

I Introduction

In accordance with the California Environmental Quality Act (CEQA), this document provides responses to comments received on the Draft Subsequent Environmental Impact Report (Draft SEIR) for the proposed Downtown Station Area Specific Plan Update (Proposed Project) in Santa Rosa, California, and it includes revisions to the text in the Draft EIR made in response to comments. The Draft SEIR identified significant impacts associated with the Proposed Project and examined alternatives and recommended mitigation measures that could avoid or reduce potential impacts.

This document, together with the Draft SEIR and Mitigation Monitoring and Reporting Program (MMRP), will collectively constitute the Final SEIR if the Santa Rosa City Council certifies it as adequate and complete under CEQA.

Purpose

As described in Sections 15089 and 15132 of the State CEQA Guidelines, the lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies. Pursuant to CEQA Guidelines Section 15132, a Final EIR must contain the following:

- The Draft SEIR or a revision of the Draft;
- A list of persons, organizations, and public agencies commenting on the Draft SEIR;
- Comments and recommendations received on the Draft SEIR;
- The response of the Lead Agency to significant environmental points raised in the review process; and
- Any other information added by the Lead Agency.

The SEIR is intended to disclose to City of Santa Rosa decision makers, responsible agencies, organizations, and the general public the potential impacts of implementing the Proposed Project using a program level of analysis. This Final SEIR amends and incorporates by reference the Draft SEIR, which is bound separately. As required under CEQA, this document includes comments and responses to comments on the Draft SEIR, and minor corrections and clarifications to the Draft SEIR.

The Final SEIR, including the Draft SEIR and MMRP), is available electronically at www.plandowntownsr.com. Hard copies may be requested by emailing Amy Lyle at alyle@srcity.org or by calling 707-543-3410.

CEQA Process

The City of Santa Rosa is the lead agency for this SEIR. According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a Proposed Project, and to provide the general public with an opportunity to comment on the Draft SEIR. The Draft SEIR was made available for public review on July 15, 2020. The Draft SEIR was distributed to local and State responsible and trustee agencies and the general public was advised of the availability of the Draft SEIR through public notice published in the local newspaper and on the City's website and the project website as required by law. On Thursday August 13, 2020, a public hearing was held on the Draft SEIR during the official public review period. The meeting was held virtually, consistent with Governor's Executive Orders N-25-20 and N-29-20 to prevent the spread of the coronavirus, from 4:00 to 9:00 p.m. The CEQA-mandated public comment period ended on August 31, 2020.

Copies of all written comments received on the Draft SEIR are contained in this document. A summary of oral comments made at the August 13, 2020 public hearing is also included. These comments and responses to these comments are set out in Chapter 3 of this Final SEIR.

Modifications to the Proposed Plan

During the public comment period on the Draft Proposed Plan, which ran from July 15 through August 31, 2020, a series of "virtual" neighborhood and stakeholder meetings were conducted via Zoom to receive feedback from residents, businesses, and property owners. Based on the input received and planning decisions recommended by City of Santa Rosa staff, edits and additions to the Draft Proposed Plan are incorporated as shown on Table 1-1. The edits and additions can be categorized as follows:

Minor text edits and additions to clarify and correct targeted portions of the Proposed Plan;

Additions to Map UDCS-1 Special Design Considerations and Map LU-3 that apply standards and guidelines from the Proposed Plan to certain additional locations within the Planning Area;

Adjustments to the land use designations and development intensity (maximum base floor area ratio) standards applicable to certain properties on B Street, West Third Street, and Santa Rosa Avenue.

Table I-1: Edits and Additions to the Proposed Plan in Response to Public Comments

<i>Chapter</i>	<i>Page</i>	<i>Edit</i>
TOC/ Acknowledgements	Interior Cover	Acknowledgements- Remove CAC affiliation from CAC names
TOC/ Acknowledgements	Interior Cover	Acknowledgements- add Amy Nicholson, Senior Planner and Steve Brady, Senior Environmental Specialist to Staff list
Introduction	I-9	Vision for roadway reallocation, bicycle lanes, and pedestrian safety improvements
Introduction	I-5	Improving motorized, non-motorized, and transit connectivity between the SMART station site, the Downtown Transit Mall, <u>regional alternative transportation pathways, including the SMART pathway, Joe Rodota Trail, and Santa Rosa Creek Greenway Trail</u> , and existing and future adjacent commercial, residential, educational, and governmental areas
Introduction	I-9	Santa Rosa Corridor Plan- Revise to note the Plan will not be superseded but amended allow the DSASP to control where there is overlap in the Plan boundaries. Add: <u>Santa Rosa Avenue Corridor Plan (2011)</u> <u>Approved in 2011, the Santa Rosa Avenue Corridor Plan provided a comprehensive, long-term vision for this corridor and surrounding area, including recommendations for capital improvements and design guidelines. The DSASP incorporates the Corridor Plan’s vision for roadway reallocation, bicycle lanes, and pedestrian safety improvements along Santa Rosa Avenue. The Santa Rosa Avenue Corridor Plan will be amended to allow the DSASP to control where there is overlap in the Plan boundaries.</u>
Introduction	I-9	Page I-9, add discussion of Roseland Specific Plan and note amendment to be reduced in size. Add: <u>Roseland Area/Sebastopol Road Specific Plan (2016)</u> <u>The purpose of Roseland Area/Sebastopol Road Specific Plan is to support a unified, vital, healthy, and livable Roseland community. The area’s designation as a Priority Development Area supports walkable, bikeable, and transit-rich neighborhoods by increasing the number and proximity of residents to amenities, schools, parks, and jobs. The plan aims to do this by improving connectivity, concentrating areas of activity, and enhancing the physical environment. The Plan area was previously bounded by State Route (SR) 12 to the north, Bellevue Avenue to the south, US Highway 101 to the east, and Stony Point Road to the west. The Roseland Area/Sebastopol Road Specific Plan will be amended to remove the area bounded by Highway 12, Sebastopol Road, and Dutton Avenue</u>

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		<u>to be consistent with the DSASP boundary and Downtown PDA boundary.</u>
Introduction	1-9; 3-10; 3-11; 5-15	Keep consistent: <u>Citywide</u> Creeks Master Plan
Introduction	Map Intro-1	Delineate Prince Memorial Greenway on Map INTRO-1
Land Use	2-2	Change Vacant Land description on page 2-2 to state the following: Several large sites account for a large portion of this vacant land, including the SMART site west of the Downtown Station between West Third and West Sixth Streets and several properties in the western portion of the Downtown Station Area around Imwalle Gardens.
Land Use	2-17	Add Policy: Require new development within the Core Mixed Use, Station Mixed Use, Maker Use Use, and Neighborhood Mixed Use designations to achieve the mid-point or higher of the maximum FAR. Exceptions are allowed where parcel configuration, historic preservation or utility constraints make the mid-point impossible to achieve.
Land Use	2-17	LU-2.6: Require commercial uses that exceed <u>15,000</u> square feet to have a multi-storied format, rather than be spread out horizontally, and integrate other uses. Grocery stores are excepted from this requirement. Allow single-story development only if it can be shown to be complimentary and compatible with the vision and desired character for the area where it is proposed.
Land Use	2-19	Page 2-19, Policy LU- 3.8- Remove reference to "metro" chamber and just say "area" chamber of commerce groups
Land Use	Map Intro-1; Map LU-3	Remove "North Railroad Square" notation on map.
Land Use	Map LU-3, Map LU-5	Apply Neighborhood MU land use and max FAR of 2.0 for the properties on W. 3rd between Dutton and Decoe
Land Use	Map LU-3, Map LU-5, Map UDCS-1	Apply Core MU land use and max FAR of 4.0 for 526 Sonoma Avenue; add Neighborhood Transition to west-facing side of parcel
Land Use, Urban Design and Civic Spaces	Map LU-3, Map LU-5, Map UDCS-1	Apply Core MU land use and max FAR of 3.0 for two blocks on B Street north of Healdsburg Avenue up to Lincoln Ave. (Core Mixed Use - FAR 3). Add Neighborhood Transition to parcels fronting B Street.
Land Use	Map LU-3, Map LU-5	Apply Core MU land use and max FAR of 4.0 for one block on B Street between 7th Street and Healdsburg Avenue (Core Mixed Use - FAR 4).

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Mobility	3-2	Replace "Vehicle Miles Traveled" header with "Performance Metrics"
Mobility	3-4	Edit Policy MOB-1.1 to clarify as follows: Maintain a roadway classification system as illustrated in Figure MOB-1, with the following segments as Boulevards designed to accommodate transit, bicycles, and pedestrian facilities together with vehicle traffic: * <u>Santa Rosa Avenue from Sonoma Avenue to South A Street</u> * <u>E Street from Sonoma Avenue to College Avenue</u>
Mobility	3-5	Change Roberts Road to Roberts Avenue in Table MOB-1
Mobility	3-10	Add to p. 3-10 language to East-West connections describing Prince Memorial Greenway/Santa Rosa Creek trails as an east-west connection
Mobility	3-11	Downtown Loop. A strengthened transit connection along Third <u>Street</u> will link Courthouse Square, the Sonoma-Marin Area Rail Transit (SMART) station <u>and the regional Joe Rodota Trail</u> , whether by way of a trackless trolley, enhanced CityBus service, or on-demand electric vehicle (see Map MOB-5).
Mobility	3-13	New Policy MOB: Promote pedestrian and bicycle connections to the Prince Memorial Greenway and Santa Rosa Creek Greenway to provide an east-west connection across the planning area.
Mobility	3-13	Change Policy: MOB-2.2 Connect southbound bicycle infrastructure on B Street between Third <u>First</u> and Fourth streets with a class II bicycle lane.
Mobility	3-13	New Policy MOB: Identify maintenance needs and funding mechanisms for the Prince Memorial Greenway to improve and maintain the corridor to accommodate a variety of passive and active uses.
Mobility	3-24	New Policy MOB: Evaluate the need for additional accessible public parking spots on a biannual basis.
Mobility	3-24	Correction to MOB-6.4: Prohibit new stand-alone surface parking lots and encourage the conversion of existing parking lots to increase housing density.
Mobility	Map MOB-3, Map MOB-4	Show Class II bicycle facility on Map MOB-3 and MOB-4 between West Third Street and West Sixth Street through the SMART property
Mobility	Map MOB-3	Add planned Class II Bike Path to Brookwood Ave from 2nd Street to College Ave
Mobility	Map MOB-3	Add entryways at Imwalle, north of creek at RR Street, clarification that downstream of Pierson is a gravel path, and clarify that daylighting could be Matanzas and SR creeks

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Mobility	Map MOB-4	Add a pedestrian improvements icon to Map MOB-4 at Sonoma and SR Ave (as envisioned in bike ped master plan)
Mobility	Map MOB-4	Show bicycle/pedestrian through-connection from Santa Rosa Creek to SMART station at 4th Street
Urban Design and Civic Spaces	4-3	DS-1, Revise bullet four to insert a comma between "on-site" and "or" so that a curbside parklet is not required to be a minimum of 600 feet.
Urban Design and Civic Spaces	4-5	DS-2 change to "Properties with frontage on streets in the Active Ground Floor Overlay shall provide at least one primary pedestrian entrance <u>or alternative design solution(s) that implements active ground floor goals as described in the 2020 Downtown Station Area Specific Plan, subject to approval by the review authority.</u> "
Urban Design and Civic Spaces	Figure UDCS-1, 4-5	Figure UDCS-1: Ground Floor Façade should be edited to eliminate reference to 'first 20 feet'.
Urban Design and Civic Spaces	4-6	DG-7 change to "Design of the Railroad Square/Depot Park should accommodate buses, taxis, ride hailing services, and drop-off/pick-up areas, with canopied waiting areas, seating, lighting, and real time bus information."
Urban Design and Civic Spaces	4-6	DG-8 change to "Building entrances, windows, and active uses on the SMART site should be oriented to the public promenade in order to more meaningfully engage with the public space and enhance sense of security."
Urban Design and Civic Spaces	4-11	Add new Design Guidelines (after DG-10): Provide temporary restroom facilities that cater to the needs of families and seniors during public events.
Urban Design and Civic Spaces	4-13	Add check mark for washrooms in the Plazas column of Table UDCS-1
Urban Design and Civic Spaces	4-13	Typo: Canopies
Urban Design and Civic Spaces	4-14	Add footnote to Table UDCS-3: "Minimum side setback of 5 feet required if abutting existing low density residential structure." Add Cherry Street, B Street, <u>Sonoma Avenue and College Avenue</u> to left column heading in Table UDCS-3.

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Urban Design and Civic Spaces	4-15	Edit Figure UDCS-1 to add caption noting that "case shown is Seventh, Ninth, and Riley frontage."
Urban Design and Civic Spaces	4-15	Change DS-11: Buildings in the Downtown Transition zones shown on Map UDCS-1 shall step back a minimum of 6 feet, or a lesser distance as approved by the Review Authority, above the fifth floor along the frontage of Fourth and Fifth Streets.
Urban Design and Civic Spaces	4-17	DS-14 change to "Primary and side street building facades should incorporate ground floor and upper floor transparency standards consistent with Design Guidelines."
Urban Design and Civic Spaces	4-20	DS-19 edit to "but cannot encroach in the public right-of-way <u>without a variance.</u> "
Urban Design and Civic Spaces	4-20	DS-20 replace "mature oak trees" with "mature Heritage trees"
Urban Design and Civic Spaces	4-20	DS-21 edit to "The minimum floor-to-ceiling height of the ground floor commercial space shall be a minimum of 12 feet, as shown in Figure UDCS-8." Edit Figure UDCS-8.
Urban Design and Civic Spaces	4-21	DS-22 edit to "The depth of ground floor commercial space shall be sufficient to encourage small scale, or larger, commercial retail tenancies." Remove depth requirement in Figure UDCS-8.
Urban Design and Civic Spaces	Map UDCS-1	Add Burbank Gardens Preservation District (east of Santa Rosa Avenue) to Map UDCS-1
Urban Design and Civic Spaces	Map UDCS-1	Add Neighborhood transition standard to the southern-facing parcel edge of College-Avenue fronting parcels between Morgan Street to Glenn Street
Urban Design and Civic Spaces	Map UDCS-1	Add Neighborhood transition standard to east- and southeast-facing parcel edge of property at 636 Cherry Street
Urban Design and Civic Spaces	Map UDCS-1	Add Creek and Trail Activation Area to select portions of creek-fronting parcels

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Urban Design and Civic Spaces	Map UDCS-2, Map LU-3	Add Civic Space symbol in St Rose neighborhood in general vicinity of Washington St, Morgan St, and 9th St.
Urban Design and Civic Spaces	Map UDCS-2, Map LU-3	Add Civic Space symbol to Roberts area, in general vicinity of Dutton Ave and Sebastopol Rd
Urban Design and Civic Spaces	Map UDCS-2, Map LU-3	Add Civic Space symbol to Julliard Park and Fremont Park
Urban Design and Civic Spaces	Map UDCS-2	Add Gateway symbol to the Roberts Avenue and Highway 12 intersection
Urban Design and Civic Spaces	Map UDCS-1, 4-14, 4-15	Eliminate the Station Transition zone. This Transition has been determined unnecessary considering future analysis of the existing ROW area and may not achieve the built environment the Plan is seeking.
Public Services and Sustainability	5-7	The City’s stormwater system conveys runoff from developed areas into creeks to protect against flood hazards or erosion. Runoff is collected and disposed of <u>directed through</u> an integrated system of curbside gutters, underground pipelines, drainage ditches, and creeks. The main drainage conduit within the Downtown Station Area is the Santa Rosa Creek. Santa Rosa Creek runs east to west through the Downtown Station Area, going under City Hall in a 108-inch Box Culvert from E Street to Santa Rosa Avenue where it enters the Prince Memorial Greenway, a revitalized area of the creek that removed the trapezoidal, concrete-lined channel and restored it to a natural condition with vegetation, walkways and reinforced earthen banks. Matanzas Creek connects to Santa Rosa Creek under City Hall. Long term planning currently calls for relocation of the City offices, Santa Rosa Creek provides the primary drainage through the Downtown Station Area. Both Santa Rosa and Matanzas Creeks flow in large box culverts for two blocks from E Street under the City Hall Complex to their confluence on Santa Rosa Avenue at the Prince Memorial Greenway. The Greenway showcases a restored creek with pathways, trail bridges and a Class I Shared Use Path. A bare concrete trapezoidal flood control channel was replaced with a more natural channel improved water quality, supports riparian habitat, and yet maintains the desired flood capacity. Long term planning currently calls for the relocation of City offices, removal of the box culvert and subsequent restoration of the confluence of these creeks to a natural condition, including vegetation, bank stabilization, bike

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		paths and community areas. Development of the Downtown Station Area is not expected to have a significant increase in stormwater runoff. Outside of planned system upgrades, no improvements are necessary to support the increased densities proposed. Current regulations require that new development and redevelopment implement on-site stormwater treatments and hydromodifications, <u>such as vegetated bio-swales, pervious paving and other types of vegetated on-site detention</u> , which should result in a lower runoff factor for the area. New projects will also need to comply with the City's Low Impact Development (LID) standards,
Public Services and Sustainability	5-9	Add new Policy <u>PSS-3.9 Work with Recology, property owners, and developers to create standards for shared trash enclosures.</u>

Validity of the SEIR Analysis for the Modified Plan

The review process mandated by CEQA is iterative, including multiple opportunities for public comment and for project changes in response to those comments. It is not uncommon for a proposed project to evolve during the EIR process, so that the draft presented at the time of the Draft EIR has been revised by the time of the Final EIR. CEQA Guidelines Section 15088.5 addresses this situation, explaining how to evaluate whether changes to the project/plan (and to the Draft EIR's analysis and conclusions) necessitate recirculation of the Draft EIR prior to preparation of a Final EIR.

Under CEQA, recirculation of a Draft EIR is required when there is significant new information about the project or its impacts. Significant new information means disclosure of either a new significant impact, a substantial increase in the severity of an impact (unless mitigation measures are adopted that reduce the impact to a level of insignificance), or a feasible alternative or mitigation measure considerably different from others already analyzed that would clearly lessen significant impacts of the project but that the project proponents decline to adopt. Recirculation is also required if a Draft EIR is so inadequate that meaningful public review and comment was precluded. However, recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

In the current instance, the edits and additions to the Proposed Plan described above and made as a result of comments received during the public review period do not constitute significant new information pursuant to Section 15088.5 of the CEQA Guidelines. The majority of the edits and additions listed in Table 1-1 are minor text edits and additions made to clarify or correct information in the Proposed Plan. The application of neighborhood transition and daylight plane standards to additional properties on B Street and Sonoma Avenue would further limit the potential for aesthetic impacts to adjacent properties, further reducing an impact determined to be less than

significant in the Draft SEIR. The addition of active ground floor requirements to certain locations along Santa Rosa Creek and the Prince Memorial Greenway would clarify and reinforce existing standards contained in the Santa Rosa Citywide Creek Mater Plan. The addition of Civic Space icons to Map LU-5 indicates desired locations for additional public recreational spaces. If the property owners elect to redevelop the parcels and include Civic Spaces, the applicable guidelines from the Urban Design chapter of the Proposed Plan would apply, as they would in other locations within the Planning Area where community input has indicated that Civic Spaced are desired.

With respect to the land use and development intensity adjustments:

- The application of the Core Mixed Use designation to parcels currently designated Retail and Business Services along B Street between Healdsburg Avenue and Lincoln Street would broaden the range of permitted uses only slightly, as a mix of commercial, retail and residential uses is already permitted in these locations under the Draft Proposed Plan.
- Similarly, the application of the Neighborhood Mixed Use designation to parcels currently designated Retail and Business Services along West Third Street at Decoe Street would broaden the range of permitted uses only slightly, as a mix of commercial, retail and residential uses is already permitted in these locations under the Draft Proposed Plan.
- The change in the land use designation applicable to the parcel at 526 Sonoma Avenue from Medium Residential to Core Mixed Use would potentially allow for the development of non-residential uses on this property; however, this change would apply only to a single parcel immediately adjacent to two other with the same designation and as such the change would not be substantial.
- The application of a maximum base FAR of 4.0 to the properties on B Street between Seventh and Healdsburg and a maximum base FAR of 3.0 between Healdsburg and Lincoln would not substantially increase development capacity, as the parcels are all relatively small in size and subject to the height restrictions and other regulations of the H_combining district in which they are located.
- The application of a maximum base FAR of 4.0 to the parcel at 526 Sonoma and 2.0 to the parcels on West Third at Decoe would represent an increase in the permitted development intensity at these locations; however, this would not alter the projected buildout of the Proposed Plan. As noted on page 2-29 of the Draft SEIR, the projected buildout of the Proposed Plan is a reasonably foreseeable forecast of the development that may result from implementation made in consideration of market demand factors and the capacity permitted by the applicable development intensity standards. While higher permitted development intensity may increase the theoretical capacity of the sites, actual development will be limited by market conditions.

Overall the edits and additions to the Proposed Plan described above, together with the revisions to the Draft SEIR detailed in Chapter 4 of this document, merely clarify and make insignificant changes to an adequate SEIR. As a result of these changes, there would be no new significant or substantially more severe impacts or new mitigation measures that were not already included in the Draft SEIR, and consequently recirculation of the Draft SEIR is not required. Information presented in the Draft SEIR and this document support this determination.

Organization

This document contains the following components:

- **Chapter 1 Introduction.** This chapter discusses the use and organization of the Final SEIR.
- **Chapter 2 List of Commentors.** Lists all of the agencies, organizations and individuals that submitted written comments on the Draft SEIR; reproduces all comments; and provides a unique number for each comment in the page margin.
- **Chapter 3 Comments and Responses.** Provides numbered responses to comments on the Draft SEIR keyed to the comment letters included in Chapter 2, as well as revisions to the Draft SEIR where necessary to clarify or amplify in the order that responses appear. Where such revisions are warranted in response to comments on the Draft SEIR, deletions are shown in ~~striethrough~~ and additions are shown underlined in the matrix of comments and responses. Map revisions required in response to comments are noted in the matrix and the revised maps are included in Chapter 4.
- **Chapter 4 Revisions to the Draft EIR.** Provides an errata with revisions to the Draft SEIR where necessary to clarify or amplify. Revisions are organized by Draft SEIR section and by page number. Where such revisions are warranted in response to comments on the Draft SEIR, deletions are shown in ~~striethrough~~ and additions are shown underlined in the matrix of comments and responses. Map revisions required in response to comments are included at the end of the chapter.