determined by trip distributions from the proposed projects. The table shows the distribution percentages for Highway 101 North, Highway 101 South, Highway 12 East and Highway 12
West. In order to adequately address all impacts from the proposed projects, all ramp intersections and freeway segments affected by these distributions should be studied.

3. Page 4.12-1, last paragraph and Page 4.12-8, last paragraph: “1680 passenger cars per mile per lane” should be corrected to “1680 passenger cars per hour per lane”.

4. Table 4.12-3 on Page 4.12-9: “pc/mi/ln” should be corrected to “pc/hr/ln”.

5. Table 4.12-11 on Page 4.12-28 and Table 4.12-20 on Page 4.12-58: It appears that the LOS calculations are based on traffic demand volumes. The tables show LOS F and volumes are higher than section capacities for some freeway segments. In reality, all demand volumes will be constrained and the constrained volumes will be lower than capacities. According to the HCM 2000, an ideal capacity of 2400 vphpl will be adjusted to a lower value due to the constrained geometry. (Please note that the Department usually uses 2000-2100 vphpl as freeway capacity). A potential bottleneck would occur when demand volume is higher than capacity. Freeway LOS analysis should consider any bottlenecks and their associated congestion.

6. Table 4.12-21 on Page 4.12-59: V/C ratios (demand/capacity) for US 101 are shown greater than 1. As explained in comment # 5 above, a V/C ratio cannot be greater than 1 in reality. A bottleneck would likely be expected when the V/C ratio is greater than 1. Since freeway congestion is associated with bottleneck locations, the “change to V/C” shown on the table has little meaning.

7. Table 4.12-17 on Page 4.12-50: The document states that Specific Plan Policies require that mitigation measures would be provided for various locations. Will these mitigation measures be provided by the proposed projects? If not, who will implement these mitigation measures and how will they be funded? Will traffic impacts fees, based on fair-share by project, be collected for needed future improvements?

8. Page 4.12-75 - Impact Trans-1: The Specific Plan will add a substantial number of vehicles to the freeway system. The traffic study should clearly identify freeway bottleneck locations and associated impacts and consider possible mitigation measures.

Should you require further information or have any questions regarding this letter, please call or email Ina Gerhard of my staff at (510) 286-5737 or ina_gerhard@dot.ca.gov.

Sincerely,

TIMOTHY J. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse
Letter 4: Timothy C. Sable, District Branch Chief, Department of Transportation. April 2, 2007.

4-1: The comment refers to analysis of Sonoma County freeways to determine where future “bottlenecks” may occur and how those freeway bottlenecks could affect on-ramp operation. Comments 4-4, 4-7 and 4-10 are also requests to analyze future bottleneck locations, which are also addressed in this response.

As indicated in the comments, and in the EIR, portions of both Highway 101 and Highway 12 in Sonoma County are operating at capacity. While current and planned freeway widening projects are expected to provide some relief, future traffic projections and analyses indicate that demand will continue to outpace freeway capacity. Completion of the HOV lane system on Highway 101 in the coming years will signal the end of major capacity enhancements to the freeway achieved through widening. Barring major technological advances in freeway operations, there are no feasible means of increasing network capacity other than building additional freeways (which is considered to be financially, politically and environmentally infeasible).

The City of Santa Rosa acknowledges the capacity constraints of Highway 101 in the Santa Rosa 2020: General Plan Environmental Impact Report, 2001. Impact 4.4-A references a host of General Plan policies intended to reduce circulation impacts, though acknowledges that buildout of the General Plan will still result in significant and unavoidable impacts, given the impediments to constructing major regional capacity improvements.

Two recent Caltrans documents include future operating projections for Highway 101 in the year 2030\(^1\), assuming completion of continu-

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\(^1\) Highway 101 HOV Lane Widening and Improvements Project Environmental Assessment/Draft Environmental Impact Report: Highway 101 from Old Redwood
ous HOV lanes between Windsor and Petaluma. Peak period freeway operations are projected to be in the unacceptable level of service (LOS) E-F range in the northbound direction from Petaluma Boulevard North to Railroad Avenue, West Sierra Avenue to Rohnert Park Expressway and Highway 12 to Third Street. In the southbound direction, unacceptable conditions are projected from Airport Boulevard to Fulton Road and from Bicentennial Avenue to Baker Avenue.

In order to identify how the Station Area Specific Plan could influence the locations of these future “bottleneck” locations on Sonoma County freeways, a new region-wide transportation modeling effort would need to take place, since, as indicated by Caltrans, the addition of traffic in one area can create unexpected results miles away. The usefulness of such an analysis is questionable. The EIR is consistent with the Caltrans analyses in that Highway 101 is projected to operate unacceptably in the future, even upon completion of current and planned widening projects. There is also a prevailing consensus that further widening of the freeway beyond the HOV lanes is extremely unlikely to occur.

Acknowledging the limitations of the regional freeway system, agencies such as Santa Rosa and the County of Sonoma have resorted to focusing resources on managing transportation demand through TSM and TDM measures; improving alternative transportation modes such as transit usage, bicycling and walking; and encouraging better land development practices that focus on infill and transit-orientation instead of outward suburban expansion. A major goal of the Station Area Specific Plan is to reduce automobile reliance and roadway impacts through this type of “smart growth.”

Highway to Rohnert Park Expressway, August 2006, and Highway 101 HOV Lane Widening and Improvements Project Environmental Assessment/Draft Environmental Impact Report: Highway 101 from Steele Lane to Windsor River Road, December 2006
Because there are no known freeway capacity enhancements that can be made in the future, combined with a lack of financial mechanisms to collect fair-share impact fees for freeway projects if any were to be identified, the Station Area Plan EIR identifies freeway impacts as significant and unavoidable. Completion of a regional freeway analysis to determine future bottleneck locations (and subsequent impacts to onramps) would result in no changes to this conclusion. No further action is required in regards to the Draft EIR.

4-2: Based on the comment, further analysis of the potential queues at freeway ramp intersections was conducted. The SYNCHRO/SIMTRAFFIC software utilized to determine corridor levels of service under coordinated signal operation was also used to determine Future with Specific Plan 95th percentile vehicle queue lengths. Queuing conditions on freeway ramps at College Avenue, Third Street and Dutton Avenue have been evaluated to ensure that operation of the mainline freeway is not adversely affected by operation of the ramp terminals. The available storage lengths on the longest ramp lanes were determined by measuring the distance between the “gore point” and intersections, and subtracting 500 feet for deceleration. Queuing was also evaluated on the arterial segments between adjacent freeway ramps, since the short distances between these intersections can lead to potential queuing problems.

The projected 95th percentile queues are expected to result in no adverse impacts to mainline freeway segments. Storage lengths on arterial streets between ramp intersections are also expected to result in no adverse impacts, though there are two locations where available storage may be exceeded. The eastbound left turn lane on College Avenue at the Highway 101 Northbound Ramps intersection may exceed storage by approximately two car lengths. Peak queues on the southbound left and through lanes on Dutton Avenue at the Highway 12 Eastbound Ramps intersection are also projected to extend one to two car lengths beyond available storage. This type of
operation is typical at closely-spaced freeway ramps during the height of peak hours and is minimized though ongoing review and adjustment of coordinated signal timing schemes. Based on the SYNCHRO/SIMTRAFFIC corridor evaluations conducted for the EIR analysis, these conditions are expected to be infrequent and would clear quickly. The arterial corridors themselves would be expected to operate at acceptable levels of service.

A summary of the projected 95th percentile queues under Future with Specific Plan scenario is shown in Table 5-1.

4-3: Projections from the City of Santa Rosa’s traffic model were utilized as the basis for all future year analysis scenarios. The traffic model produces data only for the PM peak hour, which generally reflects worst-case operating conditions. An analysis for the future AM peak hour was not conducted based on a lack of available data, though the EIR does provide AM peak hour trip generation projections in Table 4.12-14. Buildout of the Specific Plan is expected to result in approximately 29 percent fewer AM peak hour trips than PM peak hour trips, supporting the premise that the worst-case conditions have been evaluated in the EIR.

4-4: The Specific Plan is a program-level document and does not reflect a list of currently-proposed projects. Evaluation of impacts to the county-wide freeway system could only take place under a future analysis year scenario. Please see response to Comment 4-1.

4-5: This comment does not question the adequacy of the Draft EIR, but rather provides a correction within the text. The correction is included in Chapter 3 of this Final EIR Addendum.

4-6: This comment does not question the adequacy of the Draft EIR, but rather provides a correction on Table 4.12-3. The revised table is included in Chapter 3 of this Final EIR Addendum.
### Table 5-1 95th Percentile Queues – Future with Specific Plan

<table>
<thead>
<tr>
<th>Ramp Intersection</th>
<th>Available Storage (ft)</th>
<th>95% Queue Length (ft)</th>
<th>Adequate?</th>
</tr>
</thead>
<tbody>
<tr>
<td>College Avenue/Highway 101 Southbound Ramps</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Left Turn Lanes</td>
<td>430</td>
<td>97</td>
<td>Yes</td>
</tr>
<tr>
<td>SB Right Turn Lane</td>
<td>350</td>
<td>81</td>
<td>Yes</td>
</tr>
<tr>
<td>WB Through Lanes</td>
<td>240</td>
<td>32</td>
<td>Yes</td>
</tr>
<tr>
<td>WB Left Turn Lanes</td>
<td>240</td>
<td>125</td>
<td>Yes</td>
</tr>
<tr>
<td>College Avenue/Highway 101 Northbound Ramps</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB Left Turn Lanes</td>
<td>400</td>
<td>220</td>
<td>Yes</td>
</tr>
<tr>
<td>NB Right Turn Lane</td>
<td>300</td>
<td>178</td>
<td>Yes</td>
</tr>
<tr>
<td>EB Through Lanes</td>
<td>240</td>
<td>86</td>
<td>Yes</td>
</tr>
<tr>
<td>EB Left Turn Lanes</td>
<td>240</td>
<td>280</td>
<td>Yes¹</td>
</tr>
<tr>
<td>Third Street/Davis Street-US 101 Southbound Onramp</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Through Lanes</td>
<td>580</td>
<td>105</td>
<td>Yes</td>
</tr>
<tr>
<td>WB Left Turn Lanes</td>
<td>380</td>
<td>246</td>
<td>Yes</td>
</tr>
<tr>
<td>Third Street/Morgan Street-US 101 Northbound Offramp</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>NB Left Turn Lane</td>
<td>380</td>
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<tr>
<td>NB Right Turn Lanes</td>
<td>380</td>
<td>375</td>
<td>Yes</td>
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<tr>
<td>EB Through Lanes</td>
<td>580</td>
<td>160</td>
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<tr>
<td>EB Left Turn Lanes</td>
<td>200</td>
<td>133</td>
<td>Yes</td>
</tr>
<tr>
<td>Dutton Avenue/Highway 12 Westbound Ramps</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left Turn Lane</td>
<td>700</td>
<td>488</td>
<td>Yes</td>
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<td>WB Right Turn Lane</td>
<td>400</td>
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<td>Yes²</td>
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<td>200</td>
<td>193</td>
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<tr>
<td>NB Through Lanes</td>
<td>250</td>
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<td>Dutton Avenue/Highway 12 Eastbound Ramps</td>
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<td>SB Through Lanes</td>
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<td>281</td>
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</tr>
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</table>

¹ Peak hour queue projected to extend beyond turn lane length, however, based on the SIMTRAFFIC corridor analysis conducted in the EIR, such blockages are expected to clear quickly and not adversely affect operation of the corridor.

² Right turn lane projected to be at full capacity, though additional spillover capacity exists in the ramp’s adjacent through lane.

Future freeway volumes represent travel demand projections based on the City’s traffic model and updated to reflect the Specific Plan. The model produces travel demand projections that are unconstrained. The flow rates projected in the EIR were determined using the future volumes, geometric inputs such as number of lanes, shoulder widths, grades and proportion of heavy vehicles. As indicated in the comment, some of the resulting flow rates exceed practical capacity of the freeway. These conditions represent LOS F operation based on Highway Capacity Manual criteria and information in Caltrans’s Guide for the Preparation of Traffic Impact Studies. In cases where the Plan would create or significantly contribute to unacceptable freeway operating conditions, a significant impact is deemed to occur. The applied analysis is oriented to determine the Plan’s level of significance, as discussed in response to Comment 4-1, does not evaluate future bottleneck locations on the County’s freeway system.

The intent of the EIR is to determine freeway operation on the selected segments determined to be most-impacted by the Plan and translate this into a measurable standard of significance to determine whether the project would result in significant impacts to freeway operation. The Caltrans Guide for the Preparation of Traffic Impact Studies provides level of service criteria for freeways based on service flow rates (measured in passenger cars per hour per lane) but includes no methods for determining an impact’s level of significance.

For this reason, the projected service flow rates based on future traffic demand was translated to a volume-to-capacity ratio (V/C), which is a measure frequently used in traffic analyses to determine levels of significance. If a project (or Plan in this case) increases an acceptably-operating facility’s volume-to-capacity ratio by 0.01 or greater, the project is considered to have a significant environmental impact. It is understood that a freeway would not operate with a V/C of greater than 1.0, as this would lead to bottlenecks and constrained
capacity. Despite this, the V/C ratio absolutely remains valid for use as a significance criterion.

4-9: The comment states that Specific Plan policies require mitigation measures for specific roadway improvements at various locations throughout the Specific Plan Area and questions if these mitigation measures will be provided by proposed projects. These statements by the commenter are incorrect. The Specific Plan and Draft EIR identify a list of specific roadway improvements, Table 4.12-7 in the Draft EIR, which must occur as part of implementation of the Specific Plan. The specifics regarding these improvements are identified in Chapter 6 and Appendix C of the Specific Plan and in this EIR.

The commenter goes on to ask who will implement these improvements and how will they be funded. The City of Santa Rosa is responsible for implementation of the Specific Plan. Funding for these roadway improvements will come from a combination of public and private investment as required by Specific Plan Policy SP-T-1.1, SP-T-1.2 and described in Action 8 of the Implementation Financing Action Plan, found in Chapters 6 and 8 of the Specific Plan.

4-10: Please see response to Comment 4-1.
COMMENT LETTER 5

MacNab, Ken

From: PATRICK CARTER [REFPATRICK@sonoma-county.org]
Sent: Thursday, February 22, 2007 2:48 PM
To: MacNab, Ken
Cc: KEN WELLS
Subject: RE: Draft EIR for Downtown Santa Rosa Station Area Specific Plan

Ken,

Not a problem. I found three errors (my corrections in bold):

*Page 4.13-32
i. Sonoma County Countywide Integrated Waste Management Plan (CoIWMB)
  <- should be CoIWMP

*Page 4.13-35-36
Therefore, buildout of the Specific Plan it is anticipated to contribute an additional
3,800 tons of solid waste per capita each year.
"per capita" should be deleted. I can recreate their result if we drop per capita.

*Page 4.13.37
Thus, the Specific Plan would not contribute to a significant cumulative impact related to
wastewater services.
This may be true as well, but this is the solid waste section, not wastewater. Probably
a copy, paste from the previous section.

Other than these errors, I was pleased to see the landfill bans, allocating space for
recycling, and the creation of a recycling plan for construction. Please let us know if
we can be of further assistance.

Patrick Carter
Waste Management Specialist
Sonoma County Waste Management Agency
2300 County Center Dr., Ste. B 100
Santa Rosa, CA 95403
707-565-3687
707-565-3701 fax

5-1: This comment corrects the initial abbreviation of the Sonoma County Countywide Integrated Waste Management Plan on page 4.13-32 of the Draft EIR. The correction provided is reflected in Chapter 3 of this Final EIR Addendum.

5-2: This comment clarifies anticipated quantity of solid waste for each year by the Specific Plan. The correction provided is reflected in Chapter 3 of this Final EIR Addendum.

5-3: This comment corrects the oversight of utilizing “wastewater” instead of “solid waste” under the Cumulative Impacts section on page 4.13-37 of the Draft EIR. The correction provided is reflected in Chapter 3 of this Final EIR Addendum.
DATE: March 16, 2007

TO: Ken MacNab, City Planner

FROM: Jennifer Burke, Senior Water Resources Planner

SUBJECT: Chapter 4.13 of the Downtown Station Area Specific Plan DEIR

Upon review of Chapter 4.13 Utilities and Infrastructure of the Downtown Station Area Specific Plan Draft Environmental Impact Report (DEIR), the Utilities Department has the following comment:

- The Wastewater Section Standards of Significance ii Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments and iii Require or result in the construction of wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects (p. 4.13-17) address impacts to treatment system capacity. The Impact Discussion includes discussion of collection system capacity. Collection system capacity information should not be included.

Thank you.
Upon review of Chapter 4.13 Utilities and Infrastructure of the Downtown Station Area Specific Plan Draft Environmental Impact Report (DEIR), the Utilities Department has the following comments as clarification to our initial memo dated March 16, 2007:

- The Wastewater Section Impact Discussion for Standards of Significance result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments (p. 4.13-21). Please remove the following sentences: Based on the table contained on Map #6 in Appendix G, it is estimated the Specific Plan would add approximately 1.4 mgd ADWF at buildout in the next 20 years to the existing demand, which is in excess of the 25.9 mgd ADWF planned for based on the existing General Plan. This number is conservative in that it uses 3.25 persons per household for calculation purposes for all new residential units. The result is a conservative estimation of the ultimate generation of additional sewer since a variety of densities are planned for these areas. In addition, the calculations did not net out all existing industrial land uses which would be eventually be replaced by the new infill development proposed by the Specific Plan. This analysis is for determining pipe sizing, not flow to the treatment plant. Please replace these sentences with the following, which discusses flow to the treatment plant: Based on the Water Supply Assessment, it is estimated that water demand for the Specific Plan Area would be 0.895 mgd at buildout in the next 20 years. This number is conservative in that it includes water for irrigation use and the calculations do not net out the existing General Plan assumptions for development within the Specific Plan Area. Thus, the Specific Plan Area may add sewage flow with the implementation of the Specific Plan when compared with the existing General Plan assumptions for development within the Specific Plan Area.

- The Wastewater Section Impact Discussion for Standards of Significance result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments (p. 4.13-22). To clarify the process, please add the following sentence to the second to last paragraph in the impact discussion:
“After the Specific Plan is adopted, the impact to the treatment plant will be evaluated in a manner consistent with the method used to calculate the current 2020 General Plan impacts as detailed in the IRWP Master Plan EIR Appendix N.2 Draft Technical Memo 1.”

- The Wastewater Section Impact Discussion for Standards of Significance require or result in the construction of wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects (p. 4.13-17) address impacts to treatment system capacity which may or may not occur. For clarification, please change the first sentence in the impact discussion to the following:

  “As discussed above, the Specific Plan would result in the need to quantify the additional flow and may or may not need to expand the Laguna wastewater treatment plant and disposal system in excess of what is currently planned.”

Thank you.

6-1: This comment generally asks for two sections of Chapter 4.13, Utilities and Infrastructure, to be edited in regards to wastewater. However, no specific edits are identified in this comment letter. Specific comments were submitted subsequent to this letter and can be found under Comments 6-2 through 6-4. No further action is required with regard to the Draft EIR.

6-2: This commentor notes that the analysis pertaining to wastewater impacts in the Draft EIR are based on the City’s infrastructure pipe sizing requirements, and not based on the Water Supply Assessment. The analysis completed based on the City’s infrastructure pipe sizing requirements would result in a more conservative analysis than the analysis based on the Water Supply Assessment. The commenter provides edits to clarify the analysis. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. Since the original analysis is more conservative, the findings and conclusion of the Draft EIR are adequate. No further action is required with regard to the Draft EIR.

6-3: This comment provides additional information to clarify the planning process for wastewater system improvements. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.

6-4: This comment provides language clarifying the potential impacts to treatment system capacity resulting from the implementation of the Specific Plan. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.
April 6, 2007

Mr. Ken MacNab
City of Santa Rosa
Advance Planning & Public Policy
P.O. Box 1678
Santa Rosa, CA 95402-1678

Dear Mr. MacNab:

Subject: Draft EIR – Downtown Santa Rosa Station Area Specific Plan
State Clearing House Number: 2006072104

Regional Water Board staff has reviewed the sections of the February 1, 2007, Downtown Station Area Specific Plan Program EIR (Draft EIR) that applies to our regulatory jurisdiction including construction storm water and hazardous materials. With regards to hazardous materials, our comments are:

Numerous properties within the proposed project area are currently under investigation and/or in the process of soil and groundwater remediation associated with the unauthorized discharges of wastes. Examples of waste discharges include petroleum such as gasoline, diesel and motor oil, chlorinated solvents used as cleaning and degreasing agents from dry cleaning facilities or auto repair facilities, metals and other chemical pollutants. Known discharges to land, groundwater and surface water have occurred in the project area. Discharges currently unknown are also likely to have occurred.

Therefore, we concur with the requirement for a Phase I Environmental Site Assessment to be completed for each property proposed for redeveloped. The need for a Phase II investigation should be determined by the Santa Rosa Fire Department. All Phase II investigations should include the collection of groundwater samples. And all discharges to land and water must be reported to the Santa Rosa Fire Department and North Coast Regional Water Quality Control Board. Soil and groundwater management plans are generally required for development projects where soil and groundwater impacts are likely or have been documented.

We concur with the need to protect human health and the mitigation of exposure pathways, as described in HAZ-2b. In addition, discharges must be characterized,
defined, and remediated in compliance with local (Santa Rosa Fire Department) and State (North Coast Regional Water Quality Control Board) law and regulations.

Soil impacts must be removed or effectively treated prior to development and property developments must not interfere with groundwater investigations and cleanup projects. Land use restrictions may be a component of a comprehensive cleanup plan as proposed. However, land use restrictions do not negate the need for adequate and complete corrective action.

Development plans for properties where discharges have occurred, or are in close proximity to discharge locations must be reviewed by Santa Rosa Fire Department and Regional Water Board staff.

Construction storm water regulatory requirements also apply. Mr. John Short of the Regional Water Board and his staff will be in communication with the City regarding storm water matters associated with the draft EIR.

Thank you for the opportunity to comment. If you have any questions I can be reached at (707) 576-2675.

Sincerely,

Joan Fleck
Engineering Geologist

cc: Fire Inspector Corey Vincent, Santa Rosa Fire Department

7-1: This comment discusses the presence of sites with contaminated soil and groundwater within the Specific Plan Area. The comment concurs that a Phase I environmental site assessment (ESA) is required for all sites to be redeveloped. The comment also indicates that the requirement for a Phase II environmental site assessment shall be determined by the Santa Rosa Fire Department and that all Phase II ESA investigations shall include the collection of groundwater samples. The comment also states that all discharges to land or water shall be reported to the Santa Rosa Fire Department and to the North Coast Regional Water Quality Control Board (RWQCB) and that soil and groundwater management plans are required for project sites with documented or suspected soil and groundwater contamination. The Draft EIR Mitigation Measure HAZ-2a shall be revised to add clarification based on this comment. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.

7-2: This comment agrees with the mitigation measure as presented in Mitigation Measure HAZ-2b and goes on to say that discharges must be characterized, defined and mitigated in accordance with local and State laws and regulations. The Draft EIR Mitigation Measure HAZ-2a shall be revised to include a clarifying statement that all discharges shall be remediated in accordance with local and State laws and regulations. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.

7-3: This comment indicates that contaminated soil impacts must be removed or treated prior to development and developments must not interfere with groundwater investigations and cleanup projects. The commenter agrees with the mitigation measure that land use restric-
tions may be a part of a site remedial action, but land use restrictions alone do not eliminate the need for corrective remedial action. This comment is consistent with information contained in the Mitigation Measure HAZ-2b. The mitigation measure shall be revised to clarify the mitigation language. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.

7-4: This comment indicates that development plans for properties with a history of soil or groundwater contamination, or in close proximity, should be reviewed by the Santa Rosa Fire Department and the Regional Water Quality Control Board. Mitigation Measure HAZ-2a shall be revised to add clarification of this requirement. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.

7-5: This comment indicates that construction stormwater regulatory requirements also apply. Stormwater quality is addressed under the section of Hydrology and Water Quality. Comment is noted and no further action is required with regard to the Draft EIR.
The Cultural Heritage Board thanks you for the opportunity to review and comment on the Draft EIR for the Downtown Santa Rosa Station Area Specific Plan. The Board is supportive of the station area planning effort but believes more attention needs to be given towards addressing historic and cultural resources within the plan area. Listed below are the Board’s comments, which primarily focus on the Cultural Resources section of the Draft EIR.

A. Appropriate terminology

The Draft EIR uses a variety of terms when referencing resources in the plan area (historical resources, cultural resources, historic resources, historic building, etc.). Inconsistent and casual references could be confusing or misleading to the reader. For purposes of clarity, the DEIR should use language that is consistent with CEQA’s defined terminology and with accepted nomenclature used by preservation professionals. The specific references below should be revised as noted:

1. Page 3-13, under Historic Residential Sub-Areas, replace with the following:

“Santa Rosa has a rich heritage and many historical resources and older neighborhoods remain intact in and around the downtown area. Residential preservation districts located within the Specific Plan Area include: St. Rose, Cherry Street, West End, Olive Park and Burbank Gardens.. These preservation districts add.....”
2. Page 4.4-3, second paragraph, last sentence: replace with the following:

“…..conducted in accordance with SHPO procedures, and local landmarks, districts, or other historical resources designated under a local ordinance.”

3. Page 4.4-8, first paragraph: replace with the following:

“….which includes a separate Historic Preservation Element. Railroad Square is called out as an example of a preservation district.”

4. Page 4.4-8, last paragraph, replace with the following:

“…..to identify cultural resources in the Specific Plan Area. It should be noted that the literature review for historical resources was made for the…..”

5. Page 4.4-10, last paragraph, replace with the following:

“Other significant historical resources are those listed or eligible….”

6. Page 4.4-11, first paragraph, replace with the following:

“…..potentially significant historical resources not previously listed as NRHP, CRHR, or Santa Rosa Historic Landmarks. The findings are listed in Table 4.4-4. The potentially significant historical resources are in…..”

7. Page 4.4-16, third paragraph, replace with the following:

“…..physical characteristics of a historical resource. In addition, the demolition, construction, renovation, or relocation of buildings may adversely impact the historical significance of a historic district. Buildings and renovation staging areas may also have short-term impacts on the resources by detracting from the character of the historic districts.

8. Page 4.4-16, fourth paragraph, fourth sentence, replace with the following:

“The City’s Preservation Ordinance of 1988 and General Plan Policies HP-B-1 to HP-B-8 are designed to preserve and enhance the City’s historical resources.”

9. Page 4.4-17, second and third paragraph, replace with the following:

“…..in the vicinity of a historical resource that is listed or eligible for listing on local, State, or national registers could impact or alter the significance of the historical resource and/or the character…”

“…..could adversely affect historical resources.”
B. General Plan Policy

The General Plan discussion on page 4.4-6 and 4.4-7 specifically references policies HP-B-1, HP-B-2, and HP-B-8. No reference is made to General Plan policy HP-B-4 (adaptive re-use) or HP-B-7 (historic properties zoning), both of which are applicable to the discussion in the DEIR. Technical edits should be made to list these two additional General Plan policies.

C. Designated and eligible resources

The DEIR contains limited information about the concentration of historical and cultural resources in the plan area and requires clarification on the location of resources that have been considered and acknowledgement that other resources are known to exist within the Plan Area and will require further evaluation during subsequent environmental reviews. Additionally, omission of documents such as the City’s Historic Properties Inventory and associated surveys applicable to the SAP boundaries further minimizes the prevalence of designated and eligible resources. Updates should be made to ensure that all resources within the specific plan area that are currently designated as a local landmark, local preservation district, or listed on the State or National Registers are identified.

Reference should also be made to the City’s Historic Properties Inventory and associated surveys applicable to the SAP boundaries. Technical edits should be made to the narrative for clarity and to emphasize that the area contains a concentration of cultural resources, including both recognized historical resources and potentially eligible resources and the need for project specific review for all structures over 45 years of age.

The specific references below should be revised as noted:

1. Page 4.4-8, under methodology:

   Please remove the first paragraph of this section since the information presented could be considered misleading. Especially in light of the following, more accurate statement in the next paragraph which states, “It should be noted that the literature review for historic resources was made for the entire Specific Plan Area, whereas the pedestrian archaeological and historic structure survey was conducted only in Specific Plan Areas identified as higher priority at the time of the survey.”

2. Page 4.4-9, third paragraph, replace with:

   “Eight PDs have been adopted by the City of Santa Rosa, of which six are located within the Specific Plan area: Olive Park PD, St. Rose PD, Cherry Street PD, Railroad Square PD, West End PD, and Burbank Gardens PD.”
Five preservation districts are situated within the Historic Residential Sub-Areas, and one preservation district is in the Railroad Square Sub Area.”

3. Page 4.4-10, first sentence, replace with the following:

“The City of Santa Rosa has designated 20 historic landmarks…”

4. Page 4.4-11, first sentence. Reference is made to a historic resources survey. Did the consultant conduct a historic resource survey of the plan area? According to the DEIR only fifteen potentially significant resources not currently listed were identified in the plan area, yet this area is considered a concentration of undocumented historic resources. The findings listed in Table 4.4-4 were obtained through a survey completed by the consultant? Only fifteen potentially significant resources were identified? Please clarify these statements and results by adding the following text to the first sentence.

“The historic resources survey of buildings and structures, focusing only on high priority locations within the Specific Plan Area at the time of the survey, identified…..”.

D. Significant Impacts and Mitigation Measures

**Significant Impacts**
The two Impacts discussed below outline the same potential impacts, but the first applying specifically to archaeological resources and the second apply specifically to the built environment. For clarity and consistency these impacts should read the same. Additionally, expanding the impact to cover any “new development or construction activities” more fully covers potential impacts for the purposes of the DEIR.

The specific references below should be revised as noted:

1. Impact CULT-1
Technical edits should be made to read “New development and construction activities…..”

2. Impact CULT-2
Technical edits should be made to read “Any new development or construction activities, including the widening of existing thoroughfares, in the vicinity of a historic structure that is listed or eligible for listing on local, State, or national registers could impact or alter the historical resource and/or the character…..”

**Mitigation Measures**

3. Mitigation Measure CULT-1a
This mitigation measure discusses archaeological monitoring as mitigation for ground disturbing activities, but lacks the programmatic requirements for determining whether
there is the potential that the project site is located within, adjacent, or near an archaeological site. The City’s current practice is to refer all subdivisions to the Northwest Information Center for determination of the likelihood that the project may impact a cultural resource. Because projects within the plan area are likely to proceed without subdivision entitlements, the current process would not provide information necessary for determining impacts to cultural resources. Additionally, Phase I archaeological testing does not provide a specific mitigation for potential impacts, essential to protecting any significant resources is identification prior to any approvals have been granted by the City.

For clarity in guiding subsequent CEQA review, please amend the mitigation measure to read, “Prior to the issuance of any entitlements, the City shall refer all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any cultural resources. Archaeological monitoring shall be conducted during earth-disturbing activities in the areas identified as potential impact. If an archaeological site is identified in the close vicinity of a construction project, project specific mitigation shall be developed. If construction personnel locate buried cultural materials, work shall be halted or shifted to another areas and a qualified archaeologist shall be contacted to determine proper treatment of the find.”

4. Mitigation Measure CULT-1b
Once a potential significant cultural resource has been identified through initial consultation with the NWIC and any additional documentation, project specific mitigation will need to be developed to minimize impacts to a less than significant level. The mitigation measure as currently worded does not provide general programmatic mitigation to layout the process.

For clarity in guiding subsequent CEQA review, please amend the mitigation to read: “In areas with known resources or are sensitive for archaeological resources, as determined through review by the NWIC, a qualified archaeologist with knowledge of prehistoric and historic-era archaeology shall prepare and carry out an Archaeological Testing, Monitoring, and Data Recovery Plan (ATMDRP) for the site prior to the issue of entitlements. This ATMDRP will emphasize the existing conditions of the proposed project area; examine the sensitivity for intact archaeological deposits in light of specific project designs; and provide treatment options in order to protect archaeological resources that meet the eligibility criteria of the CRHR. The scale and scope of the ATMDRP shall be appropriate to that of the project and its potential effects to cultural resources. The City, or their authorized qualified consultant, shall review the ATMDRP for adequacy. The ATMDRP may include some level of worker orientation program to be conducted prior to and during earth-disturbing activities in sensitive area. This type of program would summarize relevant laws and regulations that protect archaeological resources, and review applicable avoidance and minimization measures to protect archaeological resources. Other protective measures such as exclusionary plastic mesh fencing to prohibit the general public from disturbing sub-surface soils and
impacting possible archaeological deposits may also be included as monitoring tools in the ATMDRP.”

5. Mitigation Measure CULT-1c
Due to the known concentration of archaeological resources in the station area, consultation with Native American tribes is an important process in minimizing adverse impacts to Native American cultural and sacred places. Additionally, both the Federated Indians of Graton Rancheria and the Dry Creek Rancheria Band of Pomo Indians submitted public comment requesting consultation for projects to ensure the appropriate treatment of identified resources. The amendment of Mitigation Measure CULT-1c attempts to more fully address the consultation process for projects within the plan area.

For clarity in guiding subsequent CEQA review, please amend the mitigation to read “The City shall initiate consultation with Native American tribes prior to the issuance of entitlements to ensure the respectful treatment of Native American sacred places. Consultation shall explicitly be initiated with the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians in order to establish the likelihood and potential of any adverse impacts to Native American cultural or sacred places, including human burials; and to establish the appropriate treatment of such resources. Consultation is defined as meaningful and timely discussion and careful consideration of the views of each party, in a manner that is cognizant of all parties’ cultural values, and, where feasible, seeking agreement. Specific mitigation of potential impacts shall be considered at the project specific level, but may include but are not limited to site avoidance, site capping, integration of the site into a recreation space, or data recovery excavations.”

6. Mitigation Measure CULT-2a
The same concerns and considerations as discussed for Mitigation Measure CULT-1a, but with specific applicability to historical resources such as buildings and structures within the plan area, should be addressed in Mitigation Measure CULT-2a.

6a. For clarity in guiding subsequent CEQA review, please add new measure CULT-2a to read “Prior to the issuance of any entitlements, the City shall submit all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any known or unknown cultural resources.”

6b. Existing CULT-2a becomes CULT-2b. Once a potential significant cultural resource has been identified through initial consultation with the NWIC and any additional documentation, project specific mitigation will need to be developed to minimize impacts to a less than significant level. The mitigation measure as currently worded does not provide general programmatic mitigation, but rather provides photo documentation as acceptable mitigation. While photographic documentation has been accepted by the State as reasonable mitigation, it is a practice that the preservation community is
moving away from. The City of Santa Rosa does not generally recognize this type of mitigation as a first-choice alternative for mitigating significant adverse impacts to a historical resource. Therefore the mitigation must be amended to discuss project specific mitigation based on the unique historical resource that has been identified, project specifics, and potential impacts.

For clarity in guiding subsequent CEQA review, please amend mitigation measure to read, “Potential adverse impacts to the significance of a historical resource shall be evaluated on a project specific level in accordance with applicable local, State, and federal laws and regulations protecting these resources, including the environmental review process. Strategies such as restoration, rehabilitation, and adaptive reuse shall be encouraged. Photographic documentation is generally not adequate to mitigate a significant adverse impact to a historical resource and therefore large format camera Historic American Landscape Survey (HALS) Level II photographs accompanied by a report by a professional architectural historian shall not be considered a common and acceptable mitigation for demolition of a historical resource.”

7. Mitigation Measure CULT-2b
CULT-2b becomes CULT-2c. The Cultural Heritage Board’s existing review authority extends to properties with the historic district overlay (-H) or on a case by case referral basis. As currently written this mitigation measure expands the CHB’s review to all street widening projects within the Specific Plan area. To maintain the existing adopted review authority for the CHB, the mitigation should remove second sentence of the mitigation measure.

8. Mitigation Measure CULT-2c
CULT-2c becomes CULT-2d. Although a worker orientation program may be an effective mitigation measure to increase awareness and education for those working on the project, the parameters of such a program must be defined at the project specific level to ensure applicability to the unique resource that has been identified, the specifics of the project, and the potential impacts. Providing specific mitigation such as plastic mesh fencing is not appropriate at the programmatic level of this DEIR. Minor technical edits to specify that the worker orientation program is to be further defined at the project specific level would strengthen the mitigation.

For clarity in guiding subsequent CEQA review, please amend Mitigation Measure CULT-2d to read “A worker orientation program shall be conducted prior to and during construction activities in sensitive areas as defined at the project specific level. The program shall summarize relevant laws and regulations that protect resources, and review applicable measures for minimizing impacts to historical resources.”

9. Mitigation Measure CULT-3a and 3b
As with mitigation measure CULT-2d, spot checks during critical points of construction can be an effective mitigation measure to avoid potential impacts. However, it is essential that the spot checks be undertaken by an appropriate professional to fully ensure maximum protection of the historical resource. By making technical edits to
specify that an Architectural Historian is required to conduct the spot checks and that the critical points for spot checks will be defined at the project specific level, the mitigation measure is much stronger and maintains the programmatic level of the DEIR.

Additionally, it is important that Mitigation Measure CULT-3a states “significant or potentially significant historical resources”, in compliance with the definition of a resource pursuant to CEQA and as consistent with existing language in MM CULT-3b.

9a. For clarity in guiding subsequent CEQA review, please amend Mitigation Measure CULT-3a to read “The use of heavy bulldozers and other excessive vibration-causing equipment in construction zones shall be excluded within 25 feet of significant or potentially significant historical resources. A system of spot-check monitoring shall be performed by an architectural historian at the critical times as defined at the project specific level.”

9b. For clarity in guiding subsequent CEQA review, please amend Mitigation Measure CULT-3b to read “The use of pile-driving equipment during construction activity shall be excluded within 200 feet of all eligible or potentially eligible historical resources; augers shall be used within 200 feet. A system of spot-check monitoring shall also be performed by an architectural historian at the critical times as defined at the project specific level.”

E. State Laws and Regulations

The DEIR cites provisions of Public Resources Code Sections 5097.91 and 5097.98 that are outdated. Please update, as per AB 2641, the provisions cited on Page 4.4-4 to reflect recent changes to the language of this law.

Page 4.4-4, first paragraph: replace with the following:

….during construction of a project including the ability to make recommendations for treatment of the remains within 48 hours of being granted access to the site; and establish…”

F. Cultural Heritage Review

Page 4.4-16 discusses existing regulations and policy for reducing potential impacts to historical resources. This section inaccurately describes the Cultural Heritage’s review authority. Technical edits should be made to specify that the Cultural Heritage Board’s existing review authority extends to properties with the historic overlay (–H) or on a case by case referral basis. The CHB may review projects as necessary to evaluate impacts on properties without the –H overlay at the discretion of Staff completing the environmental review and/or the decision-making review body.

Please replace the fifth sentence in the last paragraph on Page 4.4-16 (beginning with “For the former”) with the following: “For the former, the City’s Cultural Heritage Board’s
existing review authority extends to properties with the historic overlay (-H) or on a case by case referral basis. The CHB may review projects as necessary to evaluate impacts on properties without the –H overlay at the discretion of Staff completing the environmental review and/or the decision-making review body.”

G. Miscellaneous comments

The plan area encompasses older Santa Rosa. Additionally, the plan area encompasses all or portions of six adopted preservation districts, numerous adopted landmarks, and several known archaeological sites. Due to the age of development, the plan area also contains a concentration of cultural resources that are not locally adopted, but may be considered historical resources pursuant to CEQA. General references to cultural resources in the station area planning area do not emphasize the concentration of resources and therefore may be somewhat misleading. Changes should be made within the text to clarify and emphasize this aspect. For instance “may also be other buildings” should be changed to “the concentration of potentially eligible resources”.

The specific references below should be revised as noted:

1. Page 4.4-11, first paragraph, last sentence, replace with the following:

   “Due to the generalized level of surveying, there are likely other resources within the Specific Plan Area that would be considered potentially significant pursuant to CEQA.”

2. Page 4.4-16, first sentence under subsection b, replace with the following:

   “Given the concentration of historical resources…."

3. Page 4.4-15 references General Plan policy HP-B-1 as it relates to the Secretary of the Interior’s guidelines and the DEIR discusses the Secretary of the Interior’s Standards for Identification for survey activities. HP-B-1 specifically refers to the use of the Secretary of the Interior’s Standards for Rehabilitation to be utilized in for alterations to historic buildings. These two references are not consistent and the reference is confusing. The General Plan does not require the adherence to the Secretary of the Interior’s Standards for Identification. Therefore this section presents inaccurate information and should be eliminated. This reference is repeated on page 4.4-16 and page 4.4-18.
Letter 8: Heather Hines, City Planner, Department of Community Development. City of Santa Rosa. April 6, 2007.

8-1: This comment does not question the adequacy of the Draft EIR, but rather provides general support for the Specific Plan, while serving as an introductory statement for more details comments to follow. No further action is required with regard to the Draft EIR.

8-2: This comment does not question the adequacy of the Draft EIR, but rather provides a set of edits in order to clarify the terminology used in regards to cultural resources. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum.

8-3: This comment does not question the adequacy of the Draft EIR, but rather notes that two additional General Plan policies should be listed within the EIR. These additional policies are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These additional policies do not change the analysis, conclusion or the general adequacy of this EIR.

8-4: This comment does not question the adequacy of the Draft EIR, but rather provides a set of text edits for clarity and to emphasize that the area contains a concentration of cultural resources, including both recognized historical resources and potentially eligible resources. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-5: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in regards to the impact statements. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.
8-6: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in guiding subsequent CEQA review. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-7: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in guiding subsequent CEQA review. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-8: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in guiding subsequent CEQA review. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-9: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in guiding subsequent CEQA review. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-10: This comment does not question the adequacy of the Draft EIR, but rather suggests to change Mitigation Measure CULT-2b (formally CULT-2c) to make the measure consistent with existing City policy. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-11: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in guiding subsequent CEQA review. These changes are reflected in the revised language included
in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-12: This comment does not question the adequacy of the Draft EIR, but rather provides text edits for clarity in guiding subsequent CEQA review. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-13: This comment does not question the adequacy of the Draft EIR, but rather provides text edits in order to update and clarify recent changes to the language of the law sited within the text. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-14: This comment does not question the adequacy of the Draft EIR, but rather provides text edits in order to clarify that the Cultural Heritage Board’s existing review authority extends to properties with the historic over (-H) or on a case by case referral basis. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.

8-15: This comment does not question the adequacy of the Draft EIR, but rather provides text edits in order to clarify and emphasize the concentration of cultural resources. These changes are reflected in the revised language included in Chapter 3 of this Final EIR Addendum. These text edits do not change the analysis, conclusion or the general adequacy of this EIR.
March 14, 2007

Ken MacNab
City of Santa Rosa
Advance Planning & Public Policy
100 Santa Rosa Ave.
P.O. Box 1678
Santa Rosa, CA 95404-1678

Dear Sir:

Sincerely,

I have recently been alerted that there are plans to remove proposed bike lanes in the downtown area. I am writing to strongly urge you to choose otherwise. I am sure you are aware of the effects of global warming as the recent media coverage has been strong. I believe we are all responsible to do our part to reduce our dependence on fossil fuels. I have been living in downtown Santa Rosa for 9 years. I have been riding my bike for more than 50% of my transportation needs for the last 15 years. As a mother of 2 small children I would pull them in a bike trailer and now they ride their own bikes. I am very aware of the need for bike safety in our neighborhood. I believe more families would use bicycle transportation if the roads were safer (which would also look great to prospective families moving to our area). Also, as a mother I want to keep myself safe so that I can come home to my children. There are many areas in Santa Rosa that are dangerous for bicyclists. As a person of decision making abilities you have an opportunity that most of us don’t. I urge you to stand for a future that reduces the world impact on foreign oil and increases our safety. Please increase our bike paths! I believe years from now our city will be seen as a better light if we make good decisions now. Thank you for your time.

Hilary Mello
Owner/Office Manager
Mello Construction

9-1: This comment does not question the adequacy of the Draft EIR, but rather requests the addition of bike paths/lanes within the Plan Area. The letter further states the importance to reduce dependence on fossil fuels and the contribution to global warming. No further action is required with regard to the Draft EIR.
April 6, 2007

Mr. Kenneth MacNab
City Planner, City of Santa Rosa
Department of Community Development
100 Santa Rosa Avenue, Room 3
P.O. Box 1678
Santa Rosa, CA 95402-1678

RE: Responses to City of Santa Rosa Downtown Station Area Specific Plan EIR

Dear Mr. MacNab:

Please allow this letter to serve as New Railroad Square LLC’s response to the City’s Downtown Station Area Specific Plan EIR. I would like to comment on the following issues:

1. North South circulation (SP-T-1.4, p.6-16.)

We appreciate the Specific Plan calling for the addition of new “West Street” that was the major north south connection between 6th Street to 3rd Street in the NRRS plan. West Street serves to connect the existing street grid and connects with both West 5th Street of the NRRS plan for the SMART property. West Street will be designed as a proper public street, with tree-lined sidewalks and on-street parking. It will also function as a “service” street, serving the Playhouse, the Plant No.5 Building, the Cannery, and the NRRS project. Services will include possible bus and shuttle passenger drop off and pick up, and taxi service to contribute to the multi-modal aspects to compliment the coming SMART train. West Street will also accommodate deliveries for both sides of the street and will service parking ingress-egress for the Cannery, Plant No.5, the Playhouse and SMART properties.

It should be noted that the new West Street is the preferred alternative of the Fire Department. Deputy Chief Fire Marshall Mark McCormick, in a February 6, 2007 correspondence, said “we are very happy to see the road back between 3rd and 6th Street. This access will serve as primary emergency access for the 5 buildings.”

We are in agreement with the requirement called out in the Specific Plan to prevent/discourage “cut-through” traffic into the West End neighborhood. To achieve this goal we recommend a right-turn only at the intersection of West Street and West 6th Street. In addition, parking ingress/egress for all of the projects is located on West Street so as to have the least impacts on the surrounding neighborhoods.

2. Bus Routes
Regarding bus and shuttle circulation, after studying this issue for over a year, it is the recommendation of our design team – WRT/Solomon ETC, Carlile Macy, Fehr & Peers and Nelson Nygaard - that bus routes remain on Third Street as they do now and that two well designed, highly visible bus stops be built on both sides of Third Street, one east of the SMART tracks alongside the Carlile Macy building to accommodate westbound buses, and the other on the south side, west of the train tracks, alongside the Berkowitz property. By maintaining the current system, buses will remain on their current schedules and not face the anticipated 5-10 minute delay of entering West Street and circling around Sixth Street, Wilson Street, and then returning to Third Street.

However, if the City, transit authorities and SMART insist on buses entering West Street to drop off and pick up riders on the SMART property, our plan can accommodate this future service. Our plan also easily accommodates shuttle vans and taxis.

3. Alternate Heights

In NRRS’s submittal on March 24, 2006, we included a section on alternative heights (page 4.48 of that document, included as an attachment to this letter as Exhibit A). We believe it is important for this EIR to study the potential impacts of the proposed alternate heights on the SMART parcel. We called out the possibility of going eight (8) stories on the blocks south of west 5th Street. We submitted additional height studies to be considered in this EIR in September 2006. We suggest that it be prudent just to acknowledge these studies in the EIR, and perhaps footnote these possible height alternatives in the Specific Plan. After all, the environmental impacts are not just measured by height and density, but most importantly by design. A poorly designed one story house can have a very negative impact on a neighborhood, where a beautifully designed and appropriately detailed eight story building can have a tremendously positive impact.

Regarding density, we are in support of the density proposed in the Specific Plan that calls for 65 DU’s per acre. We might suggest that the calculation be determined on a net acre basis and not gross, thus subtracting the area dedicated to streets, parkways and sidewalks.

4. Alternates for Consideration

Our design team had assembled a series of alternates for consideration and inclusion in the Station Area Specific Plan EIR. These alternates included:
- Transit & Access options for buses, servicing, retail parking, residential parking, and firefighting access
- Public street network options and street types
- Building height options
- Use options

These option included as an attachment to this letter as Exhibit B. We now also include further options, under these categories, which represent potential development alternates.
for the SMART parcel and surrounding sites which we believe also merit consideration in
the EIR. These options are attached to this letter as Exhibit C.

In conclusion, we salute the vision, wisdom and conclusion of the Specific Plan and the
accompanying EIR. The staff and consultants have performed professionally and
effectively. The community participation was as thorough and comprehensive as I’ve
ever witnessed.

Thank you for your consideration. If you have any questions regarding this letter, please
call me at 310.836.1342, or call Christopher Pizzi of WRT/Solomon ETC at
415.575.4722.

Sincerely,

[Signature]

Michael L. Dieden

MLD:hc

10-1: This comment does not question the adequacy of the Draft EIR, but rather provides support of the Specific Plan’s efforts to include a new “West Street” within the Railroad Square Sub-Area and discourage “cut-through” traffic into the West End neighborhood. No further action is required with regard to the Draft EIR.

10-2: This comment does not question the adequacy of the Draft EIR, but rather discusses bus, shuttle and taxi circulation options in the vicinity of the SMART Station site. No further action is required with regard to the Draft EIR.

10-3: This comment does not question the adequacy of the Draft EIR, but rather discusses the possibility of new buildings to be developed up to eight stories for the site south of 5th Street and adjacent to the SMART Station site. The Specific Plan identifies a maximum permissible height of five stories for the subject site, consistent with the City’s adopted Mid-Rise Policy and provisions of the Historic Combining District. No further action is required with regard to the Draft EIR.

10-4: This comment does not question the adequacy of the Draft EIR, but rather supports the Specific Plan’s development densities. It also makes the suggestion to calculate development density on a net acre basis and not gross. The suggestion is noted and no further action is required with regard to the Draft EIR.

10-5: This comment does not question the adequacy of the Draft EIR, but rather provides a series of circulation, infrastructure, development standards and land use options for consideration in the Specific Plan. No further action is required with regard to the Draft EIR.
10-6: This comment does not question the adequacy of the Draft EIR, but rather provides development options for the SMART parcel and surrounding sites. No further action is required with regard to the Draft EIR.
COMMENT LETTER 11

SANTA ROSA AREA
BUSINESS ASSOCIATION
P. O. BOX 14842
SANTA ROSA, CA 95402

April 6, 2007

RE: Santa Rosa Station Area Draft Environmental Impact Report

After a close review of the DEIR for the Santa Rosa Station Area Plan I have grave concerns about its potential implementation. The Plan throws its net over the heart of the City and extends beyond the customary half-mile boundary that is the accepted pedestrian-access limit. The City has not justifiably addressed the question of why areas outside of the half-mile limit are included, nor has the DEIR adequately addressed the impacts. There is a pattern of deceit in City planning that has victimized property owners.

Within the proposed boundaries of the Plan are portions of five existing Redevelopment Areas. The Gateways Redevelopment Area makes up approximately half of the Station Area. This redevelopment project is currently being challenged in Sonoma County Superior Court in a suit filed by the Santa Rosa Area Business Association on August 18, 2006. While an elected member of the Gateways Redevelopment Area Project Area Committee, I, along with other members, repeatedly requested information on the City’s proposed plans for the project area. There was no Specific Plan for Gateways, and there is still no plan identified as such. However, the Station Area Plan is clearly the Specific Plan for the Gateways Redevelopment Area. It appears that this plan will be administered by the Redevelopment Agency. Is it the “Lead Agency” referred to in the DEIR?

The question of why there is subterfuge regarding the identity of the Plan may be answered by the fact that the Project Area Committee meetings have been suspended by the City. If this Plan is the Specific Plan for Gateways, according to California Redevelopment Law the PAC members should be meeting to comment on it. If this is not the Specific Plan for Gateways and will be administered by another city agency then the requirements for blight within the Gateways Redevelopment Project Area are not met. The definition of blight is as follows:

Health and Safety Code Section 33030 (b)(1) of the CRL defines a blighted area as: “an area in which the combination of conditions set forth in Section 33031 is so prevalent and so substantial that it causes a reduction of or a lack of, proper utilization in the area to such an extent that it constitutes a serious physical and economic burden on the community which cannot reasonably be expected to be reversed or alleviated by private enterprise or governmental action without redevelopment.”

CONCERNED CITIZENS OF SANTA ROSA AGAINST REDEVELOPMENT LAW ABUSE
www.SRCitizensAgainstEminentDomain.com
The so-called “Park and Gardens” subarea is North Santa Rosa Avenue. This ‘opportunity site’ is outside of the half-mile limit. It is also fully within the Gateways Redevelopment Area. The historically commercial street, one of the oldest in Santa Rosa, was redesignated in the General Plan from commercial to residential in 2002, and then, in response to property owners’ protests, redesignated commercial in 2006. When the commercial designation was restored due to demands that existing property uses be consistent with their zoning, property and business owners were lulled into thinking that their property issue was settled. The Station Area Plan, however, with its form-based codes and ambiguous height and density limits has once again created a non-conforming situation on North Santa Rosa Avenue. This area is clearly being offered up to developers looking for vulnerable ‘opportunity sites’ in the Plan Area. The fact that the area is within the funding boundaries for Gateways indicates to developers that their ‘opportunity’ to acquire these non-conforming properties will be facilitated by the Redevelopment Agency.

The City has created a situation that begs for an inverse condemnation lawsuit. The North Santa Rosa Avenue area was the original core location of the founding members of the Santa Rosa Area Business Association. Although the group has now grown to include Downtown, South Santa Rosa Avenue, Maxwell Court, and other area members, the fact that North Santa Rosa Avenue is so blatantly targeted here is of concern. Have property values and individual proposals for development on North Santa Rosa Avenue been negatively impacted in order to ripen the area for charges of future blight and ‘opportunity’ for a select few? Is this area being targeted in retaliation for the lawsuit?

This Station Area Specific Plan was rolled out to fanfare touting affordable housing, sustainability, bike and pedestrian safety—all of the buzz words were used to get the environmental and affordable housing groups on the bandwagon. In fact when the DEIR is examined the truth emerges. There are no green building standards in the Plan. The Plan’s bike and pedestrian facilities were trumpeted as being a vast improvement over existing conditions and in fact are, in some cases, worse than existing. There is no affordable housing in the plan. Mixed use counts as affordable housing even though it is not affordable. This faddish darling of the Planning Department is the future blight of Santa Rosa. Form-based code demands 2-4 stories of ground floor retail with residential above. Vacancy rates on ground floor retail historically exceed residential vacancy rates. Glutting the market with retail in every building will potentially create blight. No other form of development is permitted. What a disturbing and short-sighted concept. Developers are given a pass on paying development fees on mixed use. The City has created a future disaster for itself when it loses the Gateways Redevelopment lawsuit and can’t fund the infrastructure projects needed to facilitate the Plan. The Plan itself states that the Todd Road sewer trunkline must be upgraded prior to major residential (high demand) development taking place on North Santa Rosa Avenue. Where will this money come from?

The fact that there is no Station and there is no train is the reality. It’s not a ‘build it and they will come’ project. The train is a great idea. Except only 5,000 daily riders are expected by 2025. Even if additional right of way could be acquired to increase potential ridership (at a hugely prohibitive expense) the tracks will most likely be at grade. At grade tracks require that warnings be sounded at every transverse crossing. Passenger trains will run during the day, and freight will run at night. Traffic impacts at crossings,

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safety issues, and the impacts of train noise and dirt on the proposed residential
development are not adequately addressed in the DEIR.

The Station Area Plan is a smoke-screen for a developer’s dream. This Plan will have a
tremendous impact on the City for 25-50 years. The economic life of a modern building
is approximately 50 years. The redesigning of the center of the City is being done with
the illusion of the citizens’ participation. The Gateways Project Area Committee voted
against the Project after seeing their recommendations gutted by City employees. They
had been deluded into thinking that in fact their well-considered recommendations would
actually be presented to the City Council. They were not. City employees could not
even bear to have these suggestions presented without tampering. The point is that
once again property owners, business owners, affordable housing advocates, SMART
proponents, environmental groups, and all Santa Rosa citizens are being manipulated
with a misleading and completely inadequate document.

Rosa Koire, Vice President
Santa Rosa Area Business Association

CONCERNED CITIZENS OF SANTA ROSA AGAINST
REDEVELOPMENT LAW ABUSE
www.SRCitizensAgainstEminentDomain.com
Written Objection to Draft EIR for Downtown Station Area Specific Plan

The DEIR is insufficient in its explanation of how the Specific Plan relates to the 5 redevelopment areas which it encompasses. On page 1-3, a "Lead Agency" is referred to but not identified as the Redevelopment Agency of Santa Rosa. Almost all of the Specific Plan area is in one of the five redevelopment areas in the project area. According to redevelopment law, specific plans are to accompany the establishment of redevelopment areas. The Gateways redevelopment area, established on June 20, 2006, did not include any specific plans, and a lawsuit has been filed against that redevelopment project. More than half of the Specific Plan area is in the Gateways Redevelopment Area which is at risk of being defeated by the lawsuit.

If the "Lead Agency" is the City of Santa Rosa, as opposed to the Redevelopment Agency, then this shows that the area is not a blighted area by definition, because the area will be improved and conditions will be addressed by another governmental agency and the private sector. On the other hand, if the Specific Plan is a redevelopment project, which it appears to be, then the Project Area Committee should be reviewing the plan in accordance with redevelopment law. To my knowledge, none of the 5 redevelopment area Project Area Committees are having meetings to provide oversight and recommendations on this plan.

While redevelopment is loosely mentioned a number of times in the document, there is a lack of clarity as to who is responsible for the implementation of the Specific Plan.

The DEIR fails to analyze the effects of creating a highly restrictive rezoning plan that only permits the construction of large mixed-use development on many of the streets in the project area. What will happen if the City loses the above mentioned lawsuit, and over half of the project area is no longer in a redevelopment area? It seems to me that rezoning this area could result in a deterioration of the area because property owners will be severely limited in the development of their properties. Since the Specific Plan shows that new buildings are to be built on properties that already have buildings on them, and that expansion or significant alterations will not be permitted on many properties, a situation will likely be created by the rezoning of properties that will stifle development if the Gateways Redevelopment Project fails. The rezoning of properties which may not be in redevelopment areas and that are not subject to the authority of the Redevelopment Agency should not be subject to the Specific Plan's highly restrictive land use requirements. If the City of Santa Rosa approves the Specific Plan and then loses the lawsuit against the Gateways Redevelopment Project, The rezoning of those properties could be considered as being done in "bad faith", or in other words, lead to an inverse condemnation claim.

A good example of properties being rezoned in bad faith was when the Santa Rosa Avenue area was rezoned to Residential from Commercial in the 2002 General Plan. The fully developed commercial properties had no chance of being converted to residential uses and no residential development occurred there for the last 5 years.
The Park and Gardens subarea, which is really only the commercial strip on Santa Rosa Avenue north of Highway 12, is being included in the Station Area Plan which is having their zoning changed again in bad faith. The City of Santa Rosa, in January 2007, agreed to restore the commercial properties back to conforming status. Now, with this plan, the City of Santa Rosa will convert those properties back to non-conforming status. The useless exercise of restoring the conforming status of those properties in January, knowing that the City would immediately undo that conformity with this plan just shows how unfair the City has been to the owners of those properties. The City’s actions have caused a reduction of property values in that area as well as a deterioration in the area because significant development of the commercial uses has not been allowed for the last five years.

The Station Area Plan could have a similarly deleterious effect on many areas of the plan if large mixed-use development does not occur as planned. Property owners will have the rights to develop their properties largely taken away, unless they demolish their buildings and build a formulaic, large mixed-use project. Most property owners will not have the financial ability to construct the mandated mixed-use development. The DEIR fails to address the issue of what the negative effects could be if rights to develop properties are largely stripped away. If the Gateways project area cannot go forward, the Station Area Plan could produce a large area of deterioration in the center of Santa Rosa. Perhaps it is the intention of the City for the area to deteriorate should they lose the lawsuit so that they can once again declare the area blighted to create another redevelopment area.

The Park and Gardens subarea should not be included in the plan area for the following reasons.

1-The Park and Gardens subarea is entirely outside the 1/2 mile radius around the proposed SMART site. Studies have shown that people will not walk more than 1/2 mile to get to transit.

2-The area was added to the original project area after many of the studies were done and after some of the public review scoping sessions.

3-The area was not included as an opportunity site originally, but was later added to the list.

4-Data regarding contaminated properties was only collected for properties within the 1/2 mile radius. Because this area is outside the 1/2 mile radius, no contaminated sites are shown for this area. The DEIR contains a false explanation for why they show no sites. (See Attachment 1). The EIR for the Gateways Redevelopment Project shows that there are in fact several contaminated sites in that area. Because the DEIR has not analyzed these conditions, the Park and Gardens subarea should be removed from the plan area.

5-The building standards for this area show 3 different numbers of stories for new
11-21

buildings. One description shows 2 or 3 stories, one description shows 1 to 3 stories and one description shows 2 to 4 stories. This is entirely unacceptable. At the Community scoping sessions, the 1 to 3 stories was agreed to, but the City has added two more different amounts.

11-22

6-The east side of Santa Rosa Avenue is in the Historic Burbank Gardens area. The Specific Plan imposes new development standards in this historic district, but has excluded other historic districts in the plan area from the new development standards. There are several historic properties on the east side of the street. The plan offers no protection for these properties and actually shows new buildings to be constructed on those sites.

11-23

7-The Park and Gardens subarea will have the worst level of traffic congestion in the plan area according to the DEIR. Also spillover parking is to be expected into the surrounding neighborhoods that already have insufficient parking for the existing uses.

11-24

8-The only stated goal for the Park and Gardens subarea is that the pedestrian crossing across Santa Rosa Avenue be improved, according to the DEIR. All that would be needed is a crosswalk to accomplish this. What the area really needs, is a grocery store, and possibly a pharmacy, a coffee shop, a bakery, more restaurants, a gas station and a bank. These are all commercial uses which the City has not allowed for the past 5 years. Many of these businesses would probably have developed but were not allowed by the City. If this area is left out of the Station Area Plan, it would be more likely that the needed commercial uses would be developed by the private sector without government limitations.

11-25

9-Since the Park and Gardens subarea was not initially included in the Specific Plan but was added as an afterthought, some believe that their inclusion was punitive. The Santa Rosa Area Business Association was originally formed in that area and is currently suing the City to stop the Gateways Redevelopment Project. Inclusion in the Station Area Plan also coincided with the rezoning which has temporarily legalized the commercial uses on those properties. No further rezoning restrictions should be imposed on properties in this area.

11-26

10-The DEIR states that the Park and Gardens area is connected to the Todd Road Sewer trunk line and that the area is at 90% of capacity. It also states that development in the Park and Gardens subarea cannot be done until after the Todd Road trunk lines are upgraded. Since the Todd Road area is outside the redevelopment area and cannot receive redevelopment funding, it would be unreasonable to include the Park and Gardens subarea which cannot be reasonably expected to redevelop anytime in the near future. No mention was made in the DEIR as to when the upgrades were expected to occur. Sewer backups and flooding in the adjacent Juilliard Park area happen frequently apparently due to the lack of sewer capacity for that area. Rezoning the Park and Gardens area now, prior to there being any possibility of redevelopment in that area could be grounds for an inverse condemnation claim.

11-27

11-28
The Station Area Plan is supposed to create an area to promote ridership on the Smart Rail line. Voters have repeatedly rejected the necessary sales tax needed to finance that project. Imposing a Station area plan now is completely without merit. After six failures to pass the tax, why should anyone expect it to pass? Without rail service, it's completely unreasonable to impose a highly restrictive development plan that may add another 8,000 people into a one mile square area. Santa Rosa suffers from severe traffic problems already, and air pollution is already at unacceptable levels in the area. The City should wait until a good public transportation system is assured.

The DEIR does not address the environmental impacts of demolishing a few hundred buildings. Where is all this material to go? And what about the environmental impact of generating all the new materials needed to replace all of the buildings that now exist? Replacing serviceable buildings is one of the most damaging practices for the environment. Fifty percent of all the material in landfills is construction debris. Do the nearby landfills have enough capacity for all the demolished buildings that the Station Area Plan calls for? These obvious environmental issues are not addressed in the DEIR.

It is a generally accepted fact that global warming is caused by human activity. The twenty year Station Area Plan is completely devoid of any requirements to help protect the environment. No plan should be undertaken that does not take into account its impact on global warming. As innovation to help curb greenhouse gases produces new methods to produce better buildings, these should become requirements for all new construction. The Station Area Plan lacks the flexibility to change the requirements and essentially locks in the non-sustainable building techniques that are currently being practiced. Why is the City of Santa Rosa not requiring any green building practices or the incorporation of renewable energy sources in the plan?

Even more disturbing is the complete lack of affordable housing requirements in the plan area. It's a known fact that people with low to moderate incomes are much more likely to use public transportation. Also the majority of the new jobs created by the addition of new retail shops and restaurants will pay in the low to moderate range. The majority of new residential units in the downtown area should be priced in the low to moderate range so that the new employees can afford to live near where they work and use public transportation. The DEIR makes no attempt to analyze the impact of having only higher market rate housing in the downtown instead of affordable housing. The Station Area Plan will obviously result in more car miles driven due to the lack of affordable housing in the downtown.

I object to the reunification of Courthouse Square with the approval of the Environmental Impact Report. The City is paying $100,000 for a design competition now underway that's supposed to be open to all ideas, including not reunifying the Square. This requirement should be dropped from the DEIR. Blocking off Santa Rosa Ave./Mendocino Ave. would be a terrible mistake in my opinion.
The legal requirement that the Specific Plan be consistent with the General Plan is not being adhered to with the plan. Instead, the City intends to change the General Plan to fit the Specific Plan. I'm sure that is not the intent of the law. General plans are formulated by a lengthy and rigorous process which should not be circumvented by the Station Area Plan. It appears that the City is ignoring the wishes of the community and ignoring the existing rules and regulations that they are supposed to abide by. I see the Station Area Plan as a big giveaway to developers to entice them to construct the most profitable projects they can and generate tax-increment revenues for the City. Some areas of the Station Area Plan are being upzoned to allow for twice as many units as previously allowed. Developers who purchased these upzoned properties may have known in advance of purchasing them that the City was planning to increase the densities. Some developers may have profited substantially by purchasing certain properties in advance of this plan.

Approving the Station Area Plan would be the biggest mistake since building the Plaza Mall in the 70's. When the motives for doing development are only about the money, you get a plan like this one, that has everything for the developers, and nothing for anyone else. I've heard dozens of people speaking out strongly against the Station Area Plan. The City of Santa Rosa is not listening to the concerns of its citizens, and is instead pressing forward with a completely unacceptable plan. The cost to the citizens is too great just to get some new development that mostly benefits big developers. Please do not approve the DEIR for the Station Area Plan Project.

Thank you,

Kay Tokerud
716 Howard St.
Santa Rosa, CA 95404

ATTACHMENTS
2. Letter to Cultural Heritage Board
3. DEIR pg 5-22
4. Alternatives to Project DEIR
5. General Plan Amendments DEIR
6. Culturally Sensitive Areas DEIR
7. Environmental Conditions DEIR
8. Hazardous Materials Site Map DEIR
9. Location of LOTS-Gateways K-M report
11. Table - List of Hazardous Sites - Gateways EIR
12. Letter to Design Review Board
13. Letter to Ken Mena

Page 5 of 5

11-1: This comment questions why the Specific Plan boundaries were established as shown. Based on input from the Metropolitan Transportation Commission (MTC), the City established the Specific Plan Area boundary beyond half-mile straight-line radii to incorporate opportunity sites, adequately address circulation issues and, most importantly, follow “logical” borders between neighborhoods or along major roads or other geographical features. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-2: The commenter is assuming that the Downtown Station Area Specific Plan is the Specific Plan for the Gateways Redevelopment Area and that the Santa Rosa Redevelopment Agency is the “Lead Agency” on this project. The commenter is incorrect on both of these assumptions.

The Downtown Station Area Specific Plan is a separate City of Santa Rosa planning effort not associated with the Redevelopment Agency or any specific redevelopment area plan. Second, the Redevelopment Agency is not the “Lead Agency” for this project. The City of Santa Rosa, which is legally separate from the Redevelopment Agency, is the “Lead Agency” for this project. No further action is required with regards to the Draft EIR.

11-3: This is a comment regarding the Gateways Redevelopment Plan and the Santa Rosa Redevelopment Agency. No response is required in this EIR, which does not cover redevelopment.

11-4: Please see the response to Comments 11-2 and 11-3.
11-5: This comment does not question the adequacy of the Draft EIR. Instead, it suggests that the North Santa Rosa Avenue has been “targeted” for redevelopment. This has not been the case. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-6: This comment states that the Specific Plan itself is inadequate in regard to affordable housing, sustainability and bicycle and pedestrian facilities. These are comments on the Specific Plan itself; they are not comments on the adequacy of the Draft EIR. Therefore, no response is required. However, the issues of affordable housing, sustainability and bicycle and pedestrian facilities have been raised as part of the Specific Plan discussion and will be addressed by the City before the Specific Plan is considered for adoption. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-7: This comment asserts that the Specific Plan requires 2 to 4 stories of retail at the base of all new buildings foreseen under the Specific Plan. This is not true. Depending on the Sub-Area within the Specific Plan, a mix of uses, including retail, may be required for ground floor use and is not required for multiple stories. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-8: This comment correctly states that developers, pursuant to current City policy, do not pay certain development impact fees on mixed-use projects because the City wants to create incentives for this type of development. However, the commenter provides no evidence that implementation of the Specific Plan within the framework of existing City policy would result in a deleterious physical change to the environment. Moreover, economic or social effects of a project are not to be treated as significant effects on the environment, as per CEQA Guidelines Section 15131(a). Since this comment is outside
the scope of CEQA no further action is required with regard to the Draft EIR.

11-9: This comment asks how the City will pay for infrastructure improvements to support the Specific Plan. Information on this subject is contained in Chapter 8: Implementation and Financing, of the Specific Plan. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-10: The Sonoma Marin Area Rail Transit Authority (SMART) has issued and certified its own Environmental Impact Report (SCH 2002112033) on the proposed SMART train. Additionally, the Downtown Station Area Specific Plan Notice of Preparation states that “potential environmental impacts related to the implementation of commuter rail service and construction of an ancillary bicycle/pedestrian pathway on the existing Northwestern Pacific Railroad right-of-way have been addressed in a separate EIR prepared by SMART.”

However, the Downtown Station Area Specific Plan Draft EIR considers the potential for SMART train service in relation to the development that may occur as a part of the Specific Plan, though the identified impacts and mitigation measures are not dependent on commencement of train service. Implementation of rail service is not part of the Station Area Plan “project.” Potential impacts associated with operation of the train itself, including noise, crossing impacts, and the frequency of passenger service, are issues dealt with in the SMART EIR. Further explanation of the potential impacts at due to increased traffic at rail crossings is provided in Comment responses 2-1, 2-2, 2-3 and 17-15.

11-11: This comment does not question the adequacy of the Draft EIR. Instead, it is a general comment regarding the Gateways Project Area Committee’s opinion of the Station Area Specific Plan. Since this
comment does not address the adequacy of the Draft EIR, no further response is required.

11-12: This comment states that the Redevelopment Agency of Santa Rosa is not properly identified as the “Lead Agency” for the Specific Plan and its EIR. Please see response to Comment 11-2 for details regarding “Lead Agency” responsibility.

The commenter also states that the Draft EIR does not adequately explain the relationship between the Station Area Specific Plan and the five Redevelopment Area Plans overlapping either in whole or in part with the Specific Plan Area. The commenter is correct in identifying that the Specific Plan Area actually contains entire portions or portions of five existing redevelopment project areas. Responding to how these projects relate to each other requires a very clear legal distinction between a redevelopment plan and a specific plan.

The Station Area Specific Plan was prepared and is proposed to be adopted pursuant to California Planning and Zoning Laws (Government Code Section 65000 et seq.) and specifically Government Code Section 65450, et seq. A specific plan can be adopted by a City, or its planning agency, for the systematic implementation of the general plan for all or part of the area covered by the general plan. A specific plan is generally prepared, adopted and amended in the same manner as a general plan. The procedures and contents of a specific plan are provided for under the Planning and Zoning Laws. The City and its planning agency, the City of Santa Rosa Planning Commission, are responsible for implementing the Station Area Specific Plan and the City’s general plan. One of the purposes of a specific plan is to lay out more specific development standards, regulations and policies to implement the General Plan, which can include programs, public works projects and financing measures necessary to carry out the matters identified in the specific plan.
By contrast, a redevelopment area plan is adopted by the City Council pursuant to the Community Redevelopment Law of the State of California (Health and Safety Code Section 33000 et seq.). The Redevelopment Agency of the City of Santa Rosa is a separate body, established under the Community Redevelopment Law to carry out the functions of a redevelopment agency in the City of Santa Rosa, including the implementation of redevelopment area plans currently in existence within the City. The Redevelopment Agency of the City of Santa Rosa and the Santa Rosa City Council are separate and distinct bodies, each consisting of separate and distinct members. As is required by the Community Redevelopment Law, a redevelopment plan must be in conformance with and consistent with the City’s General Plan. However, in contrast to the City’s general plan and a specific plan, a redevelopment plan does not establish land uses or zoning.

The five redevelopment plans in the Specific Plan Area, will enable the Redevelopment Agency to assist the City in implementing the City’s General Plan and, if adopted, the Station Area Specific Plan. There is no requirement that the specific projects and programs anticipated under a redevelopment plan must be incorporated within a specific plan prepared pursuant to the Planning and Zoning Laws. Further, a specific plan may include within the Specific Plan Area boundaries none or all or any portion of an area which is covered by a redevelopment plan, or portions of two or more redevelopment project areas, as is the case with the Station Area Specific Plan.

The redevelopment plans which are in effect in Santa Rosa provide the Redevelopment Agency of the City of Santa Rosa with powers, duties and obligations to implement and further the program generally formulated in the redevelopment plans for the redevelopment, rehabilitation and revitalization of the area within the specific project area covered by each redevelopment plan. Because of the long-term nature of a redevelopment plan and the need to provide the Re-
development Agency with flexibility to respond to market and economic conditions, property owner and developer interests and opportunities from time to time presented for redevelopment, a redevelopment plan does not present a precise plan or establish specific projects. A redevelopment plan rather presents a process and a basic framework within which specific development proposals and projects can be presented and specific projects and programs can be established.

A redevelopment plan also provides the Redevelopment Agency with tools to develop and proceed with the specific projects and programs that are established. As specific projects are established and plans finalized, they will be subject to the City’s normal planning, design, review and approval process. All appropriate mitigation measures of a redevelopment plan will be incorporated into, and made a condition of, the design and construction of the specific public improvements projects at that time.

11-13: This comment does not question the adequacy of the Draft EIR. Instead, it is a comment about the Gateways Redevelopment Plan. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-14: Please see the response to Comments 11-2 and 11-12.

11-15: This comment inquires as to who will implement this Specific Plan. The City of Santa Rosa’s Advanced Planning and Public Policy Department is the “Lead Agency” for this project and is responsible for its implementation. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-16: This comment suggests that new development in the Specific Plan Area will not occur if the Gateways Redevelopment Plan is invalidated due to pending litigation, and that therefore the Specific Plan
would lead to physical blight in the area. This is not the case, since the Downtown Station Area Specific Plan is not the specific plan for the Gateways Redevelopment area. Furthermore, the City will proceed with implementation of the Downtown Station Area Specific Plan, regardless of the outcome of the litigation against the Gateways Redevelopment Plan, since this Specific Plan is not reliant on Redevelopment Agency funds for completion of proposed projects. Finally, private developers are already pursuing projects within the Specific Plan Area, so there is no reason to believe that the Specific Plan will limit private development efforts.

11-17: This comment suggests that the Park and Gardens Area is designated for residential use only under the Specific Plan, and that this would render existing commercial use non-conforming. This is erroneous. The Specific Plan would allow for mixed-use in this area, and the existing commercial uses would be allowed to remain.

11-18: The commenter suggests that the Specific Plan will take away development rights and asks that the Draft EIR analyze the negative impacts the Specific Plan could have with regard to individual property rights. In fact, the Specific Plan would not take away opportunities to develop property; instead it would allow development to occur at a higher use. Moreover, the economic analysis requested by the commenter is beyond the requirements of CEQA, as per CEQA Guidelines Section 15131(a), which state that economic or social effects of a project shall not be treated as significant impacts on the environment. There is no evidence provided in the comment that implementation of the Specific Plan would result in a deleterious physical change to the environment. No further economic analysis is needed.

11-19: This comment does not question the adequacy of the Draft EIR, but rather describes why the commenter believes that the Park and Gardens Sub-Area should not be part of the Specific Plan. For a discus-
sion of the reasons for the Specific Plan boundaries, please see the response to Comment 11-1.

11-20: This comment challenges the statement that there are no properties with contaminated soils in the Park and Gardens Sub-Area, citing the Gateways Redevelopment Area EIR, where two sites in this area were identified.

The commenter is correct; there are two properties in the Park and Gardens Sub-Area that have contaminated soil. Both of these properties contain Leaking Underground Fuel Tanks (LUFT) that are currently under study and/or have undergone either partial or complete remediation activities.

These sites have been added to the Existing Conditions section of Chapter 4.6, Hazards and Hazardous Materials, in Chapter 3 of this Final EIR. Identification of these sites does not change the impacts, mitigations measures or conclusion of this EIR or its adequacy.

11-21: The commenter is incorrect to state that the Specific Plan has divergent height limits in the Park and Garden Sub-Area. The allowed heights for this area, as described in Chapter 4: Land Use of the Specific Plan, states that “there is a three-story height limit for new buildings in this Sub-Area. A minimum height of two stories is required.” Additionally, this is explained in the project description on page 3-12 of the Draft EIR. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-22: This is primarily a comment on the Specific Plan itself, as opposed to the Draft EIR. So no response is required in this Final EIR. However, it should be noted that the Cultural Resources Chapter, 4.4 of the Draft EIR, does identify and provide adequate protections for all of the designated Preservation Districts within the Specific Plan Area, including the Historic Burbank Gardens area. The mitigation
measures for cultural resources identified in this Final EIR provide adequate protection for cultural resources. Therefore, the analysis and conclusions of the Draft EIR are adequate and no further action is required.

11-23: This comment claims that the Park and Gardens Sub-Area will have the worst level of traffic congestion in the Specific Plan Area. This is not correct. On the contrary, while traffic volumes on Santa Rosa Avenue are expected to increase, the study intersections are projected to operate acceptably upon buildout of the Plan.

11-24: The potential for adverse spillover parking was considered in the development of the Specific Plan’s parking requirements for the Park and Gardens Sub-Area. The Plan would allow only slight deductions to the City’s current parking requirements in order to balance projected parking supply with demand without affecting adjacent residential blocks.

11-25: The commenter is incorrect to state that the Draft EIR lists only one goal for the Park and Gardens Sub-Area. In fact, the Park and Garden Sub-Area description in project description “envisioned as a mixed use area with housing allowed throughout. Activity-generating ground floor use would be required along Santa Rosa Avenue.” Furthermore, the project objectives listed on page 3-6 of the Draft EIR apply to the Park and Garden Sub-Area, including, the “develop and implement urban design standards that promote walkable and livable environments within the Specific Plan study area.” No further action is required with regard to the Draft EIR.

11-26 This is a comment regarding the service needs of the Park and Garden Sub-Area and the best way to provide for economic development of the Sub-Area. Since this comment does not address the adequacy of the Draft EIR, no further response is required.
11-27: This is primarily a comment on the Specific Plan itself, as opposed to the Draft EIR. So no response is required in this Final EIR. However, it should be noted that the Park and Garden Sub-Area was not added to the Specific Plan Area “as an afterthought,” as purported by the commenter. The Park and Garden Sub-Area was in the Specific Plan Area since the inception of the planning process. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

11-28: This comment does not question the adequacy of the Draft EIR, but rather suggest reasons that the commenter believes should preclude the Park and Gardens Sub-Area from being included in the Specific Plan. No response is required in this Final EIR.

11-29: This comment does not question the adequacy of the Draft EIR, but rather it is describing the present status of the SMART Rail line with regards to the Specific Plan. No response is required in this Final EIR.

11-30: This comment expresses concern about the generation of additional solid waste from potential demolition that will occur in the Specific Plan Area.

Although the Specific Plan does not specifically call for the demolition of any specific structures and the City intends to preserve historic structures and encourage the rehabilitation or reuse of structures. It is acknowledged that up to as many as 170 to 190 structures might be demolished within the life span of the Specific Plan. However, this is a highly conservative estimate. Based on this conservative estimate, approximately 110,000 tons of construction and demolition waste could be generated, which is about 5,500 tons per year for the life span of the Specific Plan. These numbers general estimates and do not account for construction and demolition of specific building types such as residential, commercial, parking garages, etc.
Additionally, this estimate excludes the waste that is recycled or reused as required by local, county and State regulations.

For example, Specific Plan Goal SP-UPS-4 seeks to have solid waste disposal needs of existing and new development in the Specific Plan Area be met while providing opportunities for reduction, reuse and recycling. Supporting this goal is Specific Plan Policy SP-UPS-4.2, which states new development requiring demolition of existing structures in the Plan Area are to reuse and recycle materials to the greatest extent possible.

Based on existing regulations, recycling programs and waste disposal agreements discussed in Section D of Chapter 4.13 for the Draft EIR, the Sonoma County Waste Management Agency provides sufficient disposal systems and can accommodate the overall solid waste that would be generated by the Specific Plan. No further action is required with regard to the Draft EIR.

11-31: The City of Santa Rosa and State of California are concerned about greenhouse gas emissions and their effect on global climate change. In 2006, the governor of California signed AB 32, the Global Warming Solutions Act, into legislation. The Act requires that California cap its greenhouse gas emissions at 1990 levels by 2020. This legislation requires CARB to establish a program for statewide greenhouse gas emissions reporting and monitoring/enforcement of that program. This year, CARB is required to publish a list of discrete greenhouse gas emissions reduction measures that can be implemented. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions. The 1990 and 2020 greenhouse gas emission limits will be established by CARB effective January 1, 2008. Furthermore, the Governor recently directed CARB to implement regulations that would reduce the carbon content of motor vehicle fuels.
Neither CEQA nor case law currently identifies thresholds or other direction in measuring or evaluating the effect of individual projects on global warming. However, the Specific Plan and Draft EIR include features that will help to minimize greenhouse gases.

Carbon dioxide, the primary man-made greenhouse gas of concern, would be generated by the project primarily from mobile sources and other energy usage. The City’s General Plan and the Station Area Plan include policies that would reduce greenhouse gas emissions through measures that reduce motor vehicle and other energy use. In addition, Mitigation Measure AQ-2 includes measures that would reduce criteria air pollutant emissions and would also decrease greenhouse gas emissions. Measures that reduce vehicle travel would be most effective in reducing greenhouse gas emissions. Providing housing near employment centers, retail uses and transportation corridors that include transit would help reduce vehicle travel.

11-32: This comment provides an opinion regarding affordable housing requirements in the Specific Plan and asks that the Draft EIR analyze the impact of market rate housing as compared to affordable housing. This type of economic analysis is beyond the requirements of CEQA. The issue of housing and affordable housing is addressed in the City of Santa Rosa’s General Plan Housing Element and is addressed through General Plan Amendments as part of the Specific Plan adoption process. No further action is required with regard to the Draft EIR.

11-33: This comment provides an opinion regarding the reunification of Courthouse Square, which is foreseen in the Specific Plan. The commenter appears to assume that the Downtown Station Area Specific Plan includes a design for the reunification of Courthouse Square. This assumption is incorrect, since neither the Specific Plan nor Draft EIR identifies or addresses a specific design for Courthouse Square.
However, the commenter is correct that the City of Santa Rosa is conducting a design competition for Courthouse Square, which could possibly result in the selection of a design that does call for reunification of Courthouse Square. The Draft EIR only analyses the possible impact that reunification of Courthouse Square would have on traffic and circulation. Since this comment does not question the adequacy of the Draft EIR, no further action is required with regard to the Draft EIR.

11-34: This comment does not question the adequacy of the Draft EIR, but rather it is inquiring as to the legal requirement for consistency between the Specific Plan and General Plan. Please see response to Comment 11-12. No response is required in this Final EIR.

11-35: This comment does not question the adequacy of the Draft EIR, but rather it provides an opinion regarding the Specific Plan. No response is required in this Final EIR.
February 7, 2007

To: City of Santa Rosa
   Cultural Heritage Board

RE: Public Hearing
   Santa Rosa Station Area Specific Plan

The Federated Indians of Graton Rancheria (FIGR) wish to comment on the “Santa Rosa Station Area Specific Plan”. In recent years, the rapid pace of development in this area has destroyed many areas Tribal members consider sacred and/or important to the cultural heritage of our members. We have watched cemeteries containing the remains of our ancestors destroyed or covered by parking lots. We have watched ancient village areas, which hold scientific and cultural clues to our ancient way of life destroyed with sacred objects used in the practice of our religion. We have watched the plants and animals we used for food, medicine and religious ceremonies destroyed without consideration to our culture and traditions. We continue to watch others make decisions about what is important to us and what we would like to preserve for our children.

The Federated Indians of Graton Rancheria has established policies to protect our ancestors and ensure understanding and respect for the traditions and cultural heritage of tribal members and all Native Americans. Your understanding of these values will help us move forward by incorporating our perspectives into the interpretation of past and present cultural realities. We did not abandon our ancestral and relatives graves and sacred sites, but were forced to move to other lands which prevented us from visiting, preserving and protecting those sacred sites. We are from the land, part of the land and must eventually return to the land.

All of the land of the City of Santa Rosa is in the area Congress established as FIGR’s aboriginal territory when the Tribe was restored by Congress. The “Santa Rosa Station Area Specific Plan” is being proposed in an area containing known cemeteries and village sites. It has the potential to contain many other sacred and culturally important areas because of the proximity to current and ancient fresh water sources and food supplies. The Tribe is concerned about the high potential for further disturbance of its cultural resources.
We request the City of Santa Rosa, its City Council and Boards and Commissions embrace the spirit of current laws and actively work with the Tribe to preserve our cultural resources by;

1. Developing a systematic and thorough plan to evaluate culturally sensitive areas impacted by building for this project

2. Requiring developers to mitigate cultural resources in a written treatment plan mutually agreed to by the Tribe and the City of Santa Rosa, as the lead agency

3. Requiring the developer to have at least one monitor from FIGR to be present during all soil excavation and disturbance

We look forward to working with the City as a partner in this and other projects to preserve and understand the cultural resources impacted by this project.

Respectfully,

Nick Tipon
For the Sacred Sites Protection Committee

(707) 538-1424
ntipon@comcast.net

Cc: Sacred Sites Protection Committee

12-1: This comment does not question the adequacy of the Draft EIR, but rather provides general comments in regards to the historical context of the Federated Indians of Graton Rancheria within the Plan Area. No further action is required with regard to the Draft EIR.

12-2: This comment is asking for specific action or requirements be put in place to reduce the impacts on cultural resources. The mitigation measures in the Cultural Resources chapter, 4.4, of the Draft EIR, along with the additional clarification language provided by the Cultural Heritage Board to these mitigation measures, provide adequate protection for cultural resources. Therefore, the analysis and conclusions of the Draft EIR are deemed adequate and no further action is required.
March 26, 2007

Ken MacNab  
Office of Advance Planning and Public Policy  
City of Santa Rosa  
P.O. Box 1678  
Santa Rosa CA 95402-1678

Dear Ken,

This letter is regarding the Downtown Station Area Specific Plan (Draft) and issues that are important to the Burbank Gardens and Juilliard Park Neighborhood Associations.

1. Figure 5.7 shows only two blocks of Santa Rosa Ave (between Wheeler and Pine) as a “Shop Front Street” with Figure 5.11 showing the remainder of Santa Rosa Ave (between Hwy 12 and Sonoma Ave) as “Boulevard.” The Boulevard style with a landscaped tree median (which is designated for us on page 5-14) has 4 travel lanes. We believe our Park and Gardens Report specifies a two-lane thoroughfare for the entire street, and would like the description to include the possibility of two lanes or “Shop Front Street” for the entire length of the Park and Gardens Corridor.

2. Since we are very interested in an alternative transportation option for our neighborhoods, in particular a trolley or streetcar linking us to Downtown, Railroad Square and the Junior College, we would like to submit a recommendation for the Plaza linkage. According to page 3-3, “development guided by the Plan will: Establish Fourth Street as the central pedestrian corridor between the east and west sides of downtown.” To that end, we recommend that any Plaza linkage be limited to pedestrians, bicycles and the trolley/streetcar option, and, most importantly, specifically bar auto traffic.

Ken, once again we would like to thank you for all your hard work, time and effort in regards to this beautifully crafted document.

Sincerely,

Judy Kennedy  
Burbank Gardens Neighborhood Assoc.  

Robert Ruiz  
Burbank Gardens Neighborhood Assoc.

Karen L. Macken  
Juilliard Park Neighborhood Assoc.

13-1: This comment does not question the adequacy of the Draft EIR, but rather requests for Santa Rosa Avenue to be designated as a two lane “Shop Front Street” for the entire length of the Park and Gardens Corridor. Comment is noted and no further action is required with regard to the Draft EIR.

13-2: This comment does not question the adequacy of the Draft EIR, but rather recommends that any Courthouse Square linkage be limited to pedestrians, bicycles and the trolley/streetcar option and, most importantly, specifically bar auto traffic. Comment is noted and no further action is required with regard to the Draft EIR.
March 29, 2007

Scott Bartley, Chair
Santa Rosa Planning Commision
Department of Community Development
PO Box 1678
Santa Rosa, CA 95402-1678

Dear Chair Bartley,

The Sonoma County Bicycle Coalition supports creating a more vibrant Santa Rosa Downtown area and notes that a major goal of the Downtown Station Area Specific Plan is to “substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area” (DEIR 4.12-63). Unfortunately, we don’t find information supporting this in either the Downtown Station Area Specific Plan Draft Environmental Report (SAP DEIR) or in the Downtown Station Area Specific Plan (Plan). What we have found is quite the opposite. Despite the mission and goals of the plan there are no new bicycle facilities, just new car access.

Upon a quick scan of both documents we were pleased to find that bicycle access is listed as a major goal as is noted in the Introduction of the Plan and also in the SAP DEIR Project Description

“Just as important as the existing physical setting is the vision of the downtown area that the citizens of Santa Rosa hold for its future. This vision includes bicyclists, pedestrians, transit users and drivers sharing an attractive network of streets; it includes a mix of housing, shopping and jobs in a compact area; and it includes preserving the history, character, and natural benefits of the existing environment while allowing for change. This vision is provided in the Santa Rosa 2020: General Plan as well as other comprehensive plans and codes governing change in the downtown area.

The SAP DEIR notes City of Santa Rosa’s Relevant General Plan Goals and Policies Transportation Element

**Goal T-A:** Provide a safe and sustainable transportation system.
**Goal T-F:** Develop a viable solution for regional through traffic on north-south and east-west corridors.
**Goal T-H:** Expand the existing transit network to provide convenient and efficient public transportation to workplaces, shopping and other destinations.
**Goal T-I:** Support implementation of rail service along the Northwest Pacific Railroad.
**Goal T-J:** Provide attractive and safe streets for pedestrians and bicyclists.
**Goal T-K:** Develop a safe, convenient and continuous network of pedestrian sidewalks and pathways that link neighborhoods with schools, parks, shopping areas and employment centers.
Policy T-K-2: Allow the sharing or parallel development of pedestrian walkways with bicycle paths, where this can be safely done, in order to maximize the use of public rights-of-way.

Goal T-L: Develop a citywide system of designated bikeways that serves both experienced and casual bicyclists and which maximizes bicycle use for commuting, recreation and local transportation.

Policy T-L-4: Identify specific east-west and north-south bicycle routes through the downtown area as part of the downtown planning process.

Policy T-L-9: Require new development to dedicate land and/or construct/install bicycle facilities for project users, where a rough proportionality to demand from the project is established.

Policy T-L-10: Maintain and update, as appropriate, the pedestrian and bicycle network facilities map for Santa Rosa and the surrounding area.

All of this is very encouraging. However what we have found after further study is this:

- The SAP eliminates planned Class 2 bicycle lanes in several areas.
- Fails to address the safety issues of bicycles and cars sharing the lane.
- Doesn’t implement policies of slower speeds and significant engineering on downtown streets.
- Increased vehicular traffic will significantly impact bicycle and pedestrian circulation in the downtown.
- The plan overemphasizes vehicle circulation at the expense of bicycles and pedestrians.
- Many mistakes regarding current existing bicycle facilities.
- Bicycle parking is ignored completely.
- Incomplete language regarding the description of the 6th 7th streets linkage project.
- The addition of Roberts Avenue is in the same location as the Joe Rodota Class 1 path. The streetscape will be limited by width and shows no bike lanes. This would be viewed as adding a barrier for bikes and peds. The addition of Roberts Avenue does not meet the goals of the improving bicycle and pedestrian circulation.

The Draft Environmental Impact Report states that the impacts of the SAP on bicycles and pedestrians is “less than significant” (DEIR 4.12-63), yet the analysis was for impacts on vehicular trips only. The DEIR did not analyze the impact of adding 3,250 new housing units and attendant vehicle trips on the safety, access and convenience of bicyclists and pedestrians traveling in and around the downtown. Without a proper analysis of impacts on bicycles and pedestrians, the claims of the SAP that impacts are “less than significant” are not supported.

Please address the future impacts of not accommodating bicycles with the planned class II bicycle lanes.

While discussing the separate needs of pedestrians and bicycles, the two are lumped together for assessing current traffic volume (Fig 4.12-5). This defeats any effort to assess the separate impacts upon those constituencies. If the baseline assumption improperly lumps them together, then any conclusions may not be supported.
Please assess the separate impacts of bicycles and pedestrians in regards to traffic volume.

Currently, the majority of citizens in Santa Rosa do not feel safe riding their bicycles on city streets. Vehicle speeds are too fast. And yet, the SAP calls for removing planned bicycle lanes (Wilson Street, Ninth Street, A Street, Davis and 7th) and forcing cyclists to share the road with vehicles on most of the streets. This would serve to discourage cyclists from traveling downtown.

Please address how the removal of these planned facilities will effect air quality and traffic impacts.

The Station Area Plan does not address the impacts on cyclists and pedestrians in recommending the reconnection of Fourth Street through the Santa Rosa Plaza to include autos.

Please address this impact.

On page 4.12-4 in the SAP DEIR notes the city’s parking requirement for cars. It does not include the city’s parking requirement for bicycles.

Please address the need for safe and secure bicycle parking.

Pages 4.12-9 through 4.12-9 discuss Trip Generation Methodology but does not include the impact of bicycle use.

Why is bicycle use not included in this section?

Page 4.12-13 through 4.12-16 discusses parking for automobiles but no discussion of bicycle parking. Secure, safe and convenient bicycle parking including lockers and covered racks should be included in the plan. At a minimum, the City’s zoning code for bicycle parking must be met.

Please address the need for safe and secure bicycle parking.

Page 4.12-25 notes:

All areas of the Specific Plan have existing pedestrian and bicycle traffic, though the highest levels of activity currently occur in the Courthouse Square and Railroad Square Sub-Areas. Pedestrian and bicyclist volumes were obtained during the afternoon PM peak hour at several key intersections in these areas, and are shown in Figure 4.12-5.

a. Existing Bicycle and Trail Facilities

There is a developing bicycle network in the Specific Plan Area. An expanding network of Class I (bike path), Class II (on-street bicycle lane), and Class
III (signed route) bikeways facilitate north-south and east-west travel for transportation and recreation.

There is no mention of the removal of planned class II bicycle lanes in the SAP DEIR. Presently the Santa Rosa Bicycle and Pedestrian Advisory Board is updating the Bicycle and Pedestrian Master Plan.

This SAP DEIR needs to respect the current and future bicycle and pedestrian plans for bicycle facilities in this area.

Please address how the removal of these planned facilities will effect air quality and traffic impacts.

Corrections on Existing Bicycle and Trail Facilities:

- Pg. 4.12-30 ii. Joe Rodota/West County Trail (Class I) is now completed.
- iii. On-Street Bicycle Lanes, the class II bicycle lane on West Ninth Street is from Wilson Street to Link Lane, not Wilson Street to Stony Point Road.
- Pg. 4.12-31 I do not believe that there is a marked class III bicycle route on Santa Rosa Avenue from Sonoma to Todd. However there is a Class II bicycle lane from Maple Ave to Todd Road on Santa Rosa Avenue.
- The class III bike route on West Ninth is from Wilson to A Street, not Dutton Avenue to A Street.

Please correct these mistakes.

The connection from the Joe Rodota needs to continue north to connect to 3rd Street. Already there is a desire for this access. The fence has been cut to allow walk through. Cyclists and pedestrians, especially disabled folks, need to have convenient and reasonable access to our roads and paths. This is a significant missing link to this path.

Please include this link to the plan.

On page 4.12-31 i. notes the Northern Downtown Pedestrian Linkages Study description but leaves out a critical element that is included in the Executive Summary of the Final Report, April 26, 2006:

The purpose of this endeavor was to improve vehicular, pedestrian, and bicycle linkages between the present downtown core and the historic Railroad Square district that are split by Highway 101.

This is key language as it reflects the funding source requirements to improving bicycle and pedestrian access.

Please include this language in the SAP DEIR.
Page 4.12-32 ii. The noted funding for the bikeway along the SMART corridor from Seventh Street to College Avenue has changed.

Please get the correct information for this project.

iii. discusses the connection of the link between the Joe Rodota-West County Trail with the Prince Memorial path. This connection has been completed.

Please note this completion.

Page 4.12-39 discusses the current parking demand. It does not investigate bicycle parking.

Please include bicycle parking in this process.

Pages 4.12-52 through 4.12-57 note the need for intersection modification. Many of these intersections will need increased right-of-way to complete. However, the acquisition of right-of-way is the reason that the planned class II bike lanes are removed.

Please explain why acquiring right-of-way for car access is acceptable for autos, but not for bicycles.

Page 4.12-62 i. notes the Pedestrian and Bicycle Circulation Impacts.

The Specific Plan could lead to notable increases in the number of pedestrians and bicyclists in the Specific Plan Area, much of which already has a well developed pedestrian and bicycle network. Planned projects such as the SMART multi-use path and improvements noted in the Northern Downtown Pedestrian Linkages Study will improve connectivity between the Courthouse Square and Railroad Square Sub-Areas. Completion of a potential pedestrian linkage of Fourth Street through Santa Rosa Plaza would further improve connectivity, and provide an attractive and convenient walking and bicycling alternative to Third Street between the Courthouse Square Sub-Area and the potential SMART rail station at Railroad Square.

The Specific Plan includes specifications for street amenities on numerous corridors throughout the Specific Plan Area. The specifications address pedestrian and bicyclist circulation, including details such as where enhancements like pedestrian-scale street lighting, bicycle lanes, street furnishings, and pedestrian crossing treatments (i.e. bulbouts) should occur. In all of the Specific Plan Sub-Areas the street specifications would result in moderately- to significantly-improved pedestrian and bicycle circulation. Some of the most beneficial enhancements would occur in areas where gaps currently exist in the pedestrian and bicycle network, such as the Sebastopol Road area and northern Railroad Corridor Sub-Area.
Overall the Specific Plan would substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area. The future circulation network is also expected to accommodate the increased number of pedestrians and bicyclist trips. No adverse impacts to alternative transportation modes are projected to occur. Potential impacts to pedestrians and bicyclists attributable to the Specific Plan are therefore deemed to be less than significant.

We disagree that this plan as designed will improve bicycle access. Please explain how the loss of the planned class II bicycle lanes will “substantially improve pedestrian and bicycle circulation. We believe that the impacts of this plan will be quite significant. Please describe the net change of these impacts.

Below are notes from Downtown Station Area Specific Plan Chapter 6 Improvements to Vehicular Circulation:

All of these streets below have planned bike lanes in the Santa Rosa Bicycle and Pedestrian Master Plan yet, none of these intersections discuss the inclusion of the planned class 2 bike lanes. However, they all increase car access.

Pg. 3  
**College Avenue/Dutton Avenue.** This intersection, shown in Figure 6-2 as Intersection 1.

Pg. 4  
**College Avenue/Cleveland Avenue.** This intersection is shown in Figure 6-2 as intersection 2.

**Seventh Street/B Street.** This intersection is shown in Figure 6-2 as intersection 6. Sixth Street/Wilson Street. This intersection is shown in Figure 6-2 as intersection 8.

**Third Street/B Street and Third Street Corridor.** The intersection of Third and B Streets, shown in Figure 6-2 as intersection 15.

Pg. 5  
**Third Street/Santa Rosa Avenue.** The intersection at Third Street/Santa Rosa Avenue, shown in Figure 6-2 as intersection 16.

The **Dutton Avenue/Sebastopol Road** intersection already includes bicycle lanes east and west bound. This is not an addition. There is no discussion of the planned north and south bound bike lanes.

**Pedestrian Improvements Pg 8**

No discussion regarding the removal of the sidewalk on the south side of 3rd Street between the southbound HWY 101 on ramp and the northbound HWY 101 off ramp. This will greatly hinder the movements of pedestrians.

**Bicycle Improvements Pg. 9**

It is noted: In some Sub-Areas, implementation of planned bicycle facilities may require consideration of alternative approaches due to right-of-way constraints, a need to accommodate all modes of transportation and an interest in maintaining a pedestrian scaled look and feel.
This is unacceptable. Right-of-way constraints do not seem to hinder the addition of right- and left turn lanes to better accommodate car traffic. Pedestrian scaled look and feel should not exclude bicycle lanes. We should be limiting access to autos to make pedestrians more comfortable.

It is noted in the SAP DEIR that “Because the Specific Plan may be implemented over time, a program-level environmental document, as defined by CEQA Guideline Section 15168, is appropriate. A program-level document is appropriate when a project consists of a series of smaller projects or phases that may be implemented separately.”

This supports the addition of bicycle lanes as opportunity arises. As with intersection improvement, the inclusion of bicycle lanes does not mandate the immediate installation. Including them in the plan assures that they will be considered as projects and developments move forward.

Pg. 10
The bike route map is not from the Santa Rosa Bicycle and Pedestrian plan and does not represent the current Bicycle Plan.

Pg. 11
Changing the planned class 2 bike lanes on Wilson St. to Class 3. The rational is that the SMART trail will be the “serve as the major north-south route through the Railroad Corridor and Railroad Square Sub-Areas.” The current Bicycle and Pedestrian Plan includes both the class 1 along the SMART corridor and a class 2 on Wilson St. Cyclists need to have safe and convenient access on our city street to access the various businesses and connector streets. Many cyclists will avoid off street paths at night for personal safety reasons. Both of these bikeways are necessary.

Removing the planned class 2 routes along the 9th Street corridor using the rational that the east/west access for bicyclists will be along the 6th/7th Street corridor is unreasonable. Both these corridors are important routes on their own. It is unreasonable to expect bicyclist to use one corridor when it is out of the way. Bicyclists need safe and convenient access to our streets.

It is our sincere hope that these issues will be resolved as we very much look forward to working with the City of Santa Rosa on improving access to all our city streets for all residents and visitors including bicycle riders.

Thank you for your consideration of these matters. I can be reached at 707-545-0153.

Sincerely,

Christine Culver
Executive Director

cc: Ken McNab Department of Advance Planning & Public Policy

14-1: This comment does not question the adequacy of the Draft EIR, but rather provides a general opinion on the Specific Plan and the Draft EIR in regards to planned improvements for pedestrian and bicycle circulation. Comment is noted and no further action is required with regard to the Draft EIR.

14-2: This comment does not question the adequacy of the Draft EIR, but rather reiterates the Specific Plan’s and Draft EIR’s goal in creating a multi-modal environment for all Santa Rosa citizens to enjoy. No further action is required with regard to the Draft EIR.

14-3: This comment does not question the adequacy of the Draft EIR, but rather reiterates the goals and policies from the City’s General Plan sited within the Draft EIR. The comment goes further by providing general opinions on the effects of the Specific Plan on pedestrian and bicycle circulation, as well as the lack of bicycle parking, within the Plan Area. Comment is noted and no further action is required with regard to the Draft EIR.

14-4: This comment disagrees with the Draft EIR’s conclusions regarding the impacts from the Specific Plan on bicycle and pedestrians traveling in and around the downtown, questioning the “less than significant” statement in regards to these modes of transportation.

The Specific Plan proposes to redesignate a number of planned Class II bicycle lane facilities identified in the City’s Bicycle and Pedestrian Master Plan to Class III bicycle routes. The impacts of these changes have been fully considered and are the result of a more thorough analysis than was possible in the original Bicycle and Pedestrian Master Plan. The proposed changes to planned Class II (on street) lanes are based on a number of factors. First, it was concluded that right-
of-way constraints requiring acquisition of additional right-of-way and possible demolition of existing historic structures made installation of even minimally-acceptable bike lanes problematic. Second, it was concluded that the alternative of removing existing on-street parking (in place of right-of-way acquisition) to accommodate installation of Class II bicycle lanes would create/exacerbate spill-over parking conditions in adjacent neighborhoods that could negatively impact neighborhood livability. Other impacts associated with the removal of existing on-street parking include: encouragement of higher vehicle speeds, diminished pedestrian comfort level attributable to removal of a physical buffer (parked vehicles) between the sidewalk and moving vehicles, design challenges to providing shorter crossing distances at intersections through the use of bulb-outs and potential impacts to the viability of existing and future businesses along the Wilson Street corridor. The removal of parking would also have potentially-adverse impacts of adjacent residential uses, particularly in historic neighborhoods where homes have no garages and on-street parking is the only option. Last, proposed changes to planned Class II routes within the Specific Plan Area are only proposed in areas where reasonable alternatives for accommodating bicycle travel have been identified. In no case does the Specific Plan proposes to redesignate planned Class II bicycle lanes for the purpose of providing additional vehicle travel capacity.

In summary, the potential impacts associated with elimination of the potential on-street-lanes are considered to be less-than-significant given the urban nature and low-speed street environment that will be created by the Specific Plan, in addition to the presence of off-street facilities such as the SMART path and Prince Memorial Greenway path that are (and will continue to be) superior to those found in the downtowns of most cities.

Further, all streets within the Specific Plan Area are envisioned to have vehicle speeds of 25 miles per hour or less, either through de-
sign or, for corridors such as Third Street and Santa Rosa Avenue, through traffic congestion that is typical of urban environments. Most bicyclists feel comfortable riding on streets where traffic is slow-moving, in many cases being able to ride at similar speeds to the motorized vehicles who are sharing the same space.

The Specific Plan will, by design, add a large number of pedestrians and bicyclists to downtown Santa Rosa. Given the existing and planned facilities that would exist at buildout, in addition to consideration of the low-vehicle speed street environment, no adverse or significant impacts to these users have been identified. No further action is required with regard to the Draft EIR.

14-5: This comment requests that the Draft EIR assess separate impacts of bicycles and pedestrians in regards to traffic volume, versus combining them, as shown on Figure 4.12-5. The figure referenced in the comment does separate bicycle and pedestrian volumes. The “turning movement” volumes represent bicyclists making left, through, or right turn movements for each approach. The arrows shown in crosswalk locations represent the number of crossing pedestrians on each approach. No further action is required with regard to the Draft EIR.

14-6: This comment indicates that citizens are uncomfortable riding on City streets because of high vehicle speeds and that the Specific Plan exacerbates this condition by not providing all of the potential on-street bike lanes shown in the Bicycle and Pedestrian Master Plan. As indicated in the response to Comment 14-4, vehicle speeds within the Plan Area are envisioned to be relatively low on all streets, certainly lower than currently exist on arterial corridors or even many collector streets outside of the Plan Area. Given the expected low speed differentials between vehicles and bicyclists, no adverse impacts to either motorized vehicle or bicycle circulation would be expected. No further action is required with regard to the Draft EIR.
14-7: This comment asks for the EIR to address the impacts on cyclists and pedestrians in recommending the reconnection of Fourth Street through the Santa Rosa Plaza to include autos. A connection of Fourth Street through the existing Santa Rosa Plaza would be very similar in nature to the existing segments of Fourth Street within Courthouse Square. Vehicle speeds would be very low and pedestrian crossing activity would likely occur along the entire segment. Bicyclists would also encounter a similar situation to the existing downtown portions of Fourth Street, but without the presence of diagonal parking. This type of street environment is typically very safe for all users, including pedestrians and bicyclists, and would be expected to function very well as a local-access street. No further action is required with regard to the Draft EIR.

14-8: This comment asks that the EIR address the need for safe and secure bicycle parking. The Specific Plan does not reference bicycle parking requirements, as these are clearly identified in the City’s Zoning Code and are not proposed to be changed. No further action is required with regard to the Draft EIR.

14-9: This comment asks for the reasoning to why bicycle use is not included within the trip generation methodology section of the Draft EIR. The trip generation methodology described is used as a basis for determining vehicular traffic impacts. The methodology does, however, account for the use of non-motorized transportation options, primarily through consideration of street connectivity, which, based on empirical research, has been correlated to pedestrian and bicycle usage. The methodology also examines factors such as the jobs-housing balance in the immediate area and presence of local-serving retail as a means of identifying whether people will choose to drive an automobile versus walk or bicycle to a destination. No further action is required with regard to the Draft EIR.

14-10: Please see response to Comment 14-8.
14-11: Please see response to Comment 14-8.

14-12: Please see response to Comment 14-6.

14-13: This comment provides corrections on existing bicycle and trail facilities listed on page 4.12-30 through 4.12-31 of the Draft EIR. The corrections provided are reflected in Chapter 3 of this Final EIR Addendum. With the exception of the fourth bullet, as the Class II bicycle lane from Maple Avenue to Todd Road on Santa Rosa Avenue is outside of the Plan Area.

14-14: This comment does not question the adequacy of the Draft EIR, but rather addresses a Specific Plan issue by requesting development of a connection between the Joe Rodota trail and 3rd Street to improve circulation access for cyclists and pedestrians. The Specific Plan already addresses this issue under the Development Guidelines and Streetscape Standards, Chapter 5, in SMART Corridor Special Considerations (page 5-24) and within the Transportation section, Chapter 6, in Policy SP-T-3.6 (page 6-17). This goal is reflected in Figure 6-4, Bicycle Routes, on page 6-10. No further action is required with regard to the Draft EIR.

14-15: This comment suggests additional language to be included under Section i on page 4.12-31 of the Draft EIR. The suggested language is similar to that already stated, making it unnecessary. Furthermore, the new language would not change the analysis or conclusion of the EIR. No further action is required with regard to the Draft EIR.

14-16: This comment notes that the background information on funding for the bikeway improvements along the SMART corridor from Seventh Street to College Avenue has changed. As allowed by CEQA (Section 15125(a)), the environmental setting is to describe conditions as they exist at the time the Notice Of Preparation (NOP) for the EIR is published or at the time environmental analysis commenced.
The NOP for the Specific Plan was published in July 25, 2006. Based on this date, the funding source noted within the Draft EIR is accurate. Were the funding source be updated, it would not change the analysis or the conclusions of the EIR. No further action is required with regard to the Draft EIR.

14-17: This comment provides an update on the completion of a Capital Improvements Program project listed on page 4.12-32 of the Draft EIR. The correction provided is reflected in Chapter 3 of this Final EIR Addendum.

14-18: Please see response to Comment 14-8.

14-19: This comment inquires to why acquiring right-of-way for car access is acceptable for autos, but not for bicycles. The Specific Plan includes Policy SP-T-3.3 that requires dedication of right-of-way for improvement and/or expansion of pedestrian and bicycle facilities where insufficient right-of-way currently exists. In line with this policy, the Specific Plan process included consideration of right-of-way acquisition for bicycle facilities. Unlike intersection modifications needed to maintain vehicle flow, bicycle facilities are corridor-based and typically affect numerous parcels. Where multiple buildings near street frontages preclude right-of-way acquisition, as is the case for many potential Class II bike lanes in the Plan Area, the widening is deemed infeasible as it would require taking of property to gain the necessary right-of-way. The same criteria is applied to vehicle circulation; it would be infeasible to add new vehicle lanes on nearly all streets within the Plan Area. Where sufficient space existed to provide additional turn lanes where needed to meet the City’s level of service criteria, the improvement was deemed feasible and included as mitigation. However, it is acknowledged that right-of-way acquisition may always be appropriate and desirable where other constraints may exist (e.g., for reasons noted in the response to Com-
ment 14-14). No further action is required with regard to the Draft EIR.

14-20: This comment disagrees with the Draft EIR’s less than significant assessment in regards to impacts to pedestrian and bicyclists. The Plan increases street connectivity and will create a low-speed traffic environment that is comfortable for most cyclists. Where possible, the Plan provides additional bicycle facilities and ties into other planned facilities, such as the SMART corridor path. Please see response to Comment 14-4 for a discussion of on-street bicycle lane feasibility in the downtown area and how this relates to the current Bicycle and Pedestrian Master Plan, as well as the forthcoming update to this document.

14-21: This comment does not question the adequacy of the Draft EIR, but rather notes vehicular circulation improvements in the Specific Plan, while questioning the lack of discussion of planned class II bike lanes or the removal of the sidewalk on the south side of Third Street under Highway 101. No further action is required with regard to the Draft EIR.

14-22: This comment notes that the Specific Plan assures development of bicycle lanes over the course of development as the opportunity arises. As indicated in the response to Comment 14-19, development of the Specific Plan considered the potential for right-of-way acquisition equally for both vehicles and bicycles. Planned on-street bicycle lanes are preserved in the Plan in all locations where they have been deemed feasible. Also note that vehicular capacity improvements are extremely limited in the Specific Plan and in all cases have been balanced against the needs of pedestrians and bicyclists. The Plan adds no new through vehicle lanes to existing street corridors. With respect to eliminating existing vehicle lanes, access to downtown Santa Rosa is provided by few major corridors, unlike cities such as Sacramento or San Francisco, which have an extensive grid network of...
many through streets that enable conversion of existing vehicle lanes to bicycle lanes on selected routes.

14-23: Please see response to Comment 14-21.
March 28, 2007

Ken MacNab  
Department of Advance Planning and Public Policy  
City of Santa Rosa  
100 Santa Rosa Ave., PO Box 1678  
Santa Rosa, CA 95402  

Dear Mr. MacNab;  

As the Chief Executive Officer for Council on Aging in Sonoma County I am deeply concerned about the lack of affordable housing for seniors. We serve over 1,400 clients daily and it is not uncommon for us to assist seniors who can no longer afford their current housing or fear being displaced due to significant rent increases. We are living longer than ever before as a nation, however the fixed incomes of seniors have not kept up with the substantial cost of living increases, especially the housing in Sonoma County.  

We must plan and develop housing for seniors who have low and moderate incomes. In only about thirteen more years we will see the senior population double and it is already at about 20% here in Santa Rosa. Seniors need and use public transit more than the rest of the population and that is why it is necessary to build affordable housing near transit malls and stations.  

Thus, I am urging you and other planners to have a long term vision of the Station Area Plan and to include affordable housing for seniors. I am a member of the MTC Advisory Committee for the Elderly and Disabled and we have made this a priority. Seniors and disabled are often 100% dependent upon public transit and if we do not provide affordable housing for them in the transit areas then we need to ask if this is really “Smart Growth”? Our Advisory Committee is urging MTC staff to consider this in future funding of projects.  

If I can be of any assistance in the future planning of the Station Area, please do not hesitate to call me. Again, I am strongly encouraging you to consider the need of our seniors both now and in the future as we seek to create urban development that is both transit friendly and meet the needs of our diverse economic population.  

Most sincerely,  

Shirlee Zane, CEO
Letter 15: Shirlee Zane, CEO, Council On Aging Services For Seniors. 

15-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include affordable housing for seniors, especially adjacent to transit areas as they are highly dependent on public transit. Comment is noted and no further action is required with regard to the Draft EIR.
April 2, 2007

Bicycle and Pedestrian Advisory Board
City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Re: Santa Rosa Downtown Station Area Specific Plan

Dear Chairman Klassen and Board Members:

The Accountable Development Coalition (ADC) is a grassroots coalition of labor, environmental, transportation, and housing advocacy groups which promotes smart growth, living wage jobs and increased housing opportunities for lower income households.

The draft Santa Rosa Downtown Station Area Plan (SAP) presents an opportunity to collaboratively establish a framework for development in the North Bay that is both sustainable and accountable. We would hope that with careful planning, the SAP can serve as a model for successful transit-oriented development along the entire SMART (Sonoma Marin Area Rail Transit) corridor. This would fulfill the goals of the Metropolitan Transportation Commission which has largely funded this project.

Effective design for bicycle and pedestrian use is crucial to the success of high-density, transit-oriented development such as the Santa Rosa Station Area Plan. In order for residents of the Plan area and visitors to reduce their dependence on cars, they must be provided with safe and convenient access to both public transit and the downtown core. There will then be less valuable land wasted for parking and more space for the daily functions and enjoyment of the entire community.

As the review process for the Draft SAP moves forward towards the final hearings in July, the Accountable Development Coalition would like to encourage the Bicycle and Pedestrian Advisory Board to support amendments to the draft SAP that will make the Plan more supportive of bicyclists, pedestrians, and transit riders.

While reviewing the plan, we were pleased to see a “smart growth” inspired model for development that incorporated many of the suggestions made at the community meetings in the spring and summer 2006. We are, however, deeply concerned about what is not included in the current plan. We also see areas which need to be revised or strengthened. We would recommend changes to the Plan in four areas:

1. Affordable/Mixed-Income housing
2. Green design and building standards
3. Safe, pedestrian-oriented streets
4. Improved bicycle and transit usage
ACCOUNTABLE DEVELOPMENT COALITION
We have provided explanations to our policy recommendations in the text below, and we ask that the board recommend to the Planning Commission that these changes be incorporated in the SAP:

HOUSING FOR ALL

There is an enormous unmet need for affordable housing in Santa Rosa. Teachers, police officers, young families, the disabled, retail workers, and the City’s own employees simply cannot afford to live in the areas where they work. The area median household income is about $75,000/year for a family of four, and $52,000/year for an individual. The median home price is close to $600,000. Less than 10% of Santa Rosa residents can afford to buy a median priced home. The Station Area Plan projects an additional 3,250 units of housing in the downtown area, along with at least 300,000 sq ft of new retail, commercial and government office space. This will bring a huge increase in lower paying retail and service jobs in SAP area. We therefore need to provide housing affordable to all income levels in the area. ADC is proposing that 20% of the new units built in the area be affordable to moderate income households – those earning $60,000 to $90,000 per year; and that 20% be affordable to lower income households – those earning less than $50,000 per year.

The Station Area Plan also includes a strong priority for encouraging rider ship of public transit – trains and busses. But the draft SAP fails to make any provision for housing affordable to low and moderate income households, i.e. the households most likely to use public transit. The recently approved Comstock condominiums and other new “midrise” housing developments proposed for the downtown area include no affordable housing. The SAP should require all future residential development in Santa Rosa’s core area to include a substantial percentage of units affordable to low and moderate income households. An affordable housing component in the SAP will facilitate transit rider ship, as the SAP strives to achieve, while simultaneously achieving the broader goal of addressing housing needs of the whole community.

Policy recommendations

- Inclusionary housing requirement for the Station Area: 20% moderate, 20% low and very low-income housing
- On-site construction of inclusionary units for housing developments of 5 or more units
- Require substantial in-lieu fees for housing developments smaller than 5 units and require that any in-lieu fees collected in the Station Area be used to help build affordable units within the Station Area
- Repeal the “mixed-use” exemption for inclusionary housing and in-lieu fees — most or all of the housing proposed for this area will be “mixed use.”
- Identify specific sites which the City believes are appropriate for affordable housing and provide incentives to developers to encourage more affordable housing units

IMPROVED ENVIRONMENTAL DESIGN

The draft Station Area Plan purports to encourage environmentally friendly design in all development within the area covered by the plan. However the language in the draft is extremely vague, and gives potential developers little guidance about what is expected in commercial and residential development in the Plan area. “Green building” design standards are increasingly the norm in communities throughout the Bay Area. The SAP should unequivocally endorse and incorporate these standards. In addition, the increasing regional scarcity of water and limitations on waste management should mandate that all new development meet rigorous and specific environmental design standards.
ACCOUNTABLE DEVELOPMENT COALITION

New commercial and residential development in the SAP area should strive to be environmentally friendly and create attractive buildings and streetscapes. An integrated design approach can help to minimize costs and maximize benefits to the community and environment from green buildings. The draft SAP makes vague references to these goals, but includes no specifics. Neither the public nor potential developers can look at the draft and get any direction about what is required in terms of “green design” in the Station Area.

The City has already taken beginning steps in the right direction by setting goals to reduce greenhouse gas emissions, promote water conservation, and implement a voluntary green building program. The Station Area Plan presents an opportunity for the City to make a firm commitment to environmental stewardship for both current and future residents. We simply cannot afford to let this opportunity slip away. Environmental protection should be a high priority for businesses, for government, and for all the people of Santa Rosa.

Policy recommendations

- Require that all public facilities and commercial buildings constructed within the plan area be built to a minimum of LEED Gold Standards.
- Require mandatory green design standards for all new or significantly renovated construction. The green design guidelines required should be based on the County of Sonoma Waste Management Agency Green Building Guidelines. The guidelines should be mandatory for new residential, commercial and commercial remodels 1200 square feet and larger. A total of a minimum 60 overall points in the rating system with 15 points minimum in Indoor Air Quality, Energy Efficiency and Resource Efficiency categories should be required to receive a certificate of occupancy.
- Require that all multifamily and commercial projects offer comprehensive recycling
- Mandate reduced water usage and wastewater creation use of both water-saving landscaping (language already included) and plumbing innovations in buildings.
- Strengthen language to mandate storm water run-off reduction and emphasize solutions that enhance the natural atmosphere around the building.
- Mandate an integrative design approach for all development at the beginning of the design process, to best make use of innovations and economics to improve the “green-ness” of new buildings
- Mandatory publicity of Santa Rosa Build It Green standards at beginning of development approvals process to all potential developers in Station Area.

DESIGN FOR PEDESTRIAN ORIENTATION

The draft SAP purports to promote livable neighborhoods where shopping, schools and other facilities are within easy walking distance. But in order to do this, pedestrians – including the elderly and disabled- must be able to easily and safely access the various neighborhoods in and around the Station Area through streetscapes that are interesting, safe and attractive. Public spaces -- plazas and parks -- are also important in creating areas to gather and mingle. Reduced parking requirements will help de-emphasize the automobile and leave more room for amenities that serve the neighborhood and provide attractive streetscapes for pedestrians.

Policy recommendations

- Support the development of pocket parks throughout SAP
ACCOUNTABLE DEVELOPMENT COALITION

- Preserve Imwalle Gardens as open space possibly through cooperation with the Open Space District
- Increase the percent of transparency of store- and office-fronts to 40% for Boulevard and Entryway street types to enhance pedestrian environment
- Strict compliance with ADA regulations (see SP-LU-2.3-4)
- Designate Wilson, 4th Streets and Sebastopol Ave as Pedestrian Connectors
- Reduce parking requirement to 1 space/unit for all new residential development in Station Area
- Specify a maximum width of 30 feet for storefronts to keep pedestrian environment interesting
- Encourage building diversity on blocks in order to maintain interesting and diverse pedestrian environment

BIKEABLE STREETS

Bicycle safety on streets has become a prominent concern in Santa Rosa. In order to de-emphasize automobile reliability, bicycle travel must be a safer, more convenient transportation alternative. Bicyclists must be able to get to the commercial core and around within the downtown area to be able to access shops, services, and jobs; this includes maintaining a safe route to travel from the east side of Santa Rosa to the west side through the ever imposing barriers of Highway 101 and The Plaza. Bicycles must be provided with adequate amenities in proportion to those for automobiles (parking, road space, lockers, etc.)

Policy recommendations

- Mandate bicycle parking at all new residential developments, and in front of retail establishments. Commercial-area bike parking shall be in public, well-lit, easily-accessible areas, with 4 spots/1,000 sf of commercial space
- Stronger language to support creation of Class II bike lanes on Entryway and Boulevard street types – to be consistent with bicycle route map in SAP
- Include language that allows for creation of Class II bike lanes on streets not identified in Plan as bike routes
- Maintain Class II bike lanes as prescribed in the City Bicycle Plan

In conclusion, we believe incorporation of these policy recommendations in the Station Area Plan will insure that development in our city’s core will be environmentally and economically beneficial to the community as a whole. The Accountable Development Coalition and its member organizations urge the Bicycle and Pedestrian Advisory Board and city officials to recommend inclusion of these policies in the Santa Rosa Station Area Plan.

If we can provide any additional information or if you have any questions about any of these recommendations, please feel free to call or write us.

Yours truly,

Julia Prange  
Coalition Coordinator  
(707) 694-5482  
juliaprange@gmail.com

Michael Allen  
Coalition Chair

16-1: This comment does not question the adequacy of the Draft EIR, but rather recommends changes to the Specific Plan in four areas: affordable/mixed-income housing; green design and buildings standards; safe, pedestrian-oriented streets; and improved bicycle and transit usage. No further action is required with regard to the Draft EIR, although the City will consider the suggested policy recommendations for inclusion in the Final Specific Plan. Draft EIR related comments from the commenter are included in Comment Letter 17.
April 5th, 2007

Ken MacNab, Senior Planner
City of Santa Rosa Community Development Department
100 Santa Rosa Avenue
Santa Rosa CA 95404

Re: Draft Environmental Impact Report for Santa Rosa Station Area Specific Plan

Dear Mr. MacNab:

The Accountable Development Coalition (ADC) is a grassroots coalition of labor, environmental, housing, and transportation groups advocating for Smart Growth policies that support equitable and sustainable development that is accountable to all segments of the population in the community.

After reviewing of the Draft Environmental Impact Report (DEIR) for the Draft Station Area Specific Plan (DSAP), we would like to express the following comments towards its revision:

The Intended Purpose of the EIR is unclear

Comment 1
The function of the EIR is confusing and unclear. The EIR is presented as a Program level EIR (EIR page 1-1) and was so identified in the Notice of Preparation, but subsequent internal discussion within the DEIR (DEIR pg. 1-2 to 1-4) broadens the scope to also include its function as a “first tier” EIR (per CEQA Guidelines §15152) and a “zoning action” (per Guidelines §15183). Since these represent different triggers, the reader may be unclear as to which function would be used in the future. This is critical, since the failure to timely raise issues with this EIR could preclude any subsequent requirement for analysis and be used to demonstrate that later comments did not exhaust administrative remedies. The EIR should specifically describe the various circumstances in which the different applications would be invoked, and what limitations would result upon future comments.

Comment 2
This is also complicated by uncertainty of the relationship between this DEIR and a variety of other EIRs for projects within the boundaries of the Station Area Plan.
While mitigations adopted as part of project-specific EIRs would presumably remain in place and be in force, the status of other Program EIRs is not as obvious. As discussed below, a number of redevelopment/specific plans have been adopted, with those associated EIRs still being applied to projects covered by those documents or approvals. Aside from any question of consistency (discussed below), the very existence of these overlapping EIRs and mitigations must be acknowledged and put in context when discussing the purpose of this EIR. The EIR should specifically note those EIRs that are still in active use within the boundary of the proposed Station Area Plan, the extent to which information from within those EIRs has been incorporated within the DEIR, and the manner in CEQA implementation will occur should this DEIR also be certified and result in parallel and possibly overlapping mitigations.

The EIR determination of consistency with local plans is incomplete

Comment 3
General Plan policies are discussed for the purposes of consistency in each of the DEIR Sections as appropriate. However, the discussion of consistency with local plans goes beyond just the General Plan itself. The DEIR in the Population and Housing Chapter confirms that the Project/DEIR boundaries include some or all of multiple Redevelopment, yet this is mentioned nowhere else.

CEQA Guidelines §15125(d) requires determining consistency with applicable general and specific plans. Given Redevelopment plans adopted under the California Redevelopment Law are considered applicable if the project falls within the boundaries or may affect the implementation of such a plan, the consistency question should have been assessed with respect to each Redevelopment Plan. The Specific Plan boundaries include portions of the following Redevelopment Areas: Roseland Redevelopment District, the Gateway Redevelopment District, the Transit-Oriented Redevelopment Project Area (TORP) plan, and the Santa Rosa Center Redevelopment District. Absent an analysis of consistency with these various Redevelopment Plans, the present DEIR is incomplete.

The DEIR discussion of Redevelopment areas beginning on page 4.10-4 is limited to build-out issues relative to population and housing only. In some cases, those Redevelopment Plans already reflect the adoption of specific infrastructure improvements, which could affect the conclusions of this DEIR. Issues of transportation, esthetics, noise, and other CEQA factors are addressed in those Redevelopment Plans and their associated EIRs, yet there is no corresponding discussion in the DEIR.

In addition, different Redevelopment Plans take different approaches to consistency with the General Plan. The Gateway Redevelopment Plan provides for “temporary uses” on parcels that are inconsistent with the Redevelopment Plan, but only if they are otherwise consistent with the General Plan and other City requirements (Gateways Redevelopment Plan, §IV-C-3). In contrast, the TORP Plan specifically authorizes the Redevelopment Agency to approve “temporary” uses that are inconsistent with the Redevelopment Plan, but without the qualifying language regarding consistency with other Santa Rosa regulations (TORPA Redevelopment Plan, §IV-C-3).

Taken in the context of the Specific Plan DEIR, this suggests that projects in the Gateway district would have to be consistent with the Specific Plan, but projects in the TORP District would not have the same restriction.

What are the various policies and programs reflected in the various redevelopment plan document that may either support or conflict with the proposed Station Area Plan? What is the intended hierarchy of
administration or implementation between these overlapping plans? What is the administrative mechanism and legal requirement for the Redevelopment Agency to ensure consistency with the proposed Station Area Plan, when it is not so referenced in any of the Redevelopment Plans as adopted? Are there projects for which the Redevelopment Agency would be the lead and only Santa Rosa agency to grant approval, and what is their legal authority or obligation to ensure compliance with the proposed Station Area Plan?

Comment 4

Some of the Redevelopment Plans cited in Comment 3 consist not only of policies, but include authorization for specific infrastructure projects. Does the DEIR reflect these various infrastructure improvements as appropriate in Sections 4.11, 4.12, and 4.13 (addressing transportation, public services and general infrastructure)? Are there assumptions or conclusions in those DEIR Sections that conflict with the specific infrastructure provisions of the Redevelopment Plans (in particular the TORP and Southwest Santa Rosa Redevelopment Plans)?

Comment 5

In addition, the relationship between the findings and mitigations of this DEIR and the EIRs for the Redevelopment Plans is similarly unclear. While the Redevelopment Plans and the proposed Specific Plan are clearly both subordinate to the General Plan, their relative authority over each other is not explored in the Specific Plan DEIR.

What is the mechanism for ensuring enforcement of mitigation measures contained within the multiple EIRs that could govern over some projects, and how will conflicting or inconsistent mitigation measures be reconciled?

Comment 6

Aside from the Redevelopment Plans, a portion of the Specific Plan includes parcels already included within the Southwest Area Plan. The area north of Sebastopol Road and east of Dutton Avenue is included within the Railroad Corridor Sub-area of the Specific Plan, and a variety of design and development guidelines are proposed. This area is also governed by the Southwest Area Plan policies and guidelines relative to land use, density, transportation, backbone infrastructure, community design, community services, and historic preservation.

For this geographic portion of the Specific Plan, the Specific Plan DEIR must examine any potential impacts associated with the change in standards and requirements. Until such an assessment occurs, the DEIR is incomplete and inadequate, since a determination of consistency cannot be made without substantial evidence to support the conclusion.

Contrary To CEQA Requirements, The Project Description Is Inconsistent Between DEIR Sections

Comment 7

The project is described as addressing the establishment of Transit Oriented Development in a one-half mile radius around the SMART site. So clearly the function of the SMART station and the restoration of passenger rail service is a critical aspect of the plan. But from Section to Section within the EIR, the rail service is sometimes described as part of the “project” (meaning the Specific Plan), sometimes described
as part of the cumulative impact analysis, and sometimes excluded from any CEQA review as speculative.

Since a Program EIR has been prepared for and certified for the SMART project, it clearly qualifies as a “probable future project” under CEQA. Omitting the operation of the rail-line and the SMART station site in Railroad Square is a failure of cumulative impact analysis. And since the SMART station operation is included within some DEIR sections as a project component, to exclude such operation as “speculative” can be viewed as project segmentation.

While it would be premature to include the SMART site and rail service at a project-level of analysis, it is entirely appropriate to reflect those activities in a Program level EIR. Since a separate EIR is underway, it cannot be dismissed as simply speculative. Since the DEIR otherwise includes future unfunded infrastructure of the City as part of the Project, the similar funding status of the SMART train and station are not a basis for excluding the SMART site functions. In addition, the SMART EIR did not recognize or account for the scope of changes proposed by the Station Area Plan, nor did it provide any close analysis of impacts associated with this particular station site. So the present DEIR cannot now simply incorporate that document by reference, since it does not reflect the current City plan nor does it provide an adequate level of detail to identify impacts in the SMART station area resulting from both projects in combination. That would result in two significant public projects that each examines its own impact in absence of any relationship to the other project, even though both Projects are acknowledged to be connected and inter-dependant.

Please explain the legal basis under CEQA for excluding the operation of the SMART station site and associated rail service from either the Project Description or the Project Setting.

Comment 8
The Noise Chapter addresses both noise (EIR pg. 4.9-32) and vibration impacts (EIR pg. 4.9-35) associated with the planned operation of the rail line, and specifically does so as a Project impact.

The Air Quality Chapter addresses a number of air quality issues that would be affected by the rail service, including but not limited to suspended particulate matter and diesel emissions. Much of this discussion occurs in the context of sensitive receptors and existing compliance problems. Yet there is no discussion as to how rail service would affect air quality or contribute to potentially significant impacts.

How will future rail service impact meeting any air quality objectives in combination with emissions related to local land use generated traffic?

Comment 9
The Hazards and Hazardous Materials Chapter then includes rail service for the purposes of assessing human exposure to existing contaminants (DEIR pg. 4.6-23):

The general exposure risk to future railroad users, residents and visitors within the plan area from hazardous materials is expected to be negligible since the railroad is not proposed for hazardous material freight and new development is not expected to permit use of hazardous materials.

While this DEIR Section at least reflects the operation of the rail line in its analysis, the conclusion quoted above is offered with absolutely no substantial evidence in support.
The DEIR does not explain or document the basis for dismissing potential impacts from either hazardous material freight or hazardous material use. The phrase “is not expected to permit the use of hazardous materials” is speculative. Unless the Specific Plan excludes such uses by policy requirement or the DEIR does the same via mitigation, the potential is clearly there for some renewed level of hazardous material storage, use, and disposal to be occurring in the Specific Plan area. The Specific Plan as proposed essentially treats uses as residential, retail/commercial, and civic. No language or policy constrains the types of retail/commercial uses that are allowed. Please specifically cite the language presently within the Specific Plan that constrains or regulates activities that may “use” hazardous materials. If such language is absent, additional language must be added to the DEIR to either create the presumed prohibitions on use or regulate their handling and storage should such use be allowed.

Comment 10
Instead of addressing those issues as described in Comment 8 above, the Specific Plan provides a piece of circular logic by stating the following regarding hazardous materials (Plan pg 4-14):

Other policies to ensure no adverse environmental impacts for air quality, biological resources, cultural resources, geology and soils, hazardous materials, hydrology and noise can be found in the Downtown Station Area Specific Plan EIR.

An examination of the uses allowed in the existing Commercial Zoning Districts then reveals a variety of business activities that involve some amounts of hazardous materials. As discussed under Comment 8 above, the DEIR presumption that such “use” of hazardous materials would not be permitted is clearly not present in the Specific Plan. (Santa Rosa Zoning Code §20-23.030).

While these comments are directed to the adequacy of the DEIR, the content of the Specific Plan must be considered not only in terms of its potential for impacts, but also when the DEIR in turn relies upon the proposed Station Area Plan policies to serve as mitigation.

Please clarify to what extent the DEIR “ensures” no adverse impacts in the various topics cited and relied upon by the Station Area Plan.

Comment 11
The Traffic and Circulation Chapter would logically be the location in which such a discussion would have to occur. Yet the DEIR Traffic and Circulation Chapter makes the following two statements:

Note that no deductions were applied in the analysis for potential SMART rail service, since at the time of this analysis the rail system remains unfunded. The transit accessibility trip adjustment factors are shown in Table 4.12-4. (page 4.12-11)

The traffic and circulation analysis for the Specific Plan Area excludes vehicle trip deductions associated with implementation of SMART commuter rail, since at the time of analysis the SMART project remains unfunded. The potential for the Specific Plan to increase ridership on the proposed rail system is, however, discussed below (page 4.12-65).

This clearly shows that no assessment was made of the combined traffic impacts of combining the Specific Plan with the SMART station operation. The question of segmentation and/or failure to reflect a probable future project is specifically raised by this issue.

On this particular point, the argument that lack of funding justifies excluding the SMART station and rail service from inclusion creates an additional internal inconsistency. By design, this DEIR has included the reunification of Courthouse Square, the new performing arts facility, the relocated City Hall, and more in the analysis. Yet none of these projects have committed funding. Please explain the basis for including some unfunded and unapproved public works projects for analysis, while excluding the SMART project for no stated reason other than lack of funding.
Comment 12
The language cited above also suggests that the assumption is that all impacts would be favorable, since it would provide for increased use of public transit over vehicles. But this perspective ignores the fact that passenger train service, while encouraging pedestrian to walk if nearby, will also encourage more people to drive their cars to the station from outside the walkable perimeter. Those vehicles are drawn to the station to then use the mass transit function. This will still potentially benefit traffic flows on Highway 101 itself, but may increase congestion and traffic on local streets and intersections. To the extent that commute service is a key component of rail operation, this additional traffic entering the Specific Area to reach the SMART station will mostly occur during the AM and PM peak hours for traffic congestion.

The SMART EIR as completed already confirms the resulting potentially significant adverse traffic impacts resulting increased traffic from outside the Station Area Plan boundary coming to the station as a vehicle trip destination. Please discuss why the impacts already identified and discussed in the SMART EIR relative to traffic are not reflected in and discussed by the DEIR.

Comment 13
In addition, the SMART EIR identifies a specific local adverse traffic impact as increased congestion and queuing associated with street closures while trains are passing. The SMART EIR notes in particular that the localized congestion and queuing will occur.

Please revise the DEIR to reflect the adverse traffic impacts associated with street closures while trains are passing, including available stacking distance at intersections.

Air Quality
Comment 14
While discussing in great detail the current compliance status with air quality standards, the DEIR does not address consistency with or applicability of City policies regarding control of greenhouse gases. Given the project is in an air quality non-attainment area, the DEIR should also discuss the project impacts upon greenhouse gases, as per the standard specified by the California Attorney General’s opinion on the appropriate triggers for requiring assessment of impacts associated with increased greenhouse gases.

Please address how air quality emissions associated with implementation of the Station Area Plan and the SMART rail service affect levels of local greenhouse gases, what contribution this makes to either a project-specific or cumulative impact, and what mitigations can address this impact.

Comment 15
The discussion of air quality impacts is also clouded by the decision to include mitigations and infrastructure improvements associated with development of the SMART Station site, but excluding any actual rail function at the site. While a rail function may reduce traffic generation in the immediate vicinity, it will increase traffic flow from outside the study area to use this regional infrastructure.

How can mitigation measures of infrastructure improvements associated with the SMART EIR be embedded within the traffic flow model for this DEIR when the SMART site and operation are excluded?
Comment 16
As noted in Comment 13 above, the SMART EIR already confirms there will be periods of increased congestion during rail service, with a concentration during the anticipated AM and PM peak traffic periods. This will result in increased vehicle emissions from cars backed up during the peak hours when trains are passing and crossings are closed. This will have further implications for air quality that are not addressed. The probable occurrence of such back ups from crossings is already confirmed by the SMART EIR as noted above.

What are amounts of additional air quality emissions that will result, what are the ramifications for attainment of air quality standards in general and impacts upon local sensitive receptors?

Comment 17
The DEIR takes the position that no level of service is specified for the Downtown area, either for intersections or corridors, and therefore sets the significance level for a traffic impact at Level of Service (LOS) F (DEIR pg 4.12-41). While the merits of such a decision are discussed under a later item, there is a clear air quality implication to such a decision. LOS F is described as “Delay of more than 80 seconds. Vehicles may wait through more than one cycle to clear the intersection.” (DEIR pg. 4.12-7)

Increased vehicle emissions are a clear byproduct of allowing traffic flow to degrade to such a low level. The localized impacts of deteriorating air quality due to increased traffic congestion must be assessed. The Air Quality analysis contained within the DEIR appears to assume a linear increase in air quality emissions, buffered by some mitigation measures and regulatory standards. However, the relative emissions per vehicle will increase with increased congestion, which will result in a non-linear increase in air pollution.

What assumptions were relied upon by the DEIR air quality analysis relative to traffic congestion?
What are the potential pollutant increases that could occur with allowing a significant deterioration of intersection and corridor level of service without associated mitigation? In turn, what are the potential impacts relative to attainment levels and impacts on local sensitive receptors? Are there implications given the express objective and assumption of increased pedestrian usage in this area?

The DEIR Fails to Adequately Address Impacts Upon Affordable Housing

Comment 18
A key aspect of the function of Redevelopment Areas is to address the potential loss of existing affordable housing and directing resources into the creation of new affordable housing. Since the DEIR has no substantial discussion of any of the Redevelopment Plans, the implications of the Station Area Specific Plan upon delivering affordable housing in those Redevelopment Areas is ignored.

What are the implications of build-out of the Station Area Plan without express requirements for affordable housing, in light of redevelopment law and local Redevelopment Plan policies specific to this issue?

Comment 19
The discussion of existing conditions is not complete relative to Housing impacts. The discussion is limited to a cursory look at City wide targets, market factors, and various generalities. What is absent is any discussion of ABAG/HCD affordable housing targets, and the degree to which the City has met those targets.

The City is already significantly out of compliance with meeting its target for Very Low Income housing for the period ending in 2006. This failure to meet the adopted target should be acknowledged within
this EIR, along with a discussion of what opportunities may be presented by the proposed Specific Plan to help meet the deficiency.

By failing to discuss the unmet target for Very Low Income housing, does the DEIR fail to address the adverse impacts associated with allowing build-out of the core of Santa Rosa without policies specific to providing such housing and complying with specified targets? What mitigation measures, including additional Station Area Plan policies, could reduce this impact and area of non-compliance?

Comment 20
There is no discussion of the applicability of General Plan Housing Element policies and assumptions for the area included in the Specific Plan. In particular, there has to be discussion as to whether any of the sites relied upon or inventoried in the current Housing Element for potential delivery of affordable units are actually within the Specific Plan boundaries.
The DEIR must address consistency of the Project with the current General Plan in regards to assessing the extent to which parcels within the Station Area Plan boundaries could contribute to, or were assessed by the Housing Element relative to, providing affordable and other targeted housing.

Comment 21
The DEIR concludes there will be no significant impacts on affordable housing, and so no mitigations are proposed. But that conclusion is based upon unspecified policies within the Specific Plan itself, which contains no provisions for how affordable housing will be accounted for in the Station Area Plan. If the conclusion of “no potentially significant impact” relies upon specific policies within the Draft Specific Plan, those must be identified and called out in the DEIR. Without specific citation, those policies could subsequently be modified during the approval process without considering the specific reliance of the DEIR upon those policies.
What is the specific substantial evidence upon which the DEIR relies in concluding there will be no significant impact upon affordable housing? If those include policies within the Station Area Plan, have those policies be reconciled with existing policies regarding provision of affordable and other targeted housing as reflected in the multiple Redevelopment Plans, the Southwest Area Plan, and the General Plan?

Comment 22
The increased densities and building heights in the Specific Plan also provide a basis for reassessing the current policy for limiting the requirement for inclusionary affordable housing to sites of 15 acres or more, with the collection of in lieu fees for projects with smaller surface footprints. By accepting densities of up to 50 units per acre in an area where few parcels would be subject to the inclusionary threshold of 15 acres, there is a potential for creating tremendous pressure to build affordable housing outside the Station Area Plan boundary.
What are the potentially significant adverse impacts of shifting a significant amount of affordable housing out of the downtown area, including implications upon land uses, areas of significantly increased demand for public services and transportation, etc.?

Comment 23
As noted under Comment 23, the present on-site inclusionary housing threshold is based upon traditional low or medium density residential development with two to three story height limits. This assumption is inapplicable to the region of the Station Area Plan, which is highly fragmented, yet targeted for both higher densities and higher buildings.
What policies or mitigation measures could create an on-site inclusionary requirement specific to the Station Area Plan that would recognize that the present City standard is based on conventional horizontal residential development, whereas the Station Area Plan has smaller fragmented parcels, but a much higher density allowance and height limits? How would setting an inclusionary threshold that was based upon a vertical threshold or total residential units, rather than simply a ground footprint advance the goal of providing inclusionary housing and eliminate the unequal treatment of larger low density parcels versus smaller high density parcels? Such a policy could be based upon number of residential floors, number of residential units being created, total gross square footage of residential space being created, etc.

The DEIR Discussion of Hazardous Materials Is Not Complete or Technically Accurate

Comment 24
The DEIR contains incorrect technical conclusions, such as:

The flow of groundwater may be constrained through the network of monitoring wells often constructed about sites with contaminated groundwater (DEIR pg. 4.6-11).

Monitoring wells have no effect upon the flow of groundwater nor migration of contaminants. The dual use for monitoring wells as extraction wells for either water or vapor phase contaminants can reduce migration in some circumstances, but can also result in commingled plumes in areas where multiple sources lie in close proximity. The Hyatt Hotel site in the Railroad Square area was actually the impetus for a significant new regulatory and funding program of the California Underground Storage Tank program to address the coordinated remediation of multiple plumes, where treating one contaminant source in isolation can actually worsen the contamination impacts from a separate but nearby site. The DEIR language should be corrected, but more importantly, the DEIR must address management approaches to area remediation that cannot be addressed on a strict project-by-project basis.

Comment 25
The DEIR only addresses cleanup of contaminated soils in the context of site-specific remediation, and then in the context of soil. Yet the multitude of sites makes it inevitable that properties with contamination sources on site will have contamination associated with plume movement. In addition, the action of cleaning up one site can modify and/or complicate cleanup at other sites or plume sources. What is the probability of a significant commingling of plumes that will affect multiple properties, and associated secondary impacts? Under what circumstances might a project-specific assessment and cleanup as proposed by the DEIR have no long term benefit and actually complicate area cleanup efforts? What other mitigations could be adopted to address this problem that cannot be limited to single parcels and their associated projects?

Comment 26
The DEIR must consider the probability of site specific or area contamination associated with demolition and/or reconstruction in the area associated with the earthquakes of 1906 and 1989. Both earthquakes resulted in the direct destruction or subsequent demolition of a number of buildings in the downtown area. All such older structures have a high probability of associated asbestos contamination. The EIR must assess the likelihood of such occurrences, probable locations based upon documented building clearing and/or demolition, and either the possibility that residue remains in situ, or has been reused as fill elsewhere in the downtown area in the course of prior periods of redevelopment.
Comment 27
The EIR should address the situation of present and proposed infrastructure improvements creating preferential pathways for the movement of contaminated water within and beyond the Specific Plan boundaries. It is a common occurrence in urbanized areas that mobile contamination will follow utility trenches as transport pathways for groundwater containing a variety of contaminants. This presents two problems that must be addressed by the EIR. The first is the probability that a significant portion of current contamination will lie not on private property, but on public property and/or in public utility easements. The second is that new incremental infrastructure within public right-of-ways may create new preferential pathways for adjacent plumes. These possibilities need to be assessed by the DEIR.

The DEIR Discussion of Traffic Impacts Is Incomplete and Inadequate

Comment 28
The EIR should address the potential for entry of contaminated water into the storm water management system. This must include both inflow of groundwater into storm drain lines through leakage, as well as transfer of contaminated groundwater from existing underground utility vaults into the storm drain flows by sump pumps directly into the system or indirectly via discharge into street gutters. There are various locations within downtown where underground vaults are pumped up to the surface level, and then discharged into the street gutter, to then flow into the storm drain system. That this is not a function of roof drains is apparent from the continued discharged into surface gutters for days after a storm, and that the discharge is a cyclic surge from a discharge into the gutter (consistent with a pumping cycle as opposed to a gravity flow discharge). One such discharge point exists on the north side of the old Kinko’s building.

How will individual projects with foundations and vaults extending below the elevated winter groundwater level address and manage intrusion of or contamination from contaminated groundwater? To the extent that pumpage or other means of disposing of accumulated contaminated water is necessary, how will this be kept isolated from surface runoff and/or entry into the storm drain system?

Comment 29
As noted above, the SMART site is a fundamental part of the Station Area Plan; it literally is the hub of the area and served as the basis in part for determining the boundary of the Station Area Plan. Yet the traffic impact analysis excludes the operation of the rail line and the SMART station from any assessment of beneficial or adverse impacts.

This is particularly inappropriate, since the adopted MTC/Santa Rosa Funding Agreement states in Section 7 that the traffic analysis of the EIR shall assess “impacts upon existing and proposed bikeways, transit systems (bus and commuter rail) and pedestrians, and impact on pedestrian safety”, (MTC/Santa Rosa Funding Agreement, page 11).

The operation of the SMART rail line and station should be considered part of the “project” for the purpose of this DEIR, and all traffic and transportation impacts be assessed accordingly.

Comment 30
The DEIR improperly segments infrastructure associated with the SMART station site from the function of the station itself. The DEIR does not include the operation of the station with its associated impacts (noise, traffic, parking, etc) but does include and rely upon mitigations associated with development of the SMART site station.
The DEIR should either address SMART site development and operation in all respects, or eliminate any infrastructure improvements planned in association with the station site from the infrastructure assumptions.

Comment 31
While discussing the separate needs of pedestrians and bicycles, the two are lumped together for assessing current traffic volume (Fig 4.12-5). No basis is provided for which intersections were chosen for measuring existing non-vehicular traffic. Two of the five intersections chosen were not analyzed for corresponding traffic volumes and level of service. There is no evidence that these intersections are key hubs for either current or projected bicycle or pedestrian movement. There is no indication that these are key intersections relative to safety for pedestrian or bicyclists. What is the basis by which these intersections were chosen and what is their relationship to key bike or pedestrian movements and paths? Why are these particularly reflective of or indicative of pedestrian and bike volumes, demand, or capacity?

Comment 32
The DEIR subsequently concludes (DEIR pg. 4.12-63):

Overall the Specific Plan would substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area. The future circulation network is also expected to accommodate the increased number of pedestrians and bicyclist trips. No adverse impacts to alternative transportation modes are projected to occur. Potential impacts to pedestrians and bicyclists attributable to the Specific Plan are therefore deemed to be less than significant.

Since the DEIR provided no basis for the adequacy of the current circulation network (or the relative demand upon it), what is the basis for saying it is significantly improved? Absent some meaningful inventory of current pedestrian and bicycle volumes, what is the basis for asserting the future circulation network will “accommodate” increased non-vehicle uses? Where is that future volume quantified in the DEIR and then compared to infrastructure to serve it? In sum, where is the substantial evidence to support the conclusion that no significant impact will occur?

Comment 33
Alternative transportation modes are a key goal of the General Plan and underlie the purpose of the proposed Station Area Specific Plan. Designing a circulation system that encourages and promotes these alternative transit modes is essential for the greater function of the Specific Plan, and the DEIR must make more than a perfunctory reference to these uses. The present DEIR reflects a significant bias for analysis and mitigation of vehicle congestion and impacts, when a working premise is that the priority is to de-emphasize the norm of favoring vehicle movement at the expense of other modes of transportation.

The EIR must compare volumes of and distribution of pedestrians and bicyclists versus the paths and trails and sidewalks available to them. The EIR must show graphically the relationship between existing bike and pedestrian routes in comparison to traffic congestion. The EIR must show future dedicated pedestrian and bicycle routes in comparison future congestion. The EIR should explore whether other communities have developed measures or indices for pedestrian and bicyclist safety and capacity. The EIR must explore, in light of projected traffic volumes and congestion and impacts, whether safe and useable routes exist to connect various public spaces, including public transportation hubs.

Comment 34
The traffic intersection analysis does not address the impacts upon any intersections in the vicinity of, but outside the Plan boundaries. In some cases, these are intersections already identified as having traffic problems or projected to do so in the future, such as Sebastopol Road/Stony Point Road, E
Street/Sonoma Avenue, and E Street/4th Street. The previous EIRs that identified these as marginal intersections include the TORP EIR, the Toscana EIR, the Downtown Mixed Use Project EIR, the Stony Point Road Improvement EIR, Gateway EIR and the Walmart EIR. This includes intersections within the Plan boundary already the subject of separate CEQA review that has documented impacts.

The Scope of Work for the preparation of Specific Plan and EIR (Attachment A to the MTC/Santa Rosa Funding Agreement) states:

As part of this, W-Trans shall review other circulation studies, including the City’s Street Design Standards and Bicycle and Pedestrian Master Plan, as well as studies dealing with potential projects such as the Courthouse Square reunification and Downtown Linkages Program. Circulation analyses from other studies such as the Gateways EIR will also be reviewed to ensure consistency.

There is no reference to any of these other studies in the DEIR nor in the Traffic Analysis that is Appendix F to the DEIR. This is contrary to the requirements of the Scope of Work and excludes relevant information regarding potentially significant impacts.

There was a cursory discussion of some EIRs in the Opportunities Assessment Report – Traffic and Circulation (undated) prepared in conjunction with development of the Specific Plan. The analysis was limited to the TORPA EIR, the Courthouse Square Reunification study, the Gateways EIR, and the Mixed Use Downtown EIR. It did not reflect the Stony Point Road EIR or the Walmart EIR (both of which affect the western entry point to the Specific Plan area). The discussion of the Mixed Use EIR omitted any discussion of the traffic impact conclusions of that study. However this document is in no fashion cited by or expressly relied upon by the DEIR traffic analysis.

Please state which EIRs were reviewed consistent with the requirements of the Scope of Work, where the analysis is to be found in the DEIR or Appendices, what approach was used to determine which sets of intersection data to include from which previous studies, and why intersections were excluded that demonstrably have or are anticipated to have significant LOS problems in the future.

Comment 35
Relative to how intersections were chosen for inclusion, the EIR states only that it was a decision made by the City and W-Trans, without offering any criteria. At a minimum, any adjacent intersection already with a lower level LOS should have been included.

While the cumulative impact analysis with Project implementation does examine the impact of build-out of the General Plan within the Specific Plan area, there is no examination of any cumulative impacts that will occur external to the project area. CEQA provides that the boundary of analysis for determining potentially significant cumulative impacts must reflect the area of potential impact. In this case, the determination to limit the intersection analysis to 21 intersections (all of which are within or abut the Project) is not explained in the DEIR.
Please explain and document that basis for adding additionally intersections to the original set, and the basis for excluding others.

Comment 36
The DEIR contains no substantive discussion of ramp capacity and associated vehicle stacking on on/off ramps to both 101 and Highway 12. This is a standard requirement of CalTrans for projects adjacent to or in close enough proximity to affect highway traffic functions. This has been a continuing problem, and has already been identified as a problem in other EIRs. For example, the EIR for the Transit...
Oriented Redevelopment Project (TORP) was revised to reflect ramp capacity limitations and impacts at the Highway 12/Dutton Avenue interchange. What is the current and projected queue stacking demand and capacity at the following interchanges: Highway 12/Dutton, Highway 12/Stony Point Road, and the 101 intersections already identified in the DEIR?

Comment 37
The EIR asserts that all traffic sampling was taken prior to any construction work relative to the 101 widening project. Neither the DEIR nor the Technical Appendix provides reference dates for the samples, nor do the sources for the older samples. However, the Opportunities Assessment Report cited above identifies 12 of the intersections ultimately included in the DEIR, with data collection dates ranging from 2003 to 2005. Subsequent to that, additional intersections were added, but no date or source is available for those intersections. That raises a question as to whether some or all of those samples were taken subsequent to early 2006 when the Third Street closure and detour had begun. What was the source and date for traffic volume data used to assess the added intersections? If from City data, the City traffic volume count report only lists data for road corridor sections, not for intersections. Please document the original source for intersection-specific data.

Comment 38
A comparison of the “existing” traffic volumes shown on DEIR Figure 4.12-2 with other EIRs addressing some of these same corridors or intersections show significant variance or inconsistencies. For example, both the TORP EIR and Downtown Mixed Use EIR show higher levels of traffic volume as the existing condition than the values shown in this DEIR at intersections on Third Street. The DEIR does not indicate which, if any, of the older traffic samples relied upon in determining the “existing condition” in this DEIR were derived from previous EIRs. In cases where multiple EIRs have addressed a given intersection, there is no indication as to which study was chosen to serve as the source document for this DEIR. Why does the DEIR actually indicate a reduction in “existing” traffic volumes from that provided in previous EIRs? In cases of intersections with multiple samples to chose from, what was the basis for the choice? Was the most conservative value (i.e., reflecting the highest traffic volume) chosen in those cases, and if not, why not?

Comment 39
Neither the DEIR Traffic Section nor the associated Technical Appendix explains the methodology for recalibrating the intersection volumes to produce a consistent 2006 estimate of intersection and corridor traffic volumes. This becomes the benchmark for calculating all subsequent project impacts. What methodology was used to take samples over multiple years and derive calculated 2006 traffic volumes for the DEIR intersections?

Comment 40
The DEIR includes the reconnection of Courthouse Square, and projects traffic movements anticipated to result from traffic circulating around, rather than through, the Square. The two key intersections for assessing the impacts of that change are obviously 4th/Mendocino and 3rd/Mendocino. For no documented reason, no analysis was done of the current and projected traffic volumes and resulting Level of Service at Fourth and Mendocino. Since Fourth Street in that area is limited to one lane in each direction, it seems the more constrained of the two intersections in terms of assessing impacts from the change. Rejoining Courthouse Square will force southbound traffic either to the east and the E Street intersection or to the west and the B Street Intersection. Yet no study was done for either of these as well. The DEIR must provide some basis for excluding the intersections of 4th/B Street, 4th/Mendocino,
and 4th/E Street when these are critical to traffic flow following closing of the central street through Courthouse Square. What data suggested there would be no significant impact would result in terms of traffic, parking, pedestrian and bicycle movement, collisions/safety, etc?

Comment 41
There is no substantive discussion of collisions and safety. Given one objective of the Specific Plan is to encourage non-vehicular transportation, the safety to pedestrians and bicyclists is a key consideration. As discussed above, there in no substantial evidence or explanation as to the claimed adequacy of the improvements associated with the Specific Plan.

The Scope of Work attached to the MTC/Santa Rosa Funding Agreement states that W-Trans will provide (Scope of Work, page 11)
Data collection will also include 3-year collision data for key streets and intersections surrounding the Specific Plan Area and transit routes and route ridership.

The Scope of Work then specifically requires the following be included in the EIR:
(MTC/Santa Rosa Funding Agreement, Exhibit A, Scope of Work, pg 34)

vi. Pedestrian and Bicycle Impacts
W-Trans will review the Draft Plan's policies and any proposed improvements relating to pedestrian and bicycle circulation, and determine whether any significant effects would result. Emphasis will be placed on the adequacy and safety of major pedestrian and bicycle crossing locations on the street network surrounding and within the Specific Plan Area, and the connectivity to adjacent neighborhoods and Downtown.

Consistent with the Workplan, one stated Threshold of Significance in the DEIR is (DEIR pg. 4.12-41):
Failure to maintain acceptable levels of safety and vehicle queuing on downtown roadway segments and intersections

There is no evident discussion of the safety of any pedestrian and bicycle crossings, nor of vehicle safety and collisions. The omission becomes more significant in light of the specific collision frequency analysis contained within the Opportunities Assessment Report relative to traffic. That report reviewed vehicle collision data for three years for three roadway segments and 8 intersections. The results show that Third Street in general has a collision rate above the state standard for comparable streets, with the intersection of 3rd and Santa Rosa Avenue having a collision rate twice that of the state norm (pages 10-12) with other 3rd Street intersection all elevated above state averages.

The Opportunities Assessment Report also included a 4 year assessment of pedestrian and bicycle collisions, and identified the most frequent pedestrian locations as 4th/B Street, 3rd/Santa Rosa Avenue, 5th Street/Davis Street, 2nd Street/D Street, and 5th Street/Mendocino Avenue. The highest number of bike collisions occurred at 5th/Mendocino, 3rd Street/Davis Street, 3rd Street/B Street, 3rd Street/Wilson Street, 4th Street/Mendocino Avenue, and 6th Street/Davis Street.

Despite the requirement for safety analysis in the Scope of Work and the inclusion of safety as a Threshold of Significance in the DEIR, none of the above data was carried forward into the DEIR traffic analysis. There is no alternative assessment of collisions and safety, but only some conclusory statements. In light of the above data, this is not sufficient under CEQA and leaves many questions regarding vehicle, bicycle, and pedestrian safety unanswered.

The DEIR must include a reasoned and substantive analysis of vehicle, bicycle, and pedestrian safety that addresses both the existing conditions, identifies critical intersections as provided in the Scope of Work, and assesses how implementation of the Specific Plan would contribute to worsening or reducing these impacts.
The Water Supply Section of the DEIR Does Not Properly Respond To The Stated Thresholds of Significance or Climate Change Aspects.

Comment 42
There is no discussion of seasonal water demand, and the adequacy of supply, local storage and distribution, and system pressure, to serve the Station Area Plan uses.
The DEIR states the following (DEIR pg 4.3-9):

Table 4.13-1 compares projected supply during non-drought year conditions with projected demand. Based on this comparison, it is not anticipated that a shortage in supply, during non-drought conditions, is likely to occur in the next 20 years.

Portions of Santa Rosa continue to have marginal water pressure, and relatively short hot spells have resulted in significant storage depletion in the various Santa Rosa reservoirs that provide storage for water supplied by the Sonoma County Water Agency.
The EIR should not simply assess adequacy of supply in the context of annualized demand, but with an assessment of seasonal demand, seasonal supply, and water pressure. This should be reflected in the context of both existing conditions and project impacts.

Comment 43
The DEIR bases the water supply assessment by first providing an estimate of the water demand represented by build-out of the Station Area Plan. This assessment is based in part upon a stated assumption that there will be no landscaping in conjunction with any of the attached residential units (page 4.13-11):

The City’s projected residential water use is 110,000 gallons per detached residential unit per year. Attached residential water use includes no landscape irrigation and averages two-thirds of the detached residential water use.

This seems contrary to both existing policy and practice. While attached units may not have individual unit landscaping demands, City policies require the provision of landscaping to the benefit of such developments. This is consistent with a number of General Plan and Design Guideline policies. It also appears consistent with Chapter 5 of the Specific Plan, which provides standards for streetscapes.

In addition, urban setting landscaping is an accepted mitigation for the urban heat island effect, which is a result of pockets of urbanized development that result in increased localized temperatures during the summer months, and is exacerbated in heat spells. This increased heat impact then results in increased energy usage for cooling. Reducing the urban heat island process is both a health and comfort issue for residents, and a component of Climate Change reduction programs (which have been endorsed by the City of Santa Rosa).
The EIR must examine the potential for creating or increasing the urban heat island phenomena in downtown Santa Rosa, in part due to a reduction in landscaping and greenscape in relation to the number of residences, square footage of commercial space, and increase in impervious surfaces. In that context, the conclusion that there will be no water demand associated with attached residential units should be reexamined.

In conclusion, we believe recognition of the above comments and questions will insure that development in our city’s core will be environmentally and economically beneficial to the community as a whole. The Accountable Development Coalition and its member organizations urge city officials to include these recommendations in the next version of the EIR. If we can provide any additional
information or if you have any questions about any of these recommendations, please feel free to call or write us.

Yours truly,

Julia Prange  
Coalition Coordinator  
juliaprange@gmail.com

Michael Allen  
Coalition Chair
Letter 17: Julia Prange, Coalition Coordinator, and Michael Allen, Coalition Chair, Accountable Development Coalition. April 5, 2007.

17-1: This comment serves as an introductory statement identifying the commenter’s organization and to subsequent, more detailed comments that follow. Since no substantive comments were raised, no response is required.

17-2: This comment states that the function of the Draft EIR is confusing and unclear. The Draft EIR provides a description of its intended uses on pages 1-1 through 1-4. This section includes a discussion of when additional environmental analysis would be needed for development projects within the Specific Plan Area. No additional action is required.

17-3: This comment states that the Draft EIR should note other EIRs that are in use in the Specific Plan Area, the extent to which information from those EIRs have been incorporated into the EIR, and how CEQA implementation will occur upon certification of the EIR. The use/application of other EIRs within the planning areas apply to other projects and are not pertinent to the project as analyzed in this EIR. Any information taken from other EIRs is referenced in the appropriate section of this EIR. Implementation of CEQA for subsequent development projects is described on pages 1-1 through 1-4 of the Draft EIR. No additional action is required.

17-4: Please see the response to Comment 11-12.

17-5: Please see the response to Comment 11-12.

17-6: Please see the response to Comment 11-12.

17-7: Please see the response to Comment 11-12.
The Southwest Area Plan (Area Plan) was prepared in response to a policy adopted in the City’s 1991 General Plan (“Santa Rosa 2010”) calling for the preparation of an Area Plan for the Southwest Area. The planning area boundary for this plan includes the area bound by Highway 12 to the north, Highway 101 to the east, Ludwig/Bellevue and Todd Road to the south, and South Wright Road to the west. The Area Plan, adopted in 1994, comprehensively addresses issues, opportunities and constraints unique to the southwest area; contains goals and policies focused on creating livable neighborhoods; identifies future transportation and circulation system needs; and provides a basis for infrastructure funding.

The Land Use Diagram adopted as part of the Area Plan shows the subject area designated for Retail and Business Services and Medium Density residential development and identifies corresponding infrastructure and circulation improvements. The Area Plan also identifies several sites containing historic resources that could be part of a potential historic district, known as the Sebastopol Road Commercial District and Sebastopol Road Industrial District.

The Area Plan formally integrated into the City’s General Plan update in 1996. Subsequently, during the 2002 General Plan update, the Area Plan’s Land Use Diagram was formally replaced by the newly updated General Plan Land Use Diagram.

Therefore, only the goals, policies, implementation programs and other figures contained within the Area Plan still remain in effect. These goals, policies and objectives support and encourage mixed-use development and development of higher density and more intensive land uses along the Northwestern Pacific Railroad Corridor. The Specific Plan proposes to establish a new land use designation for the subject area (Transit Village Medium). This designation would allow for residential development at densities ranging between 25 and 40 units per acre. The designation also encourages ground floor
neighborhood serving uses and “live-work” uses. These proposed changes are consistent with the broader goals and objectives of the Area Plan.

The Specific Plan also refines and furthers the Area Plan’s goals, policies and objectives related to Community Design and Circulation. The Specific Plan will enhance the design and appearance of Sebastopol Road between Dutton Avenue and Olive Street through implementation of the recently completed Sebastopol Road Corridor Plan and establishment of specific development guidelines and streetscape standards. Circulation improvements identified in the Specific Plan are generally consistent with those identified in the Area Plan. The Specific Plan proposes to add a new street connection under Highway 12 (Robert Avenue) which would further the Area Plan objectives of providing multiple routes for local traffic so that traffic would be distributed more evenly throughout the area and not limited/concentrated to just a few routes.

Infrastructure improvements/upgrades needed to serve development envisioned by the Specific Plan are identified in the Transportation and Utilities and Public Services chapters of the Specific Plan. Implementation of these improvements would be achieved through a number of mechanisms, including the addition of regional (“backbone”) infrastructure improvement projects to the City’s Capital Facilities and Southwest Area development impact fee programs.

In sum, the Specific Plan is consistent with those portions of the Area Plan, including the broader goals and objectives that remain in effect today. No further action is required with regard to the Draft EIR.

17-9: This comment asks for an explanation as to why the SMART station site and rail service are not included in the project description or project setting sections of the Draft EIR. The potential operation of the
SMART service, including operations at the proposed rail station are considered in the appropriate sections of the EIR, including traffic and noise. However, given the uncertainty of the timing of the SMART project, the Specific Plan and EIR focus on a transit component to serve as the basis of the transit-oriented development.

17-10: This comment inquires how future rail service would impact meeting any air quality objectives in combination with emissions related to local land use generated traffic.

Future commuter rail traffic would provide convenient transportation alternatives to motor vehicle use, which would reduce emissions from new traffic generated by the project. Impacts of rail use are described in the SMART EIR. Train passages would be too infrequent to cause significant air quality impacts at sensitive receptors near the rail line. Local air quality impacts were assessed assuming worst-case traffic congestion at the busiest intersections.

17-11: This comment indicates that mitigations to control the use of hazardous materials within the Specific Plan Area are needed. The Specific Plan EIR addresses this need under Mitigation Measures HAZ-1a and HAZ-1b, including the requirement that businesses be registered and in compliance with conditions of the Hazardous Materials Business Plan (HMBP) Program, Hazardous Waste Generator Program and Accidental Release Program.

17-12: Please see the response to Comment 17-11.

17-13: For the purposes of determining vehicular trip generation, the Draft EIR traffic analysis does not assume that SMART rail service will be in operation. It is fundamentally important for the traffic analysis to make this assumption, since if the station were assumed operational, the assumed traffic generation of potential new development within the Specific Plan Area would be lower and the corresponding traffic
impacts less significant. While it is very possible that SMART service will be implemented within the time frame of the Specific Plan, it is critical to assess worst-case conditions without the train to ensure that potential development impacts have been properly analyzed. In a similar context, the Draft EIR assumes that projects such as the performing arts center will be constructed, even though they may not be funded, since exclusion of these Specific Plan components would also understate impacts.

17-14: The downtown Santa Rosa SMART station would include no public parking. Rail commuters choosing to drive to a SMART station would have to drive to the Jennings Avenue station to the north, which is outside of the Draft EIR study area and would create negligible, if any, impacts at the analyzed intersections and roadways. There would be some potential, however, for increased bus, vanpool, taxi and drop-off traffic at the downtown Station site. The Draft EIR analysis considers these localized impacts in the evaluation of the adequacy of the circulation network surrounding the station site, including the north-south street within the SMART site and connections to Third and Sixth Streets. When considering pedestrian and bicycle circulation, it is also assumed that the station area is likely to become a major activity area.

It is acknowledged that the Draft EIR may potentially overstate the potential vehicular traffic levels that would exist without SMART service, though, as indicated above, this approach was necessary to maintain a worst-case analysis. If SMART service does commence, no additional traffic or circulation impacts beyond those identified in the Draft EIR would be expected.

17-15: The Draft EIR does not duplicate the analysis conducted for the SMART EIR, though considers the findings of the document in the context of the local circulation network. The rail crossing within the Plan Area that will be most affected by passing trains is at
Third Street. The SMART EIR indicates that the duration that crossing gates are lowered over crossings adjacent to stations will be minimized though special signal equipment, with gates remaining open while the train is boarding. Given the projected operation of the Third Street corridor, only minimal disruptions are anticipated upon buildout of the Specific Plan, with adjacent intersections clearing and operation returning to normal within one to two cycles. Given the anticipated frequency of rail service, potential impacts are expected to be minimal and very unlikely to change the projected peak hour levels of service along Third Street. The Public Utilities Commission will conduct further review of the crossing and adjacent intersections if and when construction of the SMART site and station commences.

17-16: Please see the response to Comment 11-31.

17-17: The traffic analysis conducted for the Draft EIR does not apply deductions in vehicle trip generation that could result if SMART rail service becomes operational. The City traffic model used to develop future traffic projections also excludes the potential shifts from vehicle to rail travel modes associated with SMART. Please see the responses to Comments 17-13 and 17-14 for further explanation.

17-18: This comment refers to air quality impacts from traffic backed up by SMART train passages.

The Draft EIR took a conservative approach to analyzing local air quality impacts from traffic congestion. The intersections at College Avenue and Cleveland Avenue, as well as 3rd Street and B Street, would experience the combination of highest traffic volumes and worst congestion. The Draft EIR air quality analysis assessed impacts assuming congested movements in all directions, regardless of traffic predictions. These intersections would have greater impacts than congestion at SMART train/railroad crossings. Impacts were
found to be less than significant as reported on page 4.2-27 of the Draft EIR.

17-19: This comment refers to air quality impacts associated with degraded intersections in the Station Plan Area as a result of the project.

Please see response to Comment 17-18. Local air quality impacts associated with traffic congestion were analyzed assuming congested conditions and found to be less than significant. The models use (i.e., California’s on-road mobile source emission factor model, EMFAC2002), which indicate much higher emissions rates at slow speeds. The modeling used a conservative screening approach that assumed very slow speeds through the study intersections, regardless of traffic forecasts. This resulted in a conservative assessment of impacts.

17-20: This comment pertains to the adequacy of the Specific Plan in addressing the need for affordable housing, housing ratios and target requirements within the downtown area, relative to the City’s Housing Element. These are comments on the Specific Plan itself. It is erroneous for the commenter to link the adequacy of the Draft EIR to these housing factors as this issue is beyond the requirements of CEQA, as per CEQA Guidelines Section 15131(c). CEQA Guidelines Section 15131(c) states “…housing factors shall be...added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project.” The issue of housing and affordable housing is addressed in the City of Santa Rosa’s General Plan Housing Element and is addressed in this planning process through the General Plan Amendments as part of the Specific Plan and EIR adoption process. No further action is required with regard to the Draft EIR.

17-21: Please see the response to Comment 17-20.
17-22: Please see the response to Comment 17-20.

17-23: Please see the response to Comments 11-12 and 17-20.

17-24: Please see the response to Comment 17-20.

17-25: Please see the response to Comment 17-20.

17-26: This comment questions the validity of a statement in the Specific Plan Draft EIR. This sentence shall be deleted from the Draft EIR. This edit, however, does not change the conclusions or the adequacy of this EIR. This change is reflected in the revised language included in Chapter 3 of this Final EIR.

17-27: This comment discusses that specific development sites may be influenced by contamination on adjacent properties or by groundwater contamination from other sites. The comment also poses questions concerning the proposed mitigation measures dealing with site-specific contamination. Based on comments by the Regional Water Quality Control Board (RWQCB) staff (see Comment Letter 7), the EIR will be revised to require review of all investigation work by the Santa Rosa Fire Department and the RWQCB. Issues relating to multiple contamination sources should be addressed by those qualified reviewers, not by Specific Plan policies and mitigation measures (see revised language for Mitigation Measure HAZ-2a in Chapter 3 of this Final EIR). No further action is required with regard to the Draft EIR.

17-28: This comment discusses the potential for contaminated demolition debris from the 1906 and 1989 earthquake events. The Draft EIR includes a requirement for a Phase I Environmental Site Assessment (ESA) on each re-development site. As part of the Phase I ESA, the potential for the occurrence of hazardous materials on each redevelopment site will be addressed. If the potential for asbestos con-
taining building materials is identified in the ESA, then additional testing and containment will be required. No further action is required with regard to the Draft EIR.

17-29: This comment suggests that the EIR should address the situation of present and proposed infrastructure improvements creating preferential pathways for the movement of contaminated water within and beyond the Specific Plan boundaries. Mitigation Measure HAZ-2b of the Draft EIR has been revised based on RWQCB comments to include the requirement that re-development sites prepare a Soil and Groundwater Management Plan to control potentially contaminated soil and groundwater movement. The Soil and Groundwater Management Plan will address the concerns addressed in the comment. The Plan will be reviewed by the Santa Rosa Fire Department and/or the RWQCB (see revised language for Mitigation Measure HAZ-2b in Chapter 3 of this Final EIR). No further action is required with regard to the Draft EIR.

17-30: This comment suggests that the EIR should address the potential for entry of contaminated water into the stormwater management system. Mitigation Measure HAZ-2b of the Draft EIR has been revised based on the RWQCB comments to include the requirement that re-development sites prepare a Soil and Groundwater Management Plan to control potentially contaminated soil and groundwater movement. The Soil and Groundwater Management Plan will address the concerns addressed in this comment. The Plan will be reviewed by the Santa Rosa Fire Department and/or the RWQCB.

17-31: As indicated in responses to Comments 17-13, 17-14 and 17-17, the Draft EIR takes no vehicular traffic generation deductions for SMART rail service in order to present a worst-case analysis of potential Plan impacts. The Draft EIR does, however, consider the potential local circulation impacts associated with development of the SMART site as a major mixed-use development with non-commuter
station, including the assumptions that a significant amount of pedestrian and bicycle activity will be centered around the site. Updated ridership projections, assuming rail service does commence, are also provided for informational purposes.

17-32: Please see the response to Comments 11-10, 17-13 and 17-15.

17-33: The figure referenced in the comment does separate bicycle and pedestrian volumes. The “turning movement” volumes represent bicyclists making left, through, or right turn movements for each approach. The arrows shown in crosswalk locations represent the number of crossing pedestrians on each approach. These locations were determined at the onset of development of the Specific Plan in coordination with City Staff as areas with high pedestrian and bicycle activity and/or locations that provide an adequate gauge of pedestrian-bicycle activity that can be used to establish data inputs for determining vehicle level of service. The Specific Plan and Draft EIR fully acknowledge and expect pedestrian and bicycle volumes to be high within the Specific Plan Area, and most certainly higher than current volumes. Conducting additional counts beyond the multiple locations already chosen would yield little more useful data and result in no changes to the documents. No further action is required in regards to the Draft EIR.

17-34: The adequacy of the pedestrian and bicycle circulation network is based on connectivity, safety and proposed streetscape improvements. The Specific Plan, combined with other planned projects, would significantly improve connectivity in the downtown area, particularly between the Courthouse Square and Railroad Square areas. The proposed streetscape configurations include enhanced pedestrian facilities including wider sidewalks in many locations. The Specific Plan will clearly improve pedestrian and bicycle connectivity over existing conditions.
There are no methodologies used by the City to determine the adequacy of pedestrian and bicycle facilities based on volumes. Such evaluation instead relies on evaluation of anticipated development, consideration of the street and pathway network in regards to connectivity and professional judgment. Further, as this is a program-level document containing no project-specific details, there is no justifiable means of determining future pedestrian and bicycle volumes at any specific location. As indicated in response to Comment 17-33, the Specific Plan and Draft EIR fully assume pedestrian and bicycle volumes to increase substantially over time as the Plan is implemented.

17-35: The Specific Plan focuses strongly on non-automobile modes of transportation and, in fact, proposes no major capacity improvements intended to increase vehicle capacity. Alternative transportation modes will become increasingly viable and important travel options for residents and employees of the Specific Plan Area. In response to quantifying specific pedestrian and bicycle volumes at Plan buildout, please see response to Comment 17-34.

17-36: The approved scope of work for preparation of the Draft EIR traffic analysis includes evaluation of 16 intersections. As development of the Specific Plan document progressed, the traffic consultants identified the need to further expand the list to include 21 intersections. The list of intersections was chosen in coordination with City of Santa Rosa Staff and includes the locations deemed most likely to experience adverse impacts attributable to buildout of the Plan. It is also important to note that the City maintains no level of service (LOS) standards within the downtown area, which comprises the majority of the study area, but that numerous intersections were still evaluated in this area to determine overall adequacy of the circulation system and potential for gridlock and/or safety problems to arise in the future.
The Opportunities Assessment Report considers the findings of other project reports and EIRs, although the study area, data collection and methodologies employed in the Downtown Station Area Specific Plan EIR were all updated to represent current conditions and practices. The available environmental documents that were reviewed as part of the Opportunities Assessment Report, which laid the groundwork for the Plan and EIR, included the Gateways EIR, SMART EIR, TORPA EIR and Downtown Mixed Use Projects EIR. The study area for the Wal-Mart EIR is located almost exclusively to the west of the Station Area and, other than the freeways (which were evaluated in both documents), would experience relatively minor increases in traffic attributable to buildout of the Plan. Similarly, the Stony Point Road Widening EIR details conditions outside of the area expected to be influenced significantly by the Plan.

17-37: The scope of analysis for the traffic and circulation component of the Draft EIR was defined and agreed upon at the onset of the project. As the Specific Plan evolved, and potential areas of the most intense development became apparent, the list of study intersections was increased to include five additional ones. The study intersections were chosen as the most likely locations to experience adverse impacts attributable to the Plan, and follow the corridors that connect the Plan area to regional facilities such as Highways 12 and 101. While it is acknowledged that there may be intersections beyond the study area that may experience adverse operation in the future, the increment of traffic attributable to development of the Plan at these areas would be relatively small.

17-38: Please see the response to Comment 4-2.

17-39: All analyzed traffic volume data was adjusted to reflect 2006 conditions and all data was obtained prior to any detours associated with the Highway 101 widening project. The City of Santa Rosa traffic
engineering division maintains a significant amount of traffic data beyond the internet-published traffic volume data report and provided intersection turning movement volume data to W-Trans for the study intersections.

17-40: All traffic volumes utilized in the analysis were based on data either provided by the City of Santa Rosa or collected by W-Trans. While the data used in the older studies was likely good at the time, there is no way to know what types of environmental factors were present at the time of the data collection. The City’s data generally focuses on mid-week conditions and is obtained only when there are no known outside factors (such as adjacent detours) that may skew results. It is also important to consider that, while older data used in other studies may have been higher at some locations, it is also lower at others. The Draft EIR also increased any volumes collected in 2003 to 2005 by a minimum of 1.25 percent per year (consistent with traffic growth in the area) in order to reflect present conditions.

The City of Santa Rosa’s level of service criteria applies to corridors, rather than intersections, though volumes at individual intersections are used in the corridor methodology. Examination of traffic conditions at the corridor-level does normalize overall conditions by including data that may be higher-than-normal at some intersections with data that is lower-than-normal at others. The corridor analyses presented in the Draft EIR were used to determine traffic impacts and potential mitigation measures, in combination with individual intersection levels of service.

17-41: As noted above, traffic volumes collected in 2003 to 2005 were increased by 1.25 to 2.0 percent per year to reflect 2006 conditions. These growth rates are consistent with reviews of historical counts conducted by W-Trans and the City over the past several years, with specific growth rates chosen based on review of available data at adja-
cent locations and/or level of development activity that has taken place in the immediate vicinity over the subject period.

17-42: Design concepts prepared in the past for the potential reunification of Courthouse Square have assumed B Street to become the new primary north-south street through downtown. The City still envisions this traffic scheme to be used if the square is reunified, and therefore, the Draft EIR uses the same assumption. The dominant southbound traffic flow would split onto B Street just south of College Avenue. The Fourth Street/Mendocino Avenue intersection would become a minor three-legged intersection, as traffic volumes would drop significantly from current levels. The intersection would be reduced in size and would become even more pedestrian-orientated than it currently is. The Draft EIR analyzes conditions at key intersections affected by the expected Courthouse Square reunification diversion including College Avenue/Mendocino Avenue, 7th Street/Mendocino Avenue, 7th Street/B Street, Third Street/B Street, Third Street/Santa Rosa Avenue, Third Street/E Street and First Street/Santa Rosa Avenue.

17-43: All items in the scope of work have been fulfilled. As indicated in the comment, a substantive safety analysis was conducted in the Opportunities Assessment Report, including evaluation of pedestrian and bicycle collision locations. This information was in turn considered when evaluating the streetscape improvements proposed during development of the Specific Plan. The improvements shown in the final Plan are the result of an iterative process that considered both existing and potential safety concerns. The Draft EIR considers the potential safety impacts attributable to the proposed streetscape changes in tandem with the impacts of increased traffic levels for drivers, pedestrians and bicyclists.

It is impossible to predict future collision rates. In order to assess potential safety conflicts that could arise as a result of the Specific Plan...
and other growth envisioned by the General Plan, the Draft EIR considers anticipated motor vehicle speeds and congestion levels. The safety of motor vehicle drivers, pedestrians and cyclists is significantly influenced by vehicle speeds. Lower speeds allow drivers to react quickly and stop in much shorter distances, and when collisions do occur, lower severities and less potential for injury exists. The analysis conducted for the Specific Plan indicates low vehicle speeds along major arterials in the Plan Area, which, as long as traffic operation is still maintained at acceptable levels, is considered to be optimal for pedestrian and bicycle safety.

The Draft EIR also considers intersection performance as an indicator of potential safety problems. While the City’s General Plan requires no minimum LOS standard within the downtown area, the Draft EIR analyzed intersections and considered LOS F operation to be a significant impact due to potential safety concerns. Where potential safety problems were identified, the Draft EIR proposes mitigation measures intended to reduce the impacts.

17-44: This comment states that the EIR should address water demand based on seasonal demand and supply rather than annualized supply and demand. The water supply and demand analysis, which was performed for this EIR, is based on SB 610 Water Supply Assessment (WSA) and is included as Appendix H of this Final EIR. The WSA does take into account both single and multiple dry year conditions as well as hot non-drought weather conditions. Both supply and demand identified in Table 4.13-1 of the Draft EIR have been assessed based on these figures. Therefore, seasonal variations have been accounted for in the analysis. Based on the water supply sources analyzed in the WSA, it appears unlikely that drought would reduce the volume of water supply available to the City from the Sonoma County Water Agency (SCWA). Additionally, the EIR provides a comprehensive discussion of Specific Plan policies that are detailed under Goals SP-UPS-1 and SP-UPS-2, which address water
supply for existing and new development in the Plan Area on page 4.13-12 of the Draft EIR.

The comment goes on to question the adequacy of the water supply analyzed in the Draft EIR. The City currently receives all of its potable supply from the SCWA under the provisions of the Restructured Agreement for Water Supply. The Restructured Agreement for Water Supply defines the City’s entitlement as 29,100 acre-feet per year and 56.6 million gallons per day monthly average. As stated in the WSA, the Restructured Agreement for Water Supply contains shortage provisions in Section 3.5 and a requirement for a Water Shortage Allocation Methodology. The provisions and Water Shortage Allocation methodology take into account the demand hardening associated with water conservation. The City of Santa Rosa has implemented an aggressive water conservation program resulting in the lowest per capita water use among the SCWA water contractors. Under the Shortage Allocation Methodology, should SCWA water rights remain limited to 75,000 acre-feet per year and the water contractors’ demand collectively reach 75,000 acre-feet annually, the City’s would receive the full allocation of 29,100 acre-feet per year.

The WSA goes on to analyze the effect of the Memorandum of Understanding Regarding Water System Transmission System Capacity Allocation during Temporary Impairment (MOU). Under this MOU, the City’s maximum capacity of delivery is 39.1 million gallons per day (mgd) monthly average. The City’s greatest monthly average delivery was 33.6 mgd and occurred in July 2006. The MOU expires in September 2008. Because the City’s current demand is significantly below the target of the MOU, it is not expected that the impairment condition of SCWA transmission system will affect the City’s water deliveries from SCWA.

The commentor also asks that water pressure be addressed as part of the water supply. The Specific Plan Area defined in the WSA is lo-
located entirely in the City Aqueduct pressure zone. The pressure and supply for this pressure zone is provided primarily from the SCWA Aqueduct. The operating pressure of the SCWA Aqueduct is maintained at a higher operating pressure than the City’s Aqueduct Zone. The City uses Pressure Reducing Valves to reduce the SCWA Pressure to the City’s operating pressure. Because of this, the pressures for the project area are maintained year round through normal operation of the SCWA Aqueduct.

The findings and analysis of the Draft EIR are adequate; therefore, no additional response is required.

17-45: Although the heat island phenomena is not directly addressed in the EIR, the commentor is correct in stating that streetscaping and landscaping standards are identified in the General Plan and Design Guidelines policies, as well as in the Design Guidelines for the Specific Plan. These standards provide not only an aesthetic benefit to the community, but also provide the ancillary benefit of reducing the heat island phenomena. These elements, to reduce the effects of the heat island phenomena, are addressed through Specific Plan’s Development Guidelines and Streetscape Standard calling for extensive use of trees for shade, as well as providing green spaces throughout the Specific Plan Area.

The commentor goes on to question if the water demand for the streetscaping and landscaping standards, for both public and private uses, has been included in the overall water analysis of the Draft EIR. Water demand allocations for all streetscaping, park and public space landscaping improvements have been accounted for in the WSA and are reflected in water supply and demand Table 4.13-1 of the Draft EIR. The water demands for these improvements have been assessed based on these figures.
In regards to water demand for landscaping of private development projects, the WSA projected residential water use in Santa Rosa is 110,000 gallons per detached residential unit per year. Attached residential water use averages two-thirds of the detached residential water use in part because there is typically minimal area available for landscaping around attached residential units. This two-thirds average is based on an analysis of the past ten years of actual residential water use in the City of San Rosa and by default does include the requirements identified in the General Plan and Design Guidelines policies; and is consistent with the Design Guidelines for the Specific Plan. In the case of the Specific Plan, most of the attached residential units will be multi-story dwelling units that will maximize the parcel to the greatest extent possible, leaving minimal area for landscaping. The area remaining for landscaping will be done so in accordance with the policies and standards already identified.

The statement identified by the commentor will be revised for additional clarity and is reflected in the revised language included in Chapter 3 of this Final EIR. Revising this statement does not change the conclusion of this EIR or its adequacy.

17-46: This comment does not address the adequacy of the Draft EIR, rather it expresses an opinion with regard to the Specific Plan. No additional response is required.
April 5th, 2007

Ken MacNab, Senior Planner
City of Santa Rosa Community Development Department
100 Santa Rosa Avenue
Santa Rosa CA 95404

Re: Draft Environmental Impact Report for Santa Rosa Station Area Specific Plan

Dear Mr. MacNab:

Greenbelt Alliance is the Bay Area’s land conservation and urban planning organization. We have been involved in protecting open space and farmlands, and promoting livable communities in the Bay Area since 1958.

After thorough review of the Draft Environmental Impact Report (DEIR) for the Draft Station Area Specific Plan (DSAP), we would like to submit the following comments. We ask that the City take into account these comments and observations, and respond to them thoroughly with added data and/or suggested mitigations in the Final EIR and updated Station Area Plan.

THE DEIR incorrectly states that the Station Area Plan is not growth inducing

Comment 1

In its discussion of growth inducing impacts (Section 6-a of the DEIR), the argument is made that the Specific Plan will not be growth inducing, since it will promote the goal of urban infill and densities. But it also implies that there will be a corresponding shift in planned density away from other portions of the City and into the Specific Plan area:
"Implementation of the Specific Plan would therefore absorb some growth expected in outlying areas of the City."

If the DEIR intends the Specific Plan to shift planned growth from one area to another, it must include mitigations that will favor development in the core area, and/or reduce or further restrict build-out at the urban boundaries. Without such requirements, the Specific Plan is growth inducing, since it provides for densities in one part of the City greater than provided for by General Plan, while still allowing build-out as planned in the remainder of the City.

The Intended Purpose of the EIR is unclear

18-1

18-2

18-3
Comment 2
The function of the EIR is confusing and unclear. The EIR is presented as a Program level EIR (EIR page 1-1) and was so identified in the Notice of Preparation, but subsequent internal discussion within the DEIR (DEIR pg. 1-2 to 1-4) broadens the scope to also include its function as a “first tier” EIR (per CEQA Guidelines §15152) and a “zoning action” (per Guidelines §15183). Since these represent different triggers, the reader may be unclear as to which function would be used in the future. This is critical, since the failure to timely raise issues with this EIR could preclude any subsequent requirement for analysis and be used to demonstrate that later comments did not exhaust administrative remedies. The EIR should specifically describe the various circumstances in which the different applications would be invoked, and what limitations would result upon future comments.

Comment 3
This is also complicated by uncertainty of the relationship between this DEIR and a variety of other EIRs for projects within the boundaries of the Station Area Plan. While mitigations adopted as part of project-specific EIRs would presumably remain in place and be in force, the status of other Program EIRs is not as obvious. As discussed below, a number of redevelopment/specific plans have been adopted, with those associated EIRs still being applied to projects covered by those documents or approvals. Aside from any question of consistency (discussed below), the very existence of these overlapping EIRs and mitigations must be acknowledged and put in context when discussing the purpose of this EIR. The EIR should specifically note those EIRs that are still in active use within the boundary of the proposed Station Area Plan, the extent to which information from within those EIRs has been incorporated within the DEIR, and the manner in CEQA implementation will occur should this DEIR also be certified and result in parallel and possibly overlapping mitigations.

The EIR determination of consistency with local plans is incomplete

Comment 4
General Plan policies are discussed for the purposes of consistency in each of the DEIR Sections as appropriate. However, the discussion of consistency with local plans goes beyond just the General Plan itself. The DEIR in the Population and Housing Chapter confirms that the Project/DEIR boundaries include some or all of multiple Redevelopment, yet this is mentioned nowhere else.

CEQA Guidelines §15125(d) requires determining consistency with applicable general and specific plans. Given Redevelopment plans adopted under the California Redevelopment Law are considered applicable if the project falls within the boundaries or may affect the implementation of such a plan, the consistency question should have been assessed with respect to each Redevelopment Plan. The Specific Plan boundaries include portions of the following Redevelopment Areas: Roseland Redevelopment District, the Gateway Redevelopment District, the Transit-Oriented Redevelopment Project Area (TORP) plan, and the Santa Rosa Center Redevelopment District. Absent an analysis of consistency with these various Redevelopment Plans, the present DEIR is incomplete.

The DEIR discussion of Redevelopment areas beginning on page 4.10-4 is limited to build-out issues relative to population and housing only. In some cases, those Redevelopment Plans already reflect the adoption of specific infrastructure improvements, which could affect the conclusions of this DEIR. Issues of transportation, esthetics, noise, and other CEQA factors are
addressed in those Redevelopment Plans and their associated EIRs, yet there is no corresponding discussion in the DEIR.

In addition, different Redevelopment Plans take different approaches to consistency with the General Plan. The Gateway Redevelopment Plan provides for “temporary uses” on parcels that are inconsistent with the Redevelopment Plan, but only if they are otherwise consistent with the General Plan and other City requirements (Gateways Redevelopment Plan, §IV-C-3). In contrast, the TORP Plan specifically authorizes the Redevelopment Agency to approve “temporary” uses that are inconsistent with the Redevelopment Plan, but without the qualifying language regarding consistency with other Santa Rosa regulations (TORPA Redevelopment Plan, §IV-C-3).

Taken in the context of the Specific Plan DEIR, this suggests that projects in the Gateway district would have to be consistent with the Specific Plan, but projects in the TORP District would not have the same restriction.

What are the various policies and programs reflected in the various redevelopment plan document that may either support or conflict with the proposed Station Area Plan? What is the intended hierarchy of administration or implementation between these overlapping plans? What is the administrative mechanism and legal requirement for the Redevelopment Agency to ensure consistency with the proposed Station Area Plan, when it is not so referenced in any of the Redevelopment Plans as adopted? Are there projects for which the Redevelopment Agency would be the lead and only Santa Rosa agency to grant approval, and what is their legal authority or obligation to ensure compliance with the proposed Station Area Plan?

Comment 5
Some of the Redevelopment Plans cited in Comment 3 consist not only of policies, but include authorization for specific infrastructure projects. Does the DEIR reflect these various infrastructure improvements as appropriate in Sections 4.11, 4.12, and 4.13 (addressing transportation, public services and general infrastructure)? Are there assumptions or conclusions in those DEIR Sections that conflict with the specific infrastructure provisions of the Redevelopment Plans (in particular the TORP and Southwest Santa Rosa Redevelopment Plans)?

Comment 6
In addition, the relationship between the findings and mitigations of this DEIR and the EIRs for the Redevelopment Plans is similarly unclear. While the Redevelopment Plans and the proposed Specific Plan are clearly both subordinate to the General Plan, their relative authority over each other is not explored in the Specific Plan DEIR.

What is the mechanism for ensuring enforcement of mitigation measures contained within the multiple EIRs that could govern over some projects, and how will conflicting or inconsistent mitigation measures be reconciled?

Comment 7
Aside from the Redevelopment Plans, a portion of the Specific Plan includes parcels already included within the Southwest Area Plan. The area north of Sebastopol Road and east of Dutton Avenue is included within the Railroad Corridor Sub-area of the Specific Plan, and a variety of design and development guidelines are proposed. This area is also governed by the Southwest Area Plan policies and guidelines relative to land use, density, transportation, backbone infrastructure, community design, community services, and historic preservation.
For this geographic portion of the Specific Plan, the Specific Plan DEIR must examine any potential impacts associated with the change in standards and requirements. Until such an assessment occurs, the DEIR is incomplete and inadequate, since a determination of consistency cannot be made without substantial evidence to support the conclusion.

**Contrary To CEQA Requirements, The Project Description Is Inconsistent Between DEIR Sections**

**Comment 8**
The project is described as addressing the establishment of Transit Oriented Development in a one-half mile radius around the SMART site. So clearly the function of the SMART station and the restoration of passenger rail service is a critical aspect of the plan. But from Section to Section within the EIR, the rail service is sometimes described as part of the “project” (meaning the Specific Plan), sometimes described as part of the cumulative impact analysis, and sometimes excluded from any CEQA review as speculative.

Since a Program EIR has been prepared for and certified for the SMART project, it clearly qualifies as a “probable future project” under CEQA. Omitting the operation of the rail-line and the SMART station site in Railroad Square is a failure of cumulative impact analysis. And since the SMART station operation is included within some DEIR sections as a project component, to exclude such operation as “speculative” can be viewed as project segmentation.

While it would be premature to include the SMART site and rail service at a project-level of analysis, it is entirely appropriate to reflect those activities in a Program level EIR. Since a separate EIR is underway, it cannot be dismissed as simply speculative. Since the DEIR otherwise includes future unfunded infrastructure of the City as part of the Project, the similar funding status of the SMART train and station are not a basis for excluding the SMART site functions. In addition, the SMART EIR did not recognize or account for the scope of changes proposed by the Station Area Plan, nor did it provide any close analysis of impacts associated with this particular station site. So the present DEIR cannot now simply incorporate that document by reference, since it does not reflect the current City plan nor does it provide an adequate level of detail to identify impacts in the SMART station area resulting from both projects in combination. That would result in two significant public projects that each examines its own impact in absence of any relationship to the other project, even though both Projects are acknowledged to be connected and inter-dependant.

Please explain the legal basis under CEQA for excluding the operation of the SMART station site and associated rail service from either the Project Description or the Project Setting.

**Comment 9**
The Noise Chapter addresses both noise (EIR pg. 4.9-32) and vibration impacts (EIR pg. 4.9-35) associated with the planned operation of the rail line, and specifically does so as a Project impact.

The Air Quality Chapter addresses a number of air quality issues that would be affected by the rail service, including but not limited to suspended particulate matter and diesel emissions. Much of this discussion occurs in the context of sensitive receptors and existing compliance
problems. Yet there is no discussion as to how rail service would affect air quality or contribute to potentially significant impacts.

How will future rail service impact meeting any air quality objectives in combination with emissions related to local land use generated traffic?

**Comment 10**
The Hazards and Hazardous Materials Chapter then includes rail service for the purposes of assessing human exposure to existing contaminants (DEIR pg. 4.6-23):

The general exposure risk to future railroad users, residents and visitors within the plan area from hazardous materials is expected to be negligible since the railroad is not proposed for hazardous material freight and new development is not expected to permit use of hazardous materials.

While this DEIR Section at least reflects the operation of the rail line in its analysis, the conclusion quoted above is offered with absolutely no substantial evidence in support. The DEIR does not explain or document the basis for dismissing potential impacts from either hazardous material freight or hazardous material use. The phrase “is not expected to permit the use of hazardous materials” is speculative. Unless the Specific Plan excludes such uses by policy requirement or the DEIR does the same via mitigation, the potential is clearly there for some renewed level of hazardous material storage, use, and disposal to be occurring in the Specific Plan area. The Specific Plan as proposed essentially treats uses as residential, retail/commercial, and civic. No language or policy constrains the types of retail/commercial uses that are allowed. Please specifically cite the language presently within the Specific Plan that constrains or regulates activities that may “use” hazardous materials. If such language is absent, additional language must be added to the DEIR to either create the presumed prohibitions on use or regulate their handling and storage should such use be allowed.

**Comment 11**
Instead of addressing those issues as described in Comment 8 above, the Specific Plan provides a piece of circular logic by stating the following regarding hazardous materials (Plan pg 4-14):

Other policies to ensure no adverse environmental impacts for air quality, biological resources, cultural resources, geology and soils, hazardous materials, hydrology and noise can be found in the Downtown Station Area Specific Plan EIR.

An examination of the uses allowed in the existing Commercial Zoning Districts then reveals a variety of business activities that involve some amounts of hazardous materials. As discussed under Comment 8 above, the DEIR presumption that such “use” of hazardous materials would not be permitted is clearly not present in the Specific Plan. (Santa Rosa Zoning Code §20-23.030).

While these comments are directed to the adequacy of the DEIR, the content of the Specific Plan must be considered not only in terms of its potential for impacts, but also when the DEIR in turn relies upon the proposed Station Area Plan policies to serve as mitigation. Please clarify to what extent the DEIR “ensures” no adverse impacts in the various topics cited and relied upon by the Station Area Plan.

**Comment 12**
The Traffic and Circulation Chapter would logically be the location in which such a discussion would have to occur. Yet the DEIR Traffic and Circulation Chapter makes the following two statements:

Note that no deductions were applied in the analysis for potential SMART rail service, since at the time of this analysis the rail system remains unfunded. The transit accessibility trip adjustment factors are shown in Table 4.12-4. (page 4.12-11)

The traffic and circulation analysis for the Specific Plan Area excludes vehicle trip deductions associated with implementation of SMART commuter rail, since at the time of analysis the SMART project remains unfunded. The potential for the Specific Plan to increase ridership on the proposed rail system is, however, discussed below (page 4.12-65).

This clearly shows that no assessment was made of the combined traffic impacts of combining the Specific Plan with the SMART station operation. The question of segmentation and/or failure to reflect a probable future project is specifically raised by this issue.

On this particular point, the argument that lack of funding justifies excluding the SMART station and rail service from inclusion creates an additional internal inconsistency. By design, this DEIR has included the reunification of Courthouse Square, the new performing arts facility, the relocated City Hall, and more in the analysis. Yet none of these projects have committed funding. Please explain the basis for including some unfunded and unapproved public works projects for analysis, while excluding the SMART project for no stated reason other than lack of funding.

Comment 13
The language cited above also suggests that the assumption is that all impacts would be favorable, since it would provide for increased use of public transit over vehicles. But this perspective ignores the fact that passenger train service, while encouraging pedestrian to walk if nearby, will also encourage more people to drive their cars to the station from outside the walkable perimeter. Those vehicles are drawn to the station to then use the mass transit function. This will still potentially benefit traffic flows on Highway 101 itself, but may increase congestion and traffic on local streets and intersections. To the extent that commute service is a key component of rail operation, this additional traffic entering the Specific Area to reach the SMART station will mostly occur during the AM and PM peak hours for traffic congestion.

The SMART EIR as completed already confirms the resulting potentially significant adverse traffic impacts resulting increased traffic from outside the Station Area Plan boundary coming to the station as a vehicle trip destination. Please discuss why the impacts already identified and discussed in the SMART EIR relative to traffic are not reflected in and discussed by the DEIR.

Comment 14
In addition, the SMART EIR identifies a specific local adverse traffic impact as increased congestion and queuing associated with street closures while trains are passing. The SMART EIR notes in particular that the localized congestion and queuing will occur. Please revise the DEIR to reflect the adverse traffic impacts associated with street closures while trains are passing, including available stacking distance at intersections.
Air Quality

Comment 15
While discussing in great detail the current compliance status with air quality standards, the DEIR does not address consistency with or applicability of City policies regarding control of greenhouse gases. Given the project is in an air quality non-attainment area, the DEIR should also discuss the project impacts upon greenhouse gases, as per the standard specified by the California Attorney General’s opinion on the appropriate triggers for requiring assessment of impacts associated with increased greenhouse gases. Please address how air quality emissions associated with implementation of the Station Area Plan and the SMART rail service affect levels of local greenhouse gases, what contribution this makes to either a project-specific or cumulative impact, and what mitigations can address this impact.

Comment 16
The discussion of air quality impacts is also clouded by the decision to include mitigations and infrastructure improvements associated with development of the SMART Station site, but excluding any actual rail function at the site. While a rail function may reduce traffic generation in the immediate vicinity, it will increase traffic flow from outside the study area to use this regional infrastructure. How can mitigation measures of infrastructure improvements associated with the SMART EIR be embedded within the traffic flow model for this DEIR when the SMART site and operation are excluded?

Comment 17
As noted in Comment 13 above, the SMART EIR already confirms there will be periods of increased congestion during rail service, with a concentration during the anticipated AM and PM peak traffic periods. This will result in increased vehicle emissions from cars backed up during the peak hours when trains are passing and crossings are closed. This will have further implications for air quality that are not addressed. The probable occurrence of such back ups from crossings is already confirmed by the SMART EIR as noted above. What are amounts of additional air quality emissions that will result, what are the ramifications for attainment of air quality standards in general and impacts upon local sensitive receptors?

Comment 18
The DEIR takes the position that no level of service is specified for the Downtown area, either for intersections or corridors, and therefore sets the significance level for a traffic impact at Level of Service (LOS) F (DEIR pg 4.12-41) While the merits of such a decision are discussed under a later item, there is a clear air quality implication to such a decision. LOS F is described as “Delay of more than 80 seconds. Vehicles may wait through more than one cycle to clear the intersection.”(DEIR pg. 4.12-7)

Increased vehicle emissions are a clear byproduct of allowing traffic flow to degrade to such a low level. The localized impacts of deteriorating air quality due to increased traffic congestion must be assessed. The Air Quality analysis contained within the DEIR appears to assume a linear increase in air quality emissions, buffered by some mitigation measures and regulatory standards. However, the relative emissions per vehicle will increase with increased congestion, which will result in a non-linear increase in air pollution. What assumptions were relied upon by the DEIR air quality analysis relative to traffic congestion? What are the potential pollutant increases that could occur with allowing a
significant deterioration of intersection and corridor level of service without associated mitigation? In turn, what are the potential impacts relative to attainment levels and impacts on local sensitive receptors? Are there implications given the express objective and assumption of increased pedestrian usage in this area?

The DEIR Fails to Adequately Address Impacts Upon Affordable Housing

Comment 19
A key aspect of the function of Redevelopment Areas is to address the potential loss of existing affordable housing and directing resources into the creation of new affordable housing. Since the DEIR has no substantial discussion of any of the Redevelopment Plans, the implications of the Station Area Specific Plan upon delivering affordable housing in those Redevelopment Areas is ignored.
What are the implications of build-out of the Station Area Plan without express requirements for affordable housing, in light of redevelopment law and local Redevelopment Plan policies specific to this issue?

Comment 20
The discussion of existing conditions is not complete relative to Housing impacts. The discussion is limited to a cursory look at City wide targets, market factors, and various generalities. What is absent is any discussion of ABAG/HCD affordable housing targets, and the degree to which the City has met those targets.
The City is already significantly out of compliance with meeting its target for Very Low Income housing for the period ending in 2006. This failure to meet the adopted target should be acknowledged within this EIR, along with a discussion of what opportunities may be presented by the proposed Specific Plan to help meet the deficiency.
By failing to discuss the unmet target for Very Low Income housing, does the DEIR fail to address the adverse impacts associated with allowing build-out of the core of Santa Rosa without policies specific to providing such housing and complying with specified targets? What mitigation measures, including additional Station Area Plan policies, could reduce this impact and area of non-compliance?

Comment 21
There is no discussion of the applicability of General Plan Housing Element policies and assumptions for the area included in the Specific Plan. In particular, there has to be discussion as to whether any of the sites relied upon or inventoried in the current Housing Element for potential delivery of affordable units are actually within the Specific Plan boundaries.
The DEIR must address consistency of the Project with the current General Plan in regards to assessing the extent to which parcels within the Station Area Plan boundaries could contribute to, or were assessed by the Housing Element relative to, providing affordable and other targeted housing.

Comment 22
The DEIR concludes there will be no significant impacts on affordable housing, and so no mitigations are proposed. But that conclusion is based upon unspecified policies within the Specific Plan itself, which contains no provisions for how affordable housing will be accounted for in the Station Area Plan. If the conclusion of “no potentially significant impact” relies upon specific policies within the Draft Specific Plan, those must be identified and called out in the
DEIR. Without specific citation, those policies could subsequently be modified during the approval process without considering the specific reliance of the DEIR upon those policies. What is the specific substantial evidence upon which the DEIR relies in concluding there will be no significant impact upon affordable housing? If those include policies within the Station Area Plan, have those policies be reconciled with existing policies regarding provision of affordable and other targeted housing as reflected in the multiple Redevelopment Plans, the Southwest Area Plan, and the General Plan?

Comment 23
The increased densities and building heights in the Specific Plan also provide a basis for reassessing the current policy for limiting the requirement for inclusionary affordable housing to sites of 15 acres or more, with the collection of in lieu fees for projects with smaller surface footprints. By accepting densities of up to 50 units per acre in an area where few parcels would be subject to the inclusionary threshold of 15 acres, there is a potential for creating tremendous pressure to build affordable housing outside the Station Area Plan boundary. What are the potentially significant adverse impacts of shifting a significant amount of affordable housing out of the downtown area, including implications upon land uses, areas of significantly increased demand for public services and transportation, etc.?

Comment 24
As noted under Comment 23, the present on-site inclusionary housing threshold is based upon traditional low or medium density residential development with two to three story height limits. This assumption is inapplicable to the region of the Station Area Plan, which is highly fragmented, yet targeted for both higher densities and higher buildings. What policies or mitigation measures could create an on-site inclusionary requirement specific to the Station Area Plan that would recognize that the present City standard is based on conventional horizontal residential development, whereas the Station Area Plan has smaller fragmented parcels, but a much higher density allowance and height limits? How would setting an inclusionary threshold that was based upon a vertical threshold or total residential units, rather than simply a ground footprint advance the goal of providing inclusionary housing and eliminate the unequal treatment of larger low density parcels versus smaller high density parcels? Such a policy could be based upon number of residential floors, number of residential units being created, total gross square footage of residential space being created, etc.

The DEIR Discussion of Hazardous Materials Is Not Complete or Technically Accurate

Comment 25
The DEIR contains incorrect technical conclusions, such as:

The flow of groundwater may be constrained through the network of monitoring wells often constructed about sites with contaminated groundwater (DEIR pg. 4.6-11).

Monitoring wells have no effect upon the flow of groundwater nor migration of contaminants. The dual use for monitoring wells as extraction wells for either water or vapor phase contaminants can reduce migration in some circumstances, but can also result in commingled plumes in areas where multiple sources lie in close proximity. The Hyatt Hotel site in the Railroad Square area was actually the impetus for a significant new regulatory and funding program of the California Underground Storage Tank program to address the coordinated...
remediation of multiple plumes, where treating one contaminant source in isolation can actually worsen the contamination impacts from a separate but nearby site. The DEIR language should be corrected, but more importantly, the DEIR must address management approaches to area remediation that cannot be addressed on a strict project-by-project basis.

Comment 26
The DEIR only addresses cleanup of contaminated soils in the context of site-specific remediation, and then in the context of soil. Yet the multitude of sites makes it inevitable that properties with contamination sources on site will have contamination associated with plume movement. In addition, the action of cleaning up one site can modify and/or complicate cleanup at other sites or plume sources. What is the probability of a significant commingling of plumes that will affect multiple properties, and associated secondary impacts? Under what circumstances might a project-specific assessment and cleanup as proposed by the DEIR have no long term benefit and actually complicate area cleanup efforts? What other mitigations could be adopted to address this problem that cannot be limited to single parcels and their associated projects?

Comment 27
The EIR should address the situation of present and proposed infrastructure improvements creating preferential pathways for the movement of contaminated water within and beyond the Specific Plan boundaries. It is a common occurrence in urbanized areas that mobile contamination will follow utility trenches as transport pathways for groundwater containing a variety of contaminants. This presents two problems that must be addressed by the EIR. The first is the probability that a significant portion of current contamination will lie not on private property, but on public property and/or in public utility easements. The second is that new incremental infrastructure within public right-of-ways may create new preferential pathways for adjacent plumes. These possibilities need to be assessed by the DEIR.

Comment 28
The EIR should address the potential for entry of contaminated water into the storm water management system. This must include both inflow of groundwater into storm drain lines through leakage, as well as transfer of contaminated groundwater from existing underground utility vaults into the storm drain flows by sump pumps directly into the system or indirectly via discharge into street gutters. There are various locations within downtown where underground vaults are pumped up to the surface level, and then discharged into the street gutter, to then flow into the storm drain system. That this is not a function of roof drains is apparent from the continued discharged into surface gutters for days after a storm, and that the discharge is a cyclic surge from a discharge into the gutter (consistent with a pumping cycle as opposed to a gravity flow discharge). One such discharge point exists on the north side of the old Kinko’s building. How will individual projects with foundations and vaults extending below the elevated winter groundwater level address and manage intrusion of or contamination from contaminated groundwater? To the extent that pumpage or other means of disposing of accumulated contaminated water is necessary, how will this be kept isolated from surface runoff and/or entry into the storm drain system?

The DEIR Discussion of Traffic Impacts Is Incomplete and Inadequate

Comment 29
As noted above, the SMART site is a fundamental part of the Station Area Plan; it literally is the hub of the area and served as the basis in part for determining the boundary of the Station Area Plan. Yet the traffic impact analysis excludes the operation of the rail line and the SMART station from any assessment of beneficial or adverse impacts.

This is particularly inappropriate, since the adopted MTC/Santa Rosa Funding Agreement states in Section 7 that the traffic analysis of the EIR shall assess “impacts upon existing and proposed bikeways, transit systems (bus and commuter rail) and pedestrians, and impact on pedestrian safety” (MTC/Santa Rosa Funding Agreement, page 11). The operation of the SMART rail line and station should be considered part of the “project” for the purpose of this DEIR, and all traffic and transportation impacts be assessed accordingly.

Comment 30
The DEIR improperly segments infrastructure associated with the SMART station site from the function of the station itself. The DEIR does not include the operation of the station with its associated impacts (noise, traffic, parking, etc) but does include and rely upon mitigations associated with development of the SMART site station. The DEIR should either address SMART site development and operation in all respects, or eliminate any infrastructure improvements planned in association with the station site from the infrastructure assumptions.

Comment 31
While discussing the separate needs of pedestrians and bicycles, the two are lumped together for assessing current traffic volume (Fig 4.12-5). No basis is provided for which intersections were chosen for measuring existing non-vehicular traffic. Two of the five intersections chosen were not analyzed for corresponding traffic volumes and level of service. There is no evidence that these intersections are key hubs for either current or projected bicycle or pedestrian movement. There is no indication that these are key intersections relative to safety for pedestrian or bicyclists.

What is the basis by which these intersections were chosen and what is their relationship to key bike or pedestrian movements and paths? Why are these particularly reflective of or indicative of pedestrian and bike volumes, demand, or capacity?

Comment 32
The DEIR subsequently concludes (DEIR pg. 4.12-63):

Overall the Specific Plan would substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area. The future circulation network is also expected to accommodate the increased number of pedestrians and bicyclist trips. No adverse impacts to alternative transportation modes are projected to occur. Potential impacts to pedestrians and bicyclists attributable to the Specific Plan are therefore deemed to be less than significant.

Since the DEIR provided no basis for the adequacy of the current circulation network (or the relative demand upon it), what is the basis for saying it is significantly improved? Absent some meaningful inventory of current pedestrian and bicycle volumes, what is the basis for asserting the future circulation network will “accommodate” increased non-vehicle uses? Where is that future volume quantified in the DEIR and then compared to infrastructure to serve it? In sum, where is the substantial evidence to support the conclusion that no significant impact will occur?

Comment 33
Alternative transportation modes are a key goal of the General Plan and underlie the purpose of the proposed Station Area Specific Plan. Designing a circulation system that encourages and
promotes these alternative transit modes is essential for the greater function of the Specific Plan, and the DEIR must make more than a perfunctory reference to these uses. The present DEIR reflects a significant bias for analysis and mitigation of vehicle congestion and impacts, when a working premise is that the priority is to de-emphasize the norm of favoring vehicle movement at the expense of other modes of transportation.

The EIR must compare volumes of and distribution of pedestrians and bicyclists versus the paths and trails and sidewalks available to them. The EIR must show graphically the relationship between existing bike and pedestrian routes in comparison to traffic congestion. The EIR must show future dedicated pedestrian and bicycle routes in comparison to traffic congestion. The EIR should explore whether other communities have developed measures or indices for pedestrian and bicyclist safety and capacity, such as Multi-Modal Level of Service Analysis (see 4 attached documents). The EIR must explore, in light of projected traffic volumes and congestion and impacts, whether safe and useable routes exist to connect various public spaces, including public transportation hubs.

**Comment 34**

The traffic intersection analysis does not address the impacts upon any intersections in the vicinity of, but outside the Plan boundaries. In some cases, these are intersections already identified as having traffic problems or projected to do so in the future, such as Sebastopol Road/Stony Point Road, E Street/Sonoma Avenue, and E Street/4th Street. The previous EIRs that identified these as marginal intersections include the TORP EIR, the Toscana EIR, the Downtown Mixed Use Project EIR, the Stony Point Road Improvement EIR, Gateway EIR and the Walmart EIR. This includes intersections within the Plan boundary already the subject of separate CEQA review that has documented impacts.

The Scope of Work for the preparation of Specific Plan and EIR (Attachment A to the MTC/Santa Rosa Funding Agreement) states:

As part of this, W-Trans shall review other circulation studies, including the City’s Street Design Standards and Bicycle and Pedestrian Master Plan, as well as studies dealing with potential projects such as the Courthouse Square reunification and Downtown Linkages Program. Circulation analyses from other studies such as the Gateways EIR will also be reviewed to ensure consistency.

There is no reference to any of these other studies in the DEIR nor in the Traffic Analysis that is Appendix F to the DEIR. This is contrary to the requirements of the Scope of Work and excludes relevant information regarding potentially significant impacts.

There was a cursory discussion of some EIRs in the Opportunities Assessment Report – Traffic and Circulation (undated) prepared in conjunction with development of the Specific Plan. The analysis was limited to the TORPA EIR, the Courthouse Square Reunification study, the Gateways EIR, and the Mixed Use Downtown EIR. It did not reflect the Stony Point Road EIR or the Walmart EIR (both of which affect the western entry point to the Specific Plan area). The discussion of the Mixed Use EIR omitted any discussion of the traffic impact conclusions of that study. However this document is in no fashion cited by or expressly relied upon by the DEIR traffic analysis.

Please state which EIRs were reviewed consistent with the requirements of the Scope of Work, where the analysis is to be found in the DEIR or Appendices, what approach was used to determine which sets of intersection data to include from which previous studies, and why
intersections were excluded that demonstrably have or are anticipated to have significant LOS problems in the future.

Comment 35
Relative to how intersections were chosen for inclusion, the EIR states only that it was a decision made by the City and W-Trans, without offering any criteria. At a minimum, any adjacent intersection already with a lower level LOS should have been included.

While the cumulative impact analysis with Project implementation does examine the impact of build-out of the General Plan within the Specific Plan area, there is no examination of any cumulative impacts that will occur external to the project area. CEQA provides that the boundary of analysis for determining potentially significant cumulative impacts must reflect the area of potential impact. In this case, the determination to limit the intersection analysis to 21 intersections (all of which are within or abut the Project) is not explained in the DEIR. Please explain and document that basis for adding additionally intersections to the original set, and the basis for excluding others.

Comment 36
The DEIR contains no substantive discussion of ramp capacity and associated vehicle stacking on on/off ramps to both 101 and Highway 12. This is a standard requirement of CalTrans for projects adjacent to or in close enough proximity to affect highway traffic functions. This has been a continuing problem, and has already been identified as a problem in other EIRs. For example, the EIR for the Transit Oriented Redevelopment Project (TORP) was revised to reflect ramp capacity limitations and impacts at the Highway 12/Dutton Avenue interchange. What is the current and projected queue stacking demand and capacity at the following interchanges: Highway 12/Dutton, Highway 12/Stony Point Road, and the 101 intersections already identified in the DEIR?

Comment 37
The EIR asserts that all traffic sampling was taken prior to any construction work relative to the 101 widening project. Neither the DEIR nor the Technical Appendix provides reference dates for the samples, nor do the sources for the older samples. However, the Opportunities Assessment Report cited above identifies 12 of the intersections ultimately included in the DEIR, with data collection dates ranging from 2003 to 2005. Subsequent to that, additional intersections were added, but no date or source is available for those intersections. That raises a question as to whether some or all of those samples were taken subsequent to early 2006 when the Third Street closure and detour had begun.

What was the source and date for traffic volume data used to assess the added intersections? If from City data, the City traffic volume count report only lists data for road corridor sections, not for intersections. Please document the original source for intersection-specific data.

Comment 38
A comparison of the “existing” traffic volumes shown on DEIR Figure 4.12-2 with other EIRs addressing some of these same corridors or intersections show significant variance or inconsistencies. For example, both the TORP EIR and Downtown Mixed Use EIR show higher levels of traffic volume as the existing condition than the values shown in this DEIR at intersections on Third Street. The DEIR does not indicate which, if any, of the older traffic samples relied upon in determining the “existing condition” in this DEIR were derived from previous
EIRs. In cases where multiple EIRs have addressed a given intersection, there is no indication as to which study was chosen to serve as the source document for this DEIR. Why does the DEIR actually indicate a reduction in “existing” traffic volumes from that provided in previous EIRs? In cases of intersections with multiple samples to choose from, what was the basis for the choice? Was the most conservative value (i.e., reflecting the highest traffic volume) chosen in those cases, and if not, why not?

Comment 39
Neither the DEIR Traffic Section nor the associated Technical Appendix explains the methodology for recalibrating the intersection volumes to produce a consistent 2006 estimate of intersection and corridor traffic volumes. This becomes the benchmark for calculating all subsequent project impacts.
What methodology was used to take samples over multiple years and derive calculated 2006 traffic volumes for the DEIR intersections?

Comment 40
The DEIR includes the reconnection of Courthouse Square, and projects traffic movements anticipated to result from traffic circulating around, rather than through, the Square. The two key intersections for assessing the impacts of that change are obviously 4th/Mendocino and 3rd/Mendocino. For no documented reason, no analysis was done of the current and projected traffic volumes and resulting Level of Service at Fourth and Mendocino. Since Fourth Street in that area is limited to one lane in each direction, it seems the more constrained of the two intersections in terms of assessing impacts from the change. Rejoining Courthouse Square will force southbound traffic either to the east and the E Street intersection or to the west and the B Street Intersection. Yet no study was done for either of these as well. The DEIR must provide some basis for excluding the intersections of 4th/B Street, 4th/Mendocino, and 4th/E Street when these are critical to traffic flow following closing of the central street through Courthouse Square. What data suggested there would be no significant impact would result in terms of traffic, parking, pedestrian and bicycle movement, collisions/safety, etc?

Comment 41
There is no substantive discussion of collisions and safety. Given one objective of the Specific Plan is to encourage non-vehicular transportation, the safety to pedestrians and bicyclists is a key consideration. As discussed above, there in no substantial evidence or explanation as to the claimed adequacy of the improvements associated with the Specific Plan.

The Scope of Work attached to the MTC/Santa Rosa Funding Agreement states that W-Trans will provide (Scope of Work, page 11)

Data collection will also include 3-year collision data for key streets and intersections surrounding the Specific Plan Area and transit routes and route ridership.

The Scope of Work then specifically requires the following be included in the EIR:
(MTC/Santa Rosa Funding Agreement, Exhibit A, Scope of Work, pg 34)

v. Pedestrian and Bicycle Impacts

W-Trans will review the Draft Plan’s policies and any proposed improvements relating to pedestrian and bicycle circulation, and determine whether any significant effects would result. Emphasis will be placed on the adequacy and safety of major pedestrian and bicycle crossing locations on the street network surrounding and within the Specific Plan Area, and the connectivity to adjacent neighborhoods and Downtown.

Consistent with the Workplan, one stated Threshold of Significance in the DEIR is (DEIR pg. 4.12-41):

Failure to maintain acceptable levels of safety and vehicle queuing on downtown roadway segments and intersections
There is no evident discussion of the safety of any pedestrian and bicycle crossings, nor of vehicle safety and collisions. The omission becomes more significant in light of the specific collision frequency analysis contained within the Opportunities Assessment Report relative to traffic. That report reviewed vehicle collision data for three years for three roadway segments and 8 intersections. The results show that Third Street in general has a collision rate above the state standard for comparable streets, with the intersection of 3rd and Santa Rosa Avenue having a collision rate twice that of the state norm (pages 10-12) with other 3rd Street intersection all elevated above state averages.

The Opportunities Assessment Report also included a 4 year assessment of pedestrian and bicycle collisions, and identified the most frequent pedestrian locations as 4th/B Street, 5th/Santa Rosa Avenue, 5th Street/Davis Street, 2nd Street/D Street, and 5th Street/Mendocino Avenue. The highest number of bike collisions occurred at 5th/Mendocino, 3rd Street/Davis Street, 3rd Street/B Street, 3rd Street/Wilson Street, 4th Street/Mendocino Avenue, and 6th Street/Davis Street.

Despite the requirement for safety analysis in the Scope of Work and the inclusion of safety as a Threshold of Significance in the DEIR, none of the above data was carried forward into the DEIR traffic analysis. There is no alternative assessment of collisions and safety, but only some conclusory statements. In light of the above data, this is not sufficient under CEQA and leaves many questions regarding vehicle, bicycle, and pedestrian safety unanswered.

The DEIR must include a reasoned and substantive analysis of vehicle, bicycle, and pedestrian safety that addresses both the existing conditions, identifies critical intersections as provided in the Scope of Work, and assesses how implementation of the Specific Plan would contribute to worsening or reducing these impacts.

The Water Supply Section of the DEIR Does Not Properly Respond To The Stated Thresholds of Significance or Climate Change Aspects.

Comment 42
There is no discussion of seasonal water demand, and the adequacy of supply, local storage and distribution, and system pressure, to serve the Station Area Plan uses. The DEIR states the following (DEIR pg 4.3-9):

Table 4.13-1 compares projected supply during non-drought year conditions with projected demand. Based on this comparison, it is not anticipated that a shortage in supply, during non-drought conditions, is likely to occur in the next 20 years.

Portions of Santa Rosa continue to have marginal water pressure, and relatively short hot spells have resulted in significant storage depletion in the various Santa Rosa reservoirs that provide storage for water supplied by the Sonoma County Water Agency.

The EIR should not simply assess adequacy of supply in the context of annualized demand, but with an assessment of seasonal demand, seasonal supply, and water pressure. This should be reflected in the context of both existing conditions and project impacts.

Comment 43
The DEIR bases the water supply assessment by first providing an estimate of the water demand represented by build-out of the Station Area Plan. This assessment is based in part upon a stated assumption that there will be no landscaping in conjunction with any of the attached residential units (page 4.13-11):

The City’s projected residential water use is 110,000 gallons per detached residential unit per year. Attached residential water use includes no landscape irrigation and averages two-thirds of the detached residential water use.

This seems contrary to both existing policy and practice. While attached units may not have individual unit landscaping demands, City policies require the provision of landscaping to the benefit of such developments. This is consistent with a number of General Plan and Design Guideline policies. It also appears consistent with Chapter 5 of the Specific Plan, which provides standards for streetscapes.

In addition, urban setting landscaping is an accepted mitigation for the urban heat island effect, which is a result of pockets of urbanized development that result in increased localized temperatures during the summer months, and is exacerbated in heat spells. This increased heat impact then results in increased energy usage for cooling. Reducing the urban heat island process is both a health and comfort issue for residents, and a component of Climate Change reduction programs (which have been endorsed by the City of Santa Rosa).

The EIR must examine the potential for creating or increasing the urban heat island phenomena in downtown Santa Rosa, in part due to a reduction in landscaping and greenscape in relation to the number of residences, square footage of commercial space, and increase in impervious surfaces. In that context, the conclusion that there will be no water demand associated with attached residential units should be reexamined.

In conclusion, we believe recognition of the above comments and questions will insure that development in our city’s core will be environmentally and economically beneficial to the community as a whole. The Accountable Development Coalition and its member organizations urge city officials to include these recommendations in the next version of the EIR. If we can provide any additional information or if you have any questions about any of these recommendations, please feel free to call or write us.

Inconsistent with Land Use Section of the DEIR.

Yours truly,
Ken-

Please find below additional references for where to find materials about Multi-Modal Level of Service analyses. Please include these in my attachments to the Greenbelt Alliance DEIR comment letter.

Thanks,
Daisy

Florida State Department of Transportation website with information, tools, studies and references on Multi-Modal Level of Service: [http://www.dot.state.fl.us/Planning/systems/sm/los/default.htm](http://www.dot.state.fl.us/Planning/systems/sm/los/default.htm)

The National Cooperative Highway Research Program (NCHRP) is conducting a project to enhance methods to determine levels of service for automobile, transit, bicycle, and pedestrian modes on urban streets, with particular consideration to intermodal interactions. [http://www.trb.org/trbnet/projectdisplay.asp?projectid=824](http://www.trb.org/trbnet/projectdisplay.asp?projectid=824)

Sprinkle Consultants - have developed tested methods of bicycle and pedestrian LOS analyses: [http://www.sprinkleconsulting.com/ts_multi-modal.html](http://www.sprinkleconsulting.com/ts_multi-modal.html)

18-1: This comment questions the Draft EIR’s assertion that the Specific Plan will not be growth inducing. It also questions the Draft EIR statement on page 6-2 that “implementation of the Specific Plan would therefore absorb some growth expected in outlying areas of the City.”

The Draft EIR acknowledges the Specific Plan would exceed projected buildout growth under the City’s General Plan and would, therefore, be growth inducing. However, growth envisioned by the Specific Plan will be subject to the provisions of the City’s current Growth Management Ordinance, which will not change as a result of Specific Plan adoption. Since development will continue to be driven by private-sector market forces and property-owner interests, its location and timing cannot be predicted with any certainty. The Commenter’s main objection is to the definitive statement quoted above. This statement will be removed and is reflected in the revised language included in Chapter 3 of this Final EIR. The removal of this statement does not change the conclusion of this EIR or its adequacy.

18-2: This comment calls for additional mitigation within the Specific Plan to assure for the reduction or restriction of buildout at the urban boundaries as it is currently allowed and planned under the City’s General Plan. Without such requirements the commenter states the Specific Plan is growth inducing.

It is neither the Draft EIR’s nor the Specific Plan’s intention to shift development from one part of the city to another. For a more detail explanation, please see response to Comment 18-1.

18-3: Please see response to Comment 17-2.
18-4: Please see response to Comment 17-3.

18-5: Please see response to Comment 17-4.

18-6: Please see response to Comment 17-5.

18-7: Please see response to Comment 17-6.

18-8: Please see response to Comment 17-7.

18-9: Please see response to Comment 17-8.

18-10: Please see response to Comment 17-9.

18-11: Please see response to Comment 17-10.

18-12: Please see response to Comment 17-11.

18-13: Please see response to Comment 17-12.

18-14: Please see response to Comment 17-13.

18-15: Please see response to Comment 17-14.

18-16: Please see response to Comment 17-15.

18-17: Please see response to Comment 17-16.

18-18: Please see response to Comment 17-17.

18-19: Please see response to Comment 17-18.

18-20: Please see response to Comment 17-19.
18-21: Please see response to Comment 17-20.

18-22: Please see response to Comment 17-21.

18-23: Please see response to Comment 17-22.

18-24: Please see response to Comment 17-23.

18-25: Please see response to Comment 17-24.

18-26: Please see response to Comment 17-25.


18-28: Please see response to Comment 17-27.

18-29: Please see response to Comment 17-29.

18-30: Please see response to Comment 17-30.

18-31: Please see response to Comment 17-31.

18-32: Please see response to Comment 17-32.

18-33: Please see response to Comment 17-33.

18-34: Please see response to Comment 17-34.

18-35: Please see response to Comment 17-35.

18-36: Please see response to Comment 17-36.

18-37: Please see response to Comment 17-37.
18-38: Please see response to Comment 17-38.

18-39: Please see response to Comment 17-39.

18-40: Please see response to Comment 17-40.

18-41: Please see response to Comment 17-41.

18-42: Please see response to Comment 17-42.

18-43: Please see response to Comment 17-43.

18-44: Please see response to Comment 17-44.

18-45: Please see response to Comment 17-45.

18-46: Please see response to Comment 17-46.

18-47: This comment is unclear to what exactly is inconsistent with the Land Use section of the Draft EIR, nor the nature of its inconsistency. With no further information an adequate response is not possible. Therefore, no further action is required with regard to the Draft EIR.

18-48: This comment provides additional information as an appendix to submitted comments. As this comment does not question the adequacy of the Draft EIR, no further action is required.
April 6, 2007

Ken MacNab
Department of Advance Planning & Public Policy
City of Santa Rosa
100 Santa Rosa Avenue, Post Office Box 1678
Santa Rosa, CA 95402
via fax 707-543-3218

Re: Downtown Station Area Specific Plan Draft Environmental Report

Dear Mr. MacNab,

The Sonoma County Bicycle Coalition supports creating a vibrant Santa Rosa Downtown area and notes that a major goal of the Downtown Station Area Specific Plan is to “substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area” (DEIR 4.12-63). Upon a quick scan of both documents we were pleased to find bicycle access is listed as a major goal and is noted in the Introduction of the Plan and also in the Downtown Station Area Specific Plan Draft Environmental Report.

Project Description:

“This vision includes bicyclists, pedestrians, transit users and drivers sharing an attractive network of streets.”

Unfortunately, we did not find information supporting this in either the SAP DEIR or in the Downtown Station Area Specific Plan (Plan). What we have found is quite the opposite. Despite the mission and goals of the plan there are no new bicycle facilities.

The SAP DEIR notes City of Santa Rosa’s Goals, Transportation Element:

Goal T-A: Provide a safe and sustainable transportation system.
Goal T-J: Provide attractive and safe streets for pedestrians and bicyclists.
Goal T-K: Develop a safe, convenient and continuous network of pedestrian sidewalks and pathways that link neighborhoods with schools, parks, shopping areas and employment centers.
Goal T-L: Develop a citywide system of designated bikeways that serves both experienced and casual bicyclists and which maximizes bicycle use for commuting, recreation and local transportation.
♦ Policy T-L-4: Identify specific east-west and north-south bicycle routes through the downtown area as part of the downtown planning process.
♦ Policy T-L-9: Require new development to dedicate land and/or construct/install bicycle facilities for project users, where a rough proportionality to demand from the project is established.
All of this sounds very encouraging. However, what we actually found after further study is this:

- The SAP eliminates planned Class 2 bicycle lanes in several areas.
- Fails to address the safety issues of bicycles and cars sharing the lane.
- Doesn’t implement policies of slower speeds and significant engineering on downtown streets.
- Increased vehicular traffic will significantly impact bicycle and pedestrian circulation in the downtown.
- The plan overemphasizes vehicle circulation at the expense of bicycles and pedestrians.
- Many mistakes regarding current existing bicycle facilities.
- Bicycle parking is ignored completely.
- Incomplete language regarding the description of the 6th 7th streets linkage project.
- The addition of Roberts Avenue is in the same location as the Joe Rodota Class 1 path. The streetscape will be limited by width and shows no bike lanes. This would be viewed as adding a barrier for bikes and peds. The addition of Roberts Avenue does not meet the goals of the improving bicycle and pedestrian circulation.
- Street designations do not match the current City of Santa Rosa General Plan or the Design Guideline’s street designations.
- There is no discussion in the DEIR regarding the loss of use of the south sidewalk on Third Street and how it will effect pedestrian travel.

The Draft Environmental Impact Report states that the impacts of the SAP on bicycles and pedestrians is “less than significant” (DEIR 4.12-63), yet the analysis was for impacts on vehicular trips only. The DEIR did not analyze the impact of adding 3,250 new housing units and attendant vehicle trips on the safety, access and convenience of bicyclists and pedestrians traveling in and around the downtown. Without a proper analysis of impacts on bicycles and pedestrians, the claims of the SAP that impacts are “less than significant” are not supported.

**Please address the future impacts of not accommodating bicycles with the planned class II bicycle lanes.**

Caltrans is widening Highway 101 through the study area. Their project includes the removal of access to the sidewalk on the south side of Third Street under Highway 101. This is not included in the DEIR.

**Please address the impacts on pedestrian and bicycle safety and the impacts on reduced air quality by reducing access along this corridor.**

While discussing the separate needs of pedestrians and bicycles, the two are lumped together for assessing current traffic volume (Fig 4.12-5). This defeats any effort to assess...
the separate impacts upon those constituencies. If the baseline assumption improperly lumps them together, then any conclusions may not be supported.

Please assess the separate impacts of bicycles and pedestrians in regards to traffic volume.

Currently, the majority of citizens in Santa Rosa do not feel safe riding their bicycles on city streets. Vehicle speeds are too fast. And yet, the SAP calls for removing the planned bicycle lanes (Wilson Street, Ninth Street, A Street, Davis and 7th) and forcing cyclists to share the road with vehicles on most of the streets. This would serve to discourage cyclists from traveling downtown.

Please address how the removal of these planned facilities will effect air quality and traffic impacts.

The Station Area Plan does not address the impacts on cyclists and pedestrians in recommending the reconnection of Fourth Street through the Santa Rosa Plaza to include autos.

Please address this impact.

On page 4.12-4 in the SAP DEIR notes the city’s parking requirement for cars. It does not include the city’s parking requirement for bicycles.

Please address the need for safe and secure bicycle parking.

Pages 4.12-9 through 4.12-9 discuss Trip Generation Methodology but does not include the impact of bicycle use.

Why is bicycle use not included in this section?

Page 4.12-13 through 4.12-16 discusses parking for automobiles but no discussion of bicycle parking. Secure, safe and convenient bicycle parking including lockers and covered racks should be included in the plan. At a minimum, the City’s zoning code for bicycle parking must be met.

Please address the need for safe and secure bicycle parking.

Page 4.12-25 notes:

All areas of the Specific Plan have existing pedestrian and bicycle traffic, though the highest levels of activity currently occur in the Courthouse Square and Railroad Square Sub-Areas. Pedestrian and bicyclist volumes were obtained during the afternoon PM peak hour at several key intersections in
these areas, and are shown in Figure 4.12-5.

1. Existing Bicycle and Trail Facilities

There is a developing bicycle network in the Specific Plan Area. An expanding network of Class I (bike path), Class II (on-street bicycle lane), and Class III (signed route) bikeways facilitate north-south and east-west travel for transportation and recreation.

There is no mention of the removal of planned class II bicycle lanes in the SAP DEIR. Presently the Santa Rosa Bicycle and Pedestrian Advisory Board is updating the Bicycle and Pedestrian Master Plan.

This SAP DEIR needs to respect the current and future bicycle and pedestrian plans for bicycle facilities in this area.

**Please address how the removal of these planned facilities will effect air quality and traffic impacts.**

**Corrections on Existing Bicycle and Trail Facilities:**

- Pg. 4.12-30 ii. Joe Rodota/West County Trail (Class I) is now completed.
- iii. On-Street Bicycle Lanes, the class II bicycle lane on West Ninth Street is from Wilson Street to Link Lane, not Wilson Street to Stony Point Road.
- Pg. 4.12-31 I do not believe that there is a marked class III bicycle route on Santa Rosa Avenue from Sonoma to Todd. However there is a Class II bicycle lane from Maple Ave to Todd Road on Santa Rosa Avenue.
- The class III bike route on West Ninth is from Wilson to A Street, not Dutton Avenue to A Street.

**Please correct these mistakes.**

The connection from the Joe Rodota needs to continue north to connect to 3rd Street. Already there is a desire for this access. The fence has been cut to allow a person to walk through. Cyclists and pedestrians, especially disabled folks, need to have convenient and reasonable access to our roads and paths. This is a significant missing link to this path.

**Please include this link to the plan.**

On page 4.12-31 i. notes the Northern Downtown Pedestrian Linkages Study description but leaves out a critical element that is included in the Executive Summary of the Final Report of the Linkages Study, April 26, 2006:

“The purpose of this endeavor was to improve vehicular, pedestrian, and bicycle linkages between the present downtown core and the historic Railroad Square district that are split by Highway 101.”
This is key language as it reflects the funding source requirements to improving bicycle and pedestrian access.

Please include this language in the SAP DEIR.

Page 4.12-32 ii. The noted funding for the bikeway along the SMART corridor from Seventh Street to College has changed.

Please get the correct information for this project.

iii. Discusses the connection of the link between the Joe Rodota-West County Trail with the Prince Memorial path. This connection has been completed.

Please note this completion.

Page 4.12-39 discusses the current parking demand. It does not investigate bicycle parking.

Please include bicycle parking in this process.

Pages 4.12-52 through 4.12-57 note the need for intersection modification. Many of these intersections will need increased right-of-way to complete. However, the acquisition of right-of-way is the reason that the planned class II bike lanes are removed.

Please explain why acquiring right-of-way for car access is acceptable for autos, but not for bicycles.

Page 4.12-62 i. notes the Pedestrian and Bicycle Circulation Impacts. The Specific Plan could lead to notable increases in the number of pedestrians and bicyclists in the Specific Plan Area, much of which already has a well developed pedestrian and bicycle network. Planned projects such as the SMART multi-use path and improvements noted in the Northern Downtown Pedestrian Linkages Study will improve connectivity between the Courthouse Square and Railroad Square Sub-Areas. Completion of a potential pedestrian linkage of Fourth Street through Santa Rosa Plaza would further improve connectivity, and provide an attractive and convenient walking and bicycling alternative to Third Street between the Courthouse Square Sub-Area and the potential SMART rail station at Railroad Square.

The Specific Plan includes specifications for street amenities on numerous corridors throughout the Specific Plan Area. The specifications address pedestrian...
and bicyclist circulation, including details such as where enhancements like pedestrian-scale street lighting, bicycle lanes, street furnishings, and pedestrian crossing treatments (i.e. bulbouts) should occur. In all of the Specific Plan Sub-Areas the street specifications would result in moderately- to significantly-improved pedestrian and bicycle circulation. Some of the most beneficial enhancements would occur in areas where gaps currently exist in the pedestrian and bicycle network, such as the Sebastopol Road area and northern Railroad Corridor Sub-Area.

Overall the Specific Plan would substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area. The future circulation network is also expected to accommodate the increased number of pedestrians and bicyclist trips. No adverse impacts to alternative transportation modes are projected to occur. Potential impacts to pedestrians and bicyclists attributable to the Specific Plan are therefore deemed to be less than significant.

We disagree that this plan as designed will improve bicycle access. Please explain how the loss of the planned class II bicycle lanes will “substantially improve pedestrian and bicycle circulation. We believe that the impacts of this plan will be quite significant. Please describe the net change of these impacts.

Below are notes from the Downtown Station Area Specific Plan Chapter 6 Improvements to Vehicular Circulation:

Currently all of these streets below are included in the City of Santa Rosa’s Bicycle and Pedestrian Master Plan and have planned Class II bike lanes, yet none of these intersections discuss the inclusion of the planned class 2 bike lanes. However, they all increase car access.

Pg. 3
College Avenue/Dutton Avenue. Figure 6-2 as Intersection 1.

Pg. 4
College Avenue/Cleveland Avenue. Figure 6-2 as intersection 2.

Seventh Street/B Street. Figure 6-2 as intersection 6.

Sixth Street/Wilson Street. Figure 6-2 as intersection 8.

Third Street/B Street and Third Street Corridor. Figure 6-2 as intersection 15.

Pg. 5
Third Street/Santa Rosa Avenue. Figure 6-2 as intersection 16.

Pg. 5
Dutton Avenue/Sebastopol Road and Dutton Corridor. Figure 6-2 as intersection 20. This intersection already includes bicycle lanes east and west bound. This is not an addition as is claimed.

There is no discussion of the planned north and south bound bike lanes.
The existing dual westbound through lanes could be converted to a single 12-foot travel lane plus a bicycle lane.

**Pedestrian Improvements Pg. 8**
No discussion regarding the removal of the sidewalk on the south side of 3rd Street between the southbound HWY 101 on ramp and the northbound HWY 101 off ramp. This will greatly hinder the movements of pedestrians.

**Bicycle Improvements Pg. 9**
It is noted: “In some Sub-Areas, implementation of planned bicycle facilities may require consideration of alternative approaches due to right-of-way constraints, a need to accommodate all modes of transportation and an interest in maintaining a pedestrian scaled look and feel.”

This is outrageous. Right-of-way constraints do not seem to hinder the addition of right and left turn lanes to better accommodate car traffic. Pedestrian Scaled look and feel should not exclude bicycle lanes. We should be limiting access to autos to make pedestrians more comfortable.

**Pg. 10** The bike route map is not from the Santa Rosa Bicycle and Pedestrian plan and does not represent the current Bicycle Plan.

**Pg. 11**
Changing the planned class 2 bike lanes on Wilson St. to Class 3. The rational is that the SMART trail will be the “serve as the major north-south route through the Railroad Corridor and Railroad Square Sub-Areas.” The current Bicycle and Pedestrian Plan includes both the class 1 along the SMART corridor and a class 2 on Wilson St. Cyclist need to have safe and convenient access on our city street to access the various businesses and connector streets. Many cyclists will avoid off-street paths at night for personal safety reasons. Both of these bikeways are necessary.

Removing the planned class 2 routes along the 9th Street corridor using the rational that the east/west access for bicyclists will be along the 6th/7th Street corridor is unreasonable. Both these corridors are important routes on their own. It is unreasonable to expect bicyclist to use one corridor when it is out of the way. Bicyclists need safe and convenient access to our streets.

Thank you for your consideration of these matters. I can be reached at 707-545-0153.

Sincerely,

Christine Culver
Executive Director
Letter 19: Christine Culver, Executive Director, Sonoma County Bicycle Coalition. April 6, 2007.

19-1: Please see response to Comment 14-1.

19-2: Please see response to Comment 14-3.

19-3: Subsequent to preparation of the Specific Plan and Draft EIR, it was discovered that the current Caltrans widening of Highway 101 would result in the elimination of a sidewalk on the south side of Third Street between the two freeway ramps. City staff has since been coordinating with Caltrans to consider any possible means of maintaining the sidewalk without eliminating travel lanes, bicycle facilities, or the remaining sidewalk on the north side of the street. The City has identified several design alternatives that could potentially allow the sidewalk to remain, although it would likely require Caltrans design exceptions. The City continues to pursue resolution to this issue and has indicated that should Caltrans deem preservation of the sidewalk cost prohibitive, the City will continue to evaluate potential solutions and seek funding sources to reinstall the sidewalk.

Given the current uncertainty, it remains possible that the Caltrans Highway 101 widening project will permanently eliminate the sidewalk on the south side of Third Street between the two freeway ramps. This change would result in an inconvenience for pedestrians walking, for example, between the Vineyard Creek Hotel and Conference Center and downtown. Pedestrians destined for the southern portions of downtown would instead have to cross to the north side of Third Street or use the Prince Memorial Greenway creek path.

Though the freeway widening project is slated to eliminate the sidewalk on the south side of Third Street, the opposing sidewalk on the north side of the street would be widened. The freeway ramp traffic signals would continue to provide pedestrian crossing phasing,
crosswalks and equipment. Combined with the creek path, pedestrian connectivity between the east and west sides of the freeway would be retained, though with less convenience than currently exists. The potential sidewalk loss represents an unfortunate condition that the City hopes to rectify, though given the proximity of parallel routes, would not represent a significant environmental impact.

19-4: Please see response to Comment 14-4.

19-5: Please see response to Comment 19-3.

19-6: Please see response to Comment 14-5.

19-7: Please see response to Comment 14-6.

19-8: Please see response to Comment 14-7.

19-9: Please see response to Comment 14-8.

19-10: Please see response to Comment 14-9.

19-11: Please see response to Comment 14-10.

19-12: Please see response to Comment 14-11.

19-13: Please see response to Comment 14-12.

19-14: Please see response to Comment 14-13.

19-15: Please see response to Comment 14-14.

19-16: Please see response to Comment 14-15.

19-17: Please see response to Comment 14-16.
19-18:  Please see response to Comment 14-17.

19-19:  Please see response to Comment 14-18.

19-20:  Please see response to Comment 14-19.

19-21:  Please see response to Comment 14-20.

19-22:  Please see response to Comment 14-21.
April 6, 2007

Attention: Ken MacNab
Department of Advance Planning & Public Policy
City of Santa Rosa
100 Santa Rosa Avenue, Post Office Box 1678
Santa Rosa, CA 95402

Re: DEIR for the Santa Rosa Station Area Specific Plan

Dear Mr. MacNab,

The planning project was carried out in an ideal manner, and has resulted in a model plan. While I don't have the expertise to know if the legal requirements were all met, the DEIR seems well done.

The following commentary is on what might be called a “standard omission” of EIRs; Until now, they have lacked consideration of climate change impacts of transportation.

More specifically, the EIR focuses on the impact of planned development on traffic congestion, and recommends mitigations that will increase greenhouse gases and thus exacerbate global warming.

The DEIR is uncommonly conservative in the sense that it avoids mitigation recommendations intended to bring motor vehicle traffic up to a free-flowing level upon project build-out. Nevertheless, where it recommends mitigations to alleviate traffic constrictions it follows the usual practice of taking space away from adjacent land uses in order to add vehicle capacity. Adding vehicle capacity in critical spots is tantamount to ensuring more vehicle miles than would be the case without those mitigations.

Greenhouse gas production by motor vehicles is directly related to VMT or traffic volume, and is inversely related to traffic congestion. There is a strong city goal of reducing greenhouse gas production, and adding capacity will militate against this expressed goal. Therefore, there should be no net increase in vehicle capacity, regardless of the size or density of development that is being planned.

The project (program for future projects) is intentionally aimed at increasing population density as a part of an effort to curtail environmental impacts that are regional and countywide in nature. But this needn't require additional VMT. The denser places in the world have narrower streets and rely on a more more efficient mix of transportation modes. The best way to achieve that mix is to apply a variety of market mechanisms, an approach strangely missing in a nation that adheres to such mechanisms in most other
sectors of its economy.

Rather than re-write the EIR, it might be satisfactory to acknowledge that the increase in greenhouse gases that would be caused by the project has not been addressed, and to state that capacity-increasing mitigations might later be dropped in favor of programs that produce the desired modal shifts in order to provide the necessary level of mobility. That array of programs would have to include market pricing devices.

Sincerely,

Joel Woodhull

for the Sonoma County Transportation & Land-use Coalition

20-1: This comment claims the Draft EIR should have addressed impacts from the project that would affect climate and that mitigation measures to improve traffic flow would increase greenhouse gas emissions.

Please see response to Comment 11-31. The commenter is claiming that traffic mitigations would increase greenhouse gas emissions without providing any information to support that claim. Reducing traffic congestion would reduce emissions, because travel times would be less. No further action is required in regards to the Draft EIR.

20-2: The EIR traffic analysis identifies mitigation measures that are needed to address significant impacts to vehicle levels of service as defined by the City of Santa Rosa and CalTrans. This is required by the City’s General Plan. The suggested mitigations attempt to reduce the impacts to adjacent land uses and pedestrian-bicycle circulation, while not over-building to create excess vehicular capacity and related problems such as encouragement of higher vehicle speeds. While providing no capacity improvements may result in congestion that is substantial enough to reduce vehicle miles traveled, the corresponding safety impacts to all users, including pedestrians and bicyclists, would be significant.

20-3: As indicated in response to Comment 20-2, providing no vehicular capacity improvements may reduce vehicle travel, but at the expense of safety, which is considered unacceptable. Policies in the City’s General Plan also require conformance to vehicle level-of-service standards, which can only be met by adding capacity.
20-4: This comment expresses a general opinion on the Specific Plan and on national policy regarding an efficient mix of transportation modes. As this comment does not question the adequacy of the Draft EIR, no further action is required.

20-5: This comment suggests that the Draft EIR acknowledge an alleged increase in greenhouse gas emissions and that mitigation measures may not be implemented or changed.

Please see responses to Comments 11-31 and 20-1.
Esta bien que haya una Sociedad que se preocupe por tener y conservar el bienestar de nuestra ciudad de Santa Rosa, como los que están enumerados en el frente de esta hoja, los que son para mejorar la vivienda y en general para todos.

Sinceramente

Carlos Ramos
2/13/07

It is good that there is a community that is concerned with having and conserving the well-being of our city of Santa Rosa, like those that are described on the front of this sheet; those that are for improving the housing for low-income people and improvement in general for all.

Sincerely,

(signature)
Carlos Gomez

21-1: This comment does not question the adequacy of the Draft EIR, but rather approves of the efforts by the community to improve the environment and the housing for low-income people. No further action is required with regard to the Draft EIR.
COMMENT LETTER 22

Law Office of David Grabill

1930 Alderbrook Lane
Santa Rosa, CA 95405
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fax: (707) 780 1585
e-mail: dgrabill@aol.com

February 15, 2007

To: Santa Rosa Design Review Board
From: David Grabill, Sonoma County Housing Advocacy Group
Re: Draft Station Area Specific Plan

The Housing Advocacy Group has serious concerns about the current draft of the Station Area Specific Plan ("SAP"). It sets out a grand and glowing picture of future downtown development, but is very vague on specifics. In particular, it speaks of including a range of housing types, but there is no mention of how much, where, or how affordable housing will be included in the area covered by the plan. If this draft plan is approved, the Design Review Board will look at individual project proposals as they come forward. None of these proposals is likely to include much in the way of affordable housing because there’s nothing in the plan which requires or even encourages affordable housing in the 3,000+ new units proposed for the Station Area.

There is an underlying problem with how the Design Review Board is supposed to assess the SAP. The SAP overlaps with the Core Area but includes sections outside it. So it is unclear which portions of the Design Guidelines are to be applied. If a parcel is in the SAP but outside the Core Area, how will that be addressed to provide design continuity? If the SAP design guidelines are part of the Specific Plan, those in theory will override the Design Guidelines. That means the DRB will be applying the SAP design guidelines instead of the general City Design Guidelines. That means it is critical that it is clear which ARE the replacement Design Guidelines, or it could become chaos. All the more critical since there will likely be some substantial projects that will proceed solely with Design Review Board approval.

If a project doesn’t need a General Plan Amendment, rezone, tentative map, or Use Permit, then DRB is the only public review and approval. Since the City is embedding the new SAP Design Guidelines in the SAP itself, and since City Code requires the DRB to determine any project is consistent not just with the Design Guidelines but with the General and any specific plans, the net effect is that the DRB will frequently determine whether a project complies with ALL the policies of the SAP, not just the design policy portions. Are they prepared to take on that responsibility? If they think they are, would we agree with that?

From this point forward, very few projects in the Core Area/SAP will involve General Plan amendments or rezones. That meant the only projects to rise to the Planning Commission will be projects that also include a Use Permit. So look carefully at the SAP with that thought in mind. ANY PROJECT THAT DOES NOT REQUIRE A USE PERMIT OR VARIANCE WILL ONLY BE REVIEWED BY THE DRB AND THE ENTIRETY OF THE STATION AREA PLAN WILL BE APPLIED ONLY BY STAFF AND THE DRB - INCLUDING WHETHER THE PROJECT SHOULD INCLUDE AFFORDABLE HOUSING UNITS AND HOW MANY.
As to affordable housing, how will the design policies in the SAP either encourage or hinder the creation and/or maintenance of affordable housing? While they do not have jurisdiction over affordable housing, the creation and application of the new SAP design guidelines WILL have a significant influence on how developers package future proposals.

In particular, the SAP should set out policies re. mixed use buildings, existing residential buildings, and private open space for residential uses. Policies specific to the elderly and families should also be included. Many of these are policies were in the prior Design Guidelines. These Design Guidelines contained a specific chapter on residential housing within the Core Area. With the adoption of the mid-rise policy and Design Guideline amendments in October of 2005, any policies specific to housing in the Core Area were deleted. So it is critical to have a careful scrutiny of SAP Design Policies specific to housing projects and components. That should include the points noted above.

An additional issue is how this SAP overlaps or modifies existing Redevelopment Areas and Plans. The City’s various Redevelopment Plans have to be consistent with the General Plan. State redevelopment law does not require that a Redevelopment Plan be consistent with a jurisdiction’s adopted Specific Plans. So you could have strong provisions for affordable housing in the SAP, but the Redevelopment Plan could allow the Redevelopment Agency to override those Specific Plan policies that allow them to shift affordable housing outside the Redevelopment Area -- as in the case of the TORPA and GATEWAYS Redevelopment Project Area Plans. So it is essential that the connection between the Redevelopment Plans and SAP be carefully explored? In this draft SAP, the connection is virtually ignored except in the context of infrastructure funding.

The DEIR only references the Redevelopment Areas in the context of infrastructure funding. The Specific Plan acknowledges the existence of various Redevelopment Areas in Section 4.10-4 et seq but only in the context of population estimates. There is no reference to any assumptions or policies or potential conflicts with any of the Redevelopment Areas or Plans or EIRs. To make matters worse, the use of the word "redevelopment" is used throughout the Specific Plan to signify reuse of a site already built upon or built out; it does NOT refer to projects within Redevelopment Areas as designated. Since a number of policies are written in the context of "redevelopment sites", this could become very confusing. A substitute for "redevelopment" should be found, such as "reutilization" in the context where it is just general reuse, as opposed to a specific Redevelopment Area project.

We would request the Design Review Board to reject the draft Station Area Specific Plan in its current form and request the Staff to redraft it to correct these deficiencies.

22-1:  This comment does not question the adequacy of the Draft EIR, but rather provides general comments regarding the Specific Plan pertaining to design guidelines and affordable housing provisions.  No further action is required with regard to the Draft EIR.

22-2:  This comment does not question the adequacy of the Draft EIR, but rather inquires to the relationship between the Specific Plan and this EIR with other Redevelopment Areas and Redevelopment Area Plans.  For a detailed response, please see response to Comment 11-12.  No further action is required with regard to the Draft EIR.

22-3:  This comment does not question the adequacy of the Draft EIR, but rather provides general comments regarding the Specific Plan.  No further action is required with regard to the Draft EIR.
2007 de día 21 de Febrero
la Familia Aquiles
apenas a ti, SCCA que
agora mi vida es por todos
nuestra familes por la los
de vida inglesa.
y que agora porque
escuela es pillete

Celia Aquiles

CITY OF SANTA ROSA
P.O. BOX 1678
Santa Rosa, CA 95402
FEB 26 2007
DEPARTMENT OF
COMMUNITY DEVELOPMENT
February 14, 2007

The Aguilar Family supports the SCCA in creating more housing for all our families that are low income and that you create **parks, schools, and hospital.**

Celina Aguilar

**Translator’s Note: writing not clear but it appears that this is the desired wording.**

23-1: This comment does not question the adequacy of the Draft EIR, but rather supports the efforts of the Sonoma County Conservation Action (SCCA) in creating more housing for low-income families, while creating sufficient parks, schools and hospitals. No further action is required with regard to the Draft EIR.
Sr. McNab,

Yo vivo en la zona del centro de Santa Rosa. Por el momento soy considerada una persona de bajos ingresos, por lo tanto sería bueno que pusieran edificios para personas como yo y tantas otras.

Aparte de eso también me preocupa mucho el medio ambiente; y sería bueno que estos edificios fueran lo que es considerado edificios green y así ahorrarnos en electricidad y agua.

También deberían incluir más pasajes para bicicletas y peatones. Es muy peligroso andar en bicicleta por muchas de las avenidas de Santa Rosa.

Ojalá consideren las opiniones de las personas de la comunidad porque lo merecemos.

Atentamente,

Rosa Maria Canales Cueva
February 20, 2007

Mr. MacNab,

I live in the area of Santa Rosa center. For now I am considered to be a low-income person and therefore it would be good if you created buildings for people like me and for so many others.

Other than that, I am also concerned about the surrounding environment and it would be good if these buildings were considered to be Green Buildings and thus save on electricity and water.

They should also include more lanes for bicycles and pedestrians because it is very dangerous to ride around by bike on many of the streets of Santa Rosa.

I hope that you consider the opinions of the people in the community because we deserve it.

Sincerely,

Rosa Maria Canales Cuerva

24-1: This comment does not question the adequacy of the Draft EIR, but rather supports the efforts for additional affordable housing, green design standards for new buildings and additional bicycle and pedestrian facilities. No further action is required with regard to the Draft EIR.
Edificios Green viviendas para personas de bajos ingresos y que las calles sean seguras para los ciclistas.
Filimon Hernandez
647 Dutton Ave #2
Santa Rosa, CA 95407
Tel: 707 542 998

More housing for low income people

That you make more parking spaces for cars and bicycles. And that they be safe areas.

Include language that supports the security of access for handicapped people and public plazas and Green Building housing for people of low income and that the streets be safe for bicyclists.

25-1: This comment does not question the adequacy of the Draft EIR, but rather requests for additional affordable housing for low-income families, more parking for cars and bicycles in secure areas, language for adequate access for handicapped people, public plazas and buildings that include Green Building design standards within the Specific Plan. No further action is required with regard to the Draft EIR.
Sr. Ken MacNag,

Me gustaría que pusieran edificios para personas de ingreso bajo y también que sean edificios verdes que utilicen energía solar.

Aparte de eso, pongan más lugares seguros para montar bicicleta porque se a puesto muy peligroso andar por las calles de Santa Rosa.

Gracias por tomar el tiempo de considerar a la gente de la comunidad.

Gracias,

Víctor San Ramón
Mr. Ken MacNab,

I would like you to put in buildings for low-income people and also that they be Green Buildings that use solar energy.

Also, that you create more safe places for riding bicycles because it has become very dangerous to ride around the streets in Santa Rosa.

Thank you for taking the time to consider the people of the community.

Thank you,

Victor San Ramon

26-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the addition of affordable housing utilizing Green Building design standards and safe bicycle paths and lanes within the Specific Plan. No further action is required with regard to the Draft EIR.
Atención: Ken MacNab.

Esta carta es para pedir que en sus planes de el Centro de Santa Rosa y Railroad Square además de las calles que sirven como entrada a esta zona se convierta en una área segura para todas las personas, ciclistas y peatones.

También que tengan en cuenta la construcción de viviendas para personas de bajos ingresos con el mínimo de las normas del "Edificio Green". Que incluya: Medidas de conservación del agua y energía reducir el agua desechable, reciclar el agua de tormenta, Parques públicos, Residencias para personas de bajos ingresos que ganen menos de 42,000 al año.

- Que las construcciones en las propiedades públicas incluyan beneficio para la comunidad.
- Que se incluya lenguaje para apoyar la seguridad de los peatones, y los ciclistas, acceso para las personas minusválidas. Incluir accesos para que las bicicletas al centro sean seguras estacionamiento grande y seguro para las bicicletas.

Plazas públicas y diseños de edificios buenos.
Por favor queremos que esta área sea una zona donde nuestros hijos nosotros y toda la comunidad puedan trabajar, vivir, jugar y ser feliz.

Muchas gracias

Laura Solorio
2/4/07

Attention: Ken MacNab

This letter is to ask that in your plans for the Santa Rosa Center and Railroad Square, that not only the streets that serve as entrances to this area be safe, but that the entire zone be converted into a safe place for all people, bicyclists and pedestrians.

Also that you keep in mind construction of low-income housing, keeping to a minimum level of standards for “Green Buildings”, that you include methods of water and energy conservation, ways to reduce discardable water, ways to recycle rainwater.

Public parks.

Residences for low income people who earn less than 42,000 per year.

-That the construction on public property include benefits for the community
-That language is included that supports the security of pedestrians and bicyclists, and handicapped access. Include safe access for bicycles to the center, lots of parking that is safe for bicycles, public plazas and good building design.

Please we want this area to be a place where our children and all the community can work, live, play and be happy.

Thank you very much.

Laura Solario

27-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to create a safe environment for bicyclists and pedestrians, provide adequate amount of low-income housing designed using Green Building standards and additional public parks. No further action is required with regard to the Draft EIR.
Querido Ken Mac Nab,

Yo pido que los siguientes cambios se agan al Draft Station Area Specific Plan. Hacer un plan que incluya el crecimiento dentro del Station Area con un mínimo de 40% de viviendas para personas de bajos ingresos, viviendas moderadas para individuales que ganen menos de $63,000.

Toda el crecimiento en el Station Area llegue al nivel mínimo de las normas de edificios Green. Todas las viviendas deben tener medidas de conservación del agua, energía, reducir el agua desechable, reciclar el agua de tormenta, parques públicos y materiales que complementan el medio ambiente.

Tener más estacionamiento abundante para las bicicletas que sean seguras y seguros para todas las áreas de oficina y tiendas. Tener un jardín que aporte seguridad de personas entre fachadas de edificios, más acceso para personas que usen bicicletas, plazas públicas y edificios con buen diseño.

Hacer que las construcciones en las propiedades públicas sean beneficios para la comunidad. Diseños de los Edificios Green que todas las calles tengan seguridad para la gente con discapacidades.
Y haya viviendas para familias de bajos recursos y ingresos. Me gustaría ver muchos de estos cambios en el plan Draft Station Area, ya que sería bueno para mi comunidad y familia.

Muchas gracias.

[signature]
2/13/07

Dear Ken McNab,

I am asking that the following changes be made to the Draft Station Area Specific Plan:

Create a plan where growth within the Station Area have a minimum of 40% low-income housing—moderate housing for individuals that earn less than $63,000. All growth in the Station Area shall meet a minimum level of standards for Green Buildings. All the Green housing should have methods for water and energy conservation, ways to reduce discardable water, ways to recycle rainwater, public parks and the use of materials that complement the surrounding environment.

Have sufficient bicycle parking that is public and safe for all office and store areas, have language that supports the security of pedestrians in the front of buildings, more access for handicapped people, public plazas and buildings of good design.

Make it so that construction on public property have benefits for the community, designs for Green Buildings, and that all the streets be safe for people and bicyclists. And that you make housing for low income families. I would like to see lots of these changes in the plan for the Draft Station Area since it would be good for my community and my family.

Thank you very much.

Signature

28-1: This comment does not question the adequacy of the Draft EIR, but rather requests for 40 percent of the housing within the Plan Area be for low-income housing, for new buildings to utilize Green Building standards, provide sufficient bicycle parking, more access for handicapped individuals and provide more public plazas. No further action is required with regard to the Draft EIR.
Señor: Ken MacNab

Pienso que me gustaría que requiriera acceso para las escaleras al centro que sean fáciles y seguros. También estaría bien ahí fuera para las distintas áreas de acceso para los residentes. Que sea público y seguro para todas las áreas de oficinas y tiendas.

Incluir un requisito que todo el edificio esté alineado con las reglas de los Edificios "Green". Todas las viviendas deben incluir medidas de conservación del agua, medidas de conservación de energía, reducción del agua desasible, reciclaje del agua de desagüe, paquetes públicos, y materiales que complementan el medio ambiente.

Incluir un requisito que el crecimiento residencial dentro del státer "Area tenga un mínimo de 40% viviendas para personas con ingresos bajos". (Ingreso medio de 30% de ingresos bajos y extremadamente bajos) (Medrano: Significa viviendas...
Si un individuo ganó menos de $63,000, ingreso significa vivir con otros individuales que ganaron menos de $42,000 al año.

Querida Sierra:
Mr. Ken MacNab:

I think I would like that it be required that bicycle access to the center be easy and safe. Also that there be enough bicycle parking that is public and safe for all the office and store areas.

Include language that supports the safety of pedestrians in front of the buildings, adherence to access for handicapped people, and buildings with good design.

Include a requirement that all growth in the station area meet the minimum level of standard for “Green Buildings”. All Green housing should include methods for water conservation, methods for energy conservation, methods to reduce disposable water, ways to recycle rainwater, public parks, and make use of materials that complement the surrounding environment.

Include a requirement that residential growth within the station area have a minimum of 40% low-income housing (20% medium-income and 20% low and extremely low income) (medium income means housing for individuals who earn less than $63,000; low-income means housing for individuals who earn less than $42,000 per year).

Evelyn Sierra

29-1: This comment does not question the adequacy of the Draft EIR, but rather requests for a safe pedestrian and bicycling environment within the Plan Area, sufficient access for handicapped individuals, for new buildings to utilize Green Building design standards and to include at least 40 percent low-income housing as a requirement. No further action is required with regard to the Draft EIR.
2-07-07

Estimado Ken MacNab

Necesitamos más casas residenciales dentro del área del station. Casas de bajos ingresos para personas que ganan poco y piden más pagar teniendo más garajes para los autos. Teniendo más aseo para las bicicletas y centros que sean cómodos y seguros y estaciónamiento abundantemente para bicicletas en las áreas de oficina y tiendas pocos que sean seguros. También incluir que la seguridad de peatones entre las facadas de los edificios adición de aseo para las personas. Múltiples plazas públicas edificios con buenos diseños mandar que al construccion en las propiedades públicas incluyendo beneficios para la comunidad diseños de los edificios Green, vivienda para personas de bajos ingresos y vecinos calles sean seguras para los ciclistas y peatones. Se les agradece muchísimo

Familia Encarnación Ramírez
Pedro: Seme el bidáva debe incluir medía de conservación de agua, conservación de energía, reducir el agua desechable y reciclar el agua de tormenta.
Dear Ken MacNab:

We need more residential houses within the station area; low-income houses for people who earn little and able to pay, while having more bus stops.

Have easy and safe access for bicycles to the center and enough parking for bicycles in the office and store areas, and assuring they are safe. Also, include language that supports the safety of pedestrians in front of the buildings, handicapped access, public plazas and buildings with good design.

Demand that the construction of public property include benefits for the community, designs for Green buildings, housing for people of low-income and that the streets are safe for bicyclists and pedestrians. It is very much appreciated.

Family of Ernesto Ramirez

Please for me, I forgot to include methods of water and energy conservation, ways to reduce disposable water and ways to recycle rain water.

30-1: This comment does not question the adequacy of the Draft EIR, but rather requests for additional housing within the Plan Area, particularly for low-income people, for the Specific Plan to provide a safe pedestrian and bicycling environment, sufficient access for handicapped individuals, for new buildings to utilize Green Building design standards and to include sufficient low-income housing. No further action is required with regard to the Draft EIR.
COMENT LETTER 31

Sonoma County Conservation Action
540 Pacific Avenue • Santa Rosa, CA 95403
(707) 571-8566 • fax (707) 571-1678
SCCA@conservationaction.org

ACCION DE ALERTA- EL CENTRO DE SANTA ROSA Y RAILROAD SQUARE

La ciudad de Santa Rosa está planeando el futuro del centro alrededor del smart depot. Esta área incluye el centro, la plaza, Railroad Square, y las calles que sirven como entradas a esta zona.

LO QUE ESTA EN JUEGO

El futuro del centro de nuestra ciudad está siendo planeado, y necesitamos SU VOZ para asegurar que se convierta en una área segura para peatones y ciclistas donde hay viviendas disponibles para toda la comunidad. También que reducido al medio ambiente y que el diseño de las viviendas sea un lugar acogedor donde se pueda trabajar, vivir y jugar.

LO QUE PUEDES HACER

Mandarle una carta a Ken MacNab; Planeador de la Ciudad, por Fax (707)543-3218, email: KMachNab@ci.santa-rosa.ca.us

En sus propias palabras, pedir que algunos de los siguientes cambios sean hechos al Draft Station Area Specific Plan:

- Incluir un requisito que el crecimiento residencial dentro del Station Area tenga un mínimo de 40% viviendas para personas con ingresos bajos. (20% ingreso moderado y 20% de ingreso bajo y extremadamente bajo) (Moderado significa viviendas para individuales que ganan menos de $63,000; ingreo bajo significa viviendas para individuales que ganan menos de $42,000 al año)
- Incluir un requisito que todo el crecimiento en el Station Area llegue al nivel mínimo de las normas del “Edificios Green”. Todas las viviendas Green deben incluir: medidas de conservacion del agua, medidas de conservación de energía, reducir el agua deseable, reciclaje el agua de tormenta, parques publicas, y materiales que complementan el medio ambiente.
- Requerir acceso para las bicicletas al centro que sean faciles y seguros. Tambien estacionamiento abundante para las bicicletas que es publico y seguro para todas las areas de oficinas y tiendas.
- Incluir lenguaje que apoya a la seguridad de peatones entre las fachadas de los edificios, adhesion de acceso para las personas minusvalidas, plazas publicas, y edificios con buen diseño.

Mandar la construcion en las propiedades publicas incluya beneficios para la comunidad: diseños de los “Edificios Green”, viviendas para personas de bajos ingresos, y que las calles sean seguras para los ciclistas y peatones

Por favor, dejar la carta debajo de la alfombra frente de su casa con la direccion y la estampa antes de las 8:30 pm y lo recogeremos. Gracias por su apoyo!
SCCA
Sonoma County Conservation Action
540 Pacific Avenue Santa Rosa, CA 95403
(707) 571-8566 fax (707) 571-1678
SCCA@conservationaction.org

**ACTION ALERT – SANTA ROSA CENTER AND RAILROAD SQUARE**

The city of Santa Rosa is planning the future of the center around the smart depot. This area includes the center, plaza, Railroad Square, and the streets that serve as entrances to this zone.

**WHAT IS AT WORK**
The future of the center of our city is being planned, and we need YOUR VOICE in order to ensure that it is converted into a space that is safe for pedestrians and bicyclists, where there is available housing for all the community. Also, that it fit in with the surrounding environment and that the design of the housing create an inviting place where one can work, live, and play.

**WHAT YOU CAN DO**
Send a letter to Ken MacNab, City Planner, by:
Fax: (707) 543-3218; email: KMacNab@ci.santa-rosa.ca.us

Attention: Ken MacNab
Department of Advance Planning & Public Policy
City of Santa Rosa
100 Santa Rosa Ave, PO Box 1678
Santa Rosa, CA 95402

*handwritten:* Everything is very (illegible) so that the city have something different and attractive to show for and also that it benefit the people who need it. Thank you.

In your own words, ask that some of the following changes be made to the Draft Station Area Specific Plan:

*handwritten:* For families that earn 30,000 per year, everything is fine for what you want to do; there are many people who don’t have enough to pay the rent.

Include a requirement that residential growth within the Station Area have a minimum of 40% housing for people with low-income (20% moderate income and 20% low income and extremely low income). (Moderate means housing for individuals that earn less than $63,000; low income means housing for individuals that earn less than $42,000 per year).
Include a requirement that all growth within the Station Area meet a minimum level of standards for “Green Buildings”. All Green housing should include: methods of water conservation, methods for energy conservation, ways to reduce disposable water, ways to recycle rainwater, public parks, and materials that complement the surrounding environment.

Require bicycle access to the center that is easy and safe. Also enough bicycle parking that is public and safe for all the office and store areas.

Include language that supports the security of pedestrians in front of the buildings, adherence to access for handicapped people, public plazas, and buildings of good design.

Mandate that the construction of public property include benefits for the community: designs for “Green Buildings”, low-income housing, and streets that are safe for pedestrians and bicyclists.

Please leave your letter under the matt in front of your house with the address and a stamp before 8:30pm and we will pick it up. Thanks for your support!

31-1:  This comment does not question the adequacy of the Draft EIR, but rather compliments the context and the efforts of the Specific Plan. No further action is required with regard to the Draft EIR.
Dear Sir,

Regarding the SR Station Area Plan, please support:
1. Green building standards,
2. Bicycle access, and
3. Affordable housing.

Thank you,

[Signature]

32-1: This comment does not question the adequacy of the Draft EIR, but rather supporting the inclusion of Green Building design standards, additional bicycle access and affordable housing within the Plan Area. No further action is required with regard to the Draft EIR.
Dear Mr. MacNab,

I understand that the city of Santa Rosa is developing its Downtown Station Area Plan. I’m writing to request that the city include certain requirements in its plan.

First, that this area will provide safe and convenient access for pedestrian and bicycles, not just cars. Please include space for bike parking.

Second, residential development in this area should include a minimum of 20% low income housing and 20% moderate income housing.

Third, a particular standard for “green building” should be established. All development in this area should be required to meet this standard. This should include water and energy conservation, low-water landscaping, reduced use of toxic chemicals in landscape maintenance, as well as in building and painting, the use of environmentally-friendly building materials and the establishment of public green spaces.

Thank you for taking the time to consider my input.

Sincerely,

Katrina [Signature]

33-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to provide safe and convenient access for pedestrian and bicycles, sufficient bike parking, the inclusion of 20 percent of low-income and moderate-income housing each, for new buildings to utilize Green Building design standards and the establishment of public green spaces. No further action is required with regard to the Draft EIR.
Dear Mr. MacNair,

I have been informed of the planning taking place for the Downtown Santa Rosa area and wanted add my voice.

Please add to the draft station area specific plans:

- Residential development in the station area meet a minimum of 40% affordable housing.

- Development in area be using green building standards. (Dar statement is failing - the future of this area is in your hands!)

- Bicycle access to downtown area.

- Development of public owned lots include benefits for the community - green/bike design - affordable housing - bicycle/pedestrian friendly design.

- Keep this area clean. Thanks!

Thank you,

[Signature]

Kimberly Thatchers
Sonoma County

34-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan include 40 percent affordable housing, for new development to utilize Green Building design standards, provide safe access to bicycles and for public owned lots to include benefits for the community. No further action is required with regard to the Draft EIR.
COMMENT LETTER 35

Dear Mr. MacNab,

I understand that the city of Santa Rosa is developing its Downtown Station Area Plan. I’m writing to request that the city include certain requirements in its plan.

First, that this area will provide safe and convenient access for pedestrian and bicycles, not just cars. Please include space for bike parking.

Second, residential development in this area should include a minimum of 20% low income housing and 20% moderate income housing.

Third, a particular standard for “green building” should be established. All development in this area should be required to meet this standard. This should include water and energy conservation, low-water landscaping, reduced use of toxic chemicals in landscape maintenance, as well as in building and painting, the use of environmentally-friendly building materials and the establishment of public green spaces.

Thank you for taking the time to consider my input.

3-6-07
Sincerely,

[Signature]

CITY OF SANTA ROSA
P.O. BOX 1678
SANTA ROSA, CA 95402

MAR 6 9 2007

DEPARTMENT OF
COMMUNITY DEVELOPMENT

35-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to provide safe and convenient access for pedestrian and bicycles, sufficient bike parking, the inclusion of 20 percent of low-income and moderate-income housing each, for new buildings to utilize Green Building design standards and the establishment of public green spaces. No further action is required with regard to the Draft EIR.
Hi, Ken,

I have been trying to apply the lessons of the day long training session that we had a couple of Fridays ago to the Station Area Specific Plan. I foresee great difficulty getting the 750 members of the Sonoma County Bicycle Coalition and the 550 members of the Santa Rosa Cycling Club grudgingly to consent to the loss of class two bike lanes in the downtown area. This is especially true since the plan is supposed to increase the bicycle rider ship in the downtown area. Remember that the general membership elects the boards of the SCBC and SRCC.

So, what will it take to convince the affected merchants downtown grudgingly to consent to losing at curb parking? Will off street parking do it? Will a tax break do it? What if we paid for the cost of moving them to a strip mall with abundant parking? What is the city willing to do to achieve the vision, goals, and objectives of the plan?

Hopefully,
Michael Eunice
Letter 36: Mike Eunice, meunice@sonic.net. March 12, 2007.

36-1: This comment does not question the adequacy of the Draft EIR, but rather questions the necessity of the Specific Plan to call for the loss of Class II bike lanes in the downtown area. It further questions if the loss of available parking in the downtown area would be more acceptable and/or feasible. No further action is required with regard to the Draft EIR.
March 19, 2007

Ken MacNab
City of Santa Rosa
Advance Planning & Public Policy
100 Santa Rosa Avenue
P.O. Box 1678
Santa Rosa, CA 95402-1678

Dear Mr. MacNab:

As the efforts to create a safe and attractive transit supportive environment, around the planned commuter rail station site in downtown Santa Rosa, begin we need to ensure that the housing built be attractive, upscale and have a high level of "green building" standards. Also, we need to try to design and build these units to be attractive and appealing to the maturing (graying) demographics as well as the young professionals working and living in Santa Rosa. Housing built in the Courthouse Square Sub-Area and the Railroad Square Sub-Area should be built to attract those who have the disposable income to support the local businesses and thus enable Santa Rosa to attract the upscale businesses which will increase the vitality of these two areas.

Additionally, I recently attended an evening function on Louis Krohn Drive. With all of the vehicles parked on both sides of the street I wondered if there was enough room for the fire department to respond to a fire in the area. We need to ensure that the streets in the Station Area are wide enough to accommodate the largest fire department vehicles (hook and ladder) and that on-street parking does not interfere with their ability to respond to emergencies and be able to fight a fire on the upper stories.

Thank you for you consideration of this input and if I can provide any additional information please call.

Marvin Mai
4743 Woodview Drive
Santa Rosa, CA 95405
545-2224

Get a FREE Web site, company branded e-mail and more from Microsoft Office Live!
http://clk.atdmt.com/MRT/go/mcrssaub0050001411mrt/direct/01/

37-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to ensure that the housing built be attractive, upscale and have a high level of Green Building standards. It also requests careful consideration for adequate emergency vehicle access for all streets within the Plan Area, particularly for the larger fire department equipment. No further action is required with regard to the Draft EIR.
Bueno son más nabo esos planes que e ban a llevar acabo son muy buenos, solo requiere pedir que no olviden los niños crearles un lugar seguro y donde puedan jugar con áreas verdes y árboles también un lugar donde los puedan cuidar y estar seguros sin abusas de ningún tipo.

atentamente

María Estarli

y sigan adelante.

Pueden crear algún lugar también para las víctimas de Violencia Doméstica.

por favor.
Well, Mr. MacNab, these plans that are being worked out are very good. I just want to ask that you do not forget about the children. Create a secure place where they can play in green open space with trees as well. A place where they can be taken care of and be secure without fear of any type.

Sincerely,
Maria Iturbe
Carry on

Could you also create a place for Domestic Violence victims please?

38-1: This comment does not question the adequacy of the Draft EIR, but rather to compliment the efforts behind the Specific Plan, while requesting for the creation of a secure place for children to play, preferably in green open space and the creation for a domestic violence shelter for victims to go for help. No further action is required with regard to the Draft EIR.
Dear Sir,

I understand that the Santa Rosa SMART Station Area Plan has been created to guide development in the ½-mile area around the Downtown SMART Depot.

I would like, and I think it's important that, this area be accessible to pedestrians and cyclists, provide low income housing and other housing needs, have buildings that have a reduced impact on the environment, and be designed in a way that creates an inviting place to live, work and play.

To make these things possible, I ask that the following changes be made to the Draft Station Area Specific Plan: That it...

- include a requirement that residential development in the Station Area meet a minimum of 40% affordable housing, with 20% for those with moderate income and 20% for those with low and very low income;
- require that all development in the Station Area meet a minimum level of "green building" standards; water conservation measures, energy conservation measures, waste water & storm water run-off reduction, public green spaces and healthy building materials;
- require that bicycle access to the downtown area be easy and safe; that bike parking be plentiful, public, safe and secure for all new retail and office areas;
- mandate that developments on publicly-owned lots include benefits for the community that I mentioned above: green building design, affordable housing, bicycle and pedestrian-friendly design.

I am very interested in this plan's effect on the future of the Station Area, and would appreciate if you would please keep me informed on this issue. Thank you for your time and serious consideration of the above changes. I ask that you make to the plan.

Sincerely,

Brent Oakworth

39-1: This comment does not question the adequacy of the Draft EIR, but rather requests for a safe and accessible environment for pedestrians and cyclists, to provide low-income housing and for buildings to utilize Green Building design standards within the Specific Plan, particularly on publicly-owned lots. No further action is required with regard to the Draft EIR.
Dear Ken MacNab:

I am interested in the future of our city and think it is a wonderful idea to install a SMART Depot and think the following ideas should be considered. I believe it should be required that residential development in the Station Area meet a minimum of 40% affordable housing (20% moderate-income and 20% low- and very low income). It should require that all development in the Station Area meet a minimum level of green building standards. All development must include water conservation measures, energy conservation measures, wastewater reduction, stormwater run-off reduction, public green spaces, and healthy building materials. It should also require bicycle access to downtown core that is easy, safe, and bike parking that is plentiful. Public, safe, and secure for all new retail and office areas. It would also be a good idea if the developments on publicly-owned lots include benefits for the community such as green building design, affordable housing, and bicycle- and pedestrian-friendly designs. Please keep me informed on this issue.

Sincerely,

Bianca Flores

[Signature]

40-1: This comment does not question the adequacy of the Draft EIR, but rather requests for a safe and accessible environment for pedestrians and cyclists, to provide low-income housing and for buildings to utilize Green Building design standards within the Specific Plan, particularly on publicly-owned lots. No further action is required with regard to the Draft EIR.
Fred Dodge/Phyllis Heagney

From: "Fred Dodge/Phyllis Heagney" <fpd@sonic.net>
To: "Ken MacNab" <KMacNab@ci.santarosa.ca.us>
Sent: Monday, March 26, 2007 10:39 PM
Subject: Santa Rosa Downtown Area Plan

Dear Mr. MacNab:

I am a tax-paying property owner living in the historic St. Rose district in downtown Santa Rosa. My husband and I bought our home in the downtown core a little over a year ago. We told our realtor that we wanted to be able to walk downtown to see a movie, have dinner, go to the library without having to deal with parking, etc. We love our urban location.

We also enjoy the diversity of our urban neighborhood - we are blocks from the family shelter run by the Catholic Charities, live a short walk from the Redwood mission and St. Anthony soup kitchen, love the local thrift stores, pass by the JC's baking school and cafe over at the Brickyard, frequent the taquerias and ethnic joints by our house and the college, go to the local Unitarian Church. We think that what makes a neighborhood interesting is the mix of cultures, differing income levels, age span of young families to elders, liveability without relying on a car for the basic needs, parks, outdoor art.

Having said all that, I would like to go on record as saying that any planning for the downtown core development must include AT LEAST 40% affordable housing built with new environmental green standards. Let's encourage the developers to consider building housing for the people who will actually walk, bike or take transit from their homes to their jobs, instead of creating McMansions with 3-car garages filled with Hummers. Continue the lauded trend of safe bike trails so that we can actually quit having to be held hostage to $3.00 a gallon gasoline, with an actual alternative to consider! Improve public transit so that we can get to work on it without having to add three hours to our workday. Require water conservation measures to be built into any new agreements with developers - with water issues looming larger than ever, why not demand they employ the environmental breakthroughs available? After all, why is profiteering allowed to be the only guiding motivation when you and your brethren in city government have the city's well being, health, financial balance and overall aesthetic to consider too? Any development on city-owned property must include all possible benefits for our citizens. That is who pays for your salary, after all.

I would like to be kept informed of any meetings or discussions on this issue. Thank you for your time and attention. Phyllis Heagney.

Phyll Heagney

p.s. I tried to email this but it was returned. Could you please email me your correct email address. Thanks!
Letter 41: Phyllis Heagney, fpd@sonic.net. March 26, 2007.

41-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include at least 40 percent affordable housing, for new buildings to include Green Building design standards and for a safe and accessible environment for pedestrians and cyclists. No further action is required with regard to the Draft EIR.
March 23, 2007

Alan Kashiwagi
7526 Bodega Avenue
Sebastopol, CA 95472

Ken MacNab
City of Santa Rosa
Advance Planning & Public Policy
100 Santa Rosa Avenue
P.O. Box 1678
Santa Rosa, CA 95402-1678
(707) 543-3187

Dear Ken,

As a former resident of the City of Santa Rosa, I am writing to express my strong disapproval of the proposed plan to remove bike lanes, as proposed in the Downtown Station Area Specific Plan Draft Environmental Impact Report (EIR). The City of Santa Rosa has done a great job of providing off-road bike trails in order to get into town, but needs to continue to develop the on-road bike lanes in order to create a safe and pleasant environment for bicycle riding. I want to be able to ride into Santa Rosa from Sebastopol with my children and not have to worry about their safety due to the lack of bike lanes on the streets of Santa Rosa. The City should be encouraging alternative modes of transportation in order to reduce CO2 emissions from autos, the noise and traffic generated by automobiles and help to create a more pleasant and healthier environment in the area.

I urge you to reconsider the plan to not have bike lanes in the area and help to promote alternatives to the auto-centric transportation options in Sonoma County.

Sincerely,

Alan Kashiwagi
**Letter 42:** Alan Kashiwagi, 7526 Bodega Avenue, Sebastopol, CA 95472. March 26, 2007.

42-1: The Specific Plan does not include the removal of existing bicycle lanes. Some planned bicycle lanes included in the City’s 2001 Bicycle and Pedestrian Master Plan are proposed to be converted to bicycle routes due to feasibility constraints. Please see response to Comment 14-4 for further explanation.

42-2: This comment does not question the adequacy of the Draft EIR, but rather suggests for the City to encourage alternative modes of transportation in order to reduce CO2 emissions and noise generated by automobiles. No further action is required with regard to the Draft EIR.

42-3: This comment does not question the adequacy of the Draft EIR, but rather requests the City to reconsider the removal of bike lanes within the Specific Plan. No further action is required with regard to the Draft EIR.
Yo apoyo esta propuesta de las viviendas para personas de bajos ingresos, de que las calles sean seguras, parques públicos y todo lo que propone se me acredita una idea muy bien para el futuro de los niños que tienen que estar cuidando y necesitan de todo esto para su futuro y el nuestro, y muy importante para las personas de bajos ingresos yo apoyo esta idea.

Yolanda Leon
8125 P.O. Box
Santa Rosa (CA 95407)
I support the proposal for housing for people of low-income, that the streets be safe, public parks and everything that you are planning. It gives me a very good idea for the future of the children what goods things are being worked on and they need this for their future and for ours and it is very important for people of low income. I support this idea.

Yolanda Leon
8725 PO Box
Santa Rosa CA 95407
Letter 43: Yolanda Leon, P.O. Box 8725, Santa Rosa, CA 95407. March 26, 2007.

43-1: This comment does not question the adequacy of the Draft EIR, but rather supports the efforts to include more housing for people of low-income, safe streets and public parks. No further action is required with regard to the Draft EIR.
CITY OF SANTA ROSA  
P.O. Box 1678  
Santa Rosa, CA 95402  
March 3, 2007

DEPARTMENT OF  
COMMUNITY DEVELOPMENT  
ENGINEERING DIVISION

Dear Ken Macnab,

In regards to the Santa Rosa downtown station area plan, we as lifelong residents of this city would like to see green building standards used to minimize the long-term impact of this development. Along with at least forty percent affordable housing.

Also, much more bicycle access to downtown with safety being the main concern. Along with parking being plentiful and safe.

And lastly, an environment that is pedestrian friendly. It would be nice if a person could go downtown and walk from place to place safely. As it is now, the present design of the area is not conducive for walking or biking. We, as a family never get to do this simply because it is too stressful.

Sincerely,

Paul and Nancy Martinez

1374 Stroven Lane

Santa Rosa, Ca. 95407

(707) 575-1414
Letter 44: Paul and Nancy Martinez, 1374 Stroven Lane, Santa Rosa, CA 95407. March 26, 2007.

44-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include at least 40 percent affordable housing, for new buildings to include Green Building design standards and for a safe and accessible environment for pedestrians and cyclists. No further action is required with regard to the Draft EIR.
Dear Ken MacNab,

I am a concerned Santa Rosa resident asking that the following be considered regarding the Draft Station Area Specific Plan:

1) That there be a requirement met for residential development in the Station Area to include a minimum of 40% affordable housing.

2) That all development in the Station Area meet minimal "green building" standards, such as water conservation, energy conservation, waste reduction, etc.

3) To have easy, safe, and plentiful public bicycle access.

4) Mandates that developments on publicly-owned lots in someway benefit the community.

I thank you for the time taken to review this letter and considering the thoughts thereof.

Steven McDonald
1352 Page Ct
Santa Rosa 95407

45-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include at least 40 percent affordable housing, for new buildings to include Green Building design standards, for a safe and accessible environment for pedestrians and cyclists and mandate for development on publicly-owned lots to benefit the community. No further action is required with regard to the Draft EIR.
Muchas gracias por darme la oportunidad de explicarle que no tengo mucho trabajo y tengo pocos medios.
Quisiera que si llevaran acabo esto y nos diera esta oportunidad de salir adelante con ayuda de ustedes.
Porque si no Necesitamos
Mi nombre es Laura
Munoz

Y los apoyo en su campaña de un futuro mejor para nuestras Hijas.

Laura Munoz
920 Emory Lane
Sta. Rosa, Ca 95407
Tel (707) 571 1406

CITY OF SANTA ROSA
P.O. Box 1678
Santa Rosa, CA 95402

MAR 26 2007
DEPARTMENT OF
COMMUNITY DEVELOPMENT
ENGINEERING DIVISION
Thank you for coming to knock on my door and for giving me the opportunity to explain to you that I don’t have a lot of work and that I earn a small amount of money.

I would like you to carry this out and to give us the opportunity to move forward with your help because we definitely need it.

My name is Laura Munoz and I support you in your campaign for a better future for our children.

Laura Munóz
920 Emmy Lou Ct
Santa Rosa CA 95407
Tel (707) 571-1406

46-1: This comment does not question the adequacy of the Draft EIR, but rather supports the efforts in regards to the Specific Plan. No further action is required with regard to the Draft EIR.
Incluir un Requisito que todo el crecimiento en el Station Area llegue al nivel mínimo de las normas, medidas de conservación de energía, reducir el agua desechable, reciclar el agua de tormenta para parques públicos y materiales que complementen el medio ambiente.

Requerir acceso para las bicicletas al centro que sean fáciles y seguros. También están ampliamente abundantes para las bicicletas que es pública y segura para todos las áreas de oficinas y tiendas.

Josefinas S.
Tuesday, March 6, 2007

Ken MacNab

Include a requirement that all growth in the Station Area meet a minimum level of standards, methods for energy conservation, for reduction of disposable water, and for recycling rainwater, public parks and the use of materials that complement the surrounding environment.

Require bicycle access to the center that is easy and safe. Also plenty of parking for bikes that is public and safe for all the office and store areas.

Josefina S.

47-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include for new buildings to include Green Building design standards, for a safe and accessible environment for cyclists, including sufficient secure bicycle parking and more public parks. No further action is required with regard to the Draft EIR.
Para: Ken MacNab

Hola Ken estoy muy contento de que este programa este tratando de ayudar. Me gustaria pedir que ayuden en lo de las compras de casas de hogares ingresos es muy, muy importante ayudar en todo esto y gracias porque se preocupan por la seguridad de los demas. Me da mucho gusto que esten tratando de ayudar y hojalada lo puedan lograr. Tambien me gustaria pedir sobre la seguridad de los estacionamientos abundantes para los bicicletos. Hojalada que nos puedan ayudar en alguna de estas cosas, que para nosotros los hispanos nos cuesta mucho trabajo conseguir algunas de estas cosas por ejemplo casa de bajos ingresos. Espero que nos puedan ayudar. Gracias por tratar de ayudar.
For Ken MacNab

Hello Ken. I am very happy that this program is trying to help. I would like to ask that you help in the purchase of low-income houses. It is very, very important that you help in all of this and thank you for your concern for the safety of everyone else. It gives me much pleasure that you are trying to help and I hope you are able to succeed.

I would also like to ask about the safety of all the parking spots for bicycles. If only you could help us with some of these things, because we Hispanics have to work very hard and it costs us a lot to get some of these things. For example, a low-income house. I hope you can help us. Thank you for trying to help.

48-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include additional affordable housing and secure bicycle parking within the Plan Area. No further action is required with regard to the Draft EIR.
En sus propias palabras pedir que algunas de los siguientes cambios sean hechos al Draft Station Area Specific Plan.

Incluir un requisito que el crecimiento residencial dentro del Station Area tenga un mínimo de 10% viviendas para personas con ingresos bajos (20% ingreso moderado y extremadamente bajo) siguiendo con viviendas para individuales que ganan menos de $2,000 al año y $3,000 ingreso bajo.

Incluir un requisito que todo el crecimiento en el Station Area llegue al nivel mínimo de las Normas del Edificios Green. Toda vivienda Green debe incluir medidas de conservación del agua, medidas de conservación de energía, reducir el agua desechable, reciclar el agua de Tormentas, Parques Públicos y Materiales que complementan el medio ambiente.
SCCA

I want you to do those ***; I am in agreement.

In your own words, ask that some of the following changes be made to the Draft Station Area Specific Plan:

Include a requirement that residential growth within the Station Area have a minimum of 40% housing for people of low-income (20% moderate income and extremely low means housing for individuals that make less than $42,000 per year $63,000 low income.

Include a requirement that all growth in the Station Area meet a minimum level of standard for Green Buildings. All Green housing should include methods to conserve water, methods to conserve energy, methods for reducing disposable water, methods for recycling rainwater, public parks and the use of materials that complement the surrounding environment.

***Translator’s Note: word not recognized and not translatable; however believe the writer means to say “changes”.

49-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include at least 40 percent affordable housing (20 percent for moderate-income and an additional 20 percent for low-income households), for new development to include Green Building design standards and for additional public parks. No further action is required with regard to the Draft EIR.
March 28, 2007

Santa Rosa Planning Commission
City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Dear Chairman Bartley and Planning Commission members,

The City of Santa Rosa should be applauded for the Station Area Plan’s vision to create a more vibrant, healthy and bicycle, pedestrian and transit friendly downtown. This goal is embraced by citizens and neighborhood groups, organizations and businesses. Everyone looks forward to the day we have a vibrant, attractive, bustling downtown where diverse neighborhoods are connected to the downtown, and people feel completely comfortable riding their bicycles, walking and taking the bus.

A major goal of the Specific Plan is to improve alternative means of circulation in the Specific Plan Area, meaning transit, bicycles and walking. It states in Chapter 6 (6.1) The development program of 3,250 new housing units in this area will help to achieve this goal. However, simply adding more people downtown does not de facto achieve the goal to “substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area” (DEIR 4.12-63). In fact, because the SAP eliminates Class 2 bicycle lanes in several areas, fails to address the safety issues of bicycles and cars sharing the lane, and doesn’t implement policies of slower speeds and significant engineering on downtown streets, I believe that increased vehicular traffic will significantly impact bicycle and pedestrian circulation in the downtown.

Overall, the plan seems to provide overemphasis on vehicle circulation at the expense of bicycles and pedestrians.

The Draft Environmental Impact Report states that the impacts of the SAP on bicycles and pedestrians is “less than significant” (DEIR 4.12-63), yet the analysis was for impacts on vehicular trips only. The DEIR did not analyze the impact of adding 3,250 new housing units and attendant vehicle trips on the safety, access and convenience of bicyclists and pedestrians traveling in and around the downtown. Without a proper analysis of impacts on bicycles and pedestrians, the claims of the SAP that impacts are “less than significant” are not supported.

While discussing the separate needs of pedestrians and bicycles, the two are lumped together for assessing current traffic volume (Fig 4.12-5). This defeats any effort to assess the separate impacts upon those constituencies. If the baseline assumption improperly lumps them together, then any conclusions may not be supported.

Currently, the majority of citizens in Santa Rosa do not feel safe riding their bicycles on city streets. Vehicle speeds are too fast. And yet, the SAP calls for removing bicycle lanes (Wilson Street, Ninth Street, A Street, Davis and 7th) and forcing cyclists to share...
the road with vehicles on most of the streets. This would serve to discourage cyclists from traveling downtown. This is an impact and the DEIR does not address this.

Nor does the Station Area Plan address the impacts on cyclists and pedestrians in recommending the reconnection of Fourth Street through the Santa Rosa Plaza to include autos. Providing vehicle access along Fourth will mean there is no priority given to bicycles and pedestrians on any east west connector, and the impact of this on the overall goal of improving bicycle and pedestrian travel has not been analyzed.

**Air Quality**
The impacts of locating populations next to freeways cannot be underestimated. Health studies of populations located next to freeways indicate significant health risks for asthma, lung cancer, heart attacks and strokes due to exposure to fine particles and ozone. In the most recent and widely publicized study by the University of Southern California, *children who live near a highway experience lung impairments, which could result in life long health problems*

The study of more than 3,600 Southern California children noted that significant lung impairment occurred when kids lived within 500 meters (or about a quarter of a mile) from a motorway. In addition, a child’s proximity to traffic pollution seemed to be associated with reduced lung capacity regardless of the air quality in the neighborhood where he or she lived.

The study found that by age 18, children who lived near a motorway had a three percent deficit in the amount of air they could exhale compared to a control group of kids who lived 1,500 meters from the same highway. [http://www.usc.edu/uscnews/stories/13313.html](http://www.usc.edu/uscnews/stories/13313.html)

Equally important, transit buses (City of Santa Rosa and Golden Gate Transit) emit diesel pollution which, with increased transit, will contribute to unhealthy levels in the downtown area. The Station Area Plan should require that all transit buses serving the downtown area utilize the most advanced control technologies to reduce harmful particle pollution.

**Though there is no easy solution to this problem, it would make sense to consider locating housing further than 500 meters from the freeway, to require transit and truck operators serving the downtown area to utilize the most advanced technologies on diesel engines to control pollution, to enforce anti-idling laws, and to emphasize bicycle and pedestrian travel over vehicle trips in the downtown area.**

**Greenhouse Gases**
The DEIR does not address consistency with or applicability of City policies regarding control of greenhouse gases. Given the project is in a non-attainment area, the DEIR must discuss the project impacts upon greenhouse gases. A mandatory green building policy would help mitigate increased carbon emissions from this project.
Several alternatives were not analyzed within the SAP that would improve bicycle and pedestrian connectivity. Those include:

A. Wilson Street:
Install a Class 2 northerly bicycle lane and a Sharrows lane for southbound traffic. The roadway is appx. 33’ wide and would accommodate 2-10.5 foot lanes, 1- 7’ parking and 1-5’ bike lane.

B. Davis Street
Add south bound Class 2 bicycle lane from 7th to 3rd Street
Davis Street from Ninth to Seventh can remain as a Class 3 route because of the low traffic volume and need for residential on street parking.

C. Fourth Street (through mall)
Provide access for bicycles and pedestrians only (Fourth Street is indicated as having bicycle lanes Figure 5-7 on page 5-9). The recommendation for a vehicular street does not support the goals of the SAP to promote more bicycle and pedestrian environment. Bicycles and pedestrians need a Class 1 connector in the downtown core to feel safe traveling east to west.

D. Roberts Avenue
This proposed street is in the same location as the Joe Rodota Class 1 path. The streetscape will be limited by width and shows no bike lanes. This would be viewed as adding a barrier for bikes and peds. The addition of Roberts Avenue does not meet the goals of the improving bicycle and pedestrian circulation.

E. Bicycle Parking
Secure, safe and convenient bicycle parking including lockers and covered racks should be included for all street types, not just “live work” street type. The lack of adequate bicycle facilities in the downtown is a deterrent to improved bicycle and pedestrian transportation and the DEIR does not address this.

F. SMART Trail
The plan policy #SP-T-1.4 says to consider the alternative location for the new North-South Street through the SMART site. This creates a significant meandering detour for the commuting bicyclist using the rail path. The Bicycle and Pedestrian Advisory Board recommends the path stay along the tracks the full length between 6th and 3rd streets. Policy SP-T-3.5 talks about developing attractive low-level fencing yet SMART engineers contend the fencing needs to be at least 6’ high. The cost of building such a fence may impact the timeframe of the SMART trail, and thus impacts the timeframe for safe, convenient and inviting north south bikeways.

G. Pedestrian Improvements
Currently the sidewalk along the south side of Third St. under crossing at 101 will be removed with the widening project. The City should negotiate immediately with Caltrans to replace the sidewalk and insure convenience and accessibility for the pedestrian and
promote a walkable environment. The consultant (DCE) which developed this Plan along with the Project Manager for this project were not informed of the decision to remove the sidewalk and so accordingly the Plan makes no provisions for the loss of this route. Even if the sidewalk ends up being replaced, there are still several pedestrian enhancements that would be needed to insure we have the best connection possible. The following are suggestions to move toward this goal.

- advance warning signs on the 101 off ramp with "Pedestrian Crossing" amber flashing lights (solar powered).
- rumble strips on the off ramp to warn people to slow down from freeway speeds
- speed limit ahead of 25MPH with speed radar posting the speeds of oncoming traffic
- narrow the crossing on the onramp up to the mall to slow traffic and shorten the crossing distance.
- elevate the sidewalks under the mall to increase pedestrian safety
- better lighting under the mall and 101 undercrossings for safety
- widen the sidewalks along both ramps leading to and from the mall to actually make it an accessible sidewalk

H. Include bulbouts on all intersections

I. Pedestrian timers on crosswalks need to be lengthened to meet needs of disabled and seniors.

J. Slower speeds (15 mph) should be implemented on streets where bicycle boulevards or sharrows are incorporated (Fourth Street, 6th Street, etc.) and for all SAP streets (especially Third Street) to make walking and cycling more comfortable.

K. Intersections
All of the streets listed below have planned bike lanes yet, the Station Area Plan failed to explain how Class 2 bicycle lanes will be included:

- College Avenue/Dutton Avenue.
- College Avenue/Cleveland Avenue
- Seventh Street/B Street
- Sixth Street/Wilson Street.
- Third Street/B Street and Third Street Corridor
- Third Street/Santa Rosa Avenue

Dutton Avenue/Sebastopol Road and Dutton Corridor. This intersection already includes bicycle lanes east and west bound. This is not an addition. There is no discussion of the planned north and south bound bike lanes.

The Dutton Avenue/Sebastopol Road intersection should be modified to include a second eastbound left turn lane. The existing dual westbound through lanes could be converted to a single 12-foot travel lane plus a bicycle lane.
L. Include zoning for bicycle rental facilities throughout the Station Area Plan
Implementing bicycle rental stations throughout the Station Area Plan will do far more to promote bicycle and pedestrian travel. The City of Paris has plans to install 1,450 bicycle rental stations throughout their city. By the end of the year, Paris organizers and city officials say, there should be 20,600 bikes at 1,450 stations - or about one station every 250 yards across the entire city. This kind of planning would reduce need for cars and provide a wonderful way to greet visitors, provide transportation for residents, and link our neighborhoods to each other and to our downtown, transit and neighborhood services.

M. Mandatory Green Building Policy
Such a policy would enhance the goals of the city’s commitment to sustainability and reducing greenhouse gases, including sustainable water usage.

O. Affordable Housing
The Station Area Plan should incorporate inclusionary housing policies to ensure that low and very low income housing is available within the plan area. This will ensure that the city’s goals of creating thriving, diverse neighborhoods is met and meets the current deficiency of low and very low income housing.

The draft EIR could examine alternatives such as those listed above to mitigate the current impacts the SAP.

Again, though this letter is full of suggestions, please know how appreciative I am of the work that went into the creation of this plan. Our city is moving forward in such positive ways. Thank you very much for your consideration of these recommendations to help our city achieve its goals of becoming more sustainable, walkable and welcoming to all.

Sincerely,

Jenny Bard
911 Carr Avenue
Santa Rosa, CA 95404
542-2807

50-1: This comment provides general opinions praising the vision of the Specific Plan. Since this is not a comment on the adequacy of the Draft EIR, no response is required.

50-2: The Specific Plan does not include the removal of existing bicycle lanes. Some planned bicycle lanes included in the City’s 2001 Bicycle and Pedestrian Master Plan are proposed to be converted to bicycle routes due to feasibility constraints. It is unclear what is being referenced by “policies of slower speeds and significant engineering on downtown streets,” though in terms of speeds, the Specific Plan’s proposed street configurations have been developed to regulate vehicle speeds on narrower streets and devoting more space to pedestrians. Please see response to Comment 14-4 for further explanation of the removal of planned bicycle lanes.

50-3: Please see the response to Comment 14-4.

50-4: Please see the response to Comment 14-5.

50-5: Please see the response to Comment 14-6.

50-6: The reconnection of Fourth Street through Santa Rosa Plaza is shown in the Specific Plan to serve as a new linkage between Railroad Square and Courthouse Square. The connection would accommodate pedestrians, bicyclists and automobiles. The narrow two-lane configuration of the street, expected frequency of parking activity, presence of fronting retail and pedestrians and bicyclist activity will result in very low vehicle speeds similar to that on existing retail sections of Fourth Street to the east. The low-speed nature of the street would also limit capacity and discourage through traffic. Streets such as this are common in active downtown and busier...
mixed-use areas, and the low-speed environment helps maintain safety for pedestrians, bicyclists and drivers. The impact of establishing this type of linkage is considered a positive impact for pedestrian and bicyclist travel.

50:7: This comment addresses buffers along freeways to reduce air pollution exposure to sensitive receptors.

Comment noted. However, the relevancy of this study to Santa Rosa must be considered. Southern California freeways generally have much higher traffic volumes than Highway 101 or Highway 12 in Santa Rosa. Southern California has much worse air pollutant levels than Santa Rosa. Ozone and fine particulate matter are the air pollutants known to be most associated with respiratory problems (e.g., asthma). Sonoma County has very good air quality and Los Angeles County has very poor air quality. This was recently documented in the American Lung Association’s State of the Air: 2007 Report (http://www.lungusa.org/) that graded air quality in Sonoma County as “A” for ozone and “B” for particulate matter. Los Angeles County was graded “F” for both air pollutants. In fact, the days with unhealthy air quality due to particulate matter were over a hundred times greater for Los Angeles than Sonoma County. Sonoma County did not have any unhealthy days for ozone in 2006, while Los Angeles County had 158 unhealthy days.

The Draft EIR addresses health impacts associated with exposure to particulate matter from freeways in the form of increased cancer rates. This would be a surrogate for other health impacts from exposure to freeway exhaust, which diesel makes up much of the particulate matter emitted from freeways. The Draft EIR recommends buffers along Highway 101 and finds that the low truck volumes on Highway 12 would not pose an air quality problem for housing built at minimum setbacks. The U.S. EPA and California Air Resources Board have adopted standards for diesel-fueled vehicles that will sub-
substantially lower particulate matter emissions in the future. These were taken into account in the Draft EIR analysis.

50-8: This comment is similar to Comment 50-7, but addresses these impacts from transit buses operating within the Plan Area. Please see the response to Comment 50-7.

Transit bus operations and emission controls are regulated outside the jurisdiction of the City. Buses are required to meet California’s new regulations that address emission requirements from new buses and regulate idling times. There may be Golden Gate Transit and Sonoma Transit policies that address acquisition of new buses meeting certain air quality requirements. The frequency of bus operations near sensitive receptors was not found by the Draft EIR to pose a significant health risk.

50-9: These comments suggest that housing be located more than 500 meters from the freeway, the city regulate truck and transit operations within the Plan Area and emphasize pedestrian and bicycle modes of travel in the downtown area.

Please see the response to Comments 50-7 and 50-8.

50-10: This comment addresses greenhouse gas emissions associated with the project and consistency with City policies regarding such emissions.

Please see the response to Comment 11-31.

50-11: This comment does not question the adequacy of the Draft EIR, but rather provides suggestions for pedestrian, bicycle and pedestrian facilities, a sustainable building policy and affordable housing for the Specific Plan. These issues have been raised as part of the Specific Plan discussion and will be addressed by the City before the Specific
Plan is considered for adoption. No further action is required with regard to the Draft EIR.

50-12: This comment asks for the suggestions provided in Comment 50-13 to be analyzed in this EIR.

According to CEQA, a reasonable range of alternatives must be evaluated. The alternatives identified in Chapter 5 of the Draft EIR represent a regional range of alternatives, agreed to by the City. Therefore, the alternative analysis is considered adequate under CEQA. No further action is required with regard to the Draft EIR.
Comments on Downtown Station Area Specific Plan Program EIR 2/01/07
Prepared by DCE

With the proposed addition of 8000 more residents in the ½ mile radius around our rail station, attention to detail is essential to insure people can move easily between their inner city destinations. This plan hinges on walking and riding a bike to get around. Pedestrian friendly must be mentioned over 100 times throughout the plan.

Regarding pedestrian and bicycle circulation this EIR claims there will be no adverse impacts to alternative transportation modes and I challenge this assumption and ask for mitigation measures to be included.

The plan notes, “Pedestrian connectivity is also lacking between the Courthouse Square and Railroad Sq. sub areas, with SR Plaza and Hwy 101 creating barriers between the two activity areas”. But the EIR makes no recommendations on how to alleviate the situation except to say that putting a street through the Mall with a magic wand will make it all go away. Since the owners of Santa Rosa Plaza have never been consulted as to a schedule or feasibility of this proposed street though their property, I think it is unrealistic to imagine this as the solution to the two immense barriers that disconnect our City. I would like to see the interim steps added as mitigation measures such as with 24-hour access through the mall for ped’s & bikes while we wait for this vital connection.

At a minimum, if this cannot happen then we are stuck with the very inferior connection of Third St. This is a street that goes through two cavernous under crossings, crosses an freeway on ramp and off ramp, has dangerous crossings both to and from the Mall and yet the EIR makes no mention of any enhancements to make this a more pleasant route for alternative modes of transportation. Where are the mitigations for these existing woeful conditions as they get significantly worse with the more cars this plan brings into our downtown.

To add to this poor connection currently the existing sidewalk on the south side under the freeway will be removed with the widening project. The consulting firm, which prepared this Plan, knew nothing about this and so the EIR makes no mention of this lost connection or to mitigate for it.

The EIR would have you believe the 6th to 7th street linkages and the Prince Memorial path take care of these connection issues but I disagree. Although these routes offer a good east-west connection they at the fringes of the study area, about a ½ mile from the downtown core and are not convenient for the person walking and trying to catch the early morning SMART train from their condo at the Comstock high rise.

There is no mention of the new 6th street crossing of a freeway off ramp and on ramp. How will people walking and biking safely cross and where are the mitigation measures? Third street again has these same problems, why are these crossings not considered or mitigated for these barriers?
The proposal for the new Roberts street does not address the fact that this is actually reducing connectivity. This new street for cars would have to be placed over the Joe Rodota Class 1 path and is planned with no bike lanes. This is definitely increasing barriers to alternative modes of transportation.

The plan also relies heavily on the SMART trail and contends funding has been secured from 7th street to Guerneville Rd. but recent developments with SMART’s over design requirements on the barrier fence have actually caused the loss of funding due to costly design and height requirements. The section of the trail from 7th to 3rd is very debatable at this point as the SMART development does not really like the idea of the trail and street continuing along the tracks and would like it to go around the west end of the development creating a roundabout route. The plan downgrades several bike paths as shown in our current Bike Master Plan 2001. Of particular concern is the premise that Wilson can be downgraded from a Class 2 stripped lanes to a class 3 shared lane facility. The plan makes the assumption that this would be OK because you would have the SMART trail but I disagree.

This Specific Plan states “the improvements will need to be phased to occur BEFORE need arises”, yet this companion EIR does not address this need. Our General Plan also has goals and policies regarding this issue.

Policy T-E-1 states to “complete the projected street and highway improvements in time to accommodate the traffic that will be generated by future development” Policy T-E-3 goes on further to state “evaluate the costs and benefits of delaying or diverting development in areas where traffic mitigation requires costly improvements that are beyond near-term funding capability, until the construction of the needed improvements can be assured”. These guidelines tell us there would be significant impacts if the development and densification occurs before the infrastructure to accommodate the 8,000 new downtown residents is in place. The EIR makes no attempt to address this scenario or mitigate if development precedes the necessary infrastructure improvements.

The EIR states “the Specific Plan would substantially improve pedestrian and bicycle circulation and connectivity within the Specific Plan Area. The future circulation network is also expected to accommodate the increased number of pedestrians and bicyclist trips. No adverse impacts to alternative transportation modes are projected to occur. Potential impacts to pedestrians and bicyclists attributable to the Specific Plan is therefore deemed to be less then significant.” Once again I disagree with all of the EIR’s assumptions. I ask the Planning Commission to not approve this EIR until these issues have been addressed.

Steve Frye
1114 Humboldt St.
Santa Rosa, CA. 95404
707-545-4285
Letter 51: Steve Frye, 1114 Humboldt St., Santa Rosa, CA 95404.  

51-1: This comment makes a general observation to the Specific Plan’s  
vision to develop a pedestrian and bicycle friendly environment  
within the City’s core. Since this is not a comment on the adequacy  
of the Draft EIR, no response is required.

51-2: This comment provides a statement of opinion regarding impacts to  
pedestrian and bicycle circulation. The comment is acknowledged,  
but since this comment does not address the adequacy of the Draft  
EIR, no additional action is required.

51-3: The Specific Plan includes establishment of a street connection of  
Fourth Street through Santa Rosa Plaza as a highly desirable long-  
term goal. The Plan and Draft EIR do acknowledge, however, that  
the mall is private property and that any public or private improve-  
ments will be subject to negotiation and coordination with the mall  
owners. Further, the Draft EIR considers the connection in the con-  
text of the conceptual Specific Plan, recognizing that the ultimate  
configuration and design of the connection will be subject to further  
review. While the Draft EIR does not identify interim measures  
such as 24-hour access through the mall, such a connection would be  
considered desirable and is not precluded from being implemented  
by the Draft EIR.

The lack of connectivity between Courthouse Square and Railroad  
Square is a pre-existing condition identified by the Plan and Draft  
EIR and while the City recognizes that the barrier effect created by  
the freeway and mall will continue to present challenges into the fu-  
ture, efforts to strengthen ties between these areas will continue  
through the Specific Plan and other projects such as the Northern  
Downtown Pedestrian Linkage improvements. The Draft EIR con-  
siders not only the potential for a Fourth Street connection, but also
a new connection via a freeway underpass at Sixth Street and strengthened pedestrian ties to east-west linkages at Sixth Street and the Prince Memorial Greenway path.

51-4: Third Street provides a pedestrian connection between Courthouse Square and Railroad Square, although, as the commenter notes, most people would not consider the route underneath the Santa Rosa Plaza Mall and along an arterial corridor to be “pleasant.” The Plan assumes this connection to remain in place and includes streetscape improvements to the corridor where possible. However, the configuration of the tunnel under the mall and freeway overpass limit the potential to create a vibrant pedestrian corridor. As noted in response to Comment 51-3, these are pre-existing conditions that the Plan attempts to improve upon by providing alternate route options. While implementation of the Plan would increase traffic levels on Third Street, traffic speeds are expected to decrease. Decreased traffic speeds typically create a more comfortable walking environment for pedestrians and decrease the potential for severe vehicle-pedestrian collisions, somewhat offsetting the effects of increased traffic volumes. The resulting conditions are not considered to represent a significant impact in the Draft EIR. No further action is required with regard to the Draft EIR.

Please see response to Comment 19-3 for an explanation of the loss of sidewalks on the south side of Third Street under Highway 101 overpass.

51-5: The commenter indicates that the east-west connections between Courthouse Square and Railroad Square would remain inadequate even upon buildout of the Specific Plan. This opinion is noted. The Specific Plan attempts to strengthen the ties between these two areas as much as possible given the barriers created by the mall and Highway 101.
Pedestrian crossings at signalized freeway ramp intersections at Third Street include accessible pedestrian ramps, crosswalks and pedestrian-actuated signals. The signalized intersections at the Sixth Street freeway ramp intersections, which will be reconfigured when the new Sixth Street underpass is completed, will also include these pedestrian crossing facilities. These are standard measures taken at signalized intersections to provide safe and convenient pedestrian crossings. No additional mitigation measures would be required.

51-6: The Roberts Street connection would not displace pedestrian-bicycle connections provided by the Joe Rodota Trail. At the narrowest point under the Highway 12 overpass, a 34-foot wide space exists to provide both the street and the existing 10-foot wide path, albeit with no on-street parking in the most constrained section. The City fully intends to retain the Joe Rodota trail connection and the Roberts Street connection will be designed accordingly.

51-7: This comment discusses design and circulation features pertaining to the SMART development. The comment is acknowledged, but since this comment does not address the adequacy of the Draft EIR, no additional action is required.

51-8: This comment disagrees to the Specific Plan’s proposal to downgrade bike paths as shown in the City’s Bike Master Plan. The comment is acknowledged, but since this comment does not address the adequacy of the Draft EIR, no additional action is required.

51-9: Comment refers to the Specific Plan. The quotation that the commenter refers to states in full, “The timeframe for build-out of the Specific Plan is 20 years, and improvements will need to be phased to occur before need arises.” The Specific Plan then goes on to state, “More information about phasing can be found in Chapter 8.”
The commenter goes on to ask why the EIR does not address mitigation if development precedes the necessary infrastructure (meaning roadway) improvements. The EIR does not require mitigation for these roadway improvements since the Specific Plan provides specific policies, Specific Plan Policy SP-T-1.1 and SP-T-1.2; funding strategies, Action 8 of the Implementation Financing Action Plan found in Chapters 8; and phasing strategies for the Specific Plan, also found in Chapter 8. This information is provided in the Specific Plan and Draft EIR and provides adequate analysis. No further action is required with regard to the Draft EIR.

51-10: Please see response to Comment 14-4.
March 29, 2007

VIA FACSIMILE (543-3269) AND EMAIL (aniewolf@srcity.org)

City of Santa Rosa Planning Commission
Scott Bartley, Chair
100 Santa Rosa Avenue, Rm. 3
P.O. Box 1678
Santa Rosa, CA 95402-1678

Re:  March 29, 2007 Planning Commission Meeting
Agenda Item 12: Public Hearing—Draft EIR—Downtown Santa Rosa
Station Area Specific Plan—File No. ST06-011
Our File No. 37839

Dear Mr. Bartley, Ms. Cisco and Members of the Planning Commission:

This office represents Joe and Maria Imwalle, who own properties that are located within the “Imwalle Gardens Sub-Area” described in the Downtown Station Area Specific Plan and the Downtown Station Area Specific Plan Program EIR.

With regard to the Draft EIR, the agricultural designation proposed for the Imwalles’ properties is inappropriate. It is clearly counter to the goals and policies contained in the existing City of Santa Rosa General Plan, and it is also counter to the goals, policies, and the will of the voters as expressed in their approval of the Santa Rosa Urban Growth Boundary, which was specifically intended to increase densities within the City limits, and to prevent urban sprawl. Changing the land use designations
on the Imwalles’ land will have the opposite effect. I am unaware of any General Plan designation for agricultural use anywhere else within the City’s urban growth boundary.

It is the Imwalles’ position that the Low and Medium Density Residential designations, which are the present land use designations for the property contained in the City’s General Plan, are the appropriate designations for the Imwalles’ parcels. Accordingly, the Imwalles request that the final EIR include alternatives that would maintain the existing land use designations for their properties.

Such alternatives are particularly appropriate for consideration because, as the DEIR states, there would not be any significant or unavoidable impact in retaining the current land use designation since the Imwalles’ property is a “small, agricultural operation completely surrounded by urban development,” “is not considered to be significant farm land with long-term viability,” and because the eventual development of the Imwalle parcels “would not be considered a significant impact since there are limited views of the property from most of the Specific Plan Area.” (see DEIR at pages 5-7, 5-17, and 5-19).

Please also note that there are two errors in the Draft EIR’s description of the Imwalles’ property that should be corrected. The errors are repeated at page 3-12 and again at page 4.8-28. Contrary to the statements on these pages, the Imwalles’ facility is not “organic”, nor has it ever been certified as organic, and the Imwalles have no plans to make their current business into a certified organic operation.

Very truly yours,

Jeremy L. Olsan

JLO:vak

cc: Mr. and Mrs. Imwalle

52-1: The commenter does not support the agricultural designation proposed for the Imwalle’s properties under the Specific Plan. The commenter outlines reasons why the properties should not be designated as agricultural. Since the comment addressed the Specific Plan and not the adequacy of the Draft EIR, no further action is required.

52-2: This comment argues for the present designation of the Imwalle’s properties to remain as Low- and Medium-Density Residential, as oppose to what the Specific Plan calls for. Additionally, this comment requests that this EIR include alternatives that would maintain the existing land use designations for their properties.

Contrary to the commenter’s assertion, the Draft EIR does include an alternative in where the existing land use designations for the Imwalle’s properties are maintained. This is the No Project Alternative found in Chapter 5 of the Draft EIR, including its corresponding analysis. No further action is required.

52-3: This comment does not question the adequacy of the Draft EIR, but rather repeats the conclusions found within the Draft EIR. No further action is required.

52-4: This comment corrects the Draft EIR description of the Imwalle’s facility as “organic” agricultural operations. The organic label shall be removed within the pages noted within the comment and is reflected in the revised language included in Chapter 3 of this Final EIR.
Hi Ken,

I met with Mike Martine and Paul Klauson (sp?) regarding bicycle treatments on Sixth/West Sixth Street. We discussed a bicycle boulevard with traffic calming bulb outs on Davis and Sixth and the tracks and West Sixth. It would include both street sign signage and street pavement signage that bicycles and cars must share the roadway. That seems to be a reasonable solution to the neighborhood including Chops. I believe that Tom Tollivar may have written a letter in support. TeeVax also thought that was a workable plan. However, I have never heard back from the Bicycle Coalition so I guess it is not okay with them.

So consider this my request to discuss this in the plan and I guess I have to ask a question for the DEIR.

1.) How can parking, traffic and bicycles as well as pedestrians be accommodated on Sixth Street from Highway 101 west to Pierson using bicycle boulevards that will maintain the current quality of life for the people and business that are currently located on those streets?

2.) If Class II bicycle lanes are established on West Sixth Street and residents lose their on street parking, how will that impact the surrounding streets and residents regarding noise, air pollution, traffic and parking?

3.) If West Sixth Street is already a bicycle friendly street, what are the environmental impacts or environmental advantages of using Class II lanes vs. a bicycle boulevard, or leaving the street as is?

4.) West Sixth Street is and will continue to be a major pedestrian oriented street that leads to the Railroad Square shops, Santa Rosa Plaza and 6th Street Playhouse which is actually located on West Sixth Street. If Class II bicycle lanes are added to the street and parking is removed, what will be the environmental impact on the pedestrian use of that street in general and for the patrons of the Sixth Street Playhouse and Chops? If more cars are funneled through the neighborhood due to the removal of street parking for these businesses, what will be the environmental impact on the neighborhood and pedestrians regarding noise, traffic, air quality and safety.

5.) Transit Oriented Development is required to give equal protection to pedestrians and encourages walking. The Station Area Plan considers a radius of a quarter mile/half mile, or the distance that someone will walk. Pedestrians use existing infrastructure and require no special equipment, like parking, bicycle racks or special lanes that impact existing conditions, other than perhaps a crosswalk. Because the pedestrian is not competing for the shared road use, how are the needs of pedestrians addressed to assure for their environmental protection? If Class II lanes are installed somewhere and there is a missing sidewalk on certain sections where pedestrians walk in the street now, where will pedestrians safely walk?

6.) If Class II lanes are put into the plan where there currently is not enough street width to accommodate them and parking and traffic and one house sells or remodels and the owner is required to set back how does that benefit the public good? Please look at Aston Avenue bicycle lanes. If bicycle lanes are to be implemented they should be meaningful and doable.

Carol Dean
West End Neighborhood
Letter 53: Carol Dean, guydean@sonic.net. March 30, 2007.

53-1: The comment provides a suggested configuration to accommodate bicyclists on Sixth and West Sixth Streets in the West End neighborhood. Responses to follow-up questions asked in the letter are provided below.

53-2: “Bicycle Boulevards” are designated on-street bike routes on which additional measures such as traffic calming have been implemented to accommodate safe and comfortable use of the street by bicyclists. The segment of Sixth Street and West Sixth Street between Highway 101 and Pierson Street is designated by the Specific Plan to include on-street bicycle lanes. Though a bicycle boulevard would be considered less desirable than dedicated on-street bicycle lanes, such a configuration would still be expected to accommodate all users and may be useful as an interim measure.

53-3: Implementation of Class II bicycle lanes on West Sixth Street would require either additional street width or elimination of parking on one side of the street. Given the presence of commercial and residential uses on the north side of the street, including historic residences with limited or no on-site parking, it is anticipated that parking on this side of the street would be maintained if and when the Class II bike lanes were installed. The majority of the south side of the street is currently vacant and anticipated to be re-developed. Though design plans for Class II bike lanes have not yet been developed, it is likely that additional width would be obtained either through prohibition of parking on the south side of the street or conditioning of re-developing properties on the south side of the street to provide additional space (or a combination of both). Another option, as proposed by the Northern Downtown Pedestrian Linkages Study, is that angled parking be constructed on the south side of West Sixth Street along the SMART and Salvador properties to help compensate for the loss of on-street parallel parking spaces that would be lost.
with implementation of Class II bicycle lanes. The Specific Plan recommends this suggestion under the Development Guidelines and Streetscape Standards, Chapter 5, on page 5-11.

Parking occupancy was surveyed on West Sixth Street between Pierson Street and Wilson Street on July 13 (Thursday) and July 22 (Saturday), 2006. A total of 44 parking spaces exist along this segment, with 22 on each side of the street. The peak observed parking usage was 20 spaces on Thursday at 1:30 p.m., and 19 spaces on Saturday at 7:45 p.m. Based on these observations, if 22 spaces were eliminated on the south side of the street to obtain sufficient space for bicycle lanes, the remaining parking supply would be adequate to meet current demand. Future development on the south side of the street would be required to provide its own parking supply. Given these conditions, it appears that a feasible means of providing bicycle lanes on West Sixth Street will exist in the future and within the horizon of the Specific Plan. No adverse impacts associated with parking, traffic, or safety would be expected to occur.

53-4: Class II on-street bicycle lanes are considered superior to bicycle boulevards in terms of providing a dedicated, convenient riding space for bicyclists. The Specific Plan proposes Class II lanes on West Sixth Street. If a bicycle boulevard concept were to be used instead, or as an interim measure, it is not expected that adverse safety conditions would result for any roadway users given the resulting combination of street configuration and traffic volumes. In fact, the Specific Plan specifically states on page 6-9 that “implementation of planned bicycle facilities may require consideration of alternative approaches due to right-of-way constraints, a need to accommodate all modes of transportation and an interest in maintaining a pedestrian scaled look and feel.” Similar language is expressed under the Development Guidelines and Streetscape Standards, Chapter 5, on page 5-20.
53-5: If Class II bicycle lanes are added to West Sixth Street, as shown in the Specific Plan, only negligible impacts to pedestrians would result. If it became necessary to remove parking on a portion of the street to create space for bicycle lanes, the “buffer” between vehicle travel lanes and sidewalks would be lost. This buffer space is considered to create a more comfortable walking environment for pedestrians, as they are protected by a physical barrier from moving vehicles. Although a space barrier (created by the bicycle lane width) would still exist. While the pedestrian environment would differ between the two configurations, neither would be considered to create potentially adverse impacts.

The removal of on-street parking would be expected to have only a very slight, if any, effect on vehicle traffic volumes. The traffic shifts that could occur would be related to drivers seeking parking, though the incremental traffic increases in any given location may increase or decrease depending on where the alternate parking is provided. No adverse impacts to pedestrians, drivers, or safety would be anticipated.

53-6: The Draft EIR assesses pedestrian needs by considering the existing and proposed streetscape environments, as well as connectivity. Regarding the question about pedestrians walking in the street and potentially conflicting with bicyclists in Class II lanes, it is unclear where this condition would arise as a result of the Plan. Implementation of the Specific Plan would result in the filling of any gaps in the sidewalk network and installation of Class II bicycle lanes would not occur until a sufficient street width and configuration were present for the corridor. No adverse safety conflicts between pedestrians and bicyclists are expected.

53-7: Class II bicycle lanes would only be striped once the entire corridor has sufficient space to provide them, in addition to vehicle travel and parking lanes. On streets where insufficient space currently exists
for bike lanes, and incremental assembly of additional right-of-way is the chosen method to implement them, individual properties would provide the additional space as they redevelop. The bicycle lanes would not be striped, however, until the entire block or corridor had sufficient width.
Ken MacNab,

Hello my name is Jessica Cenotti. I'm writing to request that you include at least 40% affordable housing for the downtown redevelopment plan. I am a student and I work 2 jobs to support myself and I think it would be great to have the opportunity to live downtown too. Thank you for your consideration.

Sincerely,
Jessica Cenotti

p.s. I also value the green standards when creating new structures. Go GREEN AMERICA!

54-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include at least 40 percent affordable housing and for new development to include Green Building design standards. No further action is required with regard to the Draft EIR.
COMMENT LETTER 55

Ken MacNab, City Planner  
Dept of Advance Planning & Public Policy  
March 27, 2007

I would like to voice my support of CAFÉ, Conservation Action Fund for Education. As a thirty year resident of Santa Rosa I have seen the city go through many transformations. You have it within your power to make future changes that benefit all of the city's residents.

In reference to the planning of the Smart Depot it would prove wise to initiate 'green' standards. With standards agreed upon we ensure that the city will always include the area's natural flora and fauna. Too much concrete presents a cold picture, where green allows for comfort and ease. Having suggestions as to green is not enough. Standards must be set by those with the power to do so.

In addition the area should become even more accessible to walkers and bicycles. To me, along with the greenery this presents a comfortable and appealing attraction to the area. I am sure the area's businesses would agree.

There should be affordable housing so that everyone can participate in the growth of Santa Rosa. Exclusion of any persons by means of race or economic position is not why I choose to call Santa Rosa my home. These lots are publicly-owned and should be used as such.

Santa Rosa is a beautiful city that is multi-racial and multi-economic. I wish it to stay that way. With proper leadership it will.

In closing let me say that I know that financial considerations are important. Do not let money be the bottom line. It is the citizens of Santa Rosa that make the city beautiful, not the bank accounts. Show us you care about all of us.

Respectfully,

Larry G. Marks  
659 Cherry Street  
Santa Rosa, Ca. 95404

CITY OF SANTA ROSA  
PO. BOX 1678  
Santa Rosa, CA 95402

APR 03 2007  
DEPARTMENT OF  
COMMUNITY DEVELOPMENT  
ENGINEERING DIVISION

55-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include Green Building design standards for all new development, along with the inclusion of sufficient affordable housing and a safe, accessible environment for pedestrians and bicycles. No further action is required with regard to the Draft EIR.
COMMENT LETTER 56

Julie A. Schaefer  
420 Klute Street  
Santa Rosa, CA 95401  
Julieschaefer@sbcglobal.net

March 27, 2007

Ken McNab, City Planner  
Department of Advanced Planning and Public Policy  
City of Santa Rosa  
100 Santa Rosa Avenue  
PO Box 1678  
Santa Rosa, CA 95402

Dear Mr. McNab,

I am writing to you about the downtown area and its future development. Future planning should be environmentally friendly and for the common good. It should be walkable, bikeable, and where housing is affordable with 40% affordable housing divided up as 20% moderate income and 20% low income.

Other points of consideration are:
- Station area should meet minimum level “green building” standards. Development must include water conservation, energy conservation measures, wastewater reduction, storm water runoff reduction, public green spaces, and healthy building materials.
- Require bicycle access that is public, safe, secure, and around all retail and office areas.
- All publicly owned lots should supply benefits to the community.

Thank you for your time and consideration on this matter. Please keep me informed of what will happen.

Sincerely Yours,

[Signature]

Julie A. Schaefer

56-1: This comment does not question the adequacy of the Draft EIR, but rather requests for the Specific Plan to include Green Building design standards for all new development, along with the inclusion of sufficient affordable housing (20 percent for moderate-income and 20 percent for low-income) and a safe, accessible environment for pedestrians and bicycles. Additionally, it requests for all publicly owned lots to supply benefits to the community. No further action is required with regard to the Draft EIR.
To: City Planning Dept.

I am a resident of Santa Rosa and have lived in downtown Santa Rosa. I enjoy the downtown area and I walk and ride my bike often. I support the Sonoma County Conservation Action and truly hope that what is proposed is a fair percentage of affordable housing (30% moderate-income and 60% low- and very low-income) is considered. I also would like to be notified on upcoming project and meetings. I would like to be included in all matters thereof.

CITY OF SANTA ROSA
P.O. BOX 1678
SANTA ROSA, CA 95402

APR 03 2007

DEPARTMENT OF COMMUNITY DEVELOPMENT
ENGINEERING DIVISION

Thanks

[Signature]

57-1: This comment does not question the adequacy of the Draft EIR, but rather supports the efforts of the Sonoma County Conservation Action, in particular the request for the Specific Plan to include a fair percentage of affordable housing (20 percent for moderate-income and 20 percent for low- and very low-income households). No further action is required with regard to the Draft EIR.
Dear Ken MacNab,

In the future I would like to see that the station area plan includes a minimum of 40% affordable housing; 20% of that moderate income and the other 20% low and very low income housing. I would also like a requirement that all development in the station area meet a minimum level of green building standards. Including water conservation measures, energy conservation measures, wastewater reduction, storm water run-off reduction, public green space and healthy building materials. As a cyclist it would like safer bike paths and bike parking, as a student I would like more affordable housing. These matters directly affect local people. Positive actions from the City of Santa Rosa will increase respect in the local community and help many people. Please take these words seriously.

Thank You for your consideration,

58-1: This comment does not question the adequacy of the Draft EIR, but rather request for the Specific Plan to include a minimum of affordable housing (20 percent for moderate-income and 20 percent for low- and very low-income households), for all new development meet a minimum level of Green Building design standards and for a safe, accessible environment for bicyclists and their parking needs. No further action is required with regard to the Draft EIR.
Original Message:
From: Mike Bunice [mailto:meunice@sonic.net]
Sent: Thursday, March 29, 2007 10:38 AM
To: Faviia, Fabian; Christine Culver/SCBC
Subject: Proposed Amendments to the Downtown Station Specific Area Plan

Hi, Fabian,
Here are my Proposed Amendments to the Downtown Station Specific Area Plan.
By the way, Janice noticed that you attended the California Bicycle Coalition meeting. Will you make a report to the Bike/Ped Advisory Board?
Michael Bunice

Proposed Amendments to the Downtown Station Specific Area Plan

The following amendments will help promote the General Plan Goals:

- Goal T-J: Provide attractive and safe streets for pedestrians and bicyclists.
- Goal T-L: Develop a citywide system of designated bikeways that serves both experienced and casual bicyclists, and which maximizes bicycle use for commuting, recreation, and local transportation project policy.
- SP-LU-1.2: Improve pedestrian, bicycle and bus transit connections from surrounding areas to the Downtown SMART station.

All bicycle and pedestrian facilities will be completed before the SMART station is completed.

The number of pedestrians and bicyclists will double in five years in the area. Pedestrians and cyclists will be counted in the forthcoming Bicycle and Pedestrian Plan update and recounted again in the update five years from the adoption of this plan.

The city will provide bike racks to commercial establishments and funded by the BAAQMD at the request of the property owner or business owner.

The city will provide one Class I bike locker, funded by the BAAQMD, for every ten residences built without an enclosed garage.

One Class I bike locker will be provided by the city funded by the BAAQMD for every ten motor vehicle parking places in commercial or industrial developments.

Amend Figure 5-6: Urban Center Conceptual Street Section to include bike lanes.

Amend Figure 5-10: Shop Front Street Conceptual Street Section to include bike lanes.

Amend Figure 5-15: Boulevard Street with Median Conceptual Street Section to include bike lanes on both sides of the street.

On page 5-20, delete this paragraph:
Bicycle Provisions: Consider use of shared right-of-way lanes ("sharrows") or "bicycle boulevards" in place of Class II bicycle lanes to accommodate bicycle travel where right-of-way constraints exist.
Amend to read: Street improvements should include Class II bicycle lanes along designated corridors in the Bicycle and Pedestrian Master Plan.
Note: Sharrow are intended to move cyclists to the left of parked cars and to move the vehicles in the travel lane to the left in a travel lane wide enough to accommodate both bicycles and vehicles, that is, 15 feet. Bike boulevards are intended to reduce the number of vehicles on the road and usually require diversions of traffic.

Amend Figure 5-27: Neighborhood Street Conceptual Street Section to include bike lanes.

Amend Figure 5-28: Key Corridors to extend the Prince Greenway to Santa Rosa Ave.

Delete the first sentence of the second paragraph on p. 611. "The planned Class II bicycle lanes on Wilson Street are changed to a Class III bike route."

Delete the third paragraph on p. 611 "The planned Class II bicycle lanes on Ninth Street (east of Wilson Street), A Street (north of Seventh Street), and Davis Street (between Seventh Street and Ninth Street) are changed to Class III bicycle routes. The Specific Plan envisions that the Seventh Street / A Street / Sixth Street corridor will replace the Seventh Street / A Street / Ninth Street corridor as the primary connecting route between the east and west sides of Highway 101 in the northern downtown area."

Amend Appendix B: Historic Residential and Residential Sub Area Chart to show Class II bike lanes on all streets.

Amend Appendix B: Imwalle Gardens Sub-Area Chart to show Class II bike lanes on all streets.

Amend Appendix B: Railroad Corridor Sub-Area to show bike lanes on all streets.

Amend Appendix B: Railroad Square Sub-Area to show bike lanes on all streets except 4th.

59-1: This comment does not question the adequacy of the Draft EIR, but rather proposes revisions to the Specific Plan’s figures and language, along with proposing new language for inclusion. However, the issue of bicycle and pedestrian facilities have been raised as part of the Specific Plan discussion and will be addressed by the City before the Specific Plan is considered for adoption. No further action is required with regard to the Draft EIR.
MacNab, Ken

From: Nick Caston [ncaston@sonic.net]
Sent: Friday, April 06, 2007 12:21 PM
To: MacNab, Ken
Subject: Follow-up On DEIR

Ken -

In follow-up to my DEIR comments, I wanted to give you the intersections that need to be discussed and analyzed by the DEIR for the document to be complete.

Sonoma Avenue and Santa Rosa Avenue
Sonoma Avenue and E Street
Third Street and Stony Point Road
Fourth Street and Mendocino Avenue
Santa Rosa Avenue and Bennett Valley Road
College Avenue and Humboldt Street
College Avenue and Brookwood Drive

I have gone to each of these intersection during the DEIR comment period and witnessed dangerous conditions for vehicular drivers, pedestrians, and bicyclists. The DEIR needs to discuss and analysis the impact this plan will have on all forms of transportation at these intersections and discuss mitigation for the impacts.

Thanks Ken,

Nick
Letter 60: Nick Caston, ncaston@sonic.net. April 6, 2007.

60-1: Please see response to Comments 17-36 and 17-37.
March 29, 2007

CITY OF SANTA ROSA PLANNING COMMISSION
REGULAR MEETING MINUTES
THURSDAY, MARCH 29, 2007

4:00 PM REGULAR MEETING SESSION (CITY COUNCIL CHAMBER)

1. CALL TO ORDER
Chairman Bartley called the meeting to order at 4:00 p.m.

2. ROLL CALL
Commissioners present: Commissioners Arendt, Caston, Cisco, Duggan, Poulsen, Walsh, and Chairman Bartley.

Commissioners absent: None.

Staff Present: Marie Meredith, Deputy Director Community Development – Planning; Anette Niewald, Administrative Secretary.

3. APPROVAL OF MINUTES
The minutes of March 8, 2007 were approved with clarification as to why the Tentative Map Resolution for Item 11 was being continued.

4. PUBLIC APPEARANCES - none

5. DEPARTMENT REPORT
Marie Meredith – Marie recommends that both General Plan Amendments be held together on the Agenda. She also mentioned the email that everyone should have received regarding a workshop and asks that the Commissioner’s RSVP directly according to the memo and if four or more want to go, to please let her know and special arrangements will be made.

6. PLANNING COMMISSIONERS’ REPORT
Commissioner Poulsen attended the Creek Committee that morning and stated there were two items that came up that would likely be brought forward. Also, the new
Creek Document was approved and adopted by the City. He also reported on the recent San Diego Conference. He felt that a lot was learned and was grateful that the City provides this training.

Commissioner Walsh attended the Helicopter Committee/Neighborhood Meeting at Memorial Hospital and shared about the briefing received from Memorial Hospital regarding their plans for new building and remodeling of the current ones.

Commissioner Caston attended the Transportation Coalition’s Summit last Saturday in Oakland on its regional plan to combat global warming.

Chairman Bartley also stated his appreciation to the City for allowing them to attend the conference in San Diego.

7. 4:06:49 PM STATEMENTS OF ABSTENTION BY COMMISSION MEMBERS

Commissioner Arendt will abstain from Item #11 because of business relationships.

Commissioner Poulsen will abstain from Item #12 because he owns property in the area.

Chairman Bartley stated that the agenda would be reordered, hearing Item 11 before Item 10 in order to hear the General Plan Amendments together.

8. 4:08:40 PM CONSENT AGENDA

9. 4:08:45 PM PUBLIC HEARING – GENERAL PLAN AMENDMENT AND REZONING FOR REDWOOD PARK APARTMENTS – 2001 PINER ROAD – To change the General Plan Land use Designation from Mobile Homes to Low Density Residential and Rezone from the Planned Development district to Single Family Residential District – File Number GPAM06-008, MJP06-049.

City Planner, Robie Evangelista gave the Staff Report.

4:11:51 PM Commissioners question the Planner.

4:13:26 PM Applicant – Steve Sharp, representing Redwood Park Apartments and standing in for Jim Hummer addressed the Commission and answered questions regarding density.

4:14:21 PM Commissioners discussion ensues.

Commissioner Cisco discusses concerns regarding changing to low density and feels that a change to medium density would be more appropriate.

Commissioner Poulsen discusses concerns with parking.

Commissioner Caston also reiterates the concerns that Commissioner Cisco voiced.

Commissioner Walsh asks if the proposal can be changed.

Marie Meredith responds to Commissioner Walsh’s question.

4:20:10 PM Commissioners discussion continues.

The motion carried with the following vote:

Ayes: (6) (Bartley, Walsh, Duggan, Arendt, Caston, Poulsen)
Noes: (1) (Cisco)
Abstentions: (0)
Absent: (0)

Commissioner Arendt made a motion and Commissioner Poulsen seconded to approve Resolution 11087: RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ROSA RECOMMENDING APPROVAL TO THE CITY COUNCIL OF A GENERAL PLAN AMENDMENT FROM MOBILE HOMES TO LOW DENSITY RESIDENTIAL FOR THE PROPERTY AT 2001 PINER ROAD – FILE NUMBER GPAM06-008.

The motion carried with the following vote:

Ayes: (5) (Bartley, Walsh, Duggan, Arendt, Poulsen)
Noes: (2) (Cisco, Caston)
Abstentions: (0)
Absent: (0)

Commissioner Arendt made a motion and Commissioner Poulsen seconded to approve Resolution 11088: RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ROSA RECOMMENDING TO CITY COUNCIL REZONING OF PROPERTY LOCATED AT 2001 PINER ROAD TO THE R-1-6, SINGLE FAMILY RESIDENTIAL DISTRICT – FILE NUMBER REZ06-026.

The motion carried with the following vote:

Ayes: (5) (Bartley, Walsh, Duggan, Arendt, Poulsen)
Noes: (2) (Cisco, Caston)
Abstentions: (0)
Absent: (0)

10. 4:33:21 PM PUBLIC HEARING – MORGAN STREET TOWNHOMES – 1265 MORGAN STREET – 10 lot subdivision preserving 2 homes and creating 8 new lots to build single family attached housing – File Number MJP06-012.

4:33:40 PM Ex Parte Disclosers made:

Commissioner Duggan visited the site.
Commissioner Arendt visited the site.
Commissioner Cisco visited the site and met briefly with the applicant.
Commissioner Poulsen visited the site.
Commissioner Arendt visited the site.
Commissioner Caston visited the site and met with the applicant.
Chairman Bartley visited the site and met with the applicant’s representative.

4:34:16 PM City Planner Lori MacNab gave the Staff Report.

4:44:29 PM Commissioners question the Planner.
4:48:09 PM Jean Kapolchok, 843, Second Street, representing the applicant Ryan Neuman, gave a presentation and addressed concerns of the neighbors regarding density, parking, and trees.

4:56:10 PM Paul Gilger from Hedgpeth Architects gave a presentation and addressed design issues.

5:00:11 PM Public Hearing

5:00:47 PM Cherlyn Acasio, 1267 Morgan Street, opposes the project and disputes that there was a Neighborhood Meeting.

5:03:58 PM Neil Blazey, 1252 Morgan Street opposes the project.

5:07:30 PM Heidi Blazey 1252 Morgan Street opposes the project.

5:09:51 PM Lucas MacMath, 1292 Glenn Street opposes the project.

5:10:19 PM Layne Bowen, 230 Ridgway Avenue opposes the project.

5:11:44 PM Deborah Applegate, 315 Benton Street, Chair of the Neighborhood Association opposes the project.

5:14:26 PM Teresa McGinnis, 1259 Morgan Street opposes the project.

5:16:36 PM Lois Hopkins, 340 Ridgway Avenue opposes the project.

5:18:18 PM Leonard DeVilbiss, 1259 Morgan Street opposes the project.

5:21:08 PM David Jessen, 340 Ridgway Avenue opposes the project.

5:24:13 PM Trina de la Chapelle, 306 Carrillo Street opposes the project.

5:28:06 PM Kathryn Parry, 419 Benton Street opposes the project.

5:30:32 PM Kay Tokerud, 716 Howard Street, President of the Junior College Neighborhood Association opposes the project.

5:32:23 PM Jill Bottomly, 316 Benton Street opposes the project.

5:34:16 PM Forrest Johnson, 243 Ridgway Avenue opposes the project.

5:34:49 PM Mark Parry, 419 Benton Street, spoke that the property developer had retained him to do a different design but that traffic issues had stopped that. He stated there are other alternatives.

5:35:45 PM Public Hearing Closed

5:35:54 PM Applicant representative, Jean Kopolchuk responds to the Public Hearing.

5:39:10 PM Commissioners discussion ensues.

Commissioner Duggan approves of a couple of elements of the project but has concerns with density, trees, and traffic, etc.

Commissioner Walsh has concerns with the higher density.

Commissioner Arendt agrees with concerns discussed and does not support the project.

Commissioner Caston addresses the CEQA exemption; doesn’t have a problem with the density, but concurs with comments already made and would like to see the project go before Design Review and the Cultural Heritage Board.
Commissioner Poulsen has concerns with H-C-6 in the General Plan and doesn't believe the project is compatible with the neighborhood and should go back to Design Review.

Commissioner Cisco feels there needs to be more comments from Design Review Board and addresses concerns about streetscape.

Chairman Bartley concurs with the other commissioner's comments.

The Commissioners discuss the option to deny or to continue to redesign.

5:56:14 PM Marie Meredith responds to commissioner's discussion and comments that they need to be specific to issues of concern if sending back to redesign.

5:57:37 PM Commissioner Walsh questions City Attorney about upping the 10-year affordability of the low income rental units.

5:57:56 PM City Attorney, Vince Ewing states he would have to research and respond at a later date.

5:58:57 PM Applicant Jean Kopolchuk responds to the infill policy concerns.

Commissioner Walsh made a motion and Commissioner Poulsen seconded to continue to date uncertain for re-design to the Design Review Board (maintaining streetscape planter/sidewalk) before being returned to the Planning Commission.

The motion carried with the following vote:

Ayes: (7) (Bartley, Cisco, Poulsen, Arendt, Walsh, Duggan, Caston)

Noes: (0)

Abstentions: (0)

Absent: (0)

6:02:46 PM 5-Minute Recess


4:24:56 PM Gillian Hayes gave the Staff Report

4:27:06 PM Commissioners question the Planner

4:29:38 PM Steve Sharp, representing applicant James Derryberry, addressed the Commissioners.

4:30:05 PM Public Hearing – none

4:30:11 PM Commissioners discussion ensues.

Commissioner Poulsen made a motion and Commissioner Cisco seconded to approve Resolution 11089: A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ROSA RECOMMENDING TO CITY COUNCIL APPROVAL OF A NEGATIVE DECLARATION FOR A GENERAL PLAN AMENDMENT FROM IL (LIGHT INDUSTRIAL) TO BP (BUSINESS PARK) OF PROPERTY LOCATED AT 2877 GIFFEN AVENUE – FILE NUMBER MJP06-045.

The motion carried with the following vote:

Ayes: (6) (Bartley, Cisco, Walsh, Duggan, Poulsen, Caston)
Noes:                          (0)  
Abstentions:                (1)       (Arendt)  
Absent:                       (0)  

Commissioner Poulsen made a motion and Commissioner Cisco seconded to approve **Resolution 11090**: RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ROSA RECOMMENDING APPROVAL TO THE CITY COUNCIL OF A GENERAL PLAN AMENDMENT FROM IL (LIGHT INDUSTRY) TO BP (BUSINESS PARK) FOR THE PROPERTY AT 2877 GIFFEN AVENUE – FILE NUMBER MJP06-045.

The motion carried with the following vote:

Ayes:                          (6)       (Bartley, Cisco, Walsh, Duggan, Poulsen, Caston)  
Noes:                          (0)  
Abstentions:                (1)       (Arendt)  
Absent:                       (0)  

Commissioner Poulsen made a motion and Commissioner Cisco seconded to approve **Resolution 11091**: RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ROSA RECOMMENDING TO CITY COUNCIL REZONING OF PROPERTY LOCATED AT 2877 GIFFEN AVENUE TO THE BP (BUSINESS PARK) DISTRICT – FILE NUMBER MJP06-045.

The motion carried with the following vote:

Ayes:                          (6)       (Bartley, Cisco, Walsh, Duggan, Poulsen, Caston)  
Noes:                          (0)  
Abstentions:                (1)       (Arendt)  
Absent:                       (0)  

12. **PUBLIC HEARING – DRAFT EIR – DOWNTOWN SANTA ROSA STATION AREA – Specific Plan – File Number ST06-011.**

**6:10:44 PM** City Planner Ken MacNab gave the Staff Report

**6:10:51 PM** Public Hearing

**6:27:15 PM** Julia Prange, Coordinator for the Accountable Development Coalition (ADC) supports the project. However, in regards to the DEIR, ADC asks that the following issues be addressed: consistency with the General Plan addressing air quality impacts, affects of affordable housing, recognition of present toxics in the area and implications of traffic impacts.

**6:29:47 PM** Steve Frye, a member of the Bike and Pedestrian Board and speaking as a private citizen, 1114 Humboldt, Santa Rosa, addresses issues of transportation impacts. The plan needs to be hinged on walking and riding a bike in order to get around. He asks for mitigation measures to be included regarding bike and pedestrian circulation. The plan also lacks connectivity between Railroad Square and Courthouse Square sub areas with Santa Rosa Plaza and Hwy 101 creating barriers between the two activity areas and lacks recommendations on how to alleviate the situations. He would like to see interim steps added to the mitigation measures such as 24-hr access through the mall. The alternative – the under crossing on Third street is unsafe. The EIR mentions that the Sixth and Seventh Street and the Prince Memorial Path connections take care of this problem but he disagrees as they are at the fringes of
Ann Hudgins, speaking on behalf of the ADC, addresses issues of air quality, greenhouse gas emissions, and affordable housing. It should also include mixed income and mixed use development.

Christine Culver, Executive Director Sonoma County Bicycle Coalition, the draft DEIR does not address bicycle and pedestrian circulation and connectivity within the specific plan area. There are no bicycle facilities just more car access. The plan eliminates Plan Class 2 bike lanes in several areas – Wilson St., 9th Street, A Street, Davis Street and 7th Street; how will this be mitigated? It fails to address the safety issues of cars and bicycles sharing a lane. It doesn’t implement policy of slower speeds and significant engineering of the downtown streets. Increased traffic will impact bicycle and pedestrian circulation in downtown and over-emphasizes vehicular circulation at the expense of bicycles and pedestrians and includes many mistakes regarding the current existing bicycle facilities. It has incomplete language regarding the 6th and 7th Street linkage project. The addition of the Roberts Ave. is in the same location of a Class 1 that was just installed at the Joe Rodota Trail. She doesn’t believe that this plan, as designed, will improve bicycle access and is concerned at the loss of Plan Class 2 bicycle will not improve bicycle and pedestrian circulation.

Dennis Rosatti, Co-Director of Sonoma County Conservation Action has concerns with air quality. Rail function at the site is excluded from the discussion of air quality impacts caused by other infrastructure improvements associated with the SMART Station site development. While the rail function may reduce traffic generation in the immediate vicinity it will increase traffic flow from out side the study area. This will have further implications for air quality that should be addressed by the DEIR. Toxics in the environment need to be addressed, preferential pathways for the removal of contaminated water within and beyond the specific boundaries. The DEIR should address the potential entry of contaminated water into the storm water management system, impacts of runoff, i.e. the Santa Rosa Creek. He would like to see requirements for green building be inserted into the plan and those requirements could be a method for helping mitigate some of these impacts.

Ann Seeley, echoes the comments by Julia Prange of the positive components of the plan. Her concerns are over affordable low-income housing.

Jack Macy, 5497 Newanga Ave., representing the Santa Rosa Chamber of Commerce, commented on the parking analysis with regards to performing arts center; 1) Courthouse Square area with the north section being over parked and the south section being under parked, 2) the land use or the parking use needs to be brought into conformance; 3) Smart Station which does not propose parking in the 4th street downtown Santa Rosa Station site, however it doesn’t prevent people from parking there then getting on the train and using parking that would be designated for other uses. 5) Railroad Square area requirements are changing from 250 sq. ft. of office space to 1 parking space for 500 sq. ft.

Kay Tokerud, 716 Howard St. stated that the plan has strict guidelines of properties and feels that properties could be denied and wouldn’t be able to be developed in regards to the Redevelopment areas. She also finds inconsistencies in the DEIR such as parking and numbers of stories. The best plan is the reduced growth alternative which would have fewer units being built and preserving a lot of light industrial areas that could lose about 1500 jobs. The plan has unacceptable levels of air pollution and traffic issues.

Joel Woodhull, states that there are conflicting impacts that occur when mitigating one impact and making another worse, specifically traffic congestion and added vehicle capacity. Global warming which is not addressed normally in EIR’s
feels that greenhouse gas reductions should be addressed. What might work is stating that this DEIR doesn't explicitly address greenhouse gases then acknowledge that capacity increasing mitigations might later be dropped in favor of reducing vehicle miles traveled.

6:52:42 PM Willard Richards, Stated he is greatly pleased the city is undertaking a plan like this. He wants to know how these plans mesh with the other city plans, such as zoning code? What are the unintended consequences? What does CEQA require? He also has concerns over affordable housing and bicycle lanes, walkability, etc.

6:55:26 PM David Grabill, Accountable Development Coalition and the Housing Advocacy Group, emphasized that this DEIR needs to be done right, the implications are big. The plan needs to address affordable housing i.e., how will this plan out in the next 20-30 years? It provides 2,000 jobs but where are they going to be able to live? This kind of impact needs more analysis. The city needs to be more integrated, lower income folks living with medium to high income folks.

6:59:01 PM Steve Birdlebough, Friends of SMART, thanks the City for undertaking this project. He references from a study of Metropolitan Transit Commission on the characteristics of rail and ferry station residents in the bay area and their conclusions which state that people who live close to transit make as many trips per day as those who live in the rest of the region, but these residents have a much higher tendency to use transit to walk and to bike. This finding is not reflected in this DEIR. It makes assumptions about the need for parking which are not reflected. The other is that nearly 1/3 of households living within ½ mile of a rail or ferry transit are zero vehicle households - three times the regional average. This plays into how much parking we really need once we achieve the kinds of densities that a transient oriented development can bring us. Income levels of people living close to transit also needs to be looked at since a lot of those people are low to moderate income people.

7:01:43 PM Caroline Banuelos, representing herself expresses her concern about the consistency with the general plan. The relationship between the policy requirements of this specific plan and the existing redevelopment plans are unclear. And the relationship between the findings and mitigations of the DEIR and the EIR for the redevelopment plans are also unclear. She feels the document is incomplete and states that we need to take the time required to do it right.

7:04:05 PM Daisy Pistey-Lyhne – Sonoma Marin Field Representative for Greenbelt Alliance and also speaking as part of the Accountable Development Coalition, states that once this document is completed it will be the guiding documents for large scale development for the next 20-30 years so we need to ensure that this plan/DEIR is as good as possible. The DEIR needs to extend beyond the General Plan. She would like the final DIER to include these improvements and also analyze any impacts that the overlapping redevelopment plans could have on the project area. The DEIR's assessment of level of service is based on auto level of service and this is inadequate. She would like to see Santa Rosa adopt as in other jurisdictions, a multi-modal approach to level of service looking at how development and infrastructure improvements will impact bicycle, pedestrian, transit and automobiles.

7:07:27 PM Scott Stegeman, 1430 High School Road, mentions three things that are underpinnings of the DEIR and the Specific Plan. The DEIR examines everything except the SMART site; he states that it should include rail service or exclude it. Different portions of the DEIR include it and others do not, i.e., the traffic portion excludes any mention of rail on that site. The SMART EIR does not include these issues and is out of date. The issue of housing is also of concern as it makes no mention of affordable low income housing.

7:11:03 PM Public hearing closed.
7:11:30 PM Commissioners discussion ensues.

7:11:48 PM Commissioner Walsh – Affordable housing needs to be addressed within the specific plan i.e., what are the alternatives?

7:13:00 PM Commissioner Cisco – mitigation measures on air quality were mentioned for Hwy 101 but not on Hwy 12; Would like to have the EIR address toxic remittance; She mentions that there is discussion on population exceeding the estimates of the 2020 general plan but it’s not clear on how it’s consistent with land use changes; she feels there needs to be more discussion on the four redevelopment projects, where those are, where they meet, etc.; There needs to be coordination with other plans, some of which are not developed yet, i.e., bike and pedestrian master plan and strategic plan. How will these be handled over time when they won’t be adopted till after this plan?

7:15:28 PM Commissioner Duggan – She stated there are inconsistencies on DEIR regarding bike and pedestrian plan, how they will be updated; The DEIR mentions that the Railroad Square District is a historic district but there is no mention of how all the new housing in that area will interact with that. Regarding transportation element, there is no mention of the reunification of courthouse square. The DEIR is funded by an MTC grant and yet does not incorporate MTC’s routine accommodations policy, which means bicycles, pedestrians and cars are accommodated in the same way; she also mentions using multi-modal level of service calculations. It mentions there are extra lanes for cars, how are pedestrians impacted?

7:17:10 PM Commissioner Caston – has concerns about global warming and states there needs to be more discussion about greenhouse gases and how this plan will reduce greenhouse gas emissions; he also states there needs more discussion on adverse impacts of global warming will be causing to the environment, i.e., higher storm intensities, water availability and quality and other impacts to the national environment. He would also like to see more discussion about affordable housing in relation to the rate of available jobs in the Station Area Plan as well as traffic impacts going along with the multi-modal framework that has been presented. There should also be a review of any past DEIR and build on any inadequacies for the SMART train. He states there needs to be discussion on different parking management models as a possible mitigation to possible greenhouse gas emissions most specifically market base parking model referencing Donald Shoup, UCLA.

7:19:47 PM Commissioner Arendt – quotes page 2-20 about population of housing and no mitigation measures being required but page 3-10 reads as a contradiction.

7:20:22 PM Chairman Bartley – stated that mitigation measures seem a little too general, i.e., page 2-9: air quality, what does “exceed” mean? It also mentioned low emitting fireplaces for residential uses that burn only natural gas, but he states this is already a requirement of the city so it can’t be mitigation. Regarding reunification of Courthouse Square, do the roads go around or through the square? He mentions that this needs to be left vague so it will not impede the Courthouse Square design competition.

7:22:54 PM Commissioner Caston – mentions another concern is that intersections only within the plan are being considered and not those outside the plan.

7:23:13 PM ADJOURNMENT

Chairman Bartley adjourned the meeting at 7:23 p.m. to the regular Planning
Commission Meeting to be held at 4:00 p.m. in the City Council Chamber at Santa Rosa City Hall on Thursday April 12, 2007.

61-1: This comment does not pertain to the Draft EIR, nor the Specific Plan. No response is required.

61-2: Comment by Julia Prange, Coordinator for the Accountable Development Coalition. This comment asks for the following issues be addressed: consistency with the General Plan addressing air quality impacts, affects of affordable housing, recognition of present toxics in the area and implications of traffic impacts.

These issues were raised by the commenter in Comment Letter 17. For detailed responses regarding these issues, please see responses to Comment Letter 17. No further action is required with regard to the Draft EIR.

61-3: Comment by Steve Frye. The comments are similar to those received in written form from the speaker, as responded to in Comments 51-3 through 51-5. This comment does not raise any new issues, not already identified in comments 51-3 through 51-

61-4: Comment by Ann Hudgins, speaking on behalf of the ADC. This comment is noted, however it is unclear as to what question is being asked of either the Specific Plan or Draft EIR. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

61-5: Comment by Christine Culver, Executive Director of the Sonoma County Bicycle Coalition. The comments are similar to those received in written form from the speaker on behalf of the Sonoma County Bicycle Coalition, as responded to in Comments 14-1 through 14-23. This comment does not raise any new issues, not already identified in comments 14-1 through 14-23.
61-6: Comment by Dennis Rosatti, Co-Director of Sonoma County Conservation Action. Please see the response to Comments 17-10, 17-18 and 17-19.

61-7: Comment by Dennis Rosatti, Co-Director of Sonoma County Conservation Action. The comment indicates that toxics in the environment need to be addressed with regards to preferential pathways for the removal of contaminated water within and beyond the specific boundaries. The Draft EIR should address the potential entry of contaminated water into the storm water management system, impacts of runoff, i.e. the Santa Rosa Creek. Mitigation Measure HAZ-2b has been revised based on RWQCB comments to include the requirement that re-development sites prepare a Soil and Groundwater Management Plan to control potentially contaminated soil and groundwater movement. The Soil and Groundwater Management Plan will address the concerns raised in the comment. The Plan will be reviewed by the Santa Rosa Fire Department and/or RWQCB.

61-8: Comment by Ann Seeley. This comment does not question the adequacy of the Draft EIR, but rather raises concerns over affordable low-income housing. No further action is required with regard to the Draft EIR.

61-9: Comment by Jack Macy. The comment concerns potential problems associated with the northern Courthouse Square area being over-parked, with the southern area under-parked. This refers to the Specific Plan parking analysis findings, which indicate that a potential surplus of parking in the northern half of downtown would offset peak-period shortages in the southern half of downtown. The Draft EIR considers whether this condition would represent a potentially-significant impact. It was determined through evaluation of potential development sites, parking surplus locations and the walking routes between the two that a significant impact would not occur.
since available parking is expected to exist within a 1,200 foot walking distance of all commercial uses (which is considered to be a comfortable distance).

Regarding the potential for SMART commuter traffic to consume parking spaces in Railroad Square, the SMART operational plan indicates that a commuter rail station would be built at the Jennings Avenue station, approximately one mile to the north of the downtown station. The Jennings Avenue station will include a parking garage and facilities for commuters arriving by automobile. The downtown station would include no parking. Parking meters currently exist in the Railroad Square area, and every indication exists that paid parking would continue on both public streets and in private facilities. Drivers wishing to park all day in order to commute on SMART would experience both inconvenience and costs at the downtown station, whereas a facility designed to accommodate them would be located only a mile away and require minimal diversion. Though there is a possibility that commuters may attempt to park near the downtown station, it appears as though such activity would be very limited due to these conditions.

61-10: **Comment by Kay Tokerud.** The commenter raises the same issues that as she did in Comment Letter 11. For detailed responses to these issues, please see responses to Comment Letter 11.

The commenter also states that there are inconsistencies in the Draft EIR, such as parking and number of stories. This comment is viewed as an opinion, where the comment is vague in nature in that there is no supporting information that specifies what portion of the Draft EIR text that the comment applies to. Since this comment does not specifically address the adequacy of the Draft EIR, no further action is required with regard to the Draft EIR.
61-11: **Comment by Kay Tokerud.** The speaker expressed the opinion that the Specific Plan would result in unacceptable levels of traffic and air pollution. The Draft EIR analyzes traffic and identifies potential impacts and mitigation measures. The Draft EIR also acknowledges significant air quality emissions from the Plan Area, when compared to BAAQMD thresholds for projects. This is a common finding for downtown plans that intensify uses. Mitigation Measure AQ-2 would implement reasonable and feasible mitigation to further reduce these emissions. No further action is required with regard to the Draft EIR.

61-12: **Comment by Joel Woodhull.** Please see the response to Comments 11-31, 17-19, 20-1 and 50-12. The issues raised in this comment have been addressed in the responses listed.

61-13: **Comment by Willard Richards.** This comment does not question the adequacy of the Draft EIR, rather it questions the process of adoption of the Specific Plan and its content. No further action is required with regard to the Draft EIR.

61-14: **Comment by David Grableb from the Accountable Development Coalition and the Housing Advocacy Group.** This comment does not question the adequacy of the Draft EIR, rather it addresses affordable housing issues pertaining to the Specific Plan and adds the opinion that Santa Rosa should be more socially integrated. The comment is noted and no further action is required with regard to the Draft EIR.

61-15: **Comment by Steve Birdlebough.** It is recognized that research, including that conducted in the Bay Area, indicates that the presence of rail service reduces automobile-based trips made by residents and employees within one-half mile of the rail station. Implementation of SMART service is dependent upon future passage of a sales tax measure in Sonoma and Marin Counties and it is impossible to pre-
dict whether the measure will pass. The Draft EIR assumes that the traffic generated by potential development in the Specific Plan Area will not be reduced by the presence of train service. This approach was necessary to ensure that the Draft EIR remains valid regardless of SMART. If train service is initiated, the potential traffic impacts identified in the Draft EIR would be reduced. Please see the response to Comments 17-13 and 17-14 for further explanation of this issue.

For the same reasons, the parking analysis conducted for the Draft EIR does not rely upon implementation of SMART rail service. It is acknowledged that research indicates that there is a higher likelihood of zero vehicle households, and correspondingly lower parking needs, surrounding rail stops. Implementation of SMART service would potentially lower the anticipated parking demands, particularly for residential uses.

61-16: **Comment by Caroline Banuelos.** This comment questions the consistency of the Specific Plan with the City’s General Plan, existing redevelopment plans and the EIRs for each redevelopment plan. For a detailed response to the issue of consistency, please see the response to Comment 11-12.

61-17: **Comment by Daisy Pistey-Lyhne, Sonoma Marin Field Representative for Greenbelt Alliance & as a member of the Accountable Development Coalition.** This comment highlights the importance of the Specific Plan and its EIR for the City of Santa Rosa and its community. The comment also questions the consistency of the Specific Plan with the City’s overlapping redevelopment plans. For a detailed response to the issue of consistency, please see the response to Comment 11-12. Since this comment does not address the adequacy of the Draft EIR, no further action is required.
61-18: Comment by Daisy Pistey-Lyhne, Sonoma Marin Field Representative for Greenbelt Alliance & as a member of the Accountable Development Coalition. In accordance with the City of Santa Rosa's General Plan, the traffic analysis relies employed in the Draft EIR utilizes vehicle level of service methodologies. The City does not have a multi-modal level of service requirement, nor a methodology for determining multi-modal level of service.

61-19: Comment by Daisy Pistey-Lyhne, Sonoma Marin Field Representative for Greenbelt Alliance & as a member of the Accountable Development Coalition. This comment does not question the adequacy of the Draft EIR, rather recommends that the to how the City should analyze level of service using a multi-modal approach, including bicycle, pedestrian, transit and automobiles. The comment is noted and no further action is required with regard to the Draft EIR.

61-20: Comment by Scott Stegeman. The Draft EIR traffic analysis applies no deductions to account for the lower vehicle trip generation levels that may occur upon implementation of SMART rail service. Similarly, the parking demand generated by the new development envisioned in the Plan does not include deductions for the presence of rail service. Both of these approaches were needed to maintain a conservative analysis and ensure that the Draft EIR remained valid if SMART service does not commence.

The Draft EIR does, however, consider the potential impacts to the circulation system immediately surrounding the station site that may occur if train service commences. Please see the response to Comments 17-15 and 17-31 for further explanation. Again, this approach is needed to ensure that the Draft EIR considers the potential impacts attributable to development that may occur with the Specific Plan, with or without the SMART service.
61-21: **Comment by Scott Stegeman.** This comment does not question the adequacy of the Draft EIR, rather it questions the lack of policies or regulation pertaining to affordable housing within the Specific Plan. No further action is required with regard to the Draft EIR.

61-22: **Comment by Commissioner Walsh.** This comment does not question the adequacy of the Draft EIR, rather it states that affordable housing needs to be addressed within the Specific Plan. No further action is required with regard to the Draft EIR.

61-23: **Comment by Commissioner Cisco.** Impacts associated with diesel particulate matter were addressed for both Highways 101 and 12 (see Draft EIR pages 4.2-28 through 4.2-31). The analysis found that significant impact due to exposure to diesel particulate matter could occur along Highway 101. The impacts along Highway 12 would be much less due to the much lower volume of diesel-fueled vehicles. The setback for Highway 12 would be less than 50 feet from the travel lanes, where housing would not be feasible.

61-24: **Comment by Commissioner Cisco.** This comment states that the Commissioner would like to have the EIR address toxic remittance. The meaning of this comment is unclear. No further action is required.

61-25: **Comment by Commissioner Cisco.** This comment questions the consistency between the City’s General Plan and the Specific Plan, particularly in regards to land use changes, as well as with the City’s redevelopment plans and bike and pedestrian master plan. For a detailed response to these inconsistency issues, please see the response to Comment 11-12. Since this comment does not address the adequacy of the Draft EIR, no further action is required.

61-26: **Comment by Commissioner Duggan.** The Specific Plan indicates where changes to the City’s current Bicycle and Pedestrian Master
Plan are proposed and these changes are considered in the Draft EIR. The City will be updating the Bicycle and Pedestrian Master Plan in the coming year. The updated plan will incorporate any adopted changes made as a result of adopting the Downtown Station Area Specific Plan.

The comment stating that the Plan does not assume reunification of Courthouse Square to take place is incorrect. The Draft EIR assumes reunification and analyzes the circulation network with the resulting changes to traffic flows. Regarding the lack of multi-modal level of service calculations, the City maintains neither criteria nor methodologies for such an approach, though it is important to note that pedestrian and bicyclist circulation is a component of the Specific Plan and is evaluated in the Draft EIR. The Specific Plan emphasizes streetscape improvements that do not include new vehicle lanes, other than new turn lanes at select intersections, where levels of service would otherwise violate criteria set forth by the City.

61-27: **Comment by Commissioner Caston.** Please see the response to Comment 11-31.

61-28: **Comment by Commissioner Caston.** This comment does not question the adequacy of the Draft EIR, rather it states that affordable housing in relation to the rate of available jobs in the Plan Area needs to be addressed within the Specific Plan. The comment also states that traffic impacts should be analyzed within the multi-modal framework presented earlier. No further action is required with regard to the Draft EIR.

61-29: **Comment by Commissioner Caston.** Please see the response to Comment 11-10.

61-30: **Comment by Commissioner Caston.** Policies SP-T-4.8, SP-T-4.11 and SP-T-4.12 of the Specific Plan relate to progressive parking man-
agement practices, including those promoted by researcher Donald Shoup at UCLA. These include the use of appropriately-priced parking, allowing private developments to provide “unbundled” parking and exploring the potential for parking “cashout” and transit incentive programs. Each of these policies would help to reduce automobile usage and parking demand, which in turn would lead to reductions in greenhouse gas emissions. The Draft EIR does not reference such programs as mitigation measures, as they are already included as Specific Plan policies.

61-31: **Comment by Commissioner Arendt.** This comment states there is a contradiction within the Draft EIR in regards to population and housing. The meaning of this comment is unclear. There is no reference to population and housing or housing related mitigations on the specified pages in the Draft EIR. No further action is required.

61-32: **Comment by Commission Chairman Bartley.** The commenter asks for clarification as to the meaning of the term “exceed” in Mitigation Measure AQ-2. In this case, “exceed” would mean building designs that include insulation and energy efficiency that is at least 10 percent more efficient than what is currently required by the State Building Code Title 24.

In response to the commenter’s statement regarding natural gas fireplaces, Mitigation Measure AQ-2’s requirement for natural gas fireplaces is more stringent than the City’s requirements that would allow certified wood burning devices. Natural gas fireplaces result in much lower emissions than any type of wood burning device.

Since this comment does not address the adequacy of the Draft EIR, no further response is required.

61-33: **Comment by Commission Chairman Bartley.** The traffic analysis conducted for the Draft EIR assumes that Courthouse Square will be
reunified. Consistent with prior studies and evaluations of how traffic will divert upon reunification, the analysis assumes that B Street will become an important route in accommodating north-south through traffic through downtown. This is very likely to be the case regardless of the ultimate configuration chosen for Courthouse Square. The analysis allows flexibility in that no traffic capacity is assumed between the north and south sides of the square. If street connections through the square are incorporated into the ultimate design, conditions may be slightly better than shown in the Draft EIR, though any such connections would likely be very low-speed in nature and provide limited capacity.

61-34: **Comment by Commissioner Caston.** Please see the response to Comments 17-36 and 17-37.
APPENDIX A
COMMENT LETTER APPENDIX

COMMENT LETTER 10
MICHAEL L. DIEDEN
MANAGING MEMBER
NEW RAILROAD SQUARE, L.L.C.
APRIL 6, 2007
Additions and Alternates

Alternate Height Studies

During the design process the team studied alternatives for seven or eight story buildings at two places on the site – on Block Three and on the western portion of Block Two on West Street. After due consideration and feedback from stakeholders, the team concluded that buildings of this scale would be inappropriate for the site and unresponsive to the concerns of many.
New Railroad Square
Santa Rosa

Proposed Alternates for the SMART, Cannery and Plant 5 Sites, for Inclusion in the Station Area Specific Plan E.I.R.

Submitted by:

New Railroad Square LLC (Creative Housing Associates)

September 18th, 2006
Transit & Access

Bus Circulation Accessing New Railroad Square, the Cannery and Plant 5 Sites*

Buses Stop along 3rd Street
This option proposes that the bus transfer facilities be located along 3rd Street, where the current bus route and stops are located. Pedestrian access from the bus stop to the SMART station is just over a block, traveling north along Railroad Promenade; or through the new 4th Street Plaza via West Street, a new north-south street on the west side of the SMART property connecting 3rd Street and 6th Street. West Street would accommodate kiss & ride and taxi spaces. This proposed routing adds no additional distance to the existing bus route.

Buses Circulate Through the SMART Site
This option proposes that the bus transfer facilities be located on a new north-south street called West Street on the west side of the SMART property connecting West 3rd Street and West 6th Street. This new street would accommodate bus-bays, kiss & ride and taxi spaces and permit passengers to walk the short distance across the new 4th Street Plaza on their way to the SMART trains, with direct access to the Market Hall and Wine Center on either side. The bus route would form a one-way loop, traveling north on West Street, west on 6th Street, and south on Davis Street before reconnecting back with East 3rd Street. This alternative would add approximately 9 additional blocks (1700 linear feet) to the bus route.

*Note: Bus strategies are discussed further on the following pages.
Transit & Access

Trains & Buses

Bus Summary

*Santa Rosa CityBus*

Santa Rosa CityBus operates an efficient suburban-scaled transit service with a major dedicated transit center in the heart of the downtown. Buses are scheduled to “pulse” at the downtown transit center, with most lines arriving and departing at the same time. This allows passengers to efficiently transfer between routes, allowing them to travel from one side of the city to the other.

Downtown Santa Rosa is a significant employment center, and the current transit center is optimally located to serve all downtown employers and institutions. Since Railroad Square is on the far side of the freeway from downtown and will not be a major employment center, it will not make sense to relocate the downtown transit center function to Railroad Square. It may, however, make sense to have some service from the east side of Santa Rosa that currently terminates downtown and extend that service to Railroad Square once SMART service begins.

There are four routes currently running near the station site at 30-minute headways. Routes 6, 12, and 17 all depart the city’s Second Street transit center on the half-hour (6:00 and 6:30) with Route 9 departing on the quarter-hour (6:15 and 6:45). Only Routes 6 and 17 pass the project site, and they currently stop on-street along Third. Routes 9 and 12 run along Wilson, just east of the project site, and stop on-street near the corner of Wilson and Third. In the future, once SMART service begins, it is reasonable to assume some or all of these routes would operate at 15-minute headways, a frequency at which transit begins to be attractive to significant numbers of passengers with a choice of travel modes. Given SMART’s headways, however, it is not anticipated that buses would run any more frequently than every 15 minutes.

The project area, bus routes and bus stops are all marked in Figure 1 below.

**SMART Trains**

The proposed SMART line will be running at 30-minute headways with six peak hour morning trains, one mid-day train, and six peak hour afternoon trains. The average running speed for the trains will be roughly 46 miles per hour from Cloverdale to Larkspur. The Downtown Santa Rosa station has an anticipated daily ridership of 847 passengers, with 85% of those persons walking to the station and 15% accessing the site via kiss-and-ride. Drive and park trips do not play a role as there is no on-site station parking for commuters.

**Sonoma County Transit**

Two buses (42 and 60) have their termini at the Second Street center. These routes are not synchronized and it would be possible to extend both so that Railroad Square is their final stop. It is not clear whether it would make sense to extend Sonoma County Transit to this site.

**Golden Gate Transit**

Only Route 80 runs close to the station site, but because of its north-south path, it runs parallel to the SMART line and would provide redundant service. No Golden Gate Transit service is necessary.
**Bus Improvements at Railroad Square**

Each of these options presents advantages and disadvantages, and different arrangements may be optimal for different bus lines serving the station.

The existing routes 6 and 17, for example, should operate on a “stop, drop and go” or timed transfer basis, requiring either one stop in each direction or a pair of nose-to-tail stops.

Bringing new services from the east side of town into the station may require terminal and recovery space, or recovery could be located off-site, in a location with lower real estate value or operational challenges.

The potential locations for bus stops also present advantages and disadvantages. Because no railroad crossings are accessible between 3rd and 6th, deviating buses onto West Street or Wilson Street on the way to the downtown transit center would add six blocks of running time. Moving bus stops onto West Street has the advantage of having bus passengers cross a lower-volume street to get to and from their trains. Stops on West Street would be approximately the same distance from the rail platform as bus stops on 3rd Street. Provided that a high quality pedestrian crossing can be provided across 3rd at West, the operating cost savings of keeping buses on Third would be significant.

<table>
<thead>
<tr>
<th>Distance to railroad platform</th>
<th>Bus Stops on Third Street</th>
<th>Bus Stops on Wilson Street</th>
<th>Bus Stops on West Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transit running time</td>
<td>Same as current</td>
<td>Adds 1,600’ added distance, and about 2 minutes of time per trip</td>
<td>Adds 1,600’ added distance, and about 2 minutes of time per trip</td>
</tr>
<tr>
<td>Pedestrian crossing</td>
<td>Half of trips must cross West Street, a minor street</td>
<td>Half of trips must cross Wilson Street, a moderate traffic volume street.</td>
<td>Half of trips must cross Third Street, an arterial. An improved pedestrian crossing at West is necessary.</td>
</tr>
<tr>
<td>Parking conflicts</td>
<td>None</td>
<td>Takes away retail parking on Wilson.</td>
<td>Takes away retail parking on West.</td>
</tr>
<tr>
<td>Traffic conflicts</td>
<td>Retains existing stop configuration, but may create traffic conflicts on Third.</td>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>
Transit & Access

Buses

Recommendation

The added running time and delay necessary to route buses an extra six blocks to serve the West or Wilson stops is a significant concern for transit efficiency. Since stopping buses on Third Street as they do now provides bus connections as close to the train platforms as the other options, we recommend Third Street stops as the optimal solution, provided care is taken to improve pedestrian crossings and pedestrian quality on both sides of Third. Specifically:

• A signalized intersection should be provided at Third and West, with a left turn pocket from eastbound Third to northbound West.
• A pedestrian crosswalk should be provided across Third at the east side of the West intersection. A pedestrian refuge should be provided in the middle of Third, opposite the left turn pocket on the other side of the intersection.
• Improved sidewalks should be provided along Third.
• High quality bus stops, including improved landscape, information panels for routes and schedules, shelters, and electrical hookups for real-time bus arrival information.

Presently, only 50’ of straight curb is necessary to serve the existing 6 and 17 lines, along both sides of the street between the West Street intersection and the clear zone of the railroad tracks. Both routes should serve the same stop, as they do now.

In the long run, 90’ of straight curb should be provided, allowing both lines to provided timed transfers with the train, stopped, nose-to-tail. Again, this should be on both sides of Third between West Street and the railroad clear zone.

Additional expansion space should be provided west of West Street, allowing for the possibility of more timed transfer services. It appears that there is sufficient room to stop buses outside the travel lane if all travel lanes are reduced in width to standard urban dimensions of 11’. Inside lanes can be reduced to 10’ if necessary. (see also page10)

If actual layover is necessary, a location should be identified within a few blocks of the Railroad Square area, but not on the New Railroad Square site.

(Note: These recommendations are preliminary, based upon brief site observations and limited conversations with City staff.)
Development at the SMART site will include a mix of uses, including the Market Hall, the Wine Center, the Santa Rosa Junior College’s Culinary Institute, and a Moana/Auberge Restaurant. Service access to these uses is from on-street parking bays that are part of the bus-bay zone. They would be joint-use facilities and restricted to off-peak hours so as not to conflict with commute hours and the most active use of the sidewalks. The amount of service required for these uses can easily be accommodated from these parking bays that lead directly to the service and storage areas behind the retail stores. West Street also provides unprecedented service opportunities and vehicular access for the Cannery, Plant 5 and the 6th Street Playhouse.

Service access to the Market Hall, Wine Center and restaurant is from on-street parking bays that are part of the shared-use surface of Railroad Promenade, a low-speed, low-volume way. This would allow the bus bays, should they be located in the SMART site along West Street, to operate freely at all times. Parking along the promenade, while still allowing for traffic to circulate by, would allow direct front-door access into the Market Hall, the Wine Center and restaurant, an arrangement typical in urban environments, like along Railroad Square’s 4th Street.
Transit & Access

Retail Parking

On-Street

Retail Parking Along West Street & Railroad Promenade

Retail parking on the SMART site is accommodated in two ways, on-street teaser parking and garage parking. The on-street spaces are found along West Street, a new 850’ long street connecting West 3rd and West 6th Streets. West Street has parallel and diagonal parking along its west side, and diagonal parking along its east side. The east side parking also accommodates kiss-and-ride spaces for rail commuters. Further areas of on-street parking are found along Railroad Promenade, in lay-by areas on the east side of the north-only Promenade.

Secure Parking - Option 1

Access to the New Railroad Square subterranean level retail parking is located off West Street via a single ramp located within the central block between West 4th & West 5th Streets. The majority of traffic is anticipated to enter West Street from 3rd Street - traveling west from downtown Santa Rosa or US Highway 101 - and will therefore not have a negative impact on the West End neighborhood. The retail parking is located in the southern two-thirds of a single level of subterranean parking. Pedestrian access from the subterranean parking is via stairs and elevators, in a pair of light courts, leading to the two pedestrian ways aligned with West 4th and West 5th Streets.
Transit & Access

Retail Parking

Secure Parking - Option 2

Secure Parking Shared Between Subterranean Garage and Structured Parking

Secure retail parking is shared between an underground parking garage, similar to that shown in Option 1, and a structured parking facility on the site of the Plant 5 building. The remaining historic walls and loading dock of the Plant 5 building would be sensitively incorporated into the design of the structured garage. Access to both is off West Street, coming up from West 3rd Street, where the majority of traffic is expected to enter from, and will therefore not have a negative impact on the West End neighborhood. The basement retail parking located beneath the SMART site would be accessed with a single ramp within the central block building.

Secure Parking - Option 3

Secure Parking Concentrated in Structured Parking

Secure retail parking is concentrated in a structured parking facility on the site of the Plant 5 building. The remaining historic walls and loading dock of the Plant 5 building would be sensitively incorporated into the design of the structured garage. Access to both is off West Street, coming up from West 3rd Street, where the majority of traffic is expected to enter from, and will therefore not have a negative impact on the West End neighborhood. From the retail parking garage, access to the retail spaces is across West Street, a street envisioned with pedestrian-friendly design criteria in mind.
Transit & Access

Residential Parking

Secure - Option 1

New Railroad Square and Cannery Each Self-Park

Residential parking for New Railroad Square and the adjacent Cannery site is illustrated above. Parking for the Cannery is accessed off of Third Street, via a small driveway cut into the low loading dock along its south side. Access to parking for the SMART site - to the residential parking basement - is located off West Street via a ramp located within the northern block between 5th & 6th Streets. Residential occupants can directly access the elevators for all three residential blocks from the underground parking level. Additional residential parking is located in the ground floor level of the northern block. The majority of traffic is expected to enter West Street from Third Street and will therefore not have a significant impact on the West End neighborhood.

Secure - Option 2

New Railroad Square and Cannery Each Self-Park (with Cannery Access off West Street)

Residential parking for New Railroad Square and the adjacent Cannery site is illustrated above. This option has the same parking access and arrangement for New Railroad Square as in Option 1. However, here access to parking for the Cannery is via West Street. From West Street, a paved entry court between the Cannery and the Plant 5 Building gives access to parking on the bottom two levels of the Cannery. The paved entry court is designed as a shared use surface, with quality paving materials and landscaping, allowing the pedestrian way to continue from the 4th Street Plaza to the Prince Memorial Greenway along Santa Rosa Creek.
Transit & Access

Residential Parking

Secure - Option 3

New Railroad Square Self-Parks and Cannery Parks at Plant 5 Building

Residential parking on New Railroad Square and the adjacent Cannery site is illustrated above. This option has the same parking access and arrangement for New Railroad Square as in Option 1. However, here parking for the Cannery is provided in a structured parking facility on the site of the Plant 5 building. The remaining historic walls and loading dock of the Plant 5 building would be sensitively incorporated into the design of the structured garage. Two accesses to Plant 5 are shown as options. The first is access directly off of West Street; the second is access through a paved entry court between the Cannery and the Plant 5 Building. The paved entry court would be designed as a shared use surface, with quality paving materials and landscaping, allowing the pedestrian way to continue from the 4th Street Plaza to the Prince Memorial Greenway along Santa Rosa Creek, under a pedestrian bridge which would directly connect the Plant 5 parking structure with the Cannery lofts.

Secure - Option 4

New Railroad Square Provides All Parking for New Railroad Square, Cannery & Plant 5

Residential parking on New Railroad Square and the adjacent Cannery site is illustrated above. Parking for New Railroad Square, the Cannery and Plant 5 building are all accommodated in a subterranean parking structure, probably 2 levels, under the 3 blocks of New Railroad Square. Access to the subterranean residential parking is located off West Street via a ramp located within the northern block between West 5th & West 6th Streets. Residential occupants can directly access the elevators for all three residential blocks from the underground parking level. Additional residential parking is located in the ground floor level of the northern block. Residents of the Cannery (and possibly Plant 5) would exit the garage on the same route as retail visitors, via stairs and elevators in a pair of light courts along the 4th and 5th Street pedestrian ways. The majority of traffic is expected to enter West Street from Third Street and will therefore not have a negative impact on the West End neighborhood.
Transit & Access

Access from West 3rd Street

It is anticipated that the majority of traffic is expected to enter West Street from West 3rd Street, traveling west from downtown Santa Rosa or US Highway 101. However, some traffic will inevitably enter the site travelling eastbound along West 3rd Street, as there is access in the area to Highway 12. Illustrated above is a proposal for the new intersection at West 3rd Street and West Street, a new north-south street connecting 3rd Street and 6th Street. This intersection is to be signalled, with crosswalks across both 3rd and West Streets. A new left-turning lane is added east of the bridge, leading up to West Street. Preliminary analysis of the current and projected traffic along this portion of 3rd Street indicates that the street will have sufficient width for the addition of this lane, and sufficient length for both multi-car queuing at the left-turning lane and its required taper. The intersection and narrowed lanes will also work beneficially as a traffic-calming device, as east-bound drivers enter Railroad Square and the downtown Santa Rosa area.
Fire Fighting Access

Option 1

Fire Access Routes

Firetruck access to the New Railroad Square and adjacent sites is anticipated to follow the street network around the area. There is excellent street access to the buildings’ surfaces along West Street, West 6th Street and West 3rd Street. The western-most ends of 4th and 5th Streets also provide good staging areas for fire trucks. It is anticipated that from all of the areas mentioned above, all vertical surfaces of the new buildings on the SMART site could be reached with the firehose. West Street also dramatically increases firetruck access to the Cannery, Plant 5 and the 6th Street Playhouse, allowing a firetruck to pull right up along the buildings’ sides. (Note that building heights are addressed elsewhere in this document, and Construction Type is not yet determined, but has been proposed as Type V if the new buildings are to be no more than 5 stories.)

Option 2

Fire Access Routes with EVA Routes

Firetruck access in this option is similar to that shown in Option 1, with all of the benefits described therein. However, this option adds a series of Emergency Vehicle Access (EVA) routes around and across the site. The first EVA would be along Railroad Promenade. Other EVAs would follow the pedestrian ways along West 4th and 5th Streets, which would end at either side of the light court to the underground parking. The West 4th Street EVA would cross the railroad tracks along West 4th Street, where a pedestrian crossing is anticipated. The full length of the proposed commuter train, which would stop at this station, would fit on the tracks between 4th and 6th Streets. This network of EVAs would allow full access to all of the new buildings’ vertical surfaces. It is possible that an EVA could be provided leading from 3rd Street directly up to Railroad Promenade, facilitating Emergency Vehicle Access. An additional EVA also tracks down from West 6th Street, behind the 6th Street Playhouse, accessing Plant 5 and the Cannery (unavailable if Plant 5 is redeveloped as parking structure or mixed-use building).
Transit & Access

Fire Fighting Access

Option 3

Fire Access Routes with EVA Routes

Firetruck access in this option is similar to that shown in Option 2, with all of the benefits described therein. However, this option moves a key Emergency Vehicle Access (EVA) route from Railroad Promenade to the SMART railroad Right-of-way, running continuously from 3rd Street up to 6th Street. The railroad r.o.w., at 60’ wide, has an ample amount of room along its western edge for fire truck circulation. This network of EVAs would allow full access to all of the new buildings’ vertical surfaces. This configuration of EVAs would also allow Railroad Promenade to function as the narrow, shared use surface - accommodating low-speed vehicle traffic, short-term parking, bicycles and pedestrians, and the farmers market - that it was designed for in the 3/24/06 submission.
New Railroad Square is shown here proposed with a new public street, called West Street, running north-south and connecting West 3rd Street to West 6th Street. This attempts to complete a logical and missing fragment of the station area street network. The light gray arrows indicate areas that are public open space. These areas include Railroad Promenade, the 5th Street Paseo, and the 4th Street Plaza and pedestrian space leading to West Street. The public Open Spaces and new public street are designed and built to City of Santa Rosa standards, with funding and maintenance being provided by the City. In this case an easement would be given to the development, where there is an underground parking structure beneath the public open space.

New Railroad Square is shown here proposed with a new public street, called West Street, running north-south and connecting West 3rd Street to West 6th Street. This attempts to complete a logical and missing fragment of the station area street network. The red arrows indicate where easements would be dedicated over the developed New Railroad Square, likely with underground parking continuing beneath these open-air areas. These areas would include Railroad Promenade, the West 4th Street Plaza, and the West 4th and West 5th Street Paseos, leading to West Street. As these areas would remain private but with easements, the design does not include any physical barriers restricting pedestrian access.
Streets

Public Street Network

Option 3

No New Public Streets

New Railroad Square is shown here proposed with no new public streets. The open spaces are designed as public spaces, would meet relevant design criteria and anticipate public use. However, they would be technically private, in their construction funding and maintenance.
New Railroad Square is to be developed as an integrated, pedestrian-friendly environment, similar to the adjacent historic Railroad Square neighborhood. The street network represents this level of integration. The open spaces are designed to be multi-use and to accommodate different types of circulation. The network of pedestrian access continues from Railroad Square, with sidewalks along 3rd and 6th Streets, and along both sides of West Street. Pedestrian circulation also flows through the middle of New Railroad Square, across the railroad tracks on 4th Street and into a prominent plaza, then continuing west between the Cannery and Plant 5 all the way to the Prince Memorial Greenway accessing Santa Rosa Creek. West Street allows for vehicular circulation of many types, including residential and retail automobile traffic, delivery vehicles, emergency vehicles, bicycles and pedestrians.

West Street will be narrow enough to control vehicle speeds, and will have bulb-outs at pedestrian crossings at 3rd, 4th, 5th, and 6th Streets. Railroad Promenade is designed as a multi-use way, accommodating low-speed vehicle traffic, short-term lay-by parking and spaces for delivery trucks. The pedestrian spaces are designed expressly to host farmers markets, thought to be on weekends, and civic events, in the West 4th Street plaza and along Railroad Promenade.
West Street is to be a multi-use two-way street, lined with wide tree-lined sidewalks and accommodating short-term parking, loading and access points to the below-grade parking garages. The street has a narrow curb-to-curb dimension to create a pedestrian friendly environment including bulb-outs at the intersections with 3rd, 4th, 5th and 6th Streets. There are angled parking bays on the east side and angled and parallel parking bays on the west.

Railroad Promenade is to be a multi-use way, with limited traffic in the north direction only. Lined with trees along its east side, the promenade accommodates short-term retail parking and morning deliveries. The promenade would be closed to traffic during farmers markets on weekends. The promenade is a level surface, with no raised curbs on either side. Where the promenade narrows as it approaches the buildings’ projections, sturdy bicycle parking is provided.

The paseo along the 5th Street right-of-way follows the width of 5th Street to the east of the station. The paseo is pedestrian only, with small trees along both sides. At the center is a sunken courtyard, which provides light into the below-ground parking. The courtyard contains a stairway and elevator which leads up from the parking. The paseo is lined with mixed uses on both sides: the Market Hall to the south; the Junior College and Child Care to the north.
New Railroad Square is shown here ranging in height from 3-5 stories, with a roof level of 50 feet, which is 5’ less than what’s allowed in the CD-5 zoning being proposed for the property in the Station Area Specific Plan. The massing steps down as the buildings approach the lower scaled houses of the West End neighborhood, to the northwest of the site. This massing represents a middle ground, between the historic Railroad Square buildings, generally 2 to 3 1/2 stories along 4th Street, to the proposed Cannery lofts, which are set to be 60’ at parapet level. To the south, the Hyatt has a maximum height of 4 stories; the Courtyard Marriot is 5 stories. This massing strategy is consistent with what was submitted by the New Railroad Square LLC team in the 3/24/06 SMART RFP response.

New Railroad Square is shown here with a roof level of 60 feet. The massing and scale are similar to that described in Option 1, with one exception, which is the allowance of an additional 5’ in the CD-5 zone on the central and southern blocks of New Railroad Square. This minor increase in acceptable height would allow for the market hall to be designed to a desirable interior height of approximately 20’ clear, while maintaining 4 levels of residential above, which may be necessary for the development to be economically feasible. The massing still steps down as the buildings approach the lower scaled houses of the West End neighborhood. To the south, the massing rises to match the Cannery lofts, and anticipates the future redevelopment of the Berkowitz site across West 3rd Street.
Heights

Option 3

The SMART site is shown here ranging in height from 3-8 stories, with a roof level of 85 feet at the central and southern blocks. At this height, the buildings would be similar in height to many of the taller buildings in downtown Santa Rosa. The potential for 8-storey buildings on the site proposes that the site keep its current zoning of CD-10, which allows up to 10 stories. This massing allows for a dramatic gateway condition at the site’s narrow width along 3rd Street. Like option 2, this increase in height would allow for the market hall to be designed to a desirable interior height of approximately 20’ clear, while potentially adding more dwelling units. A greater residential population at this site, in an area well-served by mixed use facilities, would provide increased SMART ridership at this station node, as well as a development intensity that is well-suited for urban sites with accessible transit routes nearby. This massing strategy is consistent with what was submitted by the New Railroad Square LLC team in the 3/24/06 SMART RFP response, shown as an alternate on page 4.48.
Uses

Option 1

The northern-most block on the SMART site is mixed-use at ground level. In addition to a Child Care facility, a Health Club, a Bicycle Center and community space, this floor also contains space for Santa Rosa Junior College’s Culinary Arts Program, surrounding the Bicycle Center along Railroad Promenade. This location for the Junior College is similar to what was submitted by the New Railroad Square LLC team in the 3/24/06 SMART RFP response, with the difference being that the configuration of the Junior College has been slightly altered, following community feedback which sought a cafe plaza at the SMART site’s northeast corner, as a way of literally and figuratively opening up the site’s accessibility to its neighbors to the north.

Option 2

The Plant 5 building represents a unique opportunity for the Santa Rosa Junior College’s Culinary Arts Program. This option locates the Junior College of the ground level of the existing plant 5 building. In this location, the Junior College is the anchor along the long line of mixed uses along the 4th Street corridor. The Junior College’s restaurant would be well-situated here. In the Plant 5 building, the Junior College would have more of identity. Plant 5 would need to be redeveloped sensitively, as either a low-level building, similar to what was originally there, or as a multi-level building, matching the heights proposed for the Cannery and SMART property, and possibly integrating parking.
Uses

Option 3

Junior College in Cannery

The Cannery represents a unique opportunity for the Santa Rosa Junior College’s Culinary Arts Program. This option locates the Junior College of the ground level of the existing Cannery building. In this location, the Junior College has the potential for access and frontage along West 3rd Street, West Street, the 4th Street pedestrian way and the greenway. The Junior College’s restaurant would be well-situated here. In the Cannery, the Junior College would be integrated sensitively into the ongoing redevelopment project, which includes 3 levels of upper level lofts and live-work lofts on the ground floor.
New Railroad Square
Santa Rosa

Further Proposed Alternates for the SMART, Cannery and Plant 5 Sites, for Inclusion in the Station Area Specific Plan E.I.R.

Submitted by:
New Railroad Square LLC (Creative Housing Associates)

April 6th, 2007
Transit & Access

Commercial & Retail Parking

On-Street

Pavement]

Secure Parking - Option 1

Secure Parking Within Parking Structure

Non-residential parking on the SMART site is accommodated in two ways, on-street teaser parking and garage parking. The onstreet spaces are found along West Street (a new 850’ long street connecting West 3rd and West 6th Streets), West 5th Street and Railroad Promenade. West Street has parallel parking spaces along its west side. The east side of West Street accommodates deliveries and buses.

Access to the retail, commercial and visitor parking at New Railroad Square is located off West Street via a single ramp located within the central block between West 4th & West 5th Streets. This parking structure, on the upper levels of the Central Block above the Market, provides parking for all non-residential uses on the SMART parcel, including the market, restaurant, food & wine center, and commercial office space on the upper levels of the south block. The majority of traffic is anticipated to enter West Street from 3rd Street - traveling west from downtown Santa Rosa or US Highway 101 - and will therefore not have a negative impact on the West End neighborhood.
Transit & Access

Residential Parking

Secure - Option 1

New Railroad Square, the Cannery and Plant 5 Each Self-Park

An option for Residential parking for New Railroad Square and the adjacent Cannery & Plant 5 sites is illustrated above. Residential parking for the Cannery and Plant 5 is accessed off of West Street. For each building, openings would be carefully cut within the bays of the existing historic walls. This strategy would avoid the loading dock on the Cannery, and require a careful cutting back of the loading dock on Plant 5. Access to residential parking for the SMART site - in this case limited to the north block - is located off West Street. The North Block would have 2-3 levels of structured podium parking. This parking structure would be completely invisible from the street. It would be wrapped on all sides with residential development. Each of these three residential buildings - the Cannery, Plant 5 and the North Block of the SMART parcel - would be entirely self-parked, at ratios meeting Santa Rosa parking regulations. The majority of traffic is expected to enter West Street from Third Street and will therefore not have a significant impact on the West End neighborhood.
Transit & Access

Fire Fighting Access

Option 1

Fire Access Routes with EVA Routes

Firetruck access to the New Railroad Square and adjacent sites is anticipated to follow the street network around the area. There is excellent street access to the buildings’ surfaces along West Street, West 6th Street, West 5th Street and West 3rd Street. The inclusion of West Street in the location shown also dramatically increases firetruck access to the Cannery, Plant 5 and the 6th Street Playhouse, allowing a firetruck to pull right up along the buildings’ sides.

Firetruck access could also occur along a series of Emergency Vehicle Access (EVA) routes around and across the site. The first EVA would be along the southern 2/3s of Railroad Promenade, leading down from West 5th Street. Another EVA would follow the pedestrian way along West 4th Street, where a pedestrian crossing is anticipated. This network of EVAs would allow full access to all of the new buildings’ vertical surfaces.

Scale: Approx. 1”=250’ @ 8 1/2 x 11

Railroad Square LLC (Creative Housing Associates)
Railroad Square, Santa Rosa, CA
April 6th, 2007
New Railroad Square is shown here proposed with a new public street, called West Street, running north-south and connecting West 3rd Street to West 6th Street. This attempts to complete a logical and missing fragment of the station area street network. New public streets are shown in black dotted lines. The medium gray arrows indicate areas that are public open space, where easements could be designated. These areas include Railroad Promenade, and the 4th Street Plaza and pedestrian space leading to West Street. The public Open Spaces and new public streets are designed and built to City of Santa Rosa standards, with funding and maintenance being provided by the City.
Uses

Option 1

Mixed uses on SMART Parcel and Adjacent Parcel

In addition to those uses proposed as previous alternates, a further mix of uses should be considered as development options. Pictured above, the Plant 5 building could be redeveloped as a residential building, with townhouses facing the creek, with and 2-3 levels of stacked flats above 2 levels of parking. The central block could have the Market Hall at the ground level, and parking for the market and other nonresidential uses above it on 3 levels (2 plus roof). The south block of the SMART parcel could have 3 levels of commercial/office space above the ground floor retail / restaurant / food & wine center uses.
COMMENT LETTER II
Rosa Koire
Vice President
Santa Rosa Area Business Association
April 6, 200
could pose a significant environmental concern. Several vehicle service stations are also present or were recently operating, including franchises owned by Shell among other gas station retailers. The primary hazard from these businesses is of a leak from an underground storage tank spreading gasoline and the gasoline additive methyl-tertiary butyl ether (MTBE), or diesel fuel into soil and groundwater.

Contamination in the area is well documented through a series of remediation and cleanup efforts starting in the 1980s and continuing today with ongoing monitoring of groundwater and soil. These cases were summarized in a status report by the Sonoma County Environmental Health Department, Santa Rosa Division, in 2001.16 According to the report, the Regional Water Board is continuing to collect samples throughout the McMinn Avenue State Superfund Site Area to assess the health threat from exposure to groundwater to residents with domestic wells, and determine the extent and potential remaining sources of volatile organic compound (VOC) and methyl-tertiary butyl ether (MTBE) contamination in groundwater.

d. Park and Gardens
The Park and Gardens Sub-Area at the southeast edge of the Specific Plan Area is the only Sub-Area with no reported environmental sites probably due to its small area and lack of historical industry or fuel tanks.

e. Historic Residential
The Sonoma County Water Agency yard at 330 Hewett Street, was reported for an underground fuel tank that leaked.

f. Residential Areas
There are several industrial sites and gas stations where new residential areas are proposed in the Specific Plan. This includes the 10th Street Partnership, which was reported for another leak of gasoline with MTBE detected. Con-

16 County of Sonoma Environmental Health Department, City of Santa Rosa Unit, January 11, 2001, Summary and Status Report on Implementation of the Roseland Plan of Action and Cleanup Actions in the McMinn Avenue Superfund Site.
could pose a significant environmental concern. Several vehicle service stations are also present or were recently operating, including franchises owned by Shell among other gas station retailers. The primary hazard from these businesses is of a leak from an underground storage tank spreading gasoline and the gasoline additive methyl-tertiary butyl ether (MTBE), or diesel fuel into soil and groundwater.

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---

16 County of Sonoma Environmental Health Department, City of Santa Rosa Unit, January 11, 2001, Summary and Status Report on Implementation of the Roseland Plan of Action and Cleanup Actions in the McMinn Avenue Superfund Site.
To: Cultural Heritage Board Members  
Re: Downtown Station Area Specific Plan

10 REASONS WHY YOU SHOULD NOT SIGN OFF ON THE PLAN

1-According to CEQA GUIDELINES, the City must use the environmentally superior alternative which is the REDUCED GROWTH ALTERNATIVE. The Plan does not abide by this requirement. See attachment A (1-2)

2-According to STATE LAW, the Specific Plan must be CONSISTENT with the General Plan. If you approve the Plan you are also agreeing to extensive revisions to the General Plan to make it consistent to the Specific Plan. This is an inappropriate process. See attachment B

3-Traffic and air quality will get substantially worse with the Station Plan. The environmentally superior alternative would reduce these impacts.

4-The Station Area Specific Plan was to be implemented in conjunction with the Smartrain project. The Smartrain Plan was unsuccessful so the Station Area Plan is no longer appropriate. The Station Area Plan was funded by the Metropolitan Transportation Commission to develop a plan to complement the Smartrain. It would be irresponsible to add over 8,000 residents into an area without having any good public transportation available for them.

5-There are insufficient safeguards in the plan for historically designated neighborhoods. Including these areas will make these properties vulnerable to changes which may be implemented in the future. Since the Station Plan claims authority over all design issues, boards and commissions will not have as much authority over these areas as they do now. The plan lists very few sites as being historically significant which should be protected. See attachment C (1-2)

6-The Plan requires no affordable housing. Since the new development will not accommodate low income people, additional pressure will be put on the historic and residential neighborhoods to accommodate them. This could have a degrading effect on these neighborhoods over time.

7-The Plan greatly reduces parking requirements. It is expected that there will be a shortage of parking which will cause spillover parking into the historic and residential neighborhoods. This is already a problem in some neighborhoods.

8-The E.I.R. is inconsistent with a previous E.I.R. that was recently done by another company for many of the same areas. The previous E.I.R. prepared for the recent Gateways Redevelopment project shows 4 active hazardous materials sites on Santa Rosa Ave, (Park and Gardens). The new E.I.R. shows that there are no hazardous
materials sites in that area. This calls into question the quality and accuracy of the E.I.R. report that you are being asked to sign off on. I have also found several other inconsistencies that I will be including in a formal written objection to the plan. See attachment D (1-4)

9-Areas that are well beyond the 1/2 mile radius are being included in the plan area. Studies have shown that people outside of the 1/2 mile radius will only use transit for 4% of their trips. Property and business owners in 3 areas (at least) do not want to be included in the plan. These areas are: The Imwalle Gardens Area, the Park and Gardens area and the Maxwell Court area which is included as part of the Railroad Corridor. A petition requesting removal is planned.

10- Implementation of the Specific plan would result in the loss of 1,584 projected new jobs due to the reclassification of industrial areas. The plan calls for the elimination of 691,000 square feet of light industrial space and the loss of 8,600 square feet of heavy industrial space. Displacing these uses will result in substantially more truck traffic on the highways. The City should retain the industrial areas and not convert them to residential uses.

CONCLUSION:

The City released the massive DEIR just two days ago. You're being asked to approve the whole package including all the future General Plan Amendments which will be necessary to make the Specific Plan comply with State law. At a bare minimum, you should request that you be given more time to review the documents. You should also request that the environmentally superior Reduced Growth Alternative that's required by law to be used is presented to you for your consideration. This plan is being proposed by the City's Advance Planning Dept. that works for the City Manager. By approving this plan, you are agreeing to a substantial transfer of power to the Executive branch of our City's government. You were appointed by our elected officials and you should not give up any authority over design issues in the project area. Although the plan contains language that historical areas should be protected, there are no true safeguards that these areas will be protected. Since the main reason for doing this plan was voted down, why should this plan go forward at this time? The City should wait at least until there will in fact be a train system available. If this plan is approved, I believe there are sufficient grounds to file a lawsuit to stop its implementation. The City should scrap this plan and go back to square one and come up with a plan that makes sense.

Sincerely,

Kay Tokerud
Property owner in the Plan area.
707-576-9476
CITY OF SANTA ROSA

DOWNTOWN STATION AREA SPECIFIC PLAN E.I.R.

ALTERNATIVES TO THE PROPOSED PROJECT

D. Environmentally Superior Alternative

CEQA Guidelines require that the environmentally-superior alternative be designated. If the alternative with the least environmental impact is the No Project Alternative, then this document must also designate the next most environmentally-preferable alternative. In this case, the Reduced Growth Alternative would be the preferable alternative when considering all of the various aspects.
### TABLE 5-1  PROJECT ALTERNATIVES SUMMARY AT BUILDOUT

<table>
<thead>
<tr>
<th>Alternative Features</th>
<th>Specific Plan</th>
<th>No Project Alternative</th>
<th>Reduced Growth Alternative</th>
<th>Reallocated Growth Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Detached (units)</td>
<td>775</td>
<td>775</td>
<td>775</td>
<td>775</td>
</tr>
<tr>
<td>Residential Attached (units)</td>
<td>4,444</td>
<td>2,095</td>
<td>3,270</td>
<td>4,444</td>
</tr>
<tr>
<td>Senior Housing</td>
<td>76</td>
<td>76</td>
<td>76</td>
<td>76</td>
</tr>
<tr>
<td>Commercial/Retail (square feet)</td>
<td>2,430,000</td>
<td>2,422,856</td>
<td>2,430,000</td>
<td>2,430,000</td>
</tr>
<tr>
<td>Office (square feet)</td>
<td>1,350,000</td>
<td>1,711,959</td>
<td>1,350,000</td>
<td>1,350,000</td>
</tr>
<tr>
<td>Public/Institutional (square feet)</td>
<td>640,000</td>
<td>536,827</td>
<td>640,000</td>
<td>640,000</td>
</tr>
<tr>
<td>Heavy Industrial (square feet)</td>
<td>0</td>
<td>5,000</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Light Industrial (square feet)</td>
<td>20,000</td>
<td>379,641</td>
<td>150,000</td>
<td>20,000</td>
</tr>
</tbody>
</table>

No off-site alternatives were identified during the Specific Plan development stage, nor are any included in this EIR since the Specific Plan is targeted towards development within Downtown Santa Rosa and along the SMART rail line. As a result, there are no other sites within the City that would be able to meet the objectives of the Specific Plan.
The following summarizes the proposed amendments:

- **Land Use Element**
  - Text additions and deletions necessary for addition and removal of land use classifications.
  - Revisions to text, graphics and figures related to land use.
  - Policy revisions (related to siting of grocery stores and buffering between residential and industrial land uses).
  - Other text revisions necessary for consistency with above changes.

- **General Plan Land Use Diagram**
  - Addition of new land use designations (Transit Village, Urban Agriculture).
  - Removal of "Mixed Use" land use designation from the Specific Plan Area.
  - Reunified Courthouse Square.
  - Addition of new proposed neighborhood park sites.
  - Modifications to street network (new streets, change in functional classifications).
  - Changes to existing land use designations.

- **Transportation Element**
  - Revision of Figure 5-1 to include new streets and changes to functional classifications.
  - Revision of Figure 5-2 to include revisions to bicycle network.
  - Revisions to Transportation Appendix to reflect changes in functional classifications.

- **Public Services and Facilities**
  - Revision of Figure 6-1 to add new neighborhood park sites.
  - Revisions to text and tables related to park sites and park acreage to reflect additions of new neighborhood parks.

- **Other**
  - Revisions to text, graphics and figures related to land use, housing and population changes as necessary.

**E. Required Permits and Approvals**

As stated above, the proposed project includes the following:

- Certification of this EIR.
- Adoption of the Downtown Station Area Specific Plan.
- Adoption of a series of General Plan Amendments to ensure required consistency between the City of Santa Rosa General Plan and the Specific Plan.
TABLE 4-2  DESIGNATED HISTORIC LANDMARKS WITHIN SPECIFIC PLAN AREA

<table>
<thead>
<tr>
<th>Landmark No.</th>
<th>Resource Number</th>
<th>Name</th>
<th>Address</th>
<th>OS No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>CHB8</td>
<td>De Turk Round Barn</td>
<td>819 Donohue St.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>CHB13</td>
<td>Rosenberg Building</td>
<td>306 Mendocino Ave.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>CHB29</td>
<td>Luther Burbank Home and Garden</td>
<td>Sonoma &amp; Santa Rosa Ave</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>CHB47</td>
<td>Rosenberg Department Store</td>
<td>700 Fourth St.</td>
<td>12</td>
</tr>
<tr>
<td>5</td>
<td>CHB61</td>
<td>Hoag House (former site)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>CHB62</td>
<td>Sibbald Donovan Manor</td>
<td>725 College Ave.</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>CHB77</td>
<td>Church of One Tree</td>
<td>492 Sonoma Ave.</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>CHB148</td>
<td>Alexander House</td>
<td>412 Humboldt St.</td>
<td></td>
</tr>
</tbody>
</table>

Rosa Avenue Corridor (Opportunity Site 6) extends into the Burbank Gardens Historic Preservation District.

The City of Santa Rosa's Cultural Heritage Board (CHB) lists one historic resource within an opportunity site. Rosenberg's Department Store, which currently houses Barnes and Noble Book Store, is located within Opportunity Site 12. In 1992, a historic resources inventory and evaluation was completed for Rosenberg's Department Store, which was built in 1937. The building was formally listed on the National Register of Historic Places and on the Santa Rosa Historic Landmarks lists in 1994. Since this building was recently redeveloped, it is not anticipated to be a focus of the Specific Plan.
FIGURE 12
Location of Leaking Underground Storage Tanks (LUSTs)
Gateway Redevelopment Project

2 sites on Santa Rosa Ave.
FIGURE IV.H-1

Redevelopment Plan for the
Gateways Redevelopment Project Area EIR
Reported Hazardous Materials Sites

NOTE: EACH SITE LOCATION REPRESENTS ONE TO 54 INDIVIDUAL SITES. SEE TABLE IV.H-1 FOR DETAILS.


1/3/05 gateways redevelopment/figures/Fig_IVH1.ai (11/10/05)
**Table IV.H-3 continued**

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Site Name</th>
<th>Address</th>
<th>Hazardous Material Involved</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>28</td>
<td>Grace Property</td>
<td>802/806 Donahue St.</td>
<td>Not Reported</td>
<td>Active</td>
</tr>
<tr>
<td>28</td>
<td>SRDPW Old City Corp. Yard</td>
<td>819 Donahue St.</td>
<td>Gasoline</td>
<td>Closed</td>
</tr>
<tr>
<td>29</td>
<td>La Tortilla Factory</td>
<td>463 Sebastopol Ave.</td>
<td>Diesel</td>
<td>Closed</td>
</tr>
<tr>
<td>29</td>
<td>Hardt, G.K.</td>
<td>337 A St., South</td>
<td>Not Reported</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>Hirsch, Phil</td>
<td>230 A St., South</td>
<td>Waste Oil</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>Clark's Auto Parts</td>
<td>203 Santa Rosa Ave.</td>
<td>Not Reported</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>Boyett Petroleum</td>
<td>171 Santa Rosa Ave.</td>
<td>Gasoline</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>PG&amp;E Gas Plant - Musco</td>
<td>First/8 St.</td>
<td>Gasoline</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>Santa Rosa Proposed Theater</td>
<td>85 Santa Rosa Ave.</td>
<td>Gasoline</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>SRDPW Santa Rosa Ave.</td>
<td>90 Santa Rosa Ave.</td>
<td>Diesel</td>
<td>Active</td>
</tr>
<tr>
<td>29</td>
<td>AT&amp;T Communications</td>
<td>520 Third St., East</td>
<td>Gasoline</td>
<td>Closed</td>
</tr>
<tr>
<td>29</td>
<td>National Bank of the Redwoods</td>
<td>21 Santa Rosa Ave.</td>
<td>Gasoline</td>
<td>Closed</td>
</tr>
<tr>
<td>29</td>
<td>Bertoli Estate</td>
<td>629 Third St., West</td>
<td>Diesel</td>
<td>Closed</td>
</tr>
<tr>
<td>29</td>
<td>SRDPW Garage No 9</td>
<td>97 D St.</td>
<td>Gasoline</td>
<td>Active</td>
</tr>
<tr>
<td>30</td>
<td>Creekside Convalescent Hospital</td>
<td>850 Sonoma Ave.</td>
<td>Solvents</td>
<td>Active</td>
</tr>
<tr>
<td>31</td>
<td>Federal Building</td>
<td>777 Sonoma Ave.</td>
<td>Diesel</td>
<td>Active</td>
</tr>
<tr>
<td>32</td>
<td>SCWA - 330 Hewett</td>
<td>330 Hewett St.</td>
<td>Not Reported</td>
<td>Active</td>
</tr>
<tr>
<td>33</td>
<td>Groth Motors</td>
<td>505 Santa Rosa Ave.</td>
<td>Misc. Fuels</td>
<td>Active</td>
</tr>
<tr>
<td>33</td>
<td>Terado</td>
<td>421 Santa Rosa Ave.</td>
<td>Gasoline</td>
<td>Active</td>
</tr>
<tr>
<td>34</td>
<td>Grace Brothers Hotel</td>
<td>170 Railroad St.</td>
<td>Waste Oil</td>
<td>Active</td>
</tr>
<tr>
<td>35</td>
<td>Shamrock Materials Inc</td>
<td>230 Roberts Ave.</td>
<td>Gasoline</td>
<td>Closed</td>
</tr>
<tr>
<td>35</td>
<td>C&amp;D Batteries</td>
<td>265 Roberts Ave.</td>
<td>Lead</td>
<td>Active</td>
</tr>
<tr>
<td>35</td>
<td>McGowen Auto Wrecking (Former)</td>
<td>112 Holbrook</td>
<td>Waste Oil</td>
<td>Active</td>
</tr>
<tr>
<td>36</td>
<td>Sonoma County Fairgrounds</td>
<td>1350 Bennett Valley Rd.</td>
<td>Diesel</td>
<td>Closed</td>
</tr>
<tr>
<td>37</td>
<td>Point St. George Fisheries</td>
<td>8 Sebastopol Ave.</td>
<td>Gasoline</td>
<td>Active</td>
</tr>
<tr>
<td>37</td>
<td>Allefex Investments, Inc.</td>
<td>1 Sebastopol Ave.</td>
<td>Gasoline</td>
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<td>38</td>
<td>Chevron #9-2642/Redwood Oil</td>
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<td>Gasoline</td>
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<td>Ohn's Transmissions Inc</td>
<td>1540 Petaluma Hill Rd.</td>
<td>Waste Oil</td>
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<td>Hardt, G.K.</td>
<td>1452 Petaluma Hill Rd.</td>
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<td>Bay Bridge Garage</td>
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<tr>
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<td>Torvick Inc.</td>
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<td>Auto Electric &amp; Carburetor</td>
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<td>900 Santa Rosa Ave.</td>
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<td>Santa Rosa Dodge Inc.</td>
<td>930 S. A St.</td>
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<td>Rickie's Salad Corp.</td>
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<td>Bromley Property</td>
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<td>Transco Transmission</td>
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</table>
Kay Tokerud  
Special Projects Coordinator  
Santa Rosa Area Business Association  
716 Howard St.  
Santa Rosa, CA 95404

February 15, 2007

To: Design Review Board  
Re: Downtown Station Area Specific Plan

Today's public hearing marks the third to the last step in the approval process for this  
massive plan which greatly restricts land use and is also a redevelopment plan  
insomuch as it occurs in redevelopment areas. Most of the plan's areas are in  
redevelopment areas, the greatest amount being within the Gateway's Redevelopment  
Area formed in June 2006. As you may know, the City of Santa Rosa is a defendant in  
the lawsuit that was filed against the formation of the Gateways Redevelopment Area.  
Since the outcome of the lawsuit is uncertain, it is premature to create a highly  
restrictive land use document over properties in areas that may not be within  
redevelopment boundaries. The plan, if approved will make over a thousand existing  
legally conforming properties, legal non-conforming properties. Properties facing  
many streets in the plan area, will not be able to be substantially improved or  
developed, unless a mixed-use multi-storied building is built in most cases. All other  
forms of development that are now legal on those properties will no longer be allowed.  
In most cases, buildings along the streets in the Station Area Plan would need to be  
demolished in order to build according to the specific plan.

If properties are in redevelopment areas, the City can control the use of properties in  
these "blighted" areas. The City does not have that legal authority in areas that are not  
in redevelopment areas. Since over half of the Station Plan's area is in the Gateways  
Redevelopment Area that is being legally challenged for its validity, property owners  
whose properties may not be in a redevelopment area should not be unreasonably  
restricted in the use of their land.

The magnitude of the change in land use in the Station Area Plan may meet the legal  
threshold of whether the City "went too far" in restricting land use. While property  
owners still have some use left, if the only way a property can be substantially  
Improved would require that existing buildings be torn down. this could represent  
substantial financial losses to property owners. Property values would be substantially  
lower on properties that are non-conforming. If the City approves the Station Plan and  
property owners effectively have their development rights denied, and the City is not  
able to proceed with the Gateway's Redevelopment Project, this will likely lead to a  
situation where large areas of the downtown could deteriorate, due to a lack of  
development. This already happened in the Santa Rosa Ave. area when the City
downzoned the area from commercial to residential in 2002. The City just changed those properties back to commercial in January 2007. In 5 years no significant development of any kind occurred on those properties which contributed to deterioration in the area.

One of the biggest problems with the Station Area Plan is that it is not consistent with the General Plan. By law, the Specific plan must be consistent with the General Plan, but the City is just going to "fix the General Plan", so that it becomes consistent with the Specific Plan. This is backwards. A very long list of General Plan amendments are being included with the Station Area Plan.

The City has joined the decision to reunify Courthouse Square with the approval of this plan. The reunification, apparently, is a forgone conclusion, even though the City is paying $100k for a design competition that's supposed to be open to all ideas.

The Environmental Impact Report, a two volume set, states that the environmentally-superior plan is the Reduced Growth Alternative, which is not the plan that is being pursued by the City. Although CEQA requires that the environmentally superior plan be selected, the City is choosing to not abide by that requirement.

There are many significant errors in the E.I.R., I strongly encourage you the take the time to thoroughly review the document like I have. One area is being included in the plan for which no data was obtained for hazardous materials sites, for example.

According to the E.I.R., implementation of the plan will cause unacceptable levels of traffic and air pollution. This would be significantly improved if the Reduced Growth Alternative was implemented instead. In August 2006 at a scoping meeting for the E.I.R. for the Station Plan, The City published in a document that the Station plan was the environmentally preferred plan. It is not. I believe it is the responsibility of the City to show the public the Reduced Growth Alternative that they have rejected. Only a few comments on this plan are included in the E.I.R.

The plan is to build over 3,200 new units of housing in the approximate 1 mile square area. The area is not served by any good public transportation system and the traffic will only get worse. Until a public transportation system can be guaranteed, no plan to increase densities should be implemented. Please exercise your rights to make recommendations concerning the plan and you should insist on having the opportunity to review the environmentally superior plan that's required under CEQA. Thank you.

Sincerely,

Kay Tokerud

Kay Tokerud
October 5, 2006

Dear Mr. MacNab:

After reviewing the Working Draft of the Downtown Santa Rosa Station Area Specific Plan, I have several comments and questions. Please enter this letter into the record for this project.

Since this plan is mostly in the Gateways Redevelopment Area and it affects properties located along “Gateway” streets, I’m concerned that this proposal has not yet been identified as a specific project of the Gateways Redevelopment Area. Obviously, the streetscape improvements, including widenings of some streets and sidewalks, is going to be expensive to complete. I would venture to guess that the City is planning to use tax-increment financing from the Gateways project to re-do the streets, sidewalks and infrastructure. The City at present isn’t even able to keep the street lights on in some areas. Unless there’s a vast new funding source, then Gateways money will be used if that Redevelopment project survives the current lawsuit against it.

Although some street improvements would probably be a good idea in some areas, including making streets safer for bicyclists and pedestrians, I think the new building standards are positively draconian and completely unjustified. To say that all new development and significant remodeling must adhere to strict new design standards along most of the main streets of the central core of the city, will deprive owners and tenants of properties the right to develop their properties in accordance with existing zoning and building regulations. The new plan will make many properties that now conform to existing zoning, building and General Plan provisions, non-conforming. This far-reaching plan is tantamount to a re-zoning and could be construed as a regulatory taking. Since almost all of the Downtown Station Area Specific Plan area is located within the Gateways Redevelopment Area, when properties become non-conforming due to the new building standards, they also become non-conforming to the Redevelopment Plan. These non-conforming property owners may be subject to entering into Owner participation Agreements with the threat of eminent domain being used to acquire their property if they should refuse to enter into these agreements.
Property owners need to be made aware of the full ramifications of what it would mean to their property rights to be in this new plan area on top of being in the Redevelopment Area.

It’s unreasonable that buildings must all be built to the "build to" line, especially since that line has yet to be determined because of street and sidewalk alterations. Measurements of street widths proposed, and exact locations of "build-to" lines must be included in the plan so property owners will know if their buildings are on that line or not.

If Proposition 90 passes, the City of Santa Rosa may be held liable for changing land use requirements and be required to pay property owners for their lack of use and diminished property values. I believe that this plan will substantially lower property values for many properties in the plan area. I strongly recommend that the building standards be dropped from the plan and use the existing General Plan to guide new development instead. The group I represent, The Santa Rosa Area Business Association, has sued the City of Santa Rosa and the Redevelopment Agency to invalidate the Gateways Redevelopment Project. If we win, and we think we will, where is the City planning to obtain the funds for the Station Area Plan?

Other objections I have about the plan are the inclusion of Juilliard Park and Olive Park in this plan. These two neighborhoods were deleted from the Gateways Project Area by Resolution 10912 on April 13, 2006 by the Planning Commission and by Resolution 1560 of the Redevelopment Agency on April 17, 2006. I object to the inclusion of South A St., Sebastopol Road, and Olive Avenue because these areas are not slated for redevelopment.

Santa Rosa Avenue, north of Highway 12, which is inappropriately named Park and Gardens, is a historically commercial district. This subarea is beyond the study area for the Rail Station and should not be included in the Downtown Station Area Plan. It’s extremely unlikely that many people in this area will use the rail service for 3 reasons. One, the area is too far away from the train site, two, Highways 101 and 12 are easily accessible from that location, and third, the regional bus station is located there. I believe the City is using the Smart train plan as an excuse to impose new development restrictions on the existing property owners on Santa Rosa Avenue to discourage businesses from continuing their commercial uses on their properties. This would make it easier for the City to redevelop the area. While some may want the street redeveloped, the commercial buildings there would be almost entirely out of conformance with the new building standards you are proposing. I believe that the property values would be significantly reduced and that the new plan would seriously impair the continued economically viable uses on the properties. The Santa Rosa Area Business Association requests that the Park and Gardens subarea be removed from the Plan area.
The Downtown Station Area Plan aims to increase the density of areas near the rail station. Increasing the density will result in the addition of more vehicles on the streets which are already severely congested. I didn’t see anything in the plan that would alleviate the traffic problems, it would only worsen them. There’s already thousands of new units planned in the central portion of the city without the addition of this new plan. These people will have cars. The closing off of the Santa Rosa Avenue/Mendocino corridor will be a traffic disaster in my opinion. Closing a main artery such as this will produce a virtual traffic “heart attack”.

The re-routing of traffic onto B St., in front of the Plaza Mall will increase the prosperity of Simon Group, the Mall owner, while depriving businesses in the Downtown/4th St. area of the traffic flow that they depend on for the prosperity of their businesses. Helping the Mall while hurting the Downtown is a very bad idea. I’ve seen plans showing Mendocino Avenue being closed off near College Ave. Southbound traffic on Mendocino would be redirected onto Healdsburg Ave. thus reducing traffic flow into the downtown. Once again, traffic is redirected along the Plaza Mall on B St. The Mall owners must be ecstatic with this plan. I’m strongly opposed to this aspect of the plan.

My questions mostly have to do with street and sidewalk widenings and/or alterations. I’d like to see the working Draft Plan from the City’s Public Works Department that accurately shows the new street and sidewalk dimensions and the exact locations of the “build-to” lines. This way, the public will know, prior to the formal public hearings whether or not their properties will conform to the new plan.

I sincerely hope that the public will be given every opportunity to find out exactly what this new plan would entail long before the legally mandated public hearing process begins. The Gateways Redevelopment Plan was pushed through without adequate public awareness and input. I would hope that the process for this plan is transparent and that all property owners and business owners are properly informed. Thank you.

Sincerely,

Kay Tokerud

Kay Tokerud