

September 24, 2020

Planning Commission  
City of Santa Rosa  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404

Dear Chair, Vice Chair, and Commissioners,

I am writing on behalf of Airport Business Center, owner of 50 Old Courthouse Square and the Roxy Stadium 14 building, regarding the Final Subsequent EIR for the Downtown Station Area Specific Plan.

Given the two polices we previously requested were not incorporated into the Plan, we were forced to review the Final EIR. We believe that the EIR analysis is insufficient, and we request that the Planning Commission not approve the EIR until further analysis can be performed or the review and incorporation of our proposed policies occur.

The items we currently feel need further analysis are:

#### **ALTERNATIVES**

This EIR only analyzes one alternate plan, the “Redistributed Growth Alternative,” in addition to the CEQA required “No Project Alternative.” We believe this is an inadequate number of alternatives for the EIR to be deemed complete.

The 2007 Specific Plan EIR agreed, as it included a third alternative, the “Reduced Growth Alternative.” This alternative called for an increase of 3,270 residential units, which was 56% more than the No Project Alternative and 26% fewer than the Proposed Plan. If we apply these percentages to the current Plan, the Reduced Growth Alternative would lead to an increase of approximately 5,000 residential units.

Given the current EIR has been deemed a subsequent analysis to the 2007 EIR, we believe that a Reduced Growth Alternative should be analyzed before the EIR is adopted. The same ratio of the increase in residential units between the current No Project and the Reduced Growth Alternative, as calculated above, should be used.

It is explained in the EIR that the Reduced Growth Alternative was not carried forward because it did not meet the objectives of the Plan and was thus infeasible. Examples provided are that it would not facilitate the production of housing, increases the number of residents within ½ mile of high frequency transit stations, or leverage City-owned properties to redevelop into housing. It seems the name of this Alternative might be confusing. The Reduced Growth Alternative means a reduced amount of growth compared to the Proposed Plan. It does not mean reduced growth as compared to today.

- The Reduced Growth Alternative would create 5,000 more residential units. This is an exceptionally large number for anywhere in Sonoma County. To put it in perspective, halfway

through the 2007 Specific Plan, only 100 residential units had been built. An additional 5,000 residential units would represent incredible growth.

- Increasing the number of housing units by 5,000 units would not reduce the number of residents within ½ mile from transit, it would increase it. It would be a smaller increase than the Proposed Plan, but that is not what the objective means. When it is stated that an objective is for the plan to increase anything, it means an increase compared to today, not compared to the Proposed Plan.
- City-owned properties could absolutely be developed into housing under the Reduced Growth Plan. It will be incredibly difficult finding enough developers willing to build residential and multi-use projects Downtown. So, it will be crucial that the City does develop their property regardless of the alternative chosen.

Given the discrepancies listed above, and given Reduced Growth seems to have been misinterpreted or misrepresented, there is too much gray area to state definitively that the Reduced Growth Alternative is infeasible. Nothing is lost by analyzing this Alternative. There could be a lot to lose if it is not, since it could be argued that the Alternatives were not properly or fairly chosen. If this Alternative proves to be vastly superior for the environment, the Planning Commission and City Council have a right to that information. They can then make the decision if it is infeasible based on their goals and objectives.

## **TRAFFIC**

- 1) The VMT analysis is unclear and the EIR should not be approved until after further information can be provided.
- 2) The City is in the process of updating its VMT guidelines and the environmental review of this project should not move forward until such guidelines have been adopted. Once these specific guidelines are approved, they should be followed in this EIR.
- 3) CEQA Guideline 15064.3(b)(1) states “Generally, projects within ½ mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.”
  - a) The SMART Station is considered a major transit stop. However, a large section of the Plan, specifically the eastern half Courthouse Square, is not within ½ mile of the SMART Station.
  - b) The Transit Mall is being considered a “high-quality transit corridor” in this study. Using this designation, the entire Plan area is within ½ mile of either a transit stop or corridor. If this is the case, no quantitative analysis would be required.
    - i) However, it is stated in Appendix F of the DEIR that the Office of Planning and Research (OPR) has indicated that “the transit mall may not meet the strict definition of a major transit stop.” And yet it is considered as such in this analysis. Although we acknowledge there is some reasoning behind designating the Transit Mall a high-quality corridor, we believe this designation is too gray and given how important this distinction is, quantitative VMT analysis should be performed.
    - ii) Additionally, given the majority of the proposed high-density residential is slated to occur in Courthouse Square, and that the eastern half of Courthouse Square is not within ½ mile of the SMART Station, again we believe that a quantitative VMT analysis must be performed.
- 4) This EIR used a trip-based analysis, versus the alternative “tour based” method. The trip-based method only counts trips to and from one location, excluding trips taken between (school, daycare, shopping, etc.). The “tour based” includes all trips and is preferred by the OPR. For the EIR to be considered comprehensive, this plan should be analyzed using both methods.

- 5) Per Santa Rosa's Draft VMT Guidelines, it is stated "projects that are inconsistent with the (General Plan) Land Use Plan are automatically considered inconsistent with the VMT policy and shall conduct a VMT analysis." This Project's proposed Land Use is inconsistent with both the General Plan as well as the 2007 Specific Plan and should thus be required to perform a full VMT analysis.
- 6) Per Santa Rosa's Draft VMT Guidelines, different Land Uses are required to apply different thresholds. For example, office uses must use the Employment VMT per worker for work related trips only, retail uses must use the Total VMT, and mixed-use must apply significant thresholds for each component separately, taking credit for internally captured trips.
  - a) From the information provided in the EIR, this level of analysis was not performed, and it should be before moving forward. If this level of analysis was performed, no calculations have been included in the report and they should be provided before moving forward.
  - b) If the City attempts to provide a reason for not providing this level of analysis, please refer to Comment #3 and Comment #6 above.
- 7) The impact of developing parking facilities has not been adequately analyzed.
  - a) Is there an VMT impact when converting parking facilities into residential uses?
    - i) How has this specific impact been analyzed? Where are the calculations and data?
  - b) Why aren't the detailed VMT calculations included in the EIR?
  - c) If parking supply is removed, people will need to park further away from their destinations. Has this been analyzed in terms of the VMT impact?
  - d) Was it assumed that the new residents would be working Downtown, thereby producing fewer VMT? Was there an alternative analysis assuming residents work elsewhere?
- 8) Although it does not hurt to have LOS incorporated in for General Plan consistency purposes, SB 743 required the analysis of the project to stand alone using VMT. There is much more LOS analysis than VMT analysis. As stated above, there should be more VMT analysis since this method is a State requirement. Currently it looks like the VMT analysis was an afterthought, versus a thorough analysis. This makes sense given the State requirements changed very recently. It is exactly because of this that we believe more time should be taken on the VMT analysis method before moving forward.

## **AESTHETICS**

- 1) This plan proposes an increase of 1.3M square feet in retail uses. A vast majority of this retail will be within mixed-use projects, requiring residential to be built above. This mixed-use type of development becomes problematic when retail demand falls short of supply, preventing landlords from leasing their ground floors. The aesthetics of the area are negatively impacted when vacant worn-down store fronts start appearing. These empty store fronts make it increasingly difficult for the neighboring buildings to be leased out, so the area continues to degrade aesthetically. This has been something our Downtown has been struggling with for some time now.
  - a) Additionally, COVID-19 has, and will, continue to wipe out retail. Restaurants have been temporarily hit, but retail will be forever changed. When looking out to 2040, there is absolutely a chance that retail will no longer exist in brick and mortar form. If even half of the square feet this Plan proposes remains vacant, there would be noticeable blights around Downtown. What vacancy percentages can be endured by an area before the aesthetics are damaged?
  - b) Such physical blights could reasonable be
  - c) Given this very real possibility, the negative aesthetic effects that could occur if retail does not survive in the future need to be further analyzed. Ideally this would be analyzed block by block, as there are different retail use densities which would affect the outcome of the analysis.

- 2) The same argument can be made regarding the residential aspect of mixed-use development. The current plan calls for 7,006 new residential units. This is an extremely high estimate by any standard. The effect the failure to build these units would have on the area's aesthetics should be analyzed. If buildings are required to build mixed-use and there is not enough residential demand, the buildings will not be fully leased, meaning the property owners will likely invest less in exterior maintenance, thus negatively impacting the area's aesthetics.
- 3) Given the physical blights, that could reasonably be assumed to result based on the current plan, we respectively request that the City's EIR consultant prepare an urban decay analysis to ensure there is a robust analysis and full disclosure of this key issue.

## **WATER AND WASTEWATER**

- 1) What will the impact be on water and wastewater when developing parking facilities into residential? Was this calculated separately? If so, please provide the data.
- 2) The EIR did not analyze the scenario where the City does not build the many infrastructure projects needed to support the proposed development.
  - a) The assumption that the City can build this infrastructure is used as a mitigation for the impacts this Plan will have on the City's water and wastewater. What happens if it cannot?
  - b) Given many of these required infrastructure projects are not even approved, and given the incredible length of time it takes Cities to build infrastructure, the EIR cannot dismiss the scenario where the City is unable to build this infrastructure in a timely manner. Therefore, this scenario must be analyzed before the EIR can be adopted.

## **NOISE**

In Appendix E, where the Noise Modeling Data is included, there are only two scenarios analyzed. The first is "Existing with no Project" and the second is "Future with Project." However, in other analyses, such as water demand, "Future with no Project" is included. Additionally, the consultant's actual report isn't included in this appendix. As developers have been required to submit acoustical studies for our projects in the past, but we cannot locate one in the EIR. Although there is information included in the Noise section, the official report by the consultant should be included to confirm that the information provided is complete and in alignment with the professional's analysis.

## **PUBLIC SERVICES AND RECREATION**

We do not believe that the Plan adequately addresses the need for both private and public recreation and open space. The discussion in the EIR surrounding parks includes information about parks outside of the Downtown Area, which should not be counted in any way. A policy used as a mitigation for the impact this Plan will have on parks is that developers will be required to dedicate land or pay in-lieu fees. This does not help the Downtown area as there is little, if any, land that could be developed into parks or open space. Additionally, the parkland ratios provided are for the entire City. This study should include parkland ratios for specifically the Downtown since the impacts only apply to the Planning Area and thus need to be mitigated within that same area.

## AIR QUALITY AND GREENHOUSE GAS

For the analysis on air quality to be valid, the data provided needs to be understood by those reading the EIR. Below is an example of the data included in the report and there are 43 pages that look like this. There is no way to check the assumptions and conclusions of the air quality analysis in the EIR if the data needed to do so is presented like this without further explanation. We request that further explanation of the hard data collected and the calculations performed be included in the EIR before it is approved.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Nonresidential_Exterior	2,645,699.00	0.00
tblArchitecturalCoating	ConstArea_Nonresidential_Interior	7,937,098.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Exterior	2,020,275.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	6,060,825.00	0.00
tblConstructionPhase	NumDays	550.00	0.00
tblConstructionPhase	NumDays	7,750.00	0.00
tblConstructionPhase	NumDays	500.00	0.00
tblConstructionPhase	NumDays	775.00	0.00
tblConstructionPhase	NumDays	550.00	0.00

## GENERAL COMMENTS/QUESTIONS

- 1) It is stated on Page ES-5 of the DEIR that the Plan’s development buildout assumes “only a portion” of the total potential development will occur by 2040. What is this portion? There should be an additional analysis in the EIR assuming a full build out. Although unlikely to occur, a full build out is still possible and those impacts should be identified so the worst-case scenario can be known before the EIR is approved.
  - a) For example, the Water Demand Analysis (Appendix D) includes Table 15, as show below, which breaks down the development phasing, assuming a full build out by 2040. If the water demand analysis uses the assumption of a full build out, then all other aspects of the plan should be analyzed using that same assumption.

**Table 15 – Phased Development by Land Use Category for Project <sup>a</sup>**

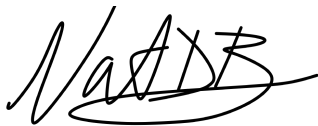
Land Use Categories	2020-2025	2025-2030	2030-2035	2035-2040	Total
Percent of Project to be Developed	25%	40%	20%	15%	100%
<b>Residential</b>					
Medium High Density	19 units	31 units	16 units	12 units	78 units
High Density	1,811 units	2,898 units	1,449 units	1,087 units	7,245 units
<b>Non-Residential</b>					
Office	-53,599 SF	-85,759 SF	-42,879 SF	-32,159 SF	-214,396 SF
Retail & Service	314,870 SF	503,793 SF	251,896 SF	188,922 SF	1,259,481 SF
Public/Institutional	138,917 SF	222,268 SF	111,134 SF	83,350 SF	555,669 SF
Industrial	-42,262 SF	-67,618 SF	-33,809 SF	-25,357 SF	-169,046 SF
Total	357,927 SF	572,683 SF	286,342 SF	214,756 SF	1,431,708 SF
	1,830 units	2,929 units	1,465 units	1,099 units	7,323 units

<sup>a</sup> Source: Table 6, Woodard & Curran, January 6, 2020.

- 2) Table 15 above breaks down the development into specific commercial uses (office, retail, industrial, etc.).

- a) Were these use breakdowns used when evaluating the various impacts, such as water, traffic, air, sound etc.? For example, the water demand for a restaurant is vastly different than for a retail or office use. If there was an assumed percentage of the commercial that would be retail, office, etc. can we please be provided with those assumptions and the subsequent calculations?
- 3) It is clearly a high priority to develop City owned property. The Plan lists parking lots and parking garages as City assets. However, a Parking Assessment District was formed decades ago in which assessments of property owners were used to pay for the creation of the Downtown parking structures. The property owners were told that their money was being collected to add and maintain parking, not for the purpose of possible future development of those structures. If these structures are developed the parking supply will be reduced, the opposite of the assessment district's purpose.
  - a) This EIR was performed assuming that these assets belong to the City versus the Parking Assessment District. If this is not accurate, the Plan and EIR would need to be revised. Before the Planning Commission can make an informed decision about the Plan and subsequent validity of the EIR, we believe that the Parking Assessment District's original formation documents and entire history, including any subsequent transfers of assets, be provided.

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read 'Natalie Balfour', with a stylized flourish at the end.

Natalie Balfour  
Airport Business Center

September 24, 2020

Santa Rosa Planning Commission  
City of Santa Rosa  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404

Dear Chair, Vice Chair, and Commissioners

I am writing on behalf of Airport Business Center; the owner of 50 Old Courthouse Square and the building Roxy Stadium 14 is located, regarding the Downtown Area Specific Plan.

We want to start by acknowledging all the work staff has done and their willingness to be available and helpful throughout the process so far.

We believe that there are a lot of great ideas that will help create a vibrant downtown. There are only three requests that we have. In terms of the Plan, they are exceedingly small and will not affect its overall goals or visions. To us, however, they are exceptionally large. We have been a property owner and landlord Downtown for 15 years and we hope to remain one for many years to come. These requests are vital in our ability to do so.

- 1. Adopt a policy to keep Parking Garage 5 (625 3<sup>rd</sup> Street) and Parking Garage 12 (555 First Street) exclusively as public parking garages.**
  - a. Garage 5 is the most used public parking garage downtown and is situated in the heart of Courthouse Square. The surrounding retailers, restaurants, and office users rely on its existence to prosper. If the City wants to attract the level of retail and service users proposed in the Plan, this parking garage must remain in effect.
  - b. Garage 12 provides parking for Roxy Stadium 14. If the City wants the movie theater to remain in our Downtown, this garage must remain in existence.
  - c. We have attached our comments to the EIR Scoping Study we submitted back in January (Attachment A). We requested an alternative analysis using the assumption that Garage 5 and Garage 12 being designated Public/Quasi.
    - i. A number of prominent business and property owners pledged their support of our request to change the land use designations of these two garages to Public/Quasi.
  
- 2. Adopt a policy stating that any ground floor space currently being utilized as office shall be allowed to retain such use, now and in the future without any alterations to the building.**
  - a. In theory, all these policies should only apply to new construction. However, this is not stated anywhere, and we are requesting that it be made clear. We want to make sure that when we go into get a permit for a TI for a new office tenant, we are not required to alter the exterior of our building to make it more “active” due to the fact that our use is office.
  - b. We realize that offices do not inherently create an active façade, but that is for a reason. Office users do not want people drawn to the building there are in, right in front of the office windows. Things like putting out chairs and tables, adding awnings, and creating

public recreational spaces could benefit retail and restaurants. But they greatly injure office use.

- c. If office use on the ground floor is not protected, this Plan will not succeed. It cannot rely upon retail, restaurants, and services account for the 800,000 square feet of commercial development this Plan is proposing. Those uses are extremely volatile with very high turn-over. Office use, on the other hand, is steady and reliable. If you allow office use to continue to exist as is, the downside is the facade might not be active, but the spaces will be filled. If you do not protect office, and there isn't enough retail to match supply, you will have vacant ground floor spaces. Vacancy is much worse than plain façades, both in terms of aesthetics as well as safety.

**3. Officially designate 50 Old Courthouse Square as a site to be preserved for employment-oriented development, as stated in Policy LU-3.4 below.**

**LU-3.4** Preserve some sites in the Courthouse Square area for employment-oriented development to ensure that its role as a regional employment hub be maintained.

Additionally, there are several more Policies in the Proposed Plan that will be irrelevant if commercial office use is not actively protected.

**LU-1.2** Foster a rich mix of uses in the Core, Station, Maker and Neighborhood Mixed Use areas, while allowing differences in emphasis on uses to distinguish between them.

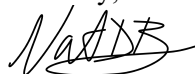
**LU-3.1** Expand and diversify the Downtown employment base by attracting new employers, including firms active in technology, medical/bio, engineering, and media.... nurturing and retaining small businesses and start-up firms. Ensure that buildings are designed to accommodate these uses.

**LU-3.5** Encourage the integration of commercial tenant spaces designed to accommodate small business within new development.

**Pg. 2-5** “The Downtown Station Area encompasses approximately 9.5 percent of the office space in Sonoma County, and the Old Courthouse Square is a regional center for financial and government offices. Market demand projections anticipate that the Downtown Station Area will capture a commensurate share of new office development as long as there is a sufficient amount of housing that is attractive and affordable to a growing workforce.”

I appreciate your time and consideration of this proposal.

Sincerely,



Natalie Balfour  
Airport Business Center



## ATTACHMENT A

January 15, 2020

Patrick Streeter, Senior Planner  
City of Santa Rosa, Planning Division  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404

RE: Downtown Santa Rosa Station Area Specific Plan: Initial Study

Dear Patrick,

The goal of this letter is to express the concerns we have regarding the Initial Study that has been prepared for the Downtown Station Area Specific Plan Update. It is written specifically on behalf of Airport Business Center, the owner of 50 Old Courthouse Square, with more than 20 tenants, and 85 Santa Rosa Avenue, where Roxy Stadium 14 is located. Additionally, we have garnered support from a number of other Downtown business and property owners, including Hugh Futrell, Doug VanDyke, Toraj Soltani, Charles Evans, Tom Robertson, and Amy Tocchini.

We realize that one of the goals of the Specific Plan Update is to promote high-density residential development in the Downtown Area. There are a number of ideas proposed in the Initial Study, as well as the memo entitled “Barriers to Downtown Development and Strategies to Address Them.” We support the majority of the proposed concepts and appreciate that the City is working to create a more vibrant and successful downtown.

However, we have one major concern – this plan does not protect any of the parking facilities from being redeveloped in the future. We believe that it is in the best interest of the Downtown businesses and properties to designate the land use and zoning of at least a few of the parking facilities as Public/Institutional. Specifically, we are requesting that Garage 5 and Garage 12 be designated Public/Institutional. Many businesses and properties located Downtown rely on these specific garages to remain viable. The Roxy Theater, Hotel E, Mac’s Deli and Cafe, Perch and Plow, and E.R. Sawyer Jewelers are just a few of them. The City cannot afford to lose these businesses, as they have become essential to the success of the Downtown Santa Rosa economy.

Zoning these garages Public/Institutional is the only way to ensure that these parking facilities will exist in the future. This information is vital when business and property owners are performing long-range planning, deciding whether to stay Downtown or relocate. A number of businesses have already decided to move elsewhere and we know of many more who are considering it. The current parking situation is already a major point of contention and has been cited as one of the main reasons businesses consider relocating. Redeveloping the garages will only make the situation worse. If these garages are zoned anything other than

Public/Institutional, the degree of unknown will increase. This will ultimately lead to uncertainty and frustration, which will only drive more businesses out of Downtown.

The projected increase of approximately 7,000 residential units in the proposed plan has been calculated using a number of assumptions. For example, assumptions have been made regarding the number of residential units each parking garage could produce, if developed. These numbers have then been used in the current analysis and scoping of the EIR. In order for us to support this Specific Plan Update, the scope of the EIR needs to be expanded to include different assumptions. We are formally requesting that the EIR include an alternative analysis using the assumption that Garage 5 and Garage 12 be zoned as Public/Institutional.

We appreciate your time and consideration and look forward to working together to find a solution that will create a vibrant Downtown, taking into account all aspects of the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Natalie Balfour", written over a horizontal line.

Natalie Balfour

Asset and Property Manager

Airport Business Center

[nbalfour@airportbusinesscenter.com](mailto:nbalfour@airportbusinesscenter.com)

(707) 217-6252

**From:** Roy Loessin  
**To:** [Lyle, Amy](#)  
**Subject:** [EXTERNAL] B Street Roy Loessin here  
**Date:** Monday, September 21, 2020 11:59:43 AM  
**Attachments:** [DOWNTOWN PLAN MAPS.doc](#)

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Amy,

Hello. I've gone over the Planning Commission package and thank you for sending the link. I wanted to bring up some points (which I think others in the neighborhood might be mentioning to you as well).

I have attached a MS Word document with my points and the related maps. I'll just briefly outline my concerns:

1. The homes on the north side of Lincoln St from Glenn St to Healdsburg Ave do not have a Neighborhood Transition as is applied to those west of Glenn St. In fact, these properties are generally older than the ones to the west.
2. Attachment 2 - General Plan Text and Figure Amendments: I appreciate the application of a Neighborhood Transition to the properties on the east side of B Street between 10th St and Lincoln St. But my concern remains that 630, 634 and 616 B Street have been defined as Retail and Business Services instead of Residential land use. The revised existing land use map has corrected this but the text with each address still keeps this commercial definition (bottom of page 25, top of page 26). Also, with a 4.0 FAR for the Core Mixed Use properties, these could be made available for development? 616 B St is from the 1880s and the thought of it being demolished astounds me.
3. On a personal note, my own home at 615 B Street on the LU-3 Land Use map, has gone from a Single Family Residential (light yellow) to Medium Residential (orange). While this might not have have any future effect on my residence, it is a change.

Thanks again for all your outreach and you are appreciated,

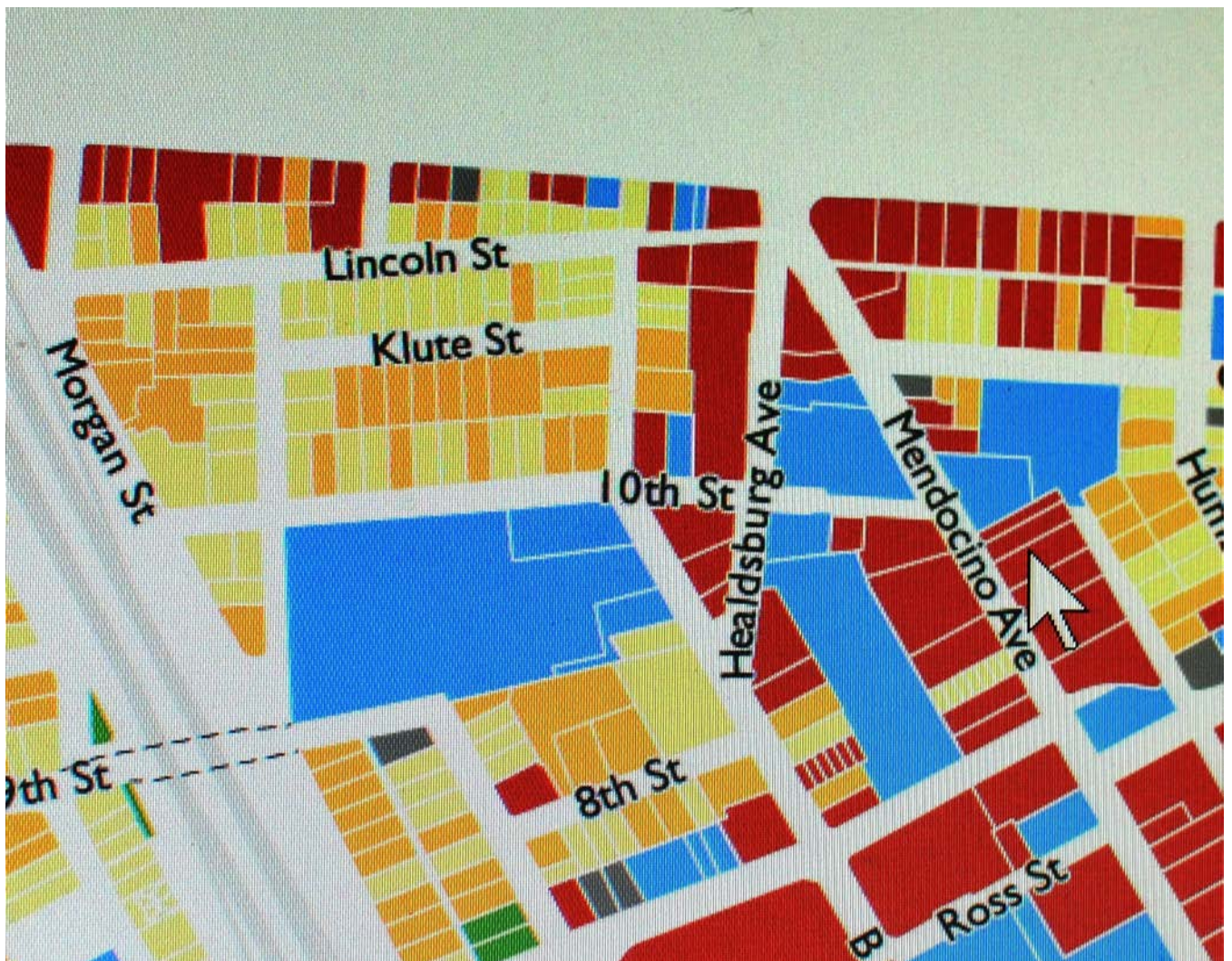
Roy

# Edits and Additions to the Proposed Plan in Response to Public Comments

Exhibit A (reso 2)-1. pdf

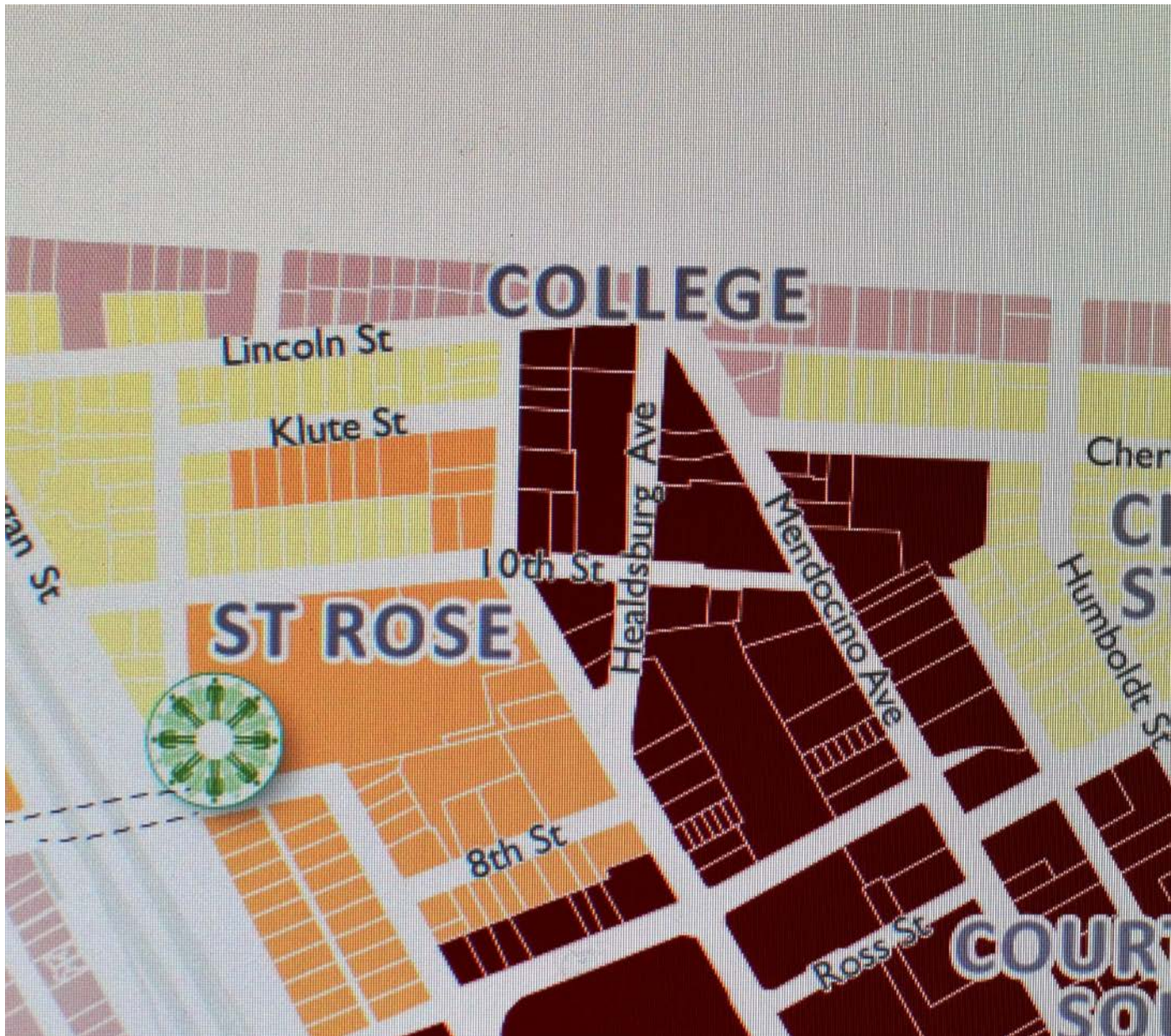
MAPS

LU-1 EXISTING LAND USE



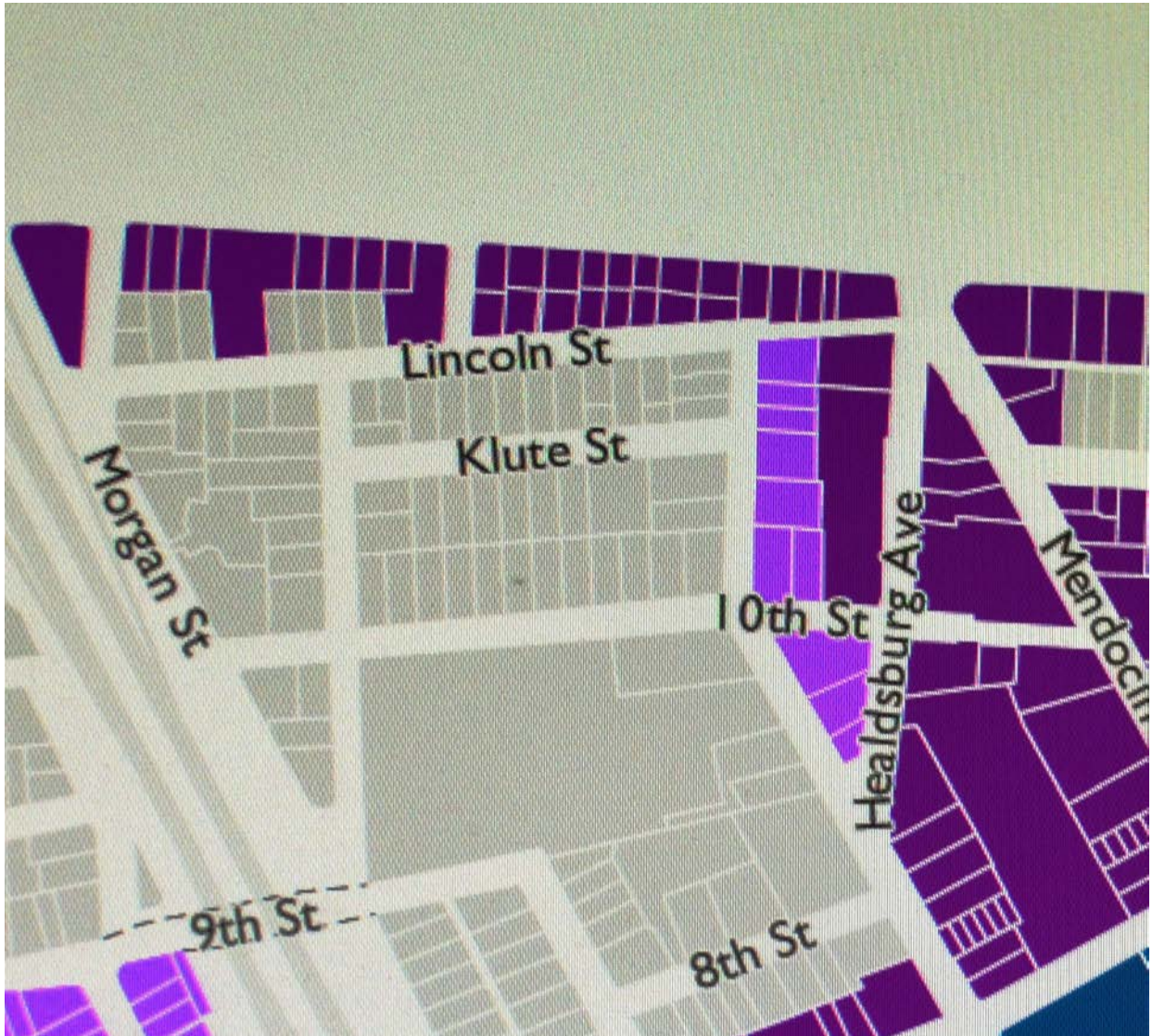
1. Properties at 630, 634 (single family) and 616 (Multi family) shown correctly as residential, but...

## 2. LU-3 LAND USE



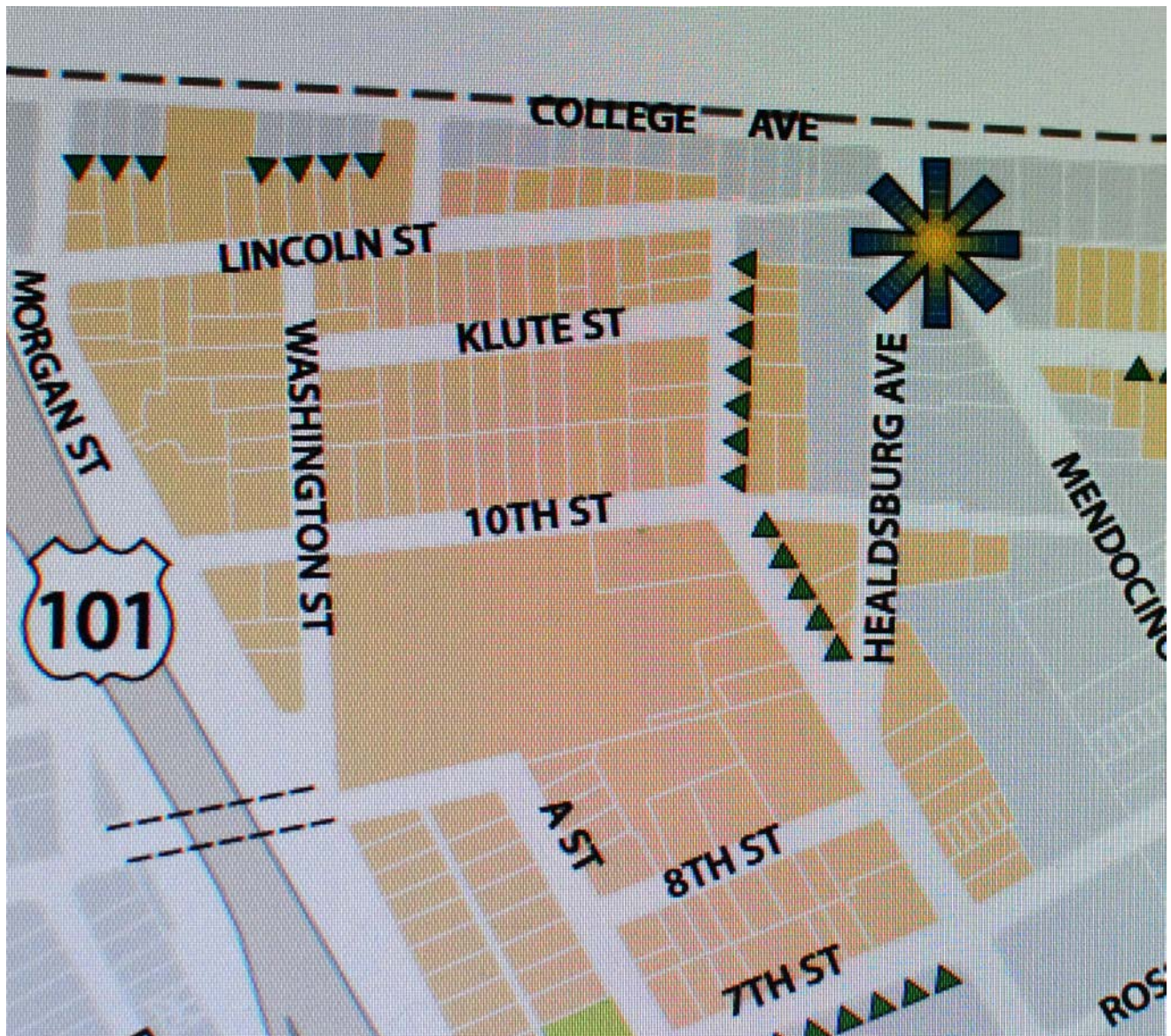
1. All properties on the east side of B Street between 10<sup>th</sup> St. and Lincoln St. now designated as Core Mixed Use. So going from Residential to Core Mixed Use, not Retail and Business Services to Core Mixed Use.
2. My home (615 B St.) which is a single residential structure is now defined as Medium Residential Land Use

## LU-5 MAXIMUM FLOOR AREA RATIO



1. Maximum FAR 3.0.
2. Neighborhood Transition standard to apply
3. Therefore, a number of the properties on the east side of B Street can be developed if the owners sell, as well as the properties combined with land on Healdsburg Ave?
4. 616 B Street is from the 1880s-1890s, but could still be demolished for development?

## UDCS-1: Special Design Considerations



1. The Neighborhood Transition does not apply to the properties on the north side of Lincoln St. between Glenn St. and Healdsburg Ave?
2. How do these properties differ from those to the east of Glenn St. to Morgan St? There are a number of historic structures, one among the oldest in the neighborhood and perhaps the City.

**From:** Denise Hill  
**To:** [Lyle\\_Amy](mailto:Lyle_Amy)  
**Subject:** [EXTERNAL] Follow-up to DSASP Zoom meeting for St. Rose residents on 9/17/20  
**Date:** Sunday, September 20, 2020 8:11:37 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[St. Rose Area of City's contributor, non-contributor Map vs DSASP FAR rating.docx](#)

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Hi, Amy,

Thanks for holding the Zoom meeting with us last Thursday. I'm encouraged by the City's interest in performing a comprehensive update to the Cultural Heritage Survey and the mention of the Redistributed Growth Alternative, the land use framework which would be revised to redistribute more growth away from potentially historic properties as part of the DSASP. I'm also a fan of the slide you showed us that directs developers of buildings of more than two stories to start stepping back the additional stories.

However, I am very much concerned that my comments submitted in August 18 (see email below)- including those regarding some of the FAR ratings listed for properties in our historic district - weren't incorporated. This same concern is listed in Attachment 3- Public Comments by Roy Loessin. My biggest concern is in regards to the 3.0 and 4.0 FAR rating for Lincoln and B Streets in our neighborhood. Not only is the northern side of Lincoln Street between Glenn and B Street residential, the homes on this block are all listed as contributors to our district except one. In addition, 421 Lincoln Street is on the California Register of Historical Resources (EIR Table 3.2-1). This is in stark contrast to the other residential streets in our neighborhood which have no FAR rating. Continuing from Lincoln Street down B Street to 7<sup>th</sup> Street, it appears all properties on the east side of B Street have a FAR of 3.0-4.0. even though many are contributors to our historic district and about half of them are residential structures.

I've attached the city's contributor map for the St. Rose Preservation District with images of each of the historic properties with a FAR rating over 2.0. Please let me know if this will be changed and a new FAR map provided to the Planning Commission prior to their review on 9/24/20.

Thanks,  
*Denise Hill*  
707-332-1966

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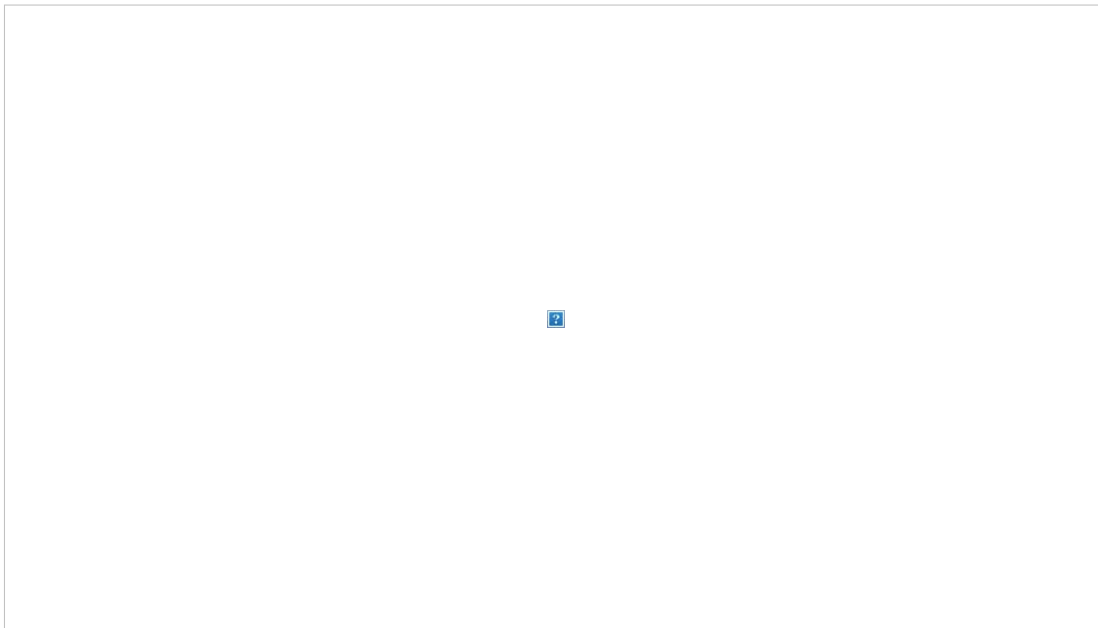
**From:** Denise Hill <[fajre@sonic.net](mailto:fajre@sonic.net)>  
**Sent:** Tuesday, August 18, 2020 8:01 PM  
**To:** Lyle, Amy <[Lyle@srcity.org](mailto:Lyle@srcity.org)>  
**Subject:** DSASP 8/19 meeting with CHB/DRB - Concerns noted in red

Hi, Amy,

My apologies that I didn't provide these comments prior to this week, but the County's fast-tracked proposal to purchase the Hotel Azura on the edge of our neighborhood for a homeless hotel has monopolized all my and other residents' time. Please see 5 slides below from your DSASP Power Point presentation with comments in red. Please share with the CHB/DRB, if possible.

Also, I believe you mentioned there was more verbiage on addressing the homeless downtown in the plan, but not on your slides. Can you send me that text?

Thanks,  
*Denise Hill*  
*St. Rose Preservation District*







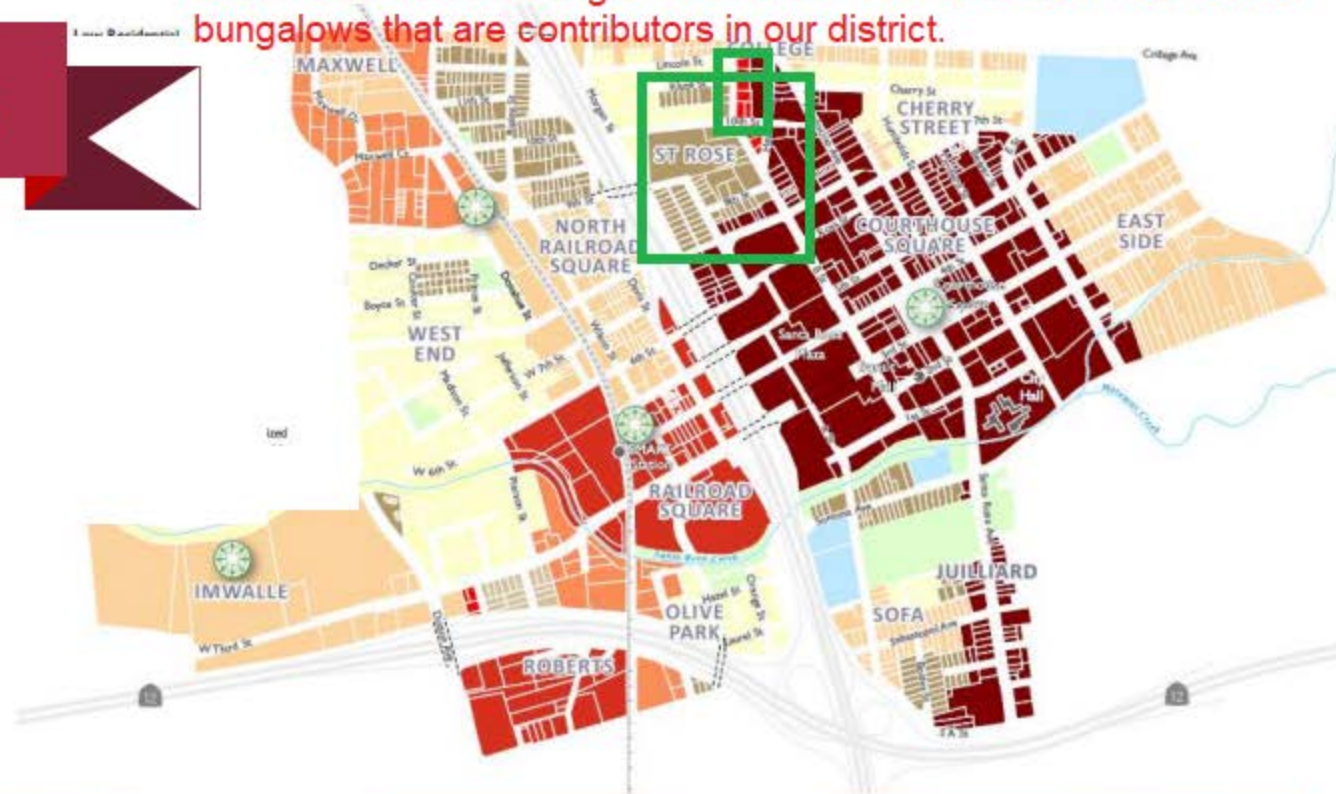
1. More residents, businesses and jobs near transit
2. More housing at all levels of affordability
3. Diverse mix of uses
4. Enhanced Preserve historic character
5. Improved connections
6. New arts and cultural facilities

I'm concerned about these areas that are noted as Medium Residential since they encompass a large portion of the St. Rose Neighborhood. There are a few apartment buildings, but the majority of homes are 1-2 story bungalows and victorians that are contributors to our district. Also, the area noted in red as Retail and Business Services along B Street from 10th to Lincoln has several bungalows that are contributors in our district.

# Land Use Categories

- New Categories:
  - Core Mixed Use
  - Station Mixed Use
  - Maker Mixed Use
  - Neighborhood Mixed Use
  - Urban Park/Civic Space

-  Low Residential
-  Medium-Low Residential
-  Medium Residential
-  Retail and Business Service
-  Public/Institutional
-  Core Mixed Use
-  Station Mixed Use
-  Maker Mixed Use
-  Neighborhood Mixed Use
-  Park
-  Urban Park/Civic Space
-  Undercrossing
-  SMART Rail



The entire north side of Lincoln Street between Glenn and B Streets is listed as a 4.0 FAR, when it contains one of the oldest homes in our neighborhood along with lots of bungalows - all contributors to our district.



## CONTENTS

- Urban design principles
- The public realm
- Public spaces
- Site and building design
- Historic resources

## GOALS

- New development standards and guidelines
- Network of green and open spaces
- Well-preserved historic resources

...including entry markers to historic neighborhoods.

## KEY MOVES

- Create urban parks/civic spaces
- Design standards and guidelines for active ground floors, transition areas that border residential neighborhoods, and wayfinding
- Historic resource assessment of age-eligible properties

Historic resource assessment of age-eligible properties not included in previous Cultural Heritage Surveys.

## CONTENTS

- Public services (schools, libraries, police/community safety, fire, utilities)
- Noise and hazardous materials
- Environmental hazards and emergency response
- Clean air, water, and natural environment

## GOALS

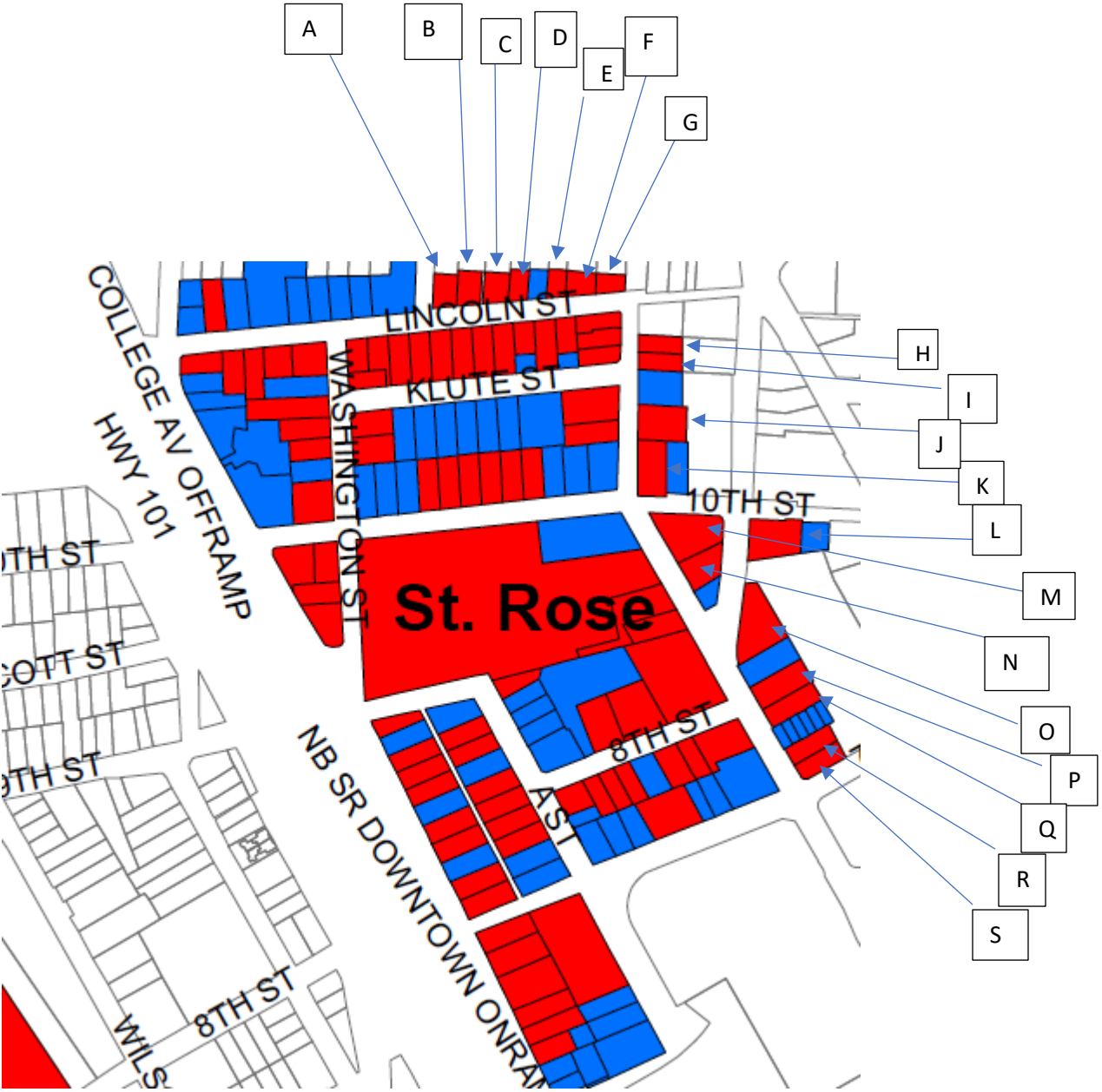
- Responsive fire and police services
- Accessible school and library facilities
- Adequate infrastructure
- Pleasant noise environment
- Healthy air and water quality
- Protection from natural hazards
- Preserved/enhanced biological and cultural resources

Promptly remove encampments and associated bio-hazards (needles, feces, etc.) in the downtown area and surrounding neighborhoods.

## KEY MOVES

- Identify infrastructure improvements needed
- Minimize exposure air and noise pollution
- Take action for effective emergency response/preparedness

# St. Rose Contributors – Lincoln and B Streets





**A. 403 Lincoln Street**



**B. 407 Lincoln Street**



**C. 417-419 Lincoln Street**

**D. 421 Lincoln Street**



**E. 425 Lincoln Street**



**F. 429 Lincoln Street**



**G. 437 Lincoln Street**







**H. 634 B Street**



**I. 630 B Street**

**J. 616 B Street (Greott Family history attached.)**



**K. 600 B Street - Hamlin Medical Building (history attached.)**



**L. Saturday Afternoon Club (history attached).**



**M. 576 B Street - Thurlow Medical Building (history attached).**



**N. 558 B Street – Berka House (history attached).**





**O. 534 B Street**

**P. 526 B Street – Rosemont Apartments**



**Q. 520 B Street**



**R. 508 and 510 B Street**



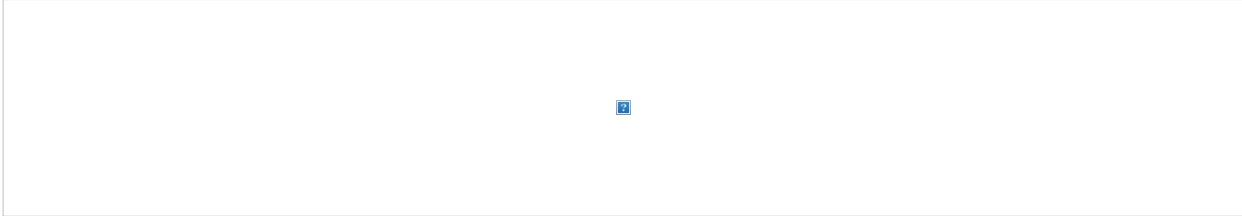
**S.**

**From:** Peter Stanley  
**To:** [Lyla Amy](#), [Trippel Andrew](#)  
**Cc:** [Hartman Claire](#)  
**Subject:** [EXTERNAL] Development Stds Under New Plan  
**Date:** Wednesday, September 16, 2020 3:41:17 PM

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Amy and Andrew,

This is going to be a deal killer for most small infill projects that want to maximize smaller development sites in the downtown. If multiple residential low to mid rise buildings go up adjacent to each other and they are required to setback 5' on each side don't you think we're going to create suburbia in our urban core. This feels like a small lot subdivision requirement, are you considering changing this in the amended plan?



**Note New Address**

**Peter Stanley, LEED BD+C**  
**Principal, ArchiLOGIX**  
427 Mendocino Ave, Suite 150  
Santa Rosa, CA 95401  
t: 707.636.0646 x402 | f: 707.636.0644  
[ps@archilogix.com](mailto:ps@archilogix.com)  
[www.archilogix.com](http://www.archilogix.com)

TABLE 2-8—CV, CD, AND CSC DISTRICT DEVELOPMENT STANDARDS

Development Feature	Requirement by Zoning District				
	CV	CD-5	CD-7	CD-10	CSC
Minimum lot size	<i>Minimum area and dimensions for parcels proposed in new subdivisions.</i>				
Area	20,000 sf		None required		Determined by CUP
Dimensions			None required (1)		
Residential density	<i>Maximum number of dwelling units allowed on a parcel. The actual number of units will be determined by the City through subdivision or land use permit approval.</i>				
Maximum density	Not allowed		No maximum		1 unit required per 4,000 sf of non-residential floor area to a maximum of 30 units per acre.
Setbacks (1) (2)	<i>Minimum setbacks required. See Section <a href="#">20-30.110</a> for setback measurement instructions.</i>				
Front	20 ft (3)		None allowed; building façade shall be at front property line, except as provided by Section <a href="#">20-23.060</a> .		7.5 ft adjacent to a residential zone or use; none required elsewhere
Side—Interior (each)			5 ft adjacent to a residential zone or use; none required elsewhere.		

**From:** Pamela Roberts  
**To:** [Lyle, Amy](#)  
**Cc:** [Greg Parker](#); [Roy Loessin](#); [Thomas Drain](#); [Denise Hill](#); [tab McBride](#)  
**Subject:** [EXTERNAL] Contributors\_Non-Contributors  
**Date:** Friday, September 18, 2020 12:39:04 PM

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Hi Amy, I'm sending this map that shows that the properties on Lincoln on the east side of Glenn street are all contributors except one. It seemed like what you showed us yesterday, they were designated as non-contributors. Or was I mis-understanding what you were showing us?

Thanks, Pamela

[https://srcity.org/DocumentCenter/View/13894/Contributors\\_Non-Contributors?bidId=](https://srcity.org/DocumentCenter/View/13894/Contributors_Non-Contributors?bidId=)

# HISTORIC PRESERVATION DISTRICT PROPERTIES

- Contributor
- Non-Contributor
- Unknown

