

### 3 Responses to Comments

This chapter includes responses to comments on environmental issues raised in the comment letter and at the Planning Commission meeting, as described in Chapter 2: Comments on the Draft SEIR.

Responses to written comments received during the public review are summarized in Table 3-1 below. The reference number and text of the comments are presented alongside the response for ease of reference. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response.

Responses focus on comments that raise important environmental issues or pertain to the adequacy of analysis in the Draft SEIR or to other aspects pertinent to the potential effects of the Proposed Project on the environment pursuant to CEQA. Comments that address policy issues, opinions or other topics beyond the purview of the Draft SEIR or CEQA are noted as such for the public record. Where comments are on the merits of the Proposed Plan rather than on the Draft SEIR, these are also noted in the responses. Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final SEIR. Where such revisions are warranted in response to comments on the Draft SEIR, deletions are shown in ~~striketrough~~ and additions are shown underlined in the matrix of comments and responses.

**Table 3-1: Responses to Comments Received on the Draft EIR**

Comment #	Comment	Response
A1-1	<p>August 29, 2020                      Santa Rosa Planning Department                      RE: Comments on Santa Rosa Downtown Station Area Specific Plan (DSASP) and the Draft Subsequent Environmental Impact Report (DSEIR)                      Dear Commissioners and City Staff:                      I write in regards to the Santa Rosa Downtown Station Area Specific Plan (DSASP) and the Environmental Impact Report (EIR) for the Plan to discuss “the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated.” This Plan is set to include the development of 7,0006 residential dwelling units and 1,006,915 square feet of non-residential development by 2040. For these reasons, I request a consideration of the below concerns and a revised EIR prior to Project approval to further analyze the listed impacts and increase the feasibility of mitigation measures.</p>	<p>The City notes that, as described on page 2-31 of the draft SEIR, the Proposed Plan “is projected to result in in 7,000 new housing units, 16,800 new residents and 828,490 non-residential square feet by 2040. This represents 3,750 more housing units, 8,670 more residents, and 334,690 non-residential square feet than envisioned under the 2007 DSASP.” Please see also responses to comments A1-3, A1-5, and A1-7 through A1-16 that address the need for revisions to the Draft SEIR.</p>
A1-2	<p>The Plan Does Not Sufficiently Mitigate Displacement Or Ensure Compliance With Santa Rosa’s Required RHNA For Moderate, Low, Very Low, And Extremely Low-Income Households                      Housing is very much needed in Santa Rosa and I applaud the efforts to increase the housing stock in general. However, I believe the Affordable Housing and Anti-Displacement strategy of the plan to be deficient in addressing the needs of working class and low-income individuals in the plan areas as well as in adjacent neighborhoods. This plan must have baked into its greater affordable housing and rental housing preservation strategies or it will have a displacement and gentrification impact. Other area plans have done this- for example, San Francisco’s Central Soma Plan explicitly stated that it would “maintain the diversity of residents by requiring that more than 33% of new housing units are affordable to low- and moderate-income households.” I The Land Use component of the Santa Rosa DSASP report acknowledges the possibility of gentrification by saying: “In creating an environment that is attractive to higher-wage industries and employees to stimulate housing production, there is potential for lower-income residents to be displaced as higher-income residents move in.”                      According to the DSIER and the 2019 Affordable Housing and Anti-Displacement Strategy of the Plan, the area plan is 34% Latino, 75% of the planning area’s housing units are</p>	<p>The comment pertains to the content of the Draft Downtown Station Area Specific Plan and not to the merits of the environmental analysis in the Draft SEIR. As such, no further response is required.</p>

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A1-3	<p>renter-occupied with 53% of those renters as rent burdened, 18% of households make under \$20,000, and 15% of households are below the poverty line.<sup>2</sup> The 2019 Sonoma County Point in Time Count identified 1600 unhoused individuals in Santa Rosa.<sup>3</sup> The area plan has a higher number of renters, higher percentage of Latinos, higher percentage of those living in poverty than the rest of Santa Rosa. As a matter of fact, in the Anti-displacement strategy report, it actually lists the populations who are vulnerable to displacement by Tract in and around the Plan as seen in the chart below which has a large number of potentially displaced persons.</p> <p>Already, according to the analysis site, AdvisorSmith, Santa Rosa is the 14th least affordable U.S. city for homebuyers.<sup>4</sup> As for renters, Santa Rosa has seen steady rent increases in the past 10 years and according to an August 2020 Housing Market report of Sonoma County says, “buyer demand has skyrocketed” because of “more affluent buyers,” are likely moving out of San Francisco due to the pandemic.<sup>5</sup> Renters in the Area Plan have rent protections that are weaker than nearby jurisdictions (codified in AB 1482, 5% allowable annual increases after inflation or 10%, whichever is lower for apartments older than 15 years).</p> <p>To address displacement, the Plan relies on existing housing/inclusionary fees ( 10% moderate income, 8% low income or 5% very low income for sale or 4% low income, 3% very low income, or 5% moderate income for rental) and other fees (Commercial linkage fee of \$3/sf) as well as current market rate construction it deems "affordable by design" to build for middle, low and very low income residents. The Plan goes on to state that affordable units will become available because the Plan provides bonus maximum base floor area ratios (FARs) to those projects that propose affordable housing, that “reducing the overall number of parking spaces provided can help with affordability,” and that “smaller units are more likely to be naturally affordable” to those at lower income levels. The Plan also speaks to “encouraging” residential development that meets the special needs of seniors, large and small families, low- and middle-income households, and people of all abilities” and “promoting” the use of material that make construction “affordable by design.” This is simply not enough. Fundamentally depending on the market in this manner will not ease the affordable housing pressures the city currently faces.</p> <p>The Plan fails to adequately meet Santa Rosa's Regional Housing Needs Assessment. Santa Rosa was allocated 5,083 new housing units to be built between 2015 and 2023, with 33</p>	<p>As required under CEQA, an analysis of the potential for the Proposed Project to</p>

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	<p>percent (1,712 units) available to Extremely Low, Very Low, and Low-Income households. While the City has not met any of its targets for housing construction, it has fared most poorly with constructing moderate, extremely low, very low, and extremely low-income housing. In these categories it has only met 15% 10% of the required amount compared to 51% for above moderate-income homes as seen with the chart below from the City of Santa Rosa. Given these deficits, why not a greater emphasis on the construction of affordable housing? Policy SP-LU-2.6 called for a review of the City’s Housing Allocation Plan to address affordable housing, but why not just incorporate stronger tenant protections and incentivize more affordable housing into the Plan?</p> <p>The proposed rezoning under the Santa Rosa Downtown Plan without stronger mitigations is a recipe for gentrification and displacement. These changes will also mean increased rents for both residential and commercial tenants. The graph below, also from the Affordable Housing and Anti-Displacement Strategy Report, shows the majority of the Area Plan as “at risk for displacement” or experiencing “ongoing gentrification.”</p> <p>This plan largely relies on incentivizing market-rate housing with the belief that eventually the market rate housing becomes affordable which is partially true. While studies do show this happens, it can take years- time gentrifying communities don’t have, especially during the COVID-19 pandemic when economic inequity is further exacerbated.<sup>6</sup> If anything, the Planning Commissioners, city staff and the City Council should consider the warning in the report by Andrés Rodríguez-Pose of the London School of Economics that “upzoning is far from the progressive policy tool it has been sold to be. It mainly leads to building high-end housing in desirable locations.”<sup>7</sup> Another study, looked at upzoning in New York City in Greenpoint/Williamsburg and Park Slope/4th Avenue.<sup>8</sup> This report indicated that during the period of rezoning, there was “a decrease of about 15,000 Latinx residents in Greenpoint &amp; Williamsburg between 2000 and 2015 despite a population increase of over 20,000 (of mostly white residents) during the same time period and a decrease of about 5,000 Black and Latinx residents in Park Slope between 2000 and 2013 despite overall population growth of over 6,000 during the same period.” The report goes on to recommend a Racial Impact Study to the environmental review process to “ensure that the racialized displacement that often accompanies rezonings would be brought to the foreground,” “develop a low-income housing strategy,” and “prioritize the retention of communities of color by reinvesting in permanently, deeply affordable</p>	<p>displace substantial numbers of existing people or housing is included in Appendix A to the Draft SEIR, which includes the Initial Study, prepared and circulated for public comment in December 2019. As noted on pages 57 through 59 of the Initial Study, the 2007 EIR determined that implementation of the DSASP would have a less than significant impact on displacement of people and housing and that while the potential for displacement would exist, proposed policies would lessen the potential impacts of displacement of by protecting existing residential neighborhoods, allowing for greater residential development to ensure a no net decrease in housing within the planning area, and maintaining a balance of housing types available at multiple income levels. Additionally, the Initial Study notes that the Proposed Plan would also have potential to displace people or housing, either directly or indirectly, through property value increases that could inadvertently affect renters without protections; however, the 7,000 new housing units projected under the Proposed Plan would be constructed primarily on vacant and underutilized commercial properties in parts of the Planning Area without substantial numbers of existing housing units. Further, the Initial Study notes that existing City anti-displacement policies,</p>

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A1-4	<p>housing.” The last recommendation is aligned with a 2016 UC Berkeley Report, that “the best way to prevent gentrification and displacement is to build affordable housing in cities and neighborhoods where rents and home prices are rising fastest.”<sup>9</sup> Large-scale displacement is considered a significant environmental impact under CEQA’s “Vehicle Miles Travelled” standard.</p> <p>In order to combat the negative impacts of the Plan on the existing working-class residents of the City, serious controls need to be put in place as outlined below:</p> <ol style="list-style-type: none"> <li>1) Establish a strong rent control similar to Ordinance 4072 that for certain residential rental units, limits rent increases to no more than 3% in a cumulative 12-month period;</li> <li>2) Aggressive non-profit or city acquisition of existing tenant occupied buildings and convert into permanently affordable housing (while protecting the rights of tenants in those buildings);</li> <li>3) Aggressive acquisition of new development sites for 100% affordable housing;</li> <li>4) Right of First Refusal for residential renters and/or nonprofits and commercial renters;</li> <li>5) Ensure the sale of public land for private or public/private development is at least 33% or more affordable;</li> </ol>	<p>including policies in the General Plan and Housing Action Plan together with a number of new State laws would further reduce potential impacts. These new State laws include SB 330, which prohibits demolition of low income, Section 8 or rent controlled apartments without replacement, mandates relocation assistance, and offers right to return to units at the same rents; and AB 1482, which prevents against price gouging and no-cause evictions. Thus, the Draft SEIR concluded that impacts to displacement of existing housing units that require construction of replacement housing elsewhere would occur would be less than significant and that implementation of the changes contained within the Proposed Plan would not result in a significant difference in environmental impact, compared to that identified in the 2007 EIR.</p> <p>The comment pertains to the content of the Draft Downtown Station Area Specific Plan and not to the merits of the environmental analysis in the Draft SEIR. As such, no further response is required.</p>

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A1-5	<p>6) Rental registry tracking buyouts;                      7) Increasing affordable housing impact fees for very low- and low-income housing in the Area Plan; and                      8) Racial Impact Study to the Environmental Review.</p>	<p>The City notes that per CEQA Guidelines Section 15064 (e), "Economic and social changes resulting from a project shall not be treated as significant effects on the environment." As such, a Racial Impact Study is not required to satisfy CEQA. However, as part of the ongoing Santa Rosa General Plan Update, an Environmental Justice Element is being prepared.</p>
A1-6	<p>Jobs/Housing Fit Imbalance will Impact the Entire City                      In addition, the Downtown Plan needs to take into consideration the jobs/housing fit. This is a metric that “measures the imbalance between a city's total number of low- wage workers and the quantity of homes affordable to them.” In other words: “By growing jobs without planning for homes for low-income workers, most cities in our region are failing to create inclusive communities and forcing low-income workers to choose between paying a disproportionate percentage of their income on housing, living in substandard and/or overcrowded conditions in order to afford housing, or enduring long commutes (and incurring costs for transportation) in order to find affordable housing in areas further away from job centers.”<sup>10</sup> The City lauds the Plan to move the jobs-housing ratio from 6.01 to 1.84 but does not adequately address the jobs/housing fit. According to the same report referenced above, Santa Rosa was already at a deficit in creating jobs for low-income and working people by 3,806 affordable units! With most of the new jobs being in the office sector and depleting industrial uses for a new “Maker” use, the Plan will benefit wealthier, more highly educated non-residents at the expense of existing low-income, working class people, and communities of color.</p>	<p>The comment pertains to the content of the Draft Downtown Station Area Specific Plan and not to the merits of the environmental analysis in the Draft SEIR. As such, no further response is required. Nevertheless, as can be seen on Table 2-2 of page 2-20 of the Draft SEIR, while implementation of the Proposed Plan would eliminate 8.2 acres of land dedicated to General Industry, it would designate 37.8 acres to Maker Mixed Use, which would encapsulate industrial uses and preserve industrial job opportunities within the Planning Area.</p>

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A1-7	<p>The DEIR Omits Analyses of the Current Trend of Residential Units Not Being Used as Traditional Housing</p> <p>There are multiple units in Santa Rosa being used as "pied-a terres" and as "short term rentals," moving away from its intended purposes as a primary residential purpose. This has a displacing impact. The EIR does not fully study the impact of corporate rentals, short term rentals and other commercial uses that are different from the original and intended uses as residential. With insufficient controls and enforcement, there is no sure way that residential housing is being used for that specific purpose.</p>	<p>As noted above in response to Comment A1-3, CEQA requires an analysis of the potential for the Proposed Project to displace substantial numbers of existing people or housing, which is included in Appendix A to the Draft SEIR. The analysis concludes that associated impacts would be less than significant given that the Proposed Plan is projected to result in 7,000 net new housing units in the Planning Area through 2004 and that existing State and City policies and regulations would reduce the potential for displacement.</p> <p>The City notes that the number of future property owners in the Planning Area who may elect to live in the area part time or rent the units out on a short term basis cannot be known at this time. Pursuant to CEQA Section 15064.(d).(3), changes resulting from the Proposed Plan which are speculative are not considered reasonably foreseeable and therefore need not be considered in the environmental analysis.</p>
A1-8	<p>Other Concerns with the EIR:</p> <ul style="list-style-type: none"> <li>● Intensity of Development and Relaxing of Development Controls Have Not Been Evaluated With Respect to State Density Bonus Laws in the DEIR</li> </ul> <p>In 2016, legislation passed at the State level to enable developers throughout California to more easily take advantage of State Density Bonus incentives. The State Density Bonus (SDB) was intended as a mechanism for local developers to build an increased amount of</p>	<p>As noted on page 2-18 of the Draft SEIR, the land use intensity regulations proposed in the Draft DSASP and the buildout projections used for the Draft SEIR account for density bonuses offered through both State and City initiatives, including Sections</p>

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A1-9	<p>affordable, student, or senior units in exchange for density increases. The latest version of the State Density Bonus (SB 1085) allows for up to 50% increase in density for a project! Understanding the impact of SDB to projects in the Area Plan is key to realize the full needs around infrastructure demands, traffic, and affordable housing.</p> <p>Inadequate Transportation Infrastructure, Traffic Impacts                      The Downtown Station Area Specific Plan will contribute to increased vehicular and residential area emissions that may exceed the BAAQMD threshold. Of course, growth-oriented traffic and transportation impacts are expected and while I applaud many of the mitigations proposed by the City, the following should be considered:</p>	<p>65915 and 65917.2 of the California Government Code and the City of Santa Rosa Density Bonus Ordinance (City Code, Chapter 20-31). Therefore, the Draft SEIR has adequately considered applicable density bonus laws.</p> <p>Air quality impacts associated with implementation of the Proposed Plan are identified and analyzed on pages 3.1-1 through 3.1-54 of the Draft SEIR. Projected emissions of ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> from mobile sources are quantified in Table 3.1-9. As shown, projected emissions of these criteria pollutants would not exceed thresholds established by the Bay Area Air Quality Management District (BAAQMD) and impacts would be less than significant. Further, projected emissions of toxic air contaminants (TACs) from mobile sources are quantified in Table 3.1-10. While projected emissions of TACs resulting from implementation of the Proposed Plan would exceed BAAQMD thresholds in certain locations shown on Figure 3.1-1 in the Draft SEIR, the implementation of recommended mitigation measures MM-AQ-1 through MM-AQ-3 would reduce impacts to a less than significant level. As such, the Draft SEIR has adequately analyzed impacts associated with traffic emissions.</p>

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A1-10	<p>Impact Of Ride Hailing Companies Within And Adjacent To The Plan Area Of The DEIR Are Not Fully Considered Ride shares/TNCs put more single vehicles in circulation and on the road. These vehicles are often idling, illegally parked, and compete for fare-paying customers and have very little oversight. Ride-hailing/ TNC traffic not only increases "Vehicle Miles Traveled," it has also increased traffic congestion and impacted pedestrian safety. This raise concerns around the transportation infrastructure needs of the Plan.</p>	<p>Pages 3.7-30 through 3.7-47 of the Draft SEIR provide an analysis of impacts on the performance of the circulation system, based on modeling of traffic generated from projected buildout of the Proposed Plan. This modeling accounts for private and commercial vehicles and trucks. While auto travel is not categorized by whether the auto is owned by the driver or operated by a TNC, the vehicle trip itself is accounted for in the traffic and VMT modeling projections. As described, with buildout of the Proposed Plan and implementation of the Plan's proposed circulation network modifications, all intersections are projected to operate acceptably at LOS D or higher. Further, with the addition of traffic associated with the Proposed Plan to existing volumes and with the circulation improvements proposed by the Plan, all of the roadway segments are projected to operate at LOS D or higher except for the segment of Third Street between B Street and Brookwood Avenue, which is projected to continue operating at LOS E in the westbound direction; however, as this segment is exempt from LOS standards, associated impacts would be less than significant. Additionally, the City notes that numerous proposed policies in the Draft DSASP would facilitate and promote the use</p>

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A1-11	<p>CEQA Concern Based On Vehicle Miles Traveled</p> <p>The upzoning of property increases the values of the underlying land, and this has the potential impact of increased costs for residential and commercial tenancies. Also, low income residents tend to be more transit dependent, so replacing low income residents with higher income residents potentially increases the population of individuals with car</p>	<p>of alternatives to the single-occupant vehicle.</p> <p>Impacts related to roadway hazards are discussed on pages 3.7-49 and 3.7-50 of the Draft SEIR. As discussed, new transportation facilities and improvements to existing facilities required for implementation of the Proposed Plan would be designed and constructed to local, regional, and federal standards, and as such, would not be expected to introduce any hazardous design features. Further, roadway improvements included in the Proposed Plan have been oriented to balance the mobility needs of all users, maintaining the flow of traffic at regulated speeds, which in turn generally leads to less severe collisions (when collisions do occur). Associated impacts would be less than significant. Please see response to comment A1-11 below regarding the adequacy of the VMT analysis.</p> <p>The Draft SEIR has adequately analyzed impacts associated with roadway operations, VMT, and roadway safety.</p> <p>Analysis of projected VMT is provided on pages 3.7-47 and 3.7-48 of the Draft SEIR. Travel demand model results, summarized in Table 3.7-12, indicate that the residential VMT per capita, employment VMT per</p>

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	<p>ownership. The impacts of the increased "Vehicle Miles Travelled" caused by more affluent and incoming populations was not considered in the EIR. This Plan will also increase residents and workers' VMT, which results in a significant traffic impact under SB 743 (2013).</p>	<p>employee, and total VMT per service population metrics for the Planning Area will all be below the applied significance thresholds. In other words, the amount of vehicle travel generated by residents within the Planning Area would be more than 15 percent below current citywide and countywide levels, and the amount of vehicle travel generated by employees within the Planning Area would be more than 15 percent below the citywide and countywide average. The total VMT per service population (residents plus employees) within the Planning Area would also be more than 15 per cent below the citywide and countywide average. Overall, the intensification of uses in proximity to transit within the Planning Area would reduce per capita VMT. Associated impacts would be less than significant.</p> <p>As discussed above in responses to comments A1-3, A1-7, and A1-8, the commenter's assertion that implementation of the Proposed Plan would result in the displacement of low-income residents in substantial numbers is incorrect. Buildout of the Proposed Plan is projected to result in the development of 7,000 net new housing units in the Planning Area, including units affordable to all income demographics and the Draft SEIR discusses a range of policies</p>

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A1-12	Emergency Vehicle Access Issues. The Plan may have significant impacts to emergency vehicle movement and access that are not disclosed or analyzed because little analysis on impact of the state density bonus, rideshares and displacement.	<p>and regulations and the State and City level which would address displacement impacts. Further, the City notes that the precise demographic mix of the Planning Area in 2040 cannot be known at this time. Pursuant to CEQA Section 15064.(d).(3), changes resulting from the Proposed Plan which are speculative are not considered reasonably foreseeable and therefore need not be considered in the environmental analysis.</p> <p>Impacts associated with emergency access are discussed on pages 3.7-50 and 3.7-51 of the Draft SEIR. As noted, future development under the Proposed Plan would be subject to Chapter 18-44, Fire Code of the Santa Rosa City Code and the requirements contained in the City's Design and Construction Standards, which include requirements for emergency access. Future development proposals would be reviewed by public safety officials as part of the City's entitlement process. Compliance with these regulations and procedures would ensure that roads are maintained to provide adequate space for emergency vehicle access. Associated impacts would be less than significant. Therefore, the Draft SEIR has adequately considered impacts related to emergency access.</p>

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A1-13	<p>Parking Impacts that are Not Disclosed or Mitigated in the DEIR. This Plan may have significant emission and traffic impacts if single occupancy vehicles find themselves circling in search of parking thereby increasing traffic congestion.</p>	<p>Please see response to comment A1-10 above. The Draft SEIR provides an analysis of impacts on the performance of the circulation system, based on modeling of traffic generated from projected buildout of the Proposed Plan. This modeling accounts for private and commercial vehicles and trucks. The Proposed Plan outlines parking strategies that balance parking supply and demand including progressive parking management practices that are aimed at ensuring that parking remains available near downtown destinations. These strategies reduce the potential for drivers needing to circulate on streets in search of parking. The Draft SEIR has adequately analyzed impacts associated with roadway operations. Additionally, the City notes that an analysis of the adequacy of parking supply is no longer required under CEQA.</p>
A1-14	<p>Air Quality Baseline Analysis is Inadequate</p> <ul style="list-style-type: none"> <li>○ Per the DSASP and EIR, “Santa Rosa exceeded federal standards in ozone” and faces “air quality threats from wildfire smoke,” in particular matter (PM2.5), which is an air pollutant. Certain air monitoring stations such as at Morris street have exceeding air quality standards without development. Our concern with the EIR is that it does not fully study the impact of ongoing fires due to climate change nor the impact of projects utilizing the state density bonus. Without this critical baseline information, the DEIR analysis is not properly reviewing "cumulative impacts" (criterion 2) despite all the proposed goals and policies.</li> <li>○ By not addressing the critical nature of wildfires, there is also the concern of emissions</li> </ul>	<p>Air quality impacts, including Plan-specific and cumulative impacts, are identified and discussed on pages 3.1-1 through 3.1-54 and pages 5-7 through 5-9 of the Draft SEIR. As discussed on page 3.1-4 and shown on Table 3.1-1, air quality modeling for the Proposed Plan is based on ambient air quality data from 2016 through 2018 collected at the BAAQMD's Morris Road air quality monitoring stations, the monitoring station</p>

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A1-15	<p>adversely affecting a substantial number of people (criterion 4). If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has eliminated or substantially lessened the significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub.Res.Code ("PRC")§ 21081; CEQA Guidelines§ 15092(b)(2)(A) &amp; (B).</p> <p>I believe that the plan also increases greenhouse emissions because again, the plan does not include the impact of state density bonus units nor calculate the impact of a displaced workforce.</p>	<p>closest to the Planning Area, located at 103 Morris Street in Sebastopol. This data was the most recent data available at the time the Draft SEIR was prepared and includes data from the time the Tubbs and Nuns Fires raged through Sonoma County. As such, the Draft SEIR has properly accounted for effects of wildfire smoke in the baseline analysis to extent possible on the basis of available data. Associated impacts would be less than significant with implementation of the recommended mitigation measures.</p> <p>Impacts associated with greenhouse gas (GHG) emissions are identified and analyzed on pages 3.3-1 through 3.3-54 of the Draft SEIR. As shown on Table 3.3-7, with implementation of the Proposed Plan both mass emission and per capita emission levels would decrease as compared to existing conditions and associated impacts would be less than significant. Further, as noted in response to comment A1-8, the land use intensity regulations proposed in the Draft DSASP and the buildout projections used for the Draft SEIR account for density bonuses offered through both State and City initiatives. Additionally, as discussed in responses to comments above in responses to comments A1-6, and A1-17, the commenter's assertion that implementation of the Proposed Plan would result in the displacement of workers in substantial</p>

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		numbers is incorrect. Therefore, the Draft SEIR has adequately considered impacts related to GHG emissions.
A1-16	Also, construction activity during development within the Specific Plan Area simultaneous to smoke particles during fires conditions will have a cumulative impact in generating concerning levels of additional air pollutant emissions.	Please see response to comment A1-14. The Draft SEIR has properly accounted for effects of wildfire smoke in the air quality analysis to extent possible on the basis of available data. Associated impacts would be less than significant with implementation of the recommended mitigation measures.
A1-17	Removal of Industrial Uses the Preferred Plan Concept creates a new Maker Mixed Use (MMU) described as a “mix of residential, creative, and maker-oriented uses in industrial areas downtown.” While believing that this might actually reduce air pollutants, it also reduces the availability of jobs for working class resident.	Please see response to comment A1-6 above.
A1-18	Insufficient Impact Fees may hinder the City’s Ability To Meet the Infrastructure Demands Of the Area Plan: The Anti Displacement report states that overall fees are less for development in the planning area than the rest of the city including a “reduction of Capital Facilities Impact Fees and Park Impact Fees based on height and inclusion of affordable units; and deferral of Water and Wastewater Impact fees.” While I applaud the City incentivizing affordable housing, it should not be at the expense of infrastructure.	The comment pertains to the content of the Draft Downtown Station Area Specific Plan and not to the merits of the environmental analysis in the Draft SEIR. As such, no further response is required. Additionally, the City notes that Chapter 6 of the Draft DSASP identified utility improvements needed to support the projected development and includes a list of potential financing and funding mechanisms.
A1-19	Prohibition of drive-through establishments. Given the multi-year reality of living through a pandemic, I recommend this option be removed to allow small businesses more flexibility in reaching customers while safely distancing.	The comment pertains to the content of the Draft Downtown Station Area Specific Plan and not to the merits of the environmental analysis in the Draft SEIR. As such, no further response is required.

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AI-20	I believe the Environmental Impact Report needs further analysis in order to properly mitigate the significant impacts of the Plan as described above. Should you have any questions, feel free to email me at bobbi@todco.org. Sincerely, Bobbi Lopez	The comment is noted. Please see also responses to comments AI-3, AI-5, and AI-7 through AI-16 that address the need for recirculation of the Draft SEIR.
BI-1	Dear Amy: The Planning Commission held a public meeting on Draft Subsequent Environmental Impact Report (SEIR) on August 13, 2020 during the 45-day public comment period. This memo provides a recap of that meeting and a summary of comments pertaining to the environmental analysis. Recap At the meeting, an overview of the key elements of the Proposed Plan and findings of the Draft SEIR was presented, including a discussion of the Draft SEIR's mitigation measures pertaining to air quality, historic resources, and parks. Following the presentation, comments on the contents of the Draft SEIR were made by the Planning Commission as well as the general public. The following comments were received:	The comment is noted.
BI-2	Footnote in Table ES-1 incorrectly notes that residential development under the Proposed Plan will predominantly be single-family.	The footnote in Table ES-1 on page ES-5 of the Draft SEIR is hereby amended as follows: All housing units are assumed to be <del>single-family</del> <u>multifamily</u> , with the exception of 78 units in Imwalle Gardens
BI-3	Clarification as to why GHG Emissions and Tribal Cultural Resources are cited as Areas of Controversy in the Executive Summary of the Draft SEIR.	The second sentence of the first full paragraph on page ES-6 of the Draft SEIR is hereby amended as follows: The following topics were identified as areas of controversy <u>or areas requiring particular attention in the Draft SEIR</u> , based on comments at public meetings on the

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Comment #	Comment	Response
B1-4	Table 2-4 in Draft SEIR lists a pedestrian crossing planned in the Bicycle and Pedestrian Master Plan at Third and Healdsburg; however, those streets don't intersect.	Proposed Plan and at the EIR Scoping Meeting, and responses to the Notice of Preparation (NOP):  Table 2.4 on page 2-25 in the Draft SEIR is hereby amended as follows: <u>Third Street and B Street Healdsburg Avenue</u>
B1-5	List amendment of the Roseland Area / Sebastopol Road Specific Plan for consistency with the DSASP in the SEIR Project Description.	The following text is hereby added before the last sentence in the first paragraph on page 2-34 of the Draft SEIR: <u>An amendment to revise the boundaries of the Roseland Area / Sebastopol Road Specific Plan and eliminate overlap with the Proposed Plan would be approved consistently with the Proposed Plan.</u>
B1-6	One member of the general public posed a question regarding the SEIR. Pamela Roberts asked for clarification regarding the standards that would be in place to evaluate potential historic resources. This commentator noted that the SEIR's use of the phrase "age-eligible" in describing properties that would be included in a historical significance survey implies that the only criterion used to determine historical significance would be the property's age. The commentator noted that the Cultural Heritage Board's "Processing Review Procedures for owners of historic properties" Section 5C names a number of criteria for considering the significance of a historic building beyond consideration of the property's age, including Event, Person, Design, Information, and Integrity. The commentator asked for clarification regarding whether it is only property age that will be used to determine historical significance or whether other criteria will be considered as well.  No further comments on the merits of the environmental analysis in the Draft SEIR were received during the public hearing.	The comment is noted. The questions regarding historical survey procedures were adequately addressed within the context of the Planning Commission meeting. As such, no further response is required.

**Table 3-1: Responses to Comments Received on the Draft EIR**

Comment #	Comment	Response
	<p>Members of the consultant team clarified the meaning of the term “age-eligible” and provided additional context regarding the content of and procedure involved in conducting a Cultural Resources Survey, confirming that multiple factors aside from age are considered during the historical review process.</p> <p>The term “age-eligible” refers to the first criterion that would be used to determine historical significance; once a site is over 50 years old, it is considered “age-eligible” and it qualifies as historic and should be reviewed under CEQA. This CEQA review would consider a comprehensive suite of historical significance criteria, including criteria similar to those identified in the Cultural Heritage Board’s report.</p> <p>The first element of a Cultural Resources Survey is the preparation of a Historic Context Statement. This statement provides an outline of the overall physical development of the City, including historical discussions of key property development types over the lifetime of the city. This work is used to identify Registration Requirements for different periods of the city’s history, which helps to identify whether a property may be significant within its specific historical context. These Registration Requirements are created using the California Register of Historical Resources criteria, the National Register, and any local requirements which may be applicable. This document then serves as the guiding document when a survey occurs, thus enabling the surveying consultant to evaluate a property according to multiple significance criteria including architecture, association with significant events and people, and integrity of the property.</p>	