

## MEMORANDUM

TO: City of Santa Rosa Planning & Economic Development Division  
Attn: Andrew Trippel & Adam Ross

427 Mendocino Avenue, Suite 150  
Santa Rosa, California 95401  
t: 707.919.0990

FROM: ArchiLOGIX

[www.archiLOGIX.com](http://www.archiLOGIX.com)

DATE: 9/10/2021

RE: Specific Plan Consistency Determination for Downtown Station (SMART Site)  
Development

---

### INTRODUCTION & BACKGROUND

- A. **The Downtown Station Area Specific Plan (DSASP)** is a blueprint for development and preservation aimed to guide the intensification of 720 acres surrounding the Downtown Sonoma-Marin Area Rail Transit (SMART) station- where a key purpose of the Specific Plan is to increase the number of residents and employees in the downtown core and within walking distance of the SMART station through intensification of land uses in the Plan Area. The City of Santa Rosa is the 5<sup>th</sup> largest city in the San Francisco Bay Area, and it is ranked in the top ten greatest Metropolitan Service Area GDPs in California (Santa Rosa DSASP, p 1-2). The Downtown Station Area is designated as a Priority Development Area (PDA) by the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) to provide opportunities for compact, infill development in proximity to transit, jobs, schools and services (Santa Rosa DSASP, p 1-4).
- B. **The Downtown Station Development** - CPSA Cornerstone Properties is pursuing entitlements for a multi-family mixed use development located at 34 6<sup>th</sup> Street- Downtown Santa Rosa SMART Station ("the Project") within the SMU-H (Shaker Mixed Use - Historic) Zoning District. The Project is the first phase of a potential three-phased development of the 5.4-acre property sitting This first phase of the 34 6<sup>th</sup> St development will catalyze the unused property through actualization of a master plan comprised of predominantly residential buildings (sited and designed to respond to the Railroad Square Preservation District, the West End Preservation District, and the Historic Cannery Building) with ground floor community spaces.

The "Project" location is within the Plan Area, more specifically, the site is identified as a catalyst site within the SMART Station Area and qualifies as a High-Quality Transit Corridor as it is adjacent to a Qualified Opportunity Zone providing access to Opportunity Zone financing. Each of the identified catalyst sites could serve as demonstration projects to "prove" the market for higher-density multi-family development, with a view to catalyzing similar projects and attracting institutional capital. The DSASP land use vision and framework seek to facilitate development in Opportunity Areas and on catalyst sites to move the vision toward reality (Santa

Rosa DSASP, p 2-4). The Project furthers the stated goal of the 2020 DSASP to enliven the downtown with the establishment of the downtown SMART Station and improvements to motorized, non-motorized, and transit connectivity between the SMART station site and surrounding neighborhoods.

- a. The large parcels west of the railroad tracks will support higher-density housing, oriented to provide easy pedestrian access to SMART's Downtown Station and Railroad Square (Santa Rosa DSASP, p 2-7) via the at-grade rail crossing.
- b. The Project is consistent with DSASP design standards with active ground floors that will add to the vitality and charm of RR Square commercial district with residents of the Project site joining with visitors in shopping, dining, and enjoying leisure time coupled with the redesign of Depot Park public plaza to "put the Square back in Railroad Square" to foster walkability around the plaza and 4<sup>th</sup> Street (Santa Rosa DSASP, p 2-7).

The first phase of the Downtown Station development proposes 114 studio, 1-bedroom, 2-bedroom, and "family" units in a 6-story residential/mixed-use building with outdoor community pool and open gathering space for residents and neighbors. The Project proposes 75 parking spaces (0.7 per unit) and the 2020 DSASP provides no minimum parking requirements in the plan area. 10.53% of Phase 1 units (12 units) will be restricted affordable units made available to low-income households.

#### DETERMINATION ANALYSIS

Pursuant to CEQA Guidelines Section 15182 this document serves as an analysis determination to outline the Project's consistency with the applicable goals, objectives, and policies set forth in the Specific Plan. Table 1 below details project consistency with the 2020-adopted DSASP document, Draft Environmental Impact Report (EIR), and FINAL Mitigation Monitoring & Reporting Program (MMRP).

The Project supports the Specific Plan's vision to encourage a diverse mix of uses by providing new residential units to support a wide range of additional services and amenities, as well as generate increased demand for transit services (SMART commuter rail transit system) and contribute a range of housing options/choices within the Plan Area.

Chapter two- **Land Use**- acknowledges development potential of vacant and underutilized properties identified as opportunity areas and catalyst sites within the Plan Area where these properties present the best opportunities for redevelopment as they are locations that can accommodate significant physical change. (Santa Rosa DSASP, p 2-4) The Project site is within the Station Mixed Use (SMU) designation, intended to provide for a range of visitor-serving uses, including retail, restaurants, entertainment, cultural amenities and hotels in proximity to the downtown SMART Station. While commercial uses are emphasized, new multi-family housing is allowed to support the daytime and evening vitality of the Downtown Station Area. All new development is required to respect the historic character of the Railroad Square area adding to the mix of uses that attract local residents, SMART train riders and visitors from the wider region. (Santa Rosa DSASP, p 2-9).

Chapter 2 of the DSASP identified challenges to creation of multifamily housing developments balancing estimates of rents and sales prices that the market will bear against consideration for lack of developer interest to incur the high costs associated with infill development downtown. Additionally, existing multifamily development downtown largely occurs in small developments (4 units or less) with few larger multifamily buildings that could offer comparable rents for that

type of construction (Santa Rosa DSASP, p2-4). To address these challenges the City of Santa Rosa has identified important measures to fast-track development of much needed housing in the downtown core and adjacent to transit by (1) streamlining of the development process timeline by up to 70% cutting time for planning, engineering and building review from 18 to 6 months, (2) reducing development fees, and (3) providing clear standards for new development downtown. DSASP Goals and policies seek to close the competitive gap between downtown Santa Rosa and other Bay Area communities. The project will utilize applicable fast tracking measures to actualize goals of the 2020 DSASP goals.

The Project would be consistent with relevant goals, objectives, and policies of the DSASP's Transportation Chapter (Chapter 3 - Mobility) as it would comply with the guidelines for private development along 6<sup>th</sup> St., the Multi-Use Trail and Emergency Vehicle Access (EVA) adjacent to the SMART rail, 3<sup>rd</sup> Street, and the future street and parking connecting 6<sup>th</sup> and 3<sup>rd</sup> streets. The Mobility chapter identifies strategies to improve connections to and within downtown by making changes to the roadway network as well as the bicycle and pedestrian network that further the goals of an integrated complete streets providing a range of safe, convenient, and enjoyable options (beyond the car) to get to and through the Downtown Station Area (Santa Rosa DSASP, p 3-1). The DSASP specifically calls for mobility improvements at the Project site:

- New local street roadway connection for SMART Extension-North South that would connect 3<sup>rd</sup> and 6<sup>th</sup> Streets that is identified on project plans as the interim 26'-wide drive lane with parking. During Phase 1, AC or gravel pavement will be used for the temporary parking area until future build out of the connector street between 3<sup>rd</sup> and 6<sup>th</sup> Streets.
- Bicycle and pedestrian network improvements to strengthen east-west connections link between Courthouse Square and Railroad Square, despite a ten-minute walk between the Downtown Santa Rosa and the SMART Station, the lack of wayfinding, discordant development pattern, and unfriendly crossing points constrains a pleasant pedestrian and bicycling experience (Santa Rosa DSASP, p 3-15).

Chapter 4: Urban Design and Civic Spaces provides a design framework to guide new development in a way that complements the walkable street grid and network of parks and Creekside trails to provide a high-quality urban living and working environment (Santa Rosa DSASP, p 4-1). The policies, standards and guidelines of Chapter 4 outlines streetscape enhancements in the Station Areas with crosswalk striping, parklets, wayfinding, art, and light (MOB-5) will enhance the pedestrian experience and improve walkability.

Chapter 5 of the DSASP identifies the anticipated needs of utilities and public services for the Plan Area. Some of the applicable utilities and public services goals and policies may require the Project applicant to contribute monetarily to infrastructure upgrades, rather than achieve consistency through modifications to Project design. It is anticipated that the Project would be consistent with the applicable goals and policies because the Project applicant would comply with any conditions of approval agreed to as part of entitling the Project.

#### CEQA ANALYSIS & CONSISTENCY WITH THE DSASP MMRP

Consistent with CEQA Guidelines Section 15063, the City of Santa Rosa prepared an Initial Study in December 2019 to determine which of the proposed Plan's effects were adequately examined by the previously certified DSASP EIR in 2007 and which effects need further analysis

in a Subsequent EIR (SEIR). The public review Draft EIR for the DSASP was published July 15, 2020 and informed the SEIR that was developed concurrently with the Draft DSASP (which was adopted 12/2020). The DSASP policies were developed to respond to the findings of the environmental analysis for the SEIR to minimize or reduce significant environmental impacts to the extent feasible- the DSASP is “self-mitigating” and the SEIR recommends mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) SCH No. 2006072104.

A Phase 1 ESA was prepared in 2018 by Harris and Lee Environmental Services, LLC in conformance with the scope and limitations of ASTM Practice E1527 for the subject property. The report recommends that no further environmental investigation is warranted on the subject property given the findings of the Phase 1 ESA which included a site reconnaissance where a professional walked the perimeter of the subject property (2 contiguous parcels) closely inspecting the site features in an effort to identify conditions that potentially could negatively impact the vacant subject site where there are no structures, water wells, underground storage tanks, no excessive staining or distressed vegetation, nor any hazardous materials.

The historical topographic maps report did not reveal any significant potential liability resulting from past activities. Between 1942-1952 the site was characterized with multiple structures located on the site. Between 1968-1985 the site was characterized as a vacant lot with a few small sheds. The latest site review between 1993 and 2016 noted that the site was characterized as a vacant lot with a few areas of construction materials. Interviews with past and present property owners, operators and occupants revealed that the site was purchased by the SMART district in 2008 and since then the site has stored construction materials the SMART district. The site was formally a railroad freight depot and maintenance/fueling yard (late 1800’s-1960’s) and there has been extensive remediation at the site (1987-2014) where numerous underground storage tanks were removed from the site. The remediated release of petroleum impacting soil and groundwater constitutes a Historical Environmental Condition. The limited shallow soil remaining on-site impacted by PAHs (petroleum hydrocarbons) is considered a de minimis condition-below residential screening levels. Harris and Lee Environmental Services recommend soils excavation and a Soil Management and Health and Safety Plan accompany residential development at the site. The Phase 1 ESA analysis of historic structures and land uses complies with CUL-1a requirement for evaluation of historic resources.

In addition, Architectural History Services prepared a review of 34 6<sup>th</sup> Street. Findings from the report are detailed in response to CUL-1a and CUL-1b in the table below.

The MMRP describes procedures to implement the mitigation measures adopted in connection with the approval of the Proposed Plan, noting intention to utilize existing review processes wherever feasible (Santa Rosa DSASP MMRP, p-1). The Downtown Station Project development will be consistent with MMRP requirements.

**CONSISTENCY ANALYSIS WITH DOWNTOWN STATION AREA SPECIFIC PLAN & MMRP**

DSASP GOALS, POLICIES & GUIDELINES	DETERMINATION	CONSISTENCY ANALYSIS
<b>CHAPTER 2: Land Use</b>		
<p><b>GOAL LU-1:</b> Downtown Santa Rosa will be an energetic regional commercial and cultural center with a range of housing, employment, retail, entertainment, and restaurant options in a safe, vibrant, walkable environment.</p>	CONSISTENT	Proposal of additional units actualizes goal for range of opportunities within the Plan Area, and specifically the Railroad Square area and Depot Park.
<ul style="list-style-type: none"> <li>Policy LU-1.5: Focus new residential and employment-generating land uses along key transit corridors, including Mendocino Avenue, Santa Rosa Avenue and Third Street in order to support higher-frequency transit service.</li> </ul>	CONSISTENT	SMART site development will activate corner of 3 <sup>rd</sup> St and the SMART rail line. At full build-out the project will connect 6 <sup>th</sup> Street to 3 <sup>rd</sup> Street.
<p><b>GOAL LU-2:</b> Significant new development is focused in Opportunity Areas and on catalyst sites.</p>	CONSISTENT	ABAG has identified the site as an opportunity zone to catalyze MF housing development in the area.
<p>Policy LU-2.2: Pursue public-private partnerships for the redevelopment of City-owned catalyst sites with high-density multi-family housing and other community-serving uses, such as affordable housing, workforce housing, childcare, community/cultural spaces, and publicly accessible outdoor recreational space. Require a minimum FAR equivalent to at least half of the maximum base FAR with redevelopment of these sites.</p>	CONSISTENT	Cornerstone Properties and the City of Santa Rosa are in negotiations to utilize Renewal Enterprise District (RED) funding to support the phased project development.
<ul style="list-style-type: none"> <li>Policy LU-2.7: Require new development within the Core Mixed Use, <b>Station Mixed Use</b>, Maker Mixed Use, and Neighborhood Mixed Use designations to achieve the mid-point or higher of the maximum FAR.</li> </ul>	CONSISTENT	FAR for this site is 6.0, phase one of the project will achieve a 3.0 FAR. The reduced FAR at this phase one location is intentional to provide a transition buffer between the project and the existing low-rise development to the north.
<p><b>GOAL LU-4:</b> A diverse range of housing opportunities suitable for people of all incomes, abilities, and stages of life</p>	CONSISTENT	Proposed units range from 430-sf studios to 1000-sf “family” units.
<ul style="list-style-type: none"> <li>Policy LU-4.1: Increase the supply of residential units Downtown and expand the range of housing opportunities available.</li> </ul>	CONSISTENT	Phase one of the project will provide 114 units of residential apartments.

<ul style="list-style-type: none"> <li>Policy LU-4.5: Facilitate construction of larger units (with two or more bedrooms) suitable for families with children.</li> </ul>	CONSISTENT	18 (or 15%) of the 114 units proposed for Phase 1 are “family” units that are 950 or 1000 sf with 2+ bedrooms and bathrooms.
<ul style="list-style-type: none"> <li>Policy LU-4.8: Preserve and expand affordable housing Downtown with the integration of deed-restricted affordable units within housing developments.</li> </ul>	CONSISTENT	10.53% of Phase 1 units (12 units) will be restricted affordable units made available to low-income households
<ul style="list-style-type: none"> <li>Policy LU-4.12: Facilitate opportunities to incorporate innovative design and program features into affordable housing developments, such as on-site health and human services, community gardens, car-sharing, and bike facilities. Support the development of projects that serve homeless and special needs populations.</li> </ul>	CONSISTENT	The downtown sites will include a mix of units with amenity-based services including programs such as car sharing, electric vehicle charging, outdoor gathering places, community gateways, and experiences via activities.
<b>Chapter 3: Mobility</b>		
<b>GOAL MOB-1:</b> A well-connected street grid that optimizes multi-modal access, connectivity, and safety for all users	CONSISTENT	Project to further multi-modal connectivity goals set out in DSASP.
<ul style="list-style-type: none"> <li>Policy MOB-1.2: Implement the program of circulation improvements shown in Table MOB-1 to optimize circulation, improve multi-modal connectivity, and enhance roadway safety.- New Roadway connection for SMART Extension-North South to connect Third and Sixth streets via a new local street through the parcel to the west of the downtown SMART Station, to be constructed as part of that site’s development.</li> </ul>	CONSISTENT	The construction of a multi-use path on the east side of the project with a proposed pedestrian crossing of the east track of the SMART rail system. A connection road between 3 <sup>rd</sup> and 6 <sup>th</sup> Streets will be partially constructed as part of this phase, future phase will complete the connection.
<b>GOAL MOB-2:</b> A comfortable, convenient bicycle and pedestrian network that is a viable, attractive alternative to the automobile.	CONSISTENT	Project to further goals set out in DSASP and Bike & Ped Master Plan encouraging mobility alternative to the automobile.
<ul style="list-style-type: none"> <li>Policy MOB-2.1: Establish bicycle lanes and pedestrian routes that connect key destinations by implementing the 2018 Bicycle and Pedestrian Master Plan Bike and Pedestrian Network improvements</li> </ul>	CONSISTENT	Plan to install Class III Bicycle Route or “sharrow” at the new roadway connection between 6 <sup>th</sup> Street and 3 <sup>rd</sup> Street.

<ul style="list-style-type: none"> <li>• Policy MOB-2.4: Work with SMART and the Sonoma County Regional Parks Department to establish an off-street trail connection between Santa Rosa Creek and West Sixth Street: <ul style="list-style-type: none"> <li>○ Connect the junction of the Joe Rodota Trail and SMART trail near the Prince Memorial Greenway to West Third Street.</li> <li>○ Locate the West Third Street trail crossing at the future intersection serving the SMART property.</li> <li>○ <b>Establish a bicycle and pedestrian connection between West Third Street and West Sixth Street through the SMART property.</b></li> </ul> </li> </ul>	CONSISTENT	Construct a multi-use path between 6 <sup>th</sup> Street and the 4 <sup>th</sup> Street SMART rail crossing. Applicant has connected with SMART and the CA Public Utilities Commission to complete this cross rail connection to 4 <sup>th</sup> Street on the east side of the tracks.
<p><b>GOAL MOB-4:</b> Frequent, reliable and safe transit service within the Downtown Station Area and to points beyond.</p>	CONSISTENT	The proposed development of multifamily units in proximity to multiple transit service options furthers goal of transit use in the DSASP area and beyond.
<ul style="list-style-type: none"> <li>• Policy MOB-4.8: Ensure development of the SMART site facilitates convenient inter-modal transfers. Transit and shared mobility facilities should be located within a visual line-of-site of the rail station platform and connected by a clearly identifiable path at least six feet wide and free of obstructions.</li> </ul>	CONSISTENT	See response to MOB-2.4
<ul style="list-style-type: none"> <li>• Policy MOB-4.10: Prioritize pedestrian safety when designing roadways and intersections serving the SMART station and Transit Center.</li> </ul>	CONSISTENT	Proposed SMART rail crossing at 4 <sup>th</sup> Street would meet all federal, state and local design requirements for a safe pedestrian crossing.
<p><b>GOAL MOB-5:</b> Reduced reliance on single-occupant vehicles and an increased share of trips made by alternate modes.</p>		The proposed development of multifamily units in proximity to multiple transit service options furthers goal of reduced reliance on single-occupant vehicles.
<ul style="list-style-type: none"> <li>• Policy MOB-5.2: Require developers to incorporate Transportation Demand Management (TDM) strategies to reduce peak hour traffic and on-site parking demand.</li> </ul>	CONSISTENT	Phased project to be developed with additional parking at each stage in compliance with PED review.

Chapter 4: Urban Design & Civic Spaces		
Design Guidelines		
<ul style="list-style-type: none"> <li>DG-8: 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.</li> </ul>	CONSISTENT	Balconies, unit entries and windows from living spaces are oriented towards 6 <sup>th</sup> Street to the north, the public “Mews” to the south and the Railroad Square Historic district to the east.
<p><b>GOAL UDCS-1:</b> A diverse range of public spaces at different scales and sizes throughout the Downtown Station Area to provide outdoor recreation and relaxation opportunities for residents, workers, and visitors.</p>	CONSISTENT	Project design includes multiple public spaces actualizing goals to enhance multi-modal opportunities.
<p>Policy UDCS-1.5: Allow residential and multi-family projects in the Downtown Station Area to construct publicly accessible, but privately owned and maintained parks and plazas in lieu of park impact fees.</p>	CONSISTENT	Phase 1 MEWS connection to the SMART Multi-use Trail + EVA. Subsequent phases include development of multiple open spaces, a pedestrian plaza and an expansive green space for public gatherings.
<p><b>GOAL UDCS-2:</b> Historic resources that enhance Downtown character and sense of place.</p>		
<ul style="list-style-type: none"> <li>Policy UDCS-2.5: Incorporate elements of historic-age buildings into new projects to impart heritage and character where feasible and not in conflict with promoting Downtown development and housing affordability.</li> </ul>	CONSISTENT	While trying not to create false historicism, the project incorporates historical elements from district through use of materials; metal awnings and shade structures as well as balconies overlooking the public spaces
Santa Rosa DSASP SEIR and MM&RP		
<ul style="list-style-type: none"> <li><b>AQ-1:</b> Residential/sensitive land use projects within 1,000 feet of a major source of toxic air contaminants (TACs) identified by BAAQMD (Facility IDs 1486, 23584, 15449, 110978, and 111751) shall reduce health risks to BAAQMD project-level threshold levels for cancer risk, hazard index, and PM2.5 concentration by installing indoor air filtration systems with a minimum efficiency reporting value of 14 or better.</li> </ul>	Not Applicable	No onsite contamination occurs at this site. The development site at 34 W. 6 <sup>th</sup> Street is 0.9 miles away from the BoDean Company Asphalt Plant site and is well outside the 1,000 ft buffer shown on the DSASP Draft EIR Figure 3.1-1.



<ul style="list-style-type: none"> <li>• <b>AQ-2:</b> Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) shall not build within a buffer of 1,000 ft of the BoDean Company site boundaries (identified in Figure 3.1-1).</li> </ul>	Not Applicable	The development site at 34 W. 6 <sup>th</sup> Street is 0.9 miles away from the BoDean Company Asphalt Plant site and is well outside the 1,000 ft buffer shown on the DSASP Draft EIR Figure 3.1-1.
<ul style="list-style-type: none"> <li>• <b>AQ-3:</b> Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) shall not build within a buffer of 1,000 ft of the Superior Supplies, Inc. site boundaries as identified in Figure 3.1-1.</li> </ul>	Not Applicable	The Downtown Station (SMART Site) Development sited at 34 W. 6 <sup>th</sup> Street is more than 1,000 ft away from the Superior Supplies, Inc site. See Figure 3.1-1 also referenced for response to AQ-2.
<ul style="list-style-type: none"> <li>• <b>CUL-1a:</b> Identify Historic Resources for projects on sites noting elements more than 45 years old.- field survey, archival research and preparation of a historic resource evaluation report. Project Sponsor to have historian prepare an evaluation of historic significance and eligibility for listing on local, state or national registers. Evaluation shall include a field survey, archival research, and preparation of a historic resource evaluation report. The report shall include documentation of methodology and findings of the historic evaluation. Proposed development projects shall then be evaluated for potential direct and/or indirect effects on the identified historic resource(s) per CEQA Guidelines Section 15364, and Mitigation Measure CUL-1b shall be implemented as appropriate.</li> </ul>	Consistent	A Phase 1 ESA was prepared for the site in 2018 and included site history and land use review. Architectural History Services prepared a Review of 34 6 <sup>th</sup> Street dated 9/15/2021 and revised on 11/5/21. The report also includes archival research with historical uses on maps from 1908, 1950, 1963, 1987, 2001 and present day. This letter notes site overview, field procedures and methodology, and findings that no historical resources are contained on the site.
<ul style="list-style-type: none"> <li>• <b>CUL-1b:</b> If avoidance of historic resource(s) is not feasible (capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors) the project sponsor shall seek to reduce</li> </ul>	Not Applicable	There are no structures or historic resources on this site to avoid as noted in John Murphey's Architectural History Services Review dated 9/15/2021 and revised on 11/5/2021.

<p>the effect on historic resources to a less-than-significant level pursuant to CEQA.</p>		
<ul style="list-style-type: none"> <li>• <b>PF-1:</b> The City of Santa Rosa shall update the General Plan to identify potential locations for new neighborhood and community parks as needed to satisfy projected demand and complete environmental review within 36-months of adoption of the Santa Rosa DSASP Update.</li> </ul>	<p>CONSISTENT</p>	<p>Land Use Map LU-3: Downtown Land Use identifies the Depot Park across the SMART rail as an Urban Park/Civic Space. Additionally, the project at 34 W. 6<sup>th</sup> Street includes open gathering space oriented at the southerly edge of the project to become the first in a series of community interconnected open spaces furnished with grills and play equipment.</p>