



MODIFIED SURFACE PARKING

- * PROPOSED PARKING SPACE REDUCTION REQUEST - **239 PARKING SPACES**
- * MODIFIED PARKING SPACE REDUCTION REQUEST - **155 PARKING SPACES**
 - REPLACE SOME LANDSCAPE PLANTING AREAS TO ADD SURFACE PARKING SPACES & CONVERT SOME PARALLEL PARKING AREAS TO PERPENDICULAR PARKING.
 - **84 SPACES ADDED**

MODIFIED SITE PLAN PARKING STATISTICS

MARKET RATE PARKING COUNT	689 spacesPREVIOUS WAS 605 (ADDED 84 SP.)
AFFORDABLE HOUSING PARKING COUNT	114 spaces
TOTAL PARKING SPACES AVAILABLE	803 spacesPREVIOUS WAS 719 (ADDED 84 SP.)
REQUIRED PARKING SPACES PER ZONING	958 spaces
NEW REDUCTION OF SPACES REQUESTED	155 spacesPREVIOUS WAS 239
NEW REDUCTION %	16.2%

MODIFIED SITE PLAN STATISTICS

	No. of Floors	Unit Count	Parking Spaces	Parking Ratio
AFFORDABLE SENIOR HOUSING				
Buildings 1, 2, 3	4	162	114	0.70
TOTAL		162	114	0.70
MARKET RATE MULTI-FAMILY HOUSING - CONCEPT STUDY				
Building 4A	4	200	382	1.91
Buildings 4B (1-4)	3	104	204	1.96
Buildings 4C (1-3)	3	66	103	1.56
TOTAL		370	689	1.86

To:	Karen Massey, Burbank Housing	From:	Stantec Consulting Services Inc.
File:	3575 Mendocino Avenue Project	Date:	November 9, 2020

Reference: 3575 Mendocino Avenue Project – Additional Surface Parking Environmental Review

Stantec Consulting Services Inc. (Stantec) has prepared this memorandum (memo) in response to BRJE Communities LLC's (Applicant) proposal to add 84 surface parking spaces to the proposed 3575 Mendocino Avenue Project (Project). Stantec understands that, while no formal comments were received during the 30-day public review of the September 28, 2020 Sustainable Communities Environmental Assessment (SCEA) prepared for the proposed Project under the California Environmental Quality Act (CEQA), during outreach on the Project a concern was expressed about the adequacy of the number of parking spaces provided by the Project. Although the Applicant is not required to propose modifications in response, in good faith, the Applicant has agreed to modify the proposed site plan to construct an additional 84 surface parking spaces on the Project site, resulting in a total of 803 parking spaces for the Project. The 84 additional surface parking spaces would be located in the northern portion of the Project site in perimeter areas previously identified for decorative landscaping and in the southwest corner of the Project site around proposed building 4A where parallel parking would be reconfigured to accommodate perpendicular parking.

This memo describes the Applicant-proposed design modifications and the effects of the modifications on the CEQA analysis.

INTRODUCTION**The Project**

The 3575 Mendocino Avenue Project involves the redevelopment of an approximately 13.3-acre infill site into a compact, sustainable, transit-oriented, master planned transit village community with up to 532 high-density multi-family housing units consisting of 162 units affordable for low and very low senior households and up to 370 market rate housing units (see Figure 1). The senior affordable housing component would include construction of three separate four-story buildings totaling 136,185 gross square feet (gsf) on 2.5 acres of the Project site. The market rate housing component would include the construction of approximately eight separate three- or four-story buildings totaling 510,531 gsf on 9 acres of the Project site. The Project would also include 1-acre of shared open space and the construction of a new public street (0.8 acre), on- and off-site utility infrastructure, parking (including surface, covered, and an aboveground garage), driveways, frontage improvements, landscaping, and a new stormwater outfall into the adjacent, off-site Russell Creek.

Pursuant to Section 20-36.040 of the City Code, the Project is required to provide one parking space per unit for senior affordable housing. Multi-family apartment buildings are required to provide 1.5 parking spaces per unit for one-bedroom apartments and 2.5 spaces per unit for two-bedroom apartments. Based on these rates, the Project would be required to provide 958 parking spaces per the City Code. However, the proposed project is a transit priority project, with proximity to transit, including CityBus Routes 1 and 10 and Sonoma County Transit Routes 44, 48, 54, 60, and 62, providing service throughout Santa Rosa and Sonoma County, including every 15 minutes throughout the day on CityBus Route 1 and every 30 minutes throughout the day on CityBus Route 10. The Project will also have bicycle parking and services to facilitate use of nearby transit. Therefore, the Project originally proposed a 25% parking reduction, comprising 114 spaces for the senior affordable component and 605 spaces for the market rate component, totaling 719 parking spaces.

Reference: 3575 Mendocino Avenue Project – Additional Surface Parking Environmental Review

Section 20-36-050 (C) of the Zoning Code indicates that the City has the discretion to apply a reduction in parking requirements, of up to 25 percent (or 239 spaces). Additionally, the Project is entitled to one Incentive or Concession to development standards under Section 20-31.090 and the City confirmed in the February 25, 2020 Inclusionary Housing Ordinance Alternative Compliance Determination Letter for the Project that a parking reduction is considered to be a Concession to development standards. On November 3, 2020 the Project submitted a formal request for a parking concession reduction of 25%, for 719 onsite parking spaces, as set forth in the Project Description.

The Modified Project

The Applicant is proposing to construct 84 additional surface parking spaces on the Project site, resulting in 803 total parking spaces for the Project (or a reduction of 155 parking spaces) (see Figure 2):

	Parking Spaces Required Under City Code	Parking Spaces Proposed	Parking Reduction
Project	958 spaces	719 spaces	239 spaces
Modified Project	958 spaces	803 spaces	155 spaces

No other design modifications are being proposed.

STATE AND LOCAL POLICY SURROUNDING PARKING

State Policy

Effective January 1, 2014, the State of California passed Senate Bill (SB) 743. SB 743 updates the way transportation impacts are measured in California for new development projects. It encourages transit priority projects by no longer requiring aesthetics and parking impacts to be considered in determining if a project has the potential to result in significant environmental effects, if the project is located within one-half mile of a major transit stop, is on an infill site, and the project is residential, mixed-use residential, or an employment center. The Project complies with all three of these criteria as it would be located on an infill site within ½ mile of the Bicentennial Way Transit Facility (a major transit stop) and proposes up to 532 units of high-density housing.

Local Policy Framework

The City of Santa Rosa's adopted General Plan contains a number of goals and policies related to land use and parking that are consistent with state and regional policies and that support locating high-density residential housing near public transit as well as reduced parking requirements, including:

Reference: 3575 Mendocino Avenue Project – Additional Surface Parking Environmental Review

Land Use

- *“Foster a compact rather than a scattered development pattern in order to reduce travel, energy, land, and materials consumption while promoting greenhouse gas emission reductions citywide.” (Land Use Element, LUL-A)*
- *“Facilitate higher-density and affordable housing development in Priority Development Areas (PDA), which include sites located near the rail transit corridor and on regional/arterial streets for convenient access to bus and rail transit. Implement existing PDA specific plans—the Downtown Station Area Specific Plan and the North Santa Rosa Station Area Specific Plan—and develop new plans, such as the Roseland Specific Plan, to encourage the development of homes that have access to services and amenities.” (Housing Element, H-C-6)*
- *“H-A-1 Ensure adequate sites are available for development of a variety of housing types for all income levels, throughout the City, such as single- and multifamily units, mobile homes, transitional housing, and homeless shelters.” (Housing Element, H-A-1)*
- *“Locate higher density residential uses adjacent to transit facilities, shopping, and employment centers, and link these areas with bicycle and pedestrian paths.” (Urban Design Element, UD-G-2)*
- *“Promote new retail and higher density uses along the city’s regional arterial corridors.” (Economic Vitality Element, EV-C)*

Parking

- *“Reduce land devoted to parking.” (Guiding Principle #20)*
- *“Ensure that regulations contained in the Santa Rosa Zoning Code provide development standards, parking requirements, and use allowances which facilitate the development of housing for all income groups.” (Housing Element, H-A-1)*
- *“Encourage the development of affordable housing for the elderly, particularly for those in need of assisted and skilled nursing care. Continue to provide funding and offer incentives such as density bonuses, reduced parking requirements, design flexibility, and deferred development fees.” (Housing Element, H-D-11)*
- *“Support transit-oriented development in the project area by allowing adequate intensity of use and requiring pedestrian-oriented development (e.g., buildings along sidewalk, parking lots minimized). (Land Use Element LUL-Z-2)*
- *“Review parking regulations downtown to consider its role as a pedestrian- and transit-friendly center.” (Land Use Element LUL-C-2)*

In addition to the goals and policies contained in the City’s General Plan, the City’s Zoning Code includes several mechanisms that allow for parking reductions. As mentioned above, Section 20-36-050 (C) of the Zoning Code allows the City to apply reduced parking requirements of up to 25 percent, with certain findings, and Section 21-02.050.G of the City’s municipal code specifically includes a parking reduction as a

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development incentive or concession. The City is required to grant a request for a concession unless it finds no identifiable cost reduction, or finds specific, adverse impact, or finds contrary to State/Federal law.

CEQA ANALYSIS

The parking capacity of the Project is not required to be analyzed under CEQA. The Project qualifies as a transit priority project that would create a 532 unit, high-density residential transit village on an infill site located in the Mendocino Avenue/Santa Rosa Avenue Corridor PDA within one-half mile of the Bicentennial Way Transit Facility, a major transit stop. State and regional policies support locating high-density housing in locations such as this as a way to reduce vehicle miles traveled and greenhouse gas emissions, encourage use of public transit and reduce overall reliance on automobiles. The City's General Plan policies identify parking requirements as a potential impediment to the provision of housing and seek to reduce those impediments by providing concessions to development standards and allowing reductions to parking requirements. As a transit priority project that would be located within one-half mile of a major transit stop, the Project's requested parking reduction aligns with state, regional and City policies aimed at encouraging high-density housing near transit, addressing Sonoma County's acute need for housing and providing the necessary incentives needed to ensure affordable housing is constructed in Santa Rosa. Further, the Project meets the criteria set forth in SB 743 and therefore, the adequacy of parking in determining the significance of the Project's impacts is not required to be analyzed under CEQA.

CEQA requires that project proponents disclose significant impacts to the environment from proposed development projects. The intent of CEQA is to foster good planning and to consider environmental issues during the planning process. Working with the City of Santa Rosa (the Lead Agency under CEQA) Stantec prepared the Project's SCEA document. The SCEA discloses, to decision-makers and to the public, the potential environmental consequences of implementing the proposed Project. The public, City residents, and other local and state resource agencies were given the opportunity to review and comment on the document during a 30-day public review period commencing on September 28, 2020 and ending on October 27, 2020, pursuant to CEQA Guidelines Section 15105. No comments were received during the 30-day public review period.

Updates to the CEQA Analysis as a Result of the Modified Project

Stantec has reviewed the proposed Project design modification to add 84 additional surface parking spaces to the Project site (modified Project) to determine if the proposed modification would result in impacts not previously disclosed in the CEQA document. Below is a summary of our conclusions, by resource:

Agriculture and Forestry Resources

The Project was determined to be located on a parcel and in an area that would not have any impacts to agriculture and forestry resources. As such, the modified Project would not result in any impacts to agriculture and forestry resources not already identified in the September 28, 2020 SCEA document.

Air Quality

The entirety of the Project site was assumed to be graded during project construction. As such, the modified Project would not require equipment that was not previously accounted for during the construction phase. The 84 parking spaces would not require additional construction workers or substantial additional material deliveries that would result in an increase in air emissions. There would be some minor off gassing of paving

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materials during construction associated with the additional parking spaces; however, the potential emissions of reactive organic gases (ROG) would not be substantial and would not result in an increase in the severity of previously disclosed construction impacts.

ROG emissions during construction would be 5.54 pounds (lbs) per day during Construction Year 1 and 35.52 pounds per day during Construction Year 2. The addition of the 84 parking spaces would add 0.001 tons of ROG annually or 0.004 lbs of ROG emissions on an average daily basis to either Construction Year 1 or Construction Year 2, for a total of 5.544 lbs and 35.524 lbs respectively, which would still be well below the BAAQMD threshold of significance of 54 lbs per day.

During operations, the additional 84 parking spaces would similarly have some ROG emissions because of routine striping/painting. Emissions would not be substantial and would not result in an increase in the severity of previously disclosed impacts. Annual operational emissions were estimated at 3.50 tons per year; the additional parking spaces would add 0.00294 tons per year of ROG emissions, for a total of 3.50294 tons per year, which would still be well below the BAAQMD threshold of 10 tons per year of ROG. Daily operational ROG emissions were estimated at 19.17 pounds per day. The additional parking spaces would add 0.016 pounds per day of ROG, for a total of 19.186 pounds per day, which would similarly be well below the BAAQMD threshold of 54 pounds per day of ROG.

Based on the above information, the modified Project would not result in any impacts to air quality not already identified in the September 28, 2020 SCEA document.

Biological Resources

The entirety of the Project site was assumed to be graded during project construction. As such, the modified Project would not result in any impacts to biological resources not already identified in the September 28, 2020 SCEA document.

Cultural Resources

The entirety of the Project site was assumed to be graded during project construction. As such, the modified Project would not result in any impacts to cultural resources not already identified in the September 28, 2020 SCEA document.

Energy

As previously discussed under air quality, the entirety of the Project site was assumed to be graded thus, the addition of the 84 parking spaces would not require additional off-road equipment or construction workers or substantial additional delivery of materials which would result in additional energy use. The additional 84 parking spaces may require some additional lighting during operations; however, the Project included lighting in the vicinity of the additional parking spaces and any additional required lighting would comply with City and State standards which would not result in any wasteful or inefficient use of energy.

Based on the above information, the modified Project would not result in any impacts to energy not already identified in the September 28, 2020 SCEA document.

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Geology and Soils

The Project was assumed to construct surface parking on the Project site. As such, the modified Project would not result in any impacts to geology and soils not already identified in the September 28, 2020 SCEA document.

Greenhouse Gases

The modified Project would replace some decorative landscape areas with parking areas and would reconfigure parallel parking to perpendicular parking and therefore would not require significant surface improvements beyond what was previously analyzed. As discussed in the air quality section, there would not be an increase in equipment, workers, or a substantial increase in material deliveries, thus construction greenhouse gas emissions would not be increased from what was previously reported in the September 28, 2020 SCEA document.

There would be a minor increase in energy emissions from the reported 502 MTCO₂e to 505 MTCO₂e. Therefore, there would be a minor increase in the total annual greenhouse gas emissions from the reported 3,492 MTCO₂e to 3,495 MTCO₂e; the greenhouse gas efficiency would remain the same as reported in the SCEA as 2.5 MTCO₂e/year/service population and would not exceed the 2023 greenhouse gas efficiency metric (4.2 MTCO₂e/year/service population).

As such, the modified Project would not result in any impacts to greenhouse gases not already identified in the September 28, 2020 SCEA document.

Hazards and Hazardous Materials

The Project was determined to be located on a parcel and in an area that would not have any impacts to hazards and hazardous materials. As such, the modified Project would not result in any impacts to hazards and hazardous materials not already identified in the September 28, 2020 SCEA document.

Hydrology and Water Quality

The modified Project would replace some decorative landscape areas with parking and reconfigure some parallel parking to perpendicular parking. The Project calculations assumed 36,237 cubic feet of runoff. Conversion of the parallel spaces to perpendicular spaces and the decorative landscape areas to surface parking under the modified Project would result in an increase in surface runoff of 753 cubic feet, resulting in a negligible increase to runoff. The Project would provide 40,737 cubic feet of total stormwater storage and would therefore be able to accommodate the additional runoff.

As such, the modified Project would not result in any impacts to hydrology and water quality not already identified in the September 28, 2020 SCEA document.

Land Use and Planning

The Project was determined to be located on a parcel and in an area that would not have any impacts to land use and planning. As such, the modified Project would not result in any impacts to land use and planning not already identified in the September 28, 2020 SCEA document.

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Mineral Resources

The Project was determined to be located on a parcel and in an area that would not have any impacts to mineral resources. As such, the modified Project would not result in any impacts to mineral resources not already identified in the September 28, 2020 SCEA document.

Noise

The entirety of the Project site would be graded and developed during project construction. As such, the modified Project would not result in any impacts to noise not already identified in the September 28, 2020 SCEA document.

Population and Housing

The Project was determined to not have impacts to population and housing. The modified Project would not result in additional residential units. As such, the modified Project would not result in impacts to population and housing not already identified in the September 28, 2020 SCEA document.

Public Services

The Project was determined to not have impacts to public services. The modified Project would replace some decorative landscape areas with parking and reconfigure parallel parking to perpendicular parking. The modified Project design would not prohibit emergency vehicle access. As such, the modified Project would not result in any impacts to public services not already identified in the September 28, 2020 SCEA document.

Recreation

The Project was determined to not have impacts to recreation. The modified Project would replace some decorative landscape areas with parking and reconfigure parallel parking to perpendicular parking and would therefore not decrease the proposed Project's public or private open space. As such, the modified Project would not result in any impacts to recreation not already identified in the September 28, 2020 SCEA document.

Transportation

The Project was determined to not have impacts to transportation. The modified Project would replace some decorative landscape areas with parking and reconfigure parallel parking to perpendicular parking. The modified Project design would not prohibit emergency vehicle access. As such, the modified Project would not result in any impacts to transportation not already identified in the September 28, 2020 SCEA document.

Tribal Cultural Resources

The entirety of the Project site would be graded during project construction. As such, the modified Project would not result in any impacts to tribal cultural resources not already identified in the September 28, 2020 SCEA document.

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Utilities and Service Systems

The Project was determined to not have impacts to utilities and service systems. As such, the modified Project would not result in any impacts to utilities and service systems not already identified in the September 28, 2020 SCEA document.

Wildfire

The modified Project would replace some decorative landscape areas with parking and reconfigure parallel parking to perpendicular parking. The modified Project design would not increase the potential for wildfire at the site. As such, the modified Project would not result in any impacts to wildfire not already identified in the September 28, 2020 SCEA document.

Mandatory Findings of Significance

The modified Project would not result in any impacts not already identified in the September 28, 2020 SCEA document.

In conclusion, the modified Project would not result in any impacts not already identified in the September 28, 2020 SCEA document.

Sincerely,



Trevor Macenski, Senior Principal
Cell: (916) 508-4170
Email: trevor.macenski@stantec.com



Anna Radonich, Senior Planner
Cell: (925) 285-6541
Email: anna.radonich@stantec.com

References

City of Santa Rosa. 2020. City of Santa Rosa Municipal Code.
<http://qcode.us/codes/santarosa/?view=desktop>. Accessed May and November 2020.

Figures

Figure 1: Project

Figure 2: Modified Project

Attachment

84 Parking Spaces Results



Source: Van Meter Williams Pollack, September 2020



Project Location

Santa Rosa, CA

Client/Project

City of Santa Rosa
3575 Mendocino Avenue Project

Figure No.

1

Title

Project



ADDITIONAL SURFACE PARKING

STEPS TAKEN TO BRIDGE THE GAP BETWEEN REQUIRED PARKING SPACES & AVAILABLE SPACES

1. CURRENT PARKING SPACE REDUCTION REQUEST - 239 PARKING SPACES
2. REPLACE SOME LANDSCAPE PLANTING AREAS TO ADD SURFACE PARKING SPACES, & CONVERT SOME PARALLEL PARKING AREAS TO PERPENDICULAR PARKING WHEREEVER POSSIBLE. - 84 SPACES ADDED

PROPOSED SITE PLAN PARKING STATISTICS

MARKET RATE PARKING COUNT	689 spacesPREVIOUS WAS 605 (ADDED 84 SP.)
AFFORDABLE HOUSING PARKING COUNT	114 spaces
TOTAL PARKING SPACES AVAILABLE	803 spacesPREVIOUS WAS 719 (ADDED 84 SP.)
REQUIRED PARKING SPACES PER ZONING	958 spaces
NEW REDUCTION OF SPACES REQUESTED	155 spaces.....(239 REDUCTION) - (84 ADDED SPACES)
NEW REDUCTION %	16.2%



Project Location
 Santa Rosa, CA
Client/Project
 City of Santa Rosa
 3575 Mendocino Avenue Project

Figure No.
2
Title
Modified Project

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	3.4211	3.4211	1.5000e-004	3.0000e-005	3.4345
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	3.4211	3.4211	1.5000e-004	3.0000e-005	3.4345
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	11760	3.4211	1.5000e-004	3.0000e-005	3.4345
Total		3.4211	1.5000e-004	3.0000e-005	3.4345

