Pullman Phase II – Building C Project

CITY PROJECT FILE# DR22-011

ENVIRONMENTAL CHECKLIST

STATUTORY EXEMPTION

PURSUANT TO CEQA GUIDELINES SECTION 15182

LEAD AGENCY:

CITY OF SANTA ROSA
PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT
100 SANTA ROSA AVENUE, ROOM 3
SANTA ROSA, CA 95404
CONTACT: CONOR MCKAY, SENIOR PLANNER

PREPARED BY:

METROPOLITAN PLANNING GROUP
499 HUMBOLDT STREET
SANTA ROSA, CA 95404

JUNE 2022

M-GROUP

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PULLMAN PHASE II – BUILDING C PROJECT
CEQA ENVIRONMENTAL CHECKLIST

Project Title:	Pullman Phase II – Building C
Lead agency name and address:	City of Santa Rosa Planning and Economic Development Department 100 Santa Rosa Avenue, Room 3 Santa Rosa, CA 95404
Contact person and phone number:	Conor McKay, City Planner (707) 543-4351 Email: ctmckay@srcity.org
Project Location:	701 Wilson Street Santa Rosa, Sonoma County, CA 95401 Assessor's Parcel Number: 010-191-005
File Number:	DR22-011
Project sponsor's name and address:	Phoenix Development Company of Minneapolis, LLC 30 Meyers Court, Novato, CA 94947 707-540-5896
Property Owner(s): -	Pullman Lofts First Phase, LLC 30 Meyers Court, Novato, CA 94947 612-386-9071
General Plan Designation/ Zoning:	Neighborhood Mixed Use/ Neighborhood Mixed Use
Description of Project:	Minor Design Review of a proposed 5-story, 40-unit, market-rate multi-family residential building with 5% of units reserved for qualifying Low-Income households. The proposed Project design features four units and five tuck-under parking spaces on the ground floor and nine units located on each floors 2-5. Unit sizes range from 414-625 square feet. Building C amenities, including a dog run, dog wash station, pool area, gym, bike storage, office, conference room and community lounge, would be located at Phase 1 of Pullman Lofts, which is currently under construction.
Surrounding land uses and setting; briefly describe the Project's surroundings:	The Project site is located north of West 8th Street, east of the SMART corridor, west of Wilson Street and south of 9th Street. The site is within ¼ mile of the SMART station at Railroad Square. The DSASP designates surrounding properties as Neighborhood Mixed Use.
Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreements):	N/A
Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	Lytton Rancheria and Federated Indians of Graton Rancheria (FIGR) were notified on February 16, 2022. The Lytton Rancheria/FIGR responded with an acknowledgement that the AB 52 referral had been received and did not request consultation. The Federated Indians of Graton Rancheria did not respond to the AB52 referral as of June 3rd, 2022.

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PULLMAN PHASE II – BUILDING C PROJECT
CEQA ENVIRONMENTAL CHECKLIST AND INITIAL STUDY

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ACRONYMS AND ABBREVIATIONS

APN	ASSESSOR PARCEL NUMBERS
BAAQMD	BAY AREA AIR QUALITY MANAGEMENT DISTRICT
BRA	BIOLOGICAL RESOURCES ASSESSMENT
BMP	BEST MANAGEMENT PRACTICE
CCR	CALIFORNIA CODE OF REGULATIONS
CDFW	CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
CEQA	CALIFORNIA ENVIRONMENTAL QUALITY ACT
CNEL	COMMUNITY NOISE EQUIVALENT LEVEL
CNPS	CALIFORNIA NATIVE PLANT SOCIETY
CRHR	CALIFORNIA REGISTER OF HISTORICAL RESOURCES
CRS	CULTURAL RESOURCES STUDY
CTS	CALIFORNIA TIGER SALAMANDER
DBA	A-WEIGHTED DECIBEL
DPM	DIESEL PARTICULATE MATTER
DPR	DEPARTMENT OF PARKS AND RECREATION
DTSC	DEPARTMENT OF TOXIC SUBSTANCE CONTROL
EIR	ENVIRONMENTAL IMPACT REPORT
GHG	GREENHOUSE GAS
GPD	GALLONS PER DAY
LID	LOW IMPACT DEVELOPMENT
LWWTP	LAGUNA WASTEWATER TREATMENT PLANT
MBTA	MIGRATORY BIRD TREATY ACT
NPDES	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
NAHC	NATIVE AMERICAN HERITAGE COMMISSION
NHPA	NATIONAL HISTORIC PRESERVATION ACT
NRHP	NATIONAL REGISTER OF HISTORIC PLACES
NWIC	NORTHWEST INFORMATION CENTER
OEHHA	CALIFORNIA OFFICE OF ENVIRONMENTAL HEALTH HAZARDS ASSESSMENT
PPV	PEAK PARTICLE VELOCITY
PRC	PUBLIC RESOURCES CODE
RCPA	REGIONAL CLIMATE PROTECTION AGENCY
ROG	REACTIVE ORGANIC GAS
RWQCB	REGIONAL WATER QUALITY CONTROL BOARD
SCH	STATE CLEARINGHOUSE
SRPCS	SANTA ROSA PLAIN CONSERVATION STRATEGY
SWPPP	STORM WATER POLLUTION PREVENTION PLAN
SWRCB	STATE WATER RESOURCES CONTROL BOARD
UST	UNDERGROUND STORAGE TANK
UWMP	URBAN WATER MANAGEMENT PLAN
$\mu G/M^3$	MICROGRAMS PER CUBIC METER

1. INTRODUCTION

This California Environmental Quality Act (CEQA) Analysis evaluates environmental impacts from the proposed Pullman Phase II – Building C Project, which consists of the construction of a new five-story apartment building containing 40 dwelling units.

1.1. OVERVIEW OF CEQA ANALYSIS

Documentation herein has been prepared by the City of Santa Rosa as lead agency in full accordance with the procedural and substantive requirements of CEQA, CEQA Guidelines, and the City of Santa Rosa's Environmental Review Guidelines. This CEQA Analysis uses CEQA Guidelines Section 15182 implementing Government Code Section 65457, which provides for an exemption for certain residential, commercial, and mixed-use projects that are consistent with an adopted specific plan for which an Environmental Impact Report (EIR) was certified. The analysis provided herein relies on the 2020 Santa Rosa Downtown Station Area Specific Plan (DSASP) and its certified Subsequent EIR (SCH No. 2006072104).

1.2. PUBLIC REVIEW PROCESS

The Project has been analyzed pursuant to CEQA Guidelines Section 15182 implementing Government Code Section 65457 and does not require circulation for public review and comment. Nonetheless the City will make this CEQA Analysis available to the public as part of the public hearing process, which requires approval through the City's Minor Design Review permitting procedure.

2. PROJECT DESCRIPTION

2.1. BACKGROUND

On September 7, 2017, the City of Santa Rosa approved the Pullman Lofts Project under Resolution 17-964 allowing for the demolition of existing buildings and structures on 1.83 acres and the construction of 74 dwelling units contained within two buildings (A and B) and ancillary improvements including lighting, landscaping, and parking. Buildings A and B, currently under construction, are located in the northern portion of the same parcel (APN 010-191-005) as the proposed Project, which consists of Building C and ancillary improvements located on a 0.20-acre area at the southern portion of the parcel as described below.

An Existing Building Assessment, prepared by Innovative Structural Engineering November 15, 2021, concluded that the existing building located at 701 Wilson Street presents hazardous conditions to occupants resulting from the high probability of structural failure during a seismic event. On December 21, 2021, the City of Santa Rosa's Chief Building Official issued a Notice and Order to Demolish the existing building due to violations, dangerous conditions, attractive nuisance, and health and safety risks per Santa Rosa Municipal Code Section 18-20.010. On April 11, 2022, the City issued a demolition permit (Building Permit No. B-22-1597) for the removal of the existing 4,738 square foot single story structure. The order to demolish is a distinct and separate action from the proposed Building C residential development. For the purposes of this analysis, it is assumed that the order to demolish will be carried out. This CEQA analysis considers the proposed redevelopment of a 0.20-acres portion of a vacant parcel with a five-story apartment building (Building C) containing 40 dwelling units, and associated access, frontage, and ancillary improvements.

2.2. PROJECT LOCATION

The proposed Pullman Phase II – Building C Project is located west of U.S. 101 within the central portion of the City of Santa Rosa, Sonoma County, California (**Figure 1: Regional Location**). The Project site is located approximately 1,000 feet north of the SMART station in Railroad Square and approximately 1,500 feet west of the Santa Rosa Plaza Mall. More specifically, the Project site is located on a 0.20-acre (8,905 square feet)

portion of the property at 701 Wilson Street immediately south of where Buildings A and B are being constructed as part of the approved Pullman Lofts Project (APN 010-191-005). The Project site is located within the boundaries of the Downtown Station Area Specific Plan (DSASP) at the northwest corner of Wilson Street and 8th Street.

The Project site is bounded by commercial and industrial uses and 9th Street to the north, commercial and residential uses and Wilson Street to the east, industrial and commercial uses and West 8th Street to the south, and industrial uses and the Sonoma-Marin Area Rail Transit (SMART) Trail and Rail Transit corridor to the west. Other surrounding uses include a school (Kid Street Charter School) and a Neighborhood Park (Harvest Park). (**Figure 2: Project Vicinity**).

2.3. GENERAL PLAN AND ZONING

Per the City of Santa Rosa General Plan 2035 Land Use Diagram, the Project site is designated Neighborhood Mixed Use (NMU) (**Figure 3: General Plan Land Use**). The NMU land use places no limits on residential density or minimum square feet per employee in commercial land uses. NMU allows for new multi-family residential land use in all-residential development and mixed-use buildings with a variety of neighborhood-scale supporting commercial uses, including live-work spaces. General Plan Figure 2-3 provides a maximum floor area ratio (FAR) of 4.0 for the Project site.

In 2018 the Santa Rosa City Council adopted the City's Resilient City Development Measures (Ordinance No. ORD-2018-012), which allows for Design Review approval to be delegated to the Zoning Administrator through the Minor Design Review process for multi-family residential projects within one of the City's Priority Development Areas, such as the Santa Rosa: Downtown Station Area, within which the Project site is located (Sections 3.3 below).

The Project site is within the Neighborhood Mixed Use (NMU) Zoning District (**Figure 4: Zoning Designations**). As stated in the DSASP, NMU allows for new multi-family residential development in all residential or mixed-use buildings. The NMU Zoning District is intended to support a mixed-use and pedestrian-oriented downtown and is consistent with the General Plan land use designation of NMU.

2.4. PROJECT DESCRIPTION DETAIL

The Project proposes construction of a 5-story, 40-unit, market-rate multi-family residential building with 5% of units reserved for affordable households **(Figure 5: Site Plan**). The proposed building height would be 52 feet and 1 inch tall. The ground floor is proposed to contain four units and floors 2-9 are proposed to contain nine units each with unit sizes ranging from 414-625 square feet. All units would contain one bedroom, one bathroom, a living room, a full kitchen, and a private outdoor balcony. Building C amenities, including a dog run, dog wash station, pool area, gym, bike storage, office, conference room and community lounge, would be shared with Buildings A and B as part of Pullman Lofts, which is currently under construction.

Access and Parking

Vehicles would access the site via a gated entry from 8th Street. A 20-foot-wide drive aisle provides vehicular access to five parking stalls tucked under the building at ground level. Of the five stalls provided, one accessible stall and one electric vehicle charging stall are proposed. The building would be accessed from an entry adjacent to parking stalls, from the frontage along 8th Street leading to the lobby, and from an entry at the rear of the building. Bicycle parking is provided in the form of six exterior bicycle racks adjacent to the entry door at the rear of the building. Additional bicycle parking is available at Building B north of the Project site. The existing parallel parking stalls along Wilson Street would be retained by the Project and available for public street parking.

Architecture + Site Design

The building is proposed to be constructed with four wood-built floors above a concrete podium. The building is proposed with a zero-lot line setback at the frontage along 8th Street and a 4-foot 6-inch setback at the frontage along Wilson Street. At the exterior, ground level stucco is used to incorporate the recommendation by the City of Santa Rosa's Design Review Board (DRB) and to achieve a more cohesive design element at the corner of Wilson and 8th street. The applicant has also added another stucco color to the body of the facades to provide more color vibrancy on the building and help tie color scheme back to Phase 1 of the Pullman Lofts Project. Building facades include recessed balconies, varied wall planes to differentiate the massing. Color and horizontal and vertical lines in wall planes further divide the building into smaller visual elements. A distinctive metal trim cap is proposed at the top roof creating an architectural element at the corner of 8th Street and Wilson Street. To address DRB concerns related to rooftop mechanical screening, several rooftop condensing units have been relocated further from the building edge to enhance the pedestrian perspective from 8th Street and Wilson Street. Landscaping is proposed along the site frontage to Wilson Street between patios on the ground floor. The proposed planting palette consists of grasses and shrubs including agave, rush, and sedge as well as vines.

Water Supply

Approximately 95 percent of the City's potable water supply comes from the Sonoma Water (formerly Sonoma County Water Agency) Aqueduct System. The City of Santa Rosa is the potable water supplier and currently provides municipal water to existing uses onsite and in the surrounding vicinity. Potable water would be accommodated via the installation of 12-inch diameter water lines, connecting to the existing 12-inch diameter water main within the Wilson Street roadway.

Wastewater

The City of Santa Rosa provides wastewater treatment services and infrastructure currently extends to the Project site. Wastewater would be accommodated via the installation of a sanitary sewer lateral extending to the existing 8-inch diameter sanitary sewer line in the Wilson Street roadway. Wastewater generated by the proposed Project would be conveyed to the Laguna Wastewater Treatment Plant for processing.

Storm Drain

Storm water runoff would be accommodated via the installation of storm drain lines connecting to the existing 24-inch diameter storm drain line within Wilson Street. At the site driveway a pervious valley gutter would be installed. Bio-treatment areas would be installed along the site frontage to Wilson Street. Storm drain infrastructure would be subject to compliance with C.3 of the Municipal Regional Stormwater Permit.

Solid Waste

The City of Santa Rosa contracts with Recology Sonoma Marin to provide waste collection services. Recology would provide solid waste, recycling, and composting services to the proposed Project. Waste, recycling, and organic matter generated by the Project would be disposed by residents in an approximately 299 square foot trash termination room at the ground level containing waste and recyclable receptacles.

Noise Attenuation

An Environmental Noise Assessment (ENA) was prepared by Illingworth and Rodkin March 30, 2022. To attenuate ambient noise levels due to proximity to the SMART rail operations, the ENA recommends an acoustically effective mechanical ventilation system or a standard central air system equipped with a switch which allows the fan to circulate air without furnace operation. Additionally, all units with windows and doors

on the northern, western, and southern facades of the building will be constructed with sound rated assemblies. Sound rated assemblies proposed by the Project include STC 33 rated windows and doors at bedrooms, STC 30 rated windows and doors in living rooms of the units, and STC 58 exterior wall materials.

Site Preparation and Construction

Construction activities associated with the proposed residential Project include site preparation, grading, utility, infrastructure installation, and building development. Site preparation involves clearing and removal of existing vegetation, buildings, structures, and hardscape surfaces. Fine site grading activities would be conducted to achieve elevations to support building foundations, utility gradients, and alignments with adjacent site improvements. Utilities would be installed to tie into existing infrastructure extending to the Project site. The 5-story building would be constructed using concrete slab on grade floors and a wood frame structure. The Project construction duration is expected to occur over a 15-month period and involve various construction equipment, workers, and material delivery.

Offsite Improvements

Frontages along Wilson Street and 8th Street would be improved with sidewalks and accessibility enhancements. Sidewalks along the site frontage at Wilson Street would be 7 feet 10 inches in width. Sidewalks along the site frontage at 8th Street would be 12 feet 2 inches in width. Striping for pedestrian crosswalks at the Wilson Street and 8th Street intersection and stenciling for stop control and Railroad crossing would be replaced. Class III Bicycle lanes along Wilson Street would also be stenciled. Pavement resurfacing would occur along the site frontage to Wilson Street and 8th Street.

Sustainability Measures

Sustainability measures include implementation of California Green Building Code Standards and utilization of energy efficient building materials, appliances, lighting and mechanical systems, and water efficient plumbing systems. The Project meets the following mandatory requirements identified in the New Development Checklist of the Santa Rosa Climate Action Plan (CAP):

1.1.1 Comply with Cal Green Tier 1 Standards
1.3.1 Install real-time energy monitors to track energy use (If provided by utility company)
1.5 Install new sidewalks and paving with high solar reflectivity materials
4.1.2 Install bicycle parking consistent with regulation
6.1.3 Increase diversion of construction waste
7.1.1 Reduce potable water use for outdoor landscaping
7.1.3 Install City-issued water meters that track real time water use with data logging equipment if necessary
9.1.3 Install low water use landscapes
9.2.1 Minimize construction idling time to 5 minutes or less
9.2.2 Maintain construction equipment per manufacturer's specs
9.2.3 Limit GHG construction equipment emissions by using electrified equipment of alternative fuels

The following mandatory requirements of the CAP are not applicable to the Project:

1.4.2 Comply with the City's Tree Preservation Ordinance
4.3.5 Encourage new employers of 50+ to provide subsidized transit passes
5.2.1 Provide alternate fuels at new refueling stations

California Native American Tribal Consultation

In accordance with AB 52 (PRC Section 21084.2), lead agencies are required to consider Tribal Cultural Resources (TCR) including site features, places, cultural landscapes, sacred places, or objects of cultural value to the tribe which are listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such. AB 52 mandates that a lead agency initiate consultation with a tribe with traditional and/or cultural affiliations in the geographic area where a subject project is located if a project may cause a substantial adverse change in the significance of a tribal cultural resource. Should the tribe respond requesting formal consultation, the lead agency must work with the tribe or representative thereof to determine the level of environmental review warranted, identify impacts, and recommend avoidance or mitigation measures to reduce any potential impacts.

In accordance with PRC Section 21080.3.1(d), notification of the proposed Project was mailed to the following local tribes on February 16, 2022:

- Federated Indians of Graton Rancheria (FIGR)
- Lytton Rancheria of California

The Lytton Rancheria/FIGR responded with an acknowledgement that the AB 52 referral has been received and did not request consultation. As of June 3rd, 2022, the Federated Indians of Graton Rancheria (FIGR) had not responded to the notification and no request for consultation has been received.

2.5. REQUIRED DISCRETIONARY ACTIONS

The Project requires the following discretionary entitlements from the City of Santa Rosa:

- Minor Design Review Permit

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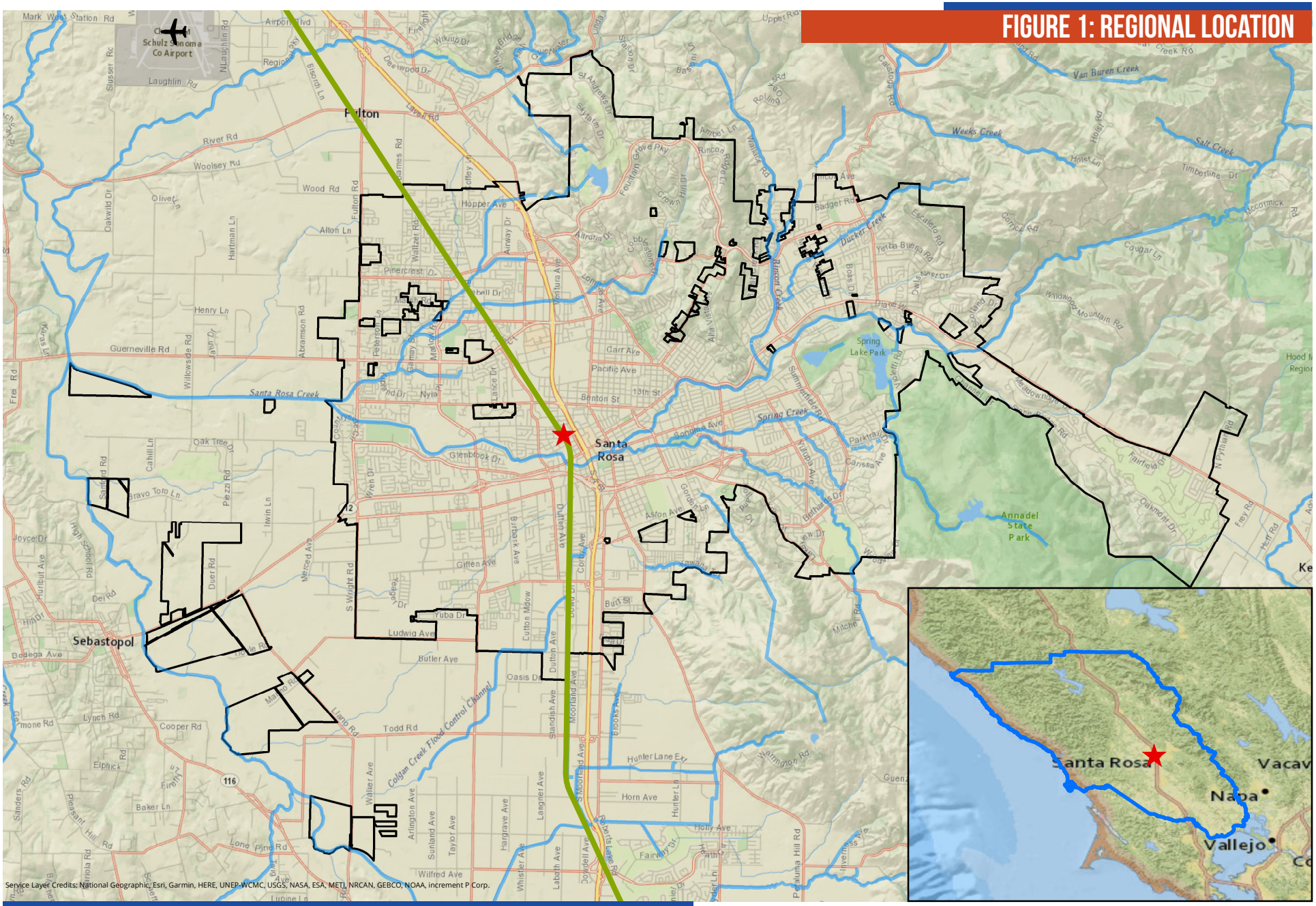
FIGURE 1: REGIONAL LOCATION



PULLMAN PHASE II – BUILDING C

PROJECT LOCATION
AIRPORT
SMART TRACKS
SANTA ROSA CITY LIMITS
SONOMA COUNTY

0 0.75 1.5 3 Miles

Data source: City of Santa Rosa GIS, Caltrans- Division of Transportation Planning GIS

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FIGURE 2: PROJECT VICINITY

PULLMAN PHASE II – BUILDING C

PROJECT SITE
PARCEL BOUNDARIES
SMART TRACKS

0 0.01 0.02 0.04 Miles

Data source: City of Santa Rosa GIS, Caltrans - Division of Transportation Planning GIS

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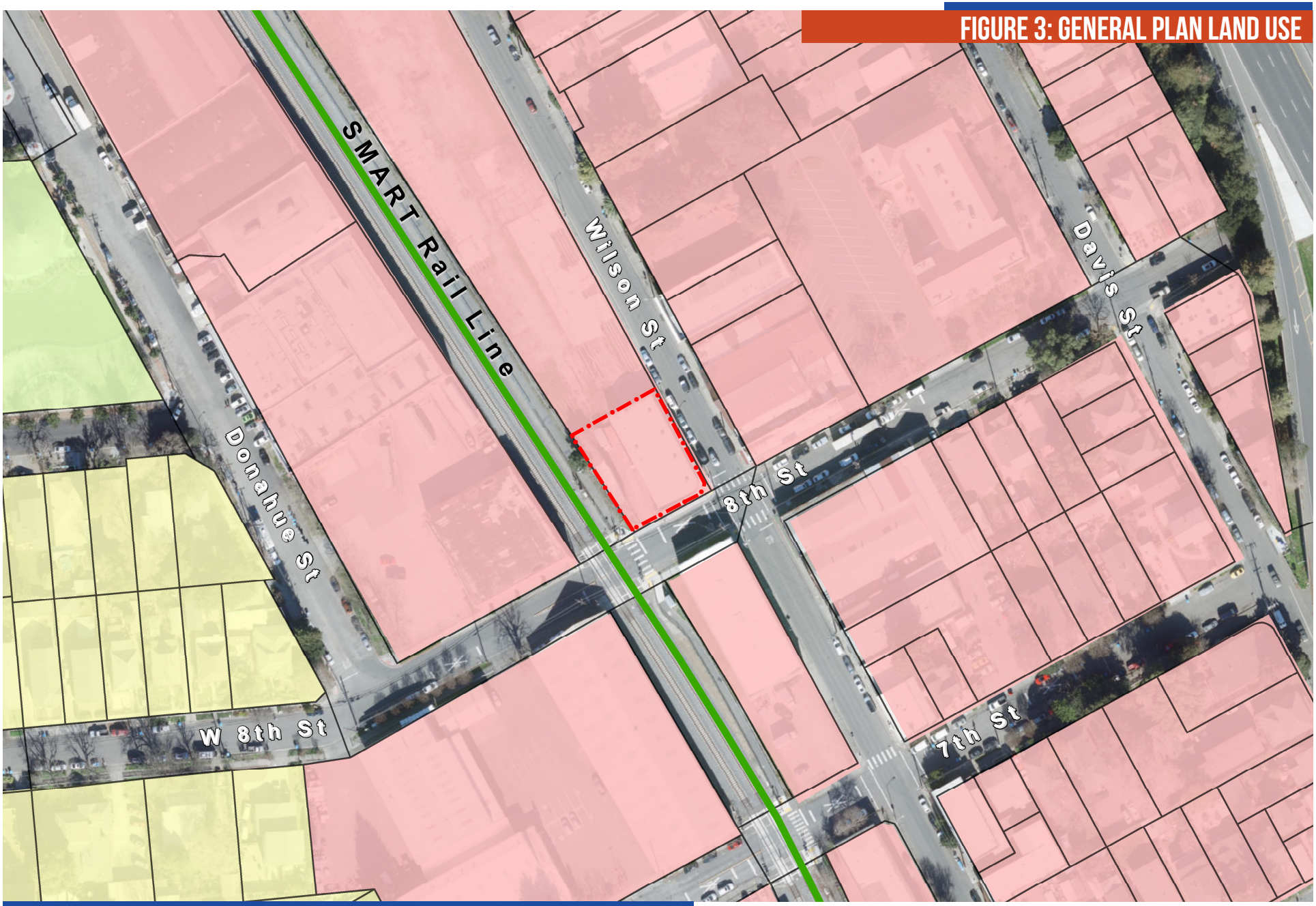
FIGURE 3: GENERAL PLAN LAND USE



PULLMAN PHASE II – BUILDING C

0 0.01 0.02 0.04 Miles

Data source: City of Santa Rosa GIS, Caltrans - Division of Transportation Planning GIS

GENERAL PLAN LAND USE

- LOW RESIDENTIAL
- NEIGHBORHOOD MIXED USE
- PARK
- PROJECT SITE
- SMART TRACKS
- PARCEL BOUNDARIES

GROUP

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FIGURE 4: ZONING

PULLMAN PHASE II – BUILDING C

0 0.01 0.02 0.04 Miles

Data source: City of Santa Rosa GIS, Caltrans - Division of Transportation Planning GIS

ZONING

- SINGLE FAMILY RESIDENTIAL (R-1)
- NEIGHBORHOOD MIXED USE (NMU)
- OPEN SPACE - RECREATION (OSR)
- PROJECT SITE
- SMART TRACKS
- PARCEL BOUNDARIES

GROUP

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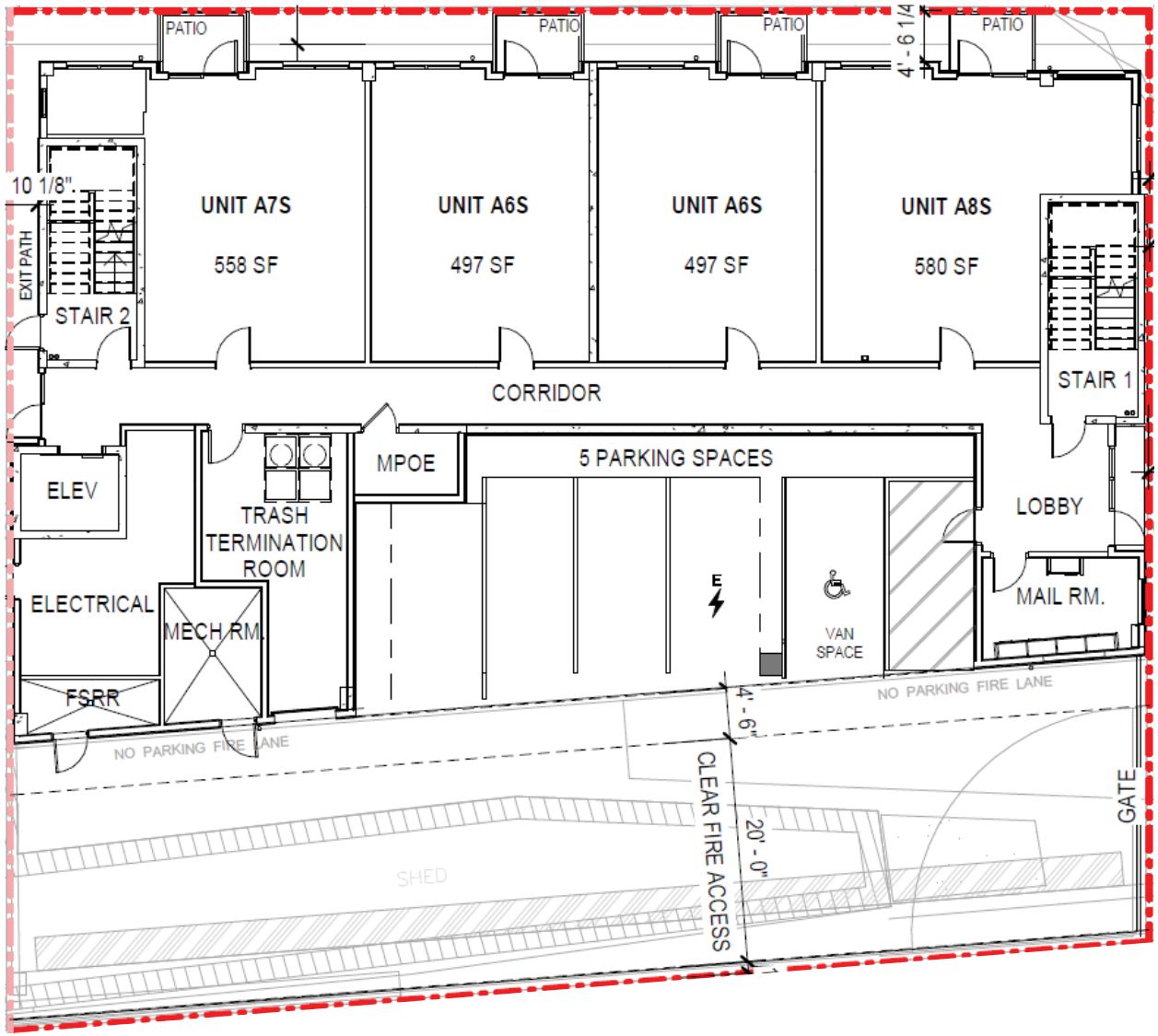
FIGURE 5: SITE PLAN



PULLMAN PHASE II – BUILDING C

0 0.00175 0.0035 0.007 Miles

Data source: BKV Group Pullman Phase II - Building C 2/15/2022 Project Plans Sheet A1.1

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3. RELEVANT CITY PLANNING DOCUMENTS

This section includes a description of the most relevant planning documents that are applicable to the proposed Project.

3.1. CITY OF SANTA ROSA GENERAL PLAN 2035

The Santa Rosa General Plan 2035 addresses issues related to physical development, growth management, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources in the Planning Area. The Santa Rosa General Plan 2035 was adopted by City Council on November 3, 2009 (Resolution No. 27509).

The Santa Rosa General Plan 2035 serves the following purposes:

- Outlines a vision of long-range physical and economic development that reflects the aspirations of the community, and provides specific implementing policies that will allow this vision to be accomplished;
- Establishes a basis for judging whether specific development proposals and public projects are in harmony with said vision;
- Allows city departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve and enhance critical environmental resources, and minimize hazards; and
- Provides the basis for establishing and setting priorities for detailed plans and implementing programs such as the Zoning Code, specific and area plans, and the Capital Improvement Program.

The Santa Rosa General Plan incorporates significant policy direction from other plans. Policy references from the following plans are included in the General Plan:

- Bicycle and Pedestrian Master Plan
- Citywide Creek Master Plan
- 2007 Downtown Station Area Specific Plan
- North Santa Rosa Station Area Specific Plan
- Economic Sustainability Strategy
- Northern Downtown Pedestrian Linkages Study
- Recreation and Parks Business and Strategic Plan
- Sebastopol Road Urban Vision and Corridor Plan
- Southeast Area Plan
- Southwest Area Plan
- Climate Action Plan

The Southeast and Southwest Area Plans were superseded with the adoption of the Santa Rosa General Plan. In 2020, the City adopted the 2020 Downtown Station Area Specific Plan, which replaces the 2007 DSASP. The remainder of above-noted plans are in full effect and where applicable are referenced for additional goals, policies, and information.

3.2. CITY OF SANTA ROSA GENERAL PLAN EIR

The Draft EIR for the Santa Rosa General Plan 2035 (SCH No. 2008092114) was prepared in March 2009. The Draft EIR, together with the Response to Comments Document dated June 2009, constitute the Final EIR for

the Santa Rosa General Plan 2035. The Final EIR was certified by the Santa Rosa City Council on November 3, 2009 (Resolution No. 27509).

The General Plan EIR reviewed all environmental impacts and effects, identified potentially significant environmental impacts, and developed measures and policies to mitigate impacts. Nonetheless, significant and unavoidable impacts were determined to occur through the implementation of the General Plan. Therefore, the City adopted a statement of overriding considerations, which balances the merits of implementing the General Plan despite the potential environmental impacts. The impacts identified as significant and unavoidable in the Santa Rosa General Plan 2035 Final EIR are:

- Increased traffic volumes, delay and a decrease in LOS on area intersections during peak hours
- Contribute to an unacceptable level of service on Highway 101
- Increase population and VMT at a rate greater than that assumed in regional air quality planning and conflict with implementation of the Bay Area Ozone Strategy
- Conflict with implementation of state or local goals for reducing greenhouse gas emissions
- Inconsistency with the 2005 Bay Area Ozone Strategy

The City of Santa Rosa's General Plan and EIR are available at the Planning and Economic Development Department, 100 Santa Rosa Avenue, Room 3, Santa Rosa, California 95404, during normal business hours and online at https://srcity.org/392/General-Plan.

3.3. CITY OF SANTA ROSA DOWNTOWN STATION AREA SPECIFIC PLAN

The Project is located within the Downtown Station Area Specific Plan (DSASP). As adopted in October 2007, the DSASP defines the framework for future development of a 720-acre area surrounding the Downtown Sonoma Marin Area Rail Transit (SMART) station with a mix of housing, shopping, and jobs that preserves the history, character, and natural benefits of the existing environment surrounding the Downtown Station. The 2007 DSASP established Transit Village Mixed Use and Transit Village Medium land use designations which allow residential development at 40 to 60 dwelling units per acre and increased the anticipated downtown buildout by 3,250 dwelling units and 8,125 residents beyond the 2020 General Plan estimate, which was in effect at the time the 2007 Specific Plan was adopted. Subsequently, the General Plan 2035 was updated and adopted in November 2009 and amended in October 2020, which captured the increased development potential within the Specific Plan area.

In October 2020, the City adopted an updated DSASP to address issues associated with intensification of housing development in the plan area, including continued unmet housing demand exacerbated by the housing crisis and loss of homes to the 2017 wildfires. The 2020 DSASP expands the eastern boundary of the plan area to Brookwood Avenue, modifies land use designations, density, and intensity regulations by replacing density and height regulations with floor area ratio requirements in and near opportunity areas.

The 2007 DSASP land use designation of the Project site was Transit Village Medium (TVM) and was redesignated by the 2020 DSASP to Neighborhood Mixed Use (NMU). The density and height maximum enforced for the TVM land use was eliminated and replaced with floor area ratio (FAR) standards which vary by parcel and permit a maximum of 4.0 FAR at the subject Project site.

3.4. CITY OF SANTA ROSA DOWNTOWN STATION AREA SPECIFIC PLAN EIR

The Downtown Station Area Specific Plan Program Environmental Impact Report (SCH No. 20060702104) was prepared in February 2007 ("Downtown Station EIR"). The 2007 Downtown Station EIR compared impacts associated with buildout under the 2007 DSASP and found significant and unavoidable impacts related to air quality and transportation and circulation.

As described above, in 2020 the DSASP was updated and a Subsequent EIR (SCH 2006072104) was prepared, dated July 15, 2020. A SEIR is required when new or substantially more adverse environmental impacts would occur as a result of substantial changes in the project description, circumstances that have occurred since certification of the prior EIR, or new information has emerged. The 2020 DSASP SEIR analyzes potential environmental impacts resulting from implementation of policies, programs, and activities identified in the 2020 DSASP. Pursuant to CEQA Guidelines Section 15163(b) a SEIR "need contain only the information necessary to make the previous adequate for the project as revised." In December 2019, an Initial Study (IS) for the 2020 DSASP provided a basis for required subsequent analysis for environmental impact categories. As many impacts of the 2020 DSASP were determined to be the same or similar to those evaluated in the 2007 DSASP EIR, the following environmental impact categories were not analyzed in the 2020 DSASP SEIR:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Geology and Soils
- Mineral Resources
- Hazards, Hazardous Materials, and Wildfires
- Land Use, Population, and Housing

The 2020 DSASP SEIR analyzed the following environmental categories:

- Air Quality
- Cultural and Tribal Cultural Resources
- Energy, Greenhouse Gases, and Climate Change
- Hydrology and Water Quality
- Noise
- Public Services and Recreation
- Traffic and Transportation
- Utilities

The 2020 DSASP SEIR concluded that with mitigation, potential environmental impacts would be reduced to less than significant levels. The 2020 SEIR supplements the 2007 EIR analysis for air quality and transportation and circulation, which identified impacts to be significant and unavoidable. The 2020 SEIR relies on updated local and regional planning documents and policies and replaces the significant and unavoidable impact finding for air quality and transportation and circulation with a less than significant impact finding with implementation of mitigation measure and policies and programs.

The Downtown Station Area Specific Plan and SEIR are available at the Planning and Economic Development Department, 100 Santa Rosa Avenue, Room 3, Santa Rosa, California 95404, during normal business hours and online at https://srcity.org/2911/Downtown-Station-Area-Specific-Plan.

3.5. SANTA ROSA ZONING CITY CODE

The Santa Rosa City Code implements the goals and policies of the Santa Rosa General Plan by classifying and regulating the uses of land and structures within the City of Santa Rosa. In addition, the Zoning Code is adopted to protect and promote the public health, safety, and general welfare of residents, and preserve and enhance the aesthetic quality of the City.

The zoning designation for the Project site is Neighborhood Mixed Use, as established by the Downtown Station Area Specific Plan.

3.6. PRIORITY DEVELOPMENT AREA

Priority Development Areas (PDAs) are locally identified infill development opportunity areas within existing Bay Area communities. PDAs are generally areas of at least 100 acres where there is local commitment to developing more housing along with amenities and services to meet the day-to-day needs of residents in a pedestrian-friendly environment served by transit. PDAs are the foundation for sustainable regional growth as envisioned through Plan Bay Area 2040, the region's Sustainable Communities Strategy. Implementation of PDAs enhance mobility and economic growth by linking the location of housing and jobs with transit, thus helping to reduce vehicle commuting miles travelled and thereby reducing greenhouse gas emissions while realizing a greater return on existing and planned transit investments.

The subject Project is located within the "Santa Rosa: Downtown Station Area" as shown on Map 7 of the Priority Development Area Investment and Growth Strategy Update[1]. The Downtown Station Area PDA is centered around the Sonoma Marin Area Rail Transit (SMART) station site in downtown Santa Rosa with development guided by the Downtown Area Station Specific Plan, adopted in October 2007 and amended in October 2020. Fragmentation of Santa Rosa's downtown core is addressed by the PDA to render the encompassed Railroad Square, Railroad Corridor, Courthouse square, and various transit options into a more transit-oriented and dense neighborhood. As of 2017, 2,045 housing units were estimated within the PDA and 5,295 housing units are expected by 2035.

3.7. SANTA ROSA CLIMATE ACTION PLAN

On December 4, 2001, the Santa Rosa City Council adopted a resolution to become a member of Cities for Climate Protection (CCP), a project of the International Council on Local Environmental Initiatives (ICLEI). On August 2, 2005, the Santa Rosa City Council adopted Council Resolution Number 26341, which established a municipal greenhouse gas reduction target of 20% from 2000 levels by 2010 and facilitates the community-wide greenhouse gas reduction target of 25% from 1990 levels by 2015.

In October 2008, the Sonoma County Community Climate Action Plan (CAP) was released, which formalized countywide greenhouse gas (GHG) reduction goals. In 2009, the Regional Climate Protection Authority (RCPA) was created to improve coordination on climate change issues and establish a clearinghouse for countywide efforts to reduce GHG emissions. Also in 2009, the City adopted a revised General Plan that includes a number of policies directed at greenhouse gas emissions reduction.

On June 5, 2012, the City of Santa Rosa adopted a Climate Action Plan, which meets the programmatic threshold for a Qualified GHG Reduction Strategy as established by the Bay Area Air Quality Management District (BAAQMD) guidelines. On August 6, 2013, the City of Santa Rosa adopted a Municipal Climate Action Plan. On January 14, 2020, the Santa Rosa City Council adopted Resolution No. RES-2020-002 declaring a climate emergency and immediate emergency mobilization to restore a safe climate. The resolution establishes a 2030 carbon neutrality goal. As of 2022, the City of Santa Rosa is pursuing an update to the Climate Action Plan as part of the General Plan update process.

3.8. SANTA ROSA RESILIENT CITY MEASURES

In May 2018, the Santa Rosa City Council adopted Ordinance 2018-012, introducing Chapter 2016 (Resilient City Development Measures) to the Santa Rosa City Code. Chapter 20-16 was adopted to address housing needs and economic development within the City of Santa Rosa following the Tubbs and Nuns fires of 2017.

[1] Sonoma County Transportation Authority, Priority Development Area Investment and Growth Strategy Update, Adopted June 12, 2017, https://scta.ca.gov/wp-content/uploads/2017/05/PDA-IGS-2017-update.pdf, Accessed February 2022.

The City Council adopted amendments to modify and extend the temporary Resilient City Development Measures in response to the need for continued fire and COVID-19 pandemic recovery effective January 1, 2021, which extends the Ordinance through December 31, 2023. The Ordinance addresses these needs through streamlined review processes, including reduced review authority for certain land uses and modifications to the design review process. Particularly relevant to the proposed Project, the Resilient City Measures allows for Design Review approval to be delegated to the Zoning Administrator through the Minor Design Review process for multi-family residential projects within one of the City's Priority Development Areas (PDA). As previously discussed, due to the Project's location within the boundaries of the Santa Rosa: Downtown Station Area PDA, the proposed multi-family residential development is delegated to the Zoning Administrator for Minor Design Review.

4. DSASP CONSISTENCY ANALYSIS

In 2007, the Downtown Station Area Specific Plan (DSASP) environmental impact report (EIR) (SCH #2006072104) evaluated and disclosed impacts resulting from implementation of the Specific Plan. In 2020, the DSASP was updated and a Subsequent EIR (SEIR) (SCH #2006072104) was prepared which evaluated and disclosed impacts resulting from implementation of the updated Specific Plan. The 2020 SEIR provided that with execution of specified policies outlined within the plan and mitigation measures, new impacts resulting from implementation of the updated plan would be reduced to less than significant levels. The City of Santa Rosa adopted Resolution 26949 certifying the EIR on October 9, 2007 and adopted Resolution RES-2020-158 certifying the SEIR on October 13, 2020.

The following discussion documents the Project's consistency with applicable DSASP policies, implementing policies identified in the SEIR that reduce environmental impacts, and summarizes the consistency review. This section summarizes findings of the SEIR and identified relevant mitigation measures applicable to the proposed Project.

4.1. DSASP CONSISTENCY REVIEW

The following identifies relevant DSASP goals, policies, and guidelines and demonstrates consistency of the proposed Project with the Specific Plan:

DSASP GOALS, POLICIES, AND GUIDELINES	PULLMAN PHASE II – BUILDING C CONSISTENCY ANALYSIS
Land Use	
Goal LU-1: 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.	Compliant. The Project introduces high density housing on an underutilized site proximate to transit, goods, and services. The Project site is located within ½ mile of the downtown Transit Mall and within ¼ mile of SMART. There are bus lines with stops one block north on West 9th Street. The Project site is within walking distance of the downtown SMART station and the downtown Transit Mall.
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.	Compliant. The Project introduces 40 residential units in proximity to transit, furthering demand for high-frequency transit. The Project site is within walking distance of transit services, including the Downtown

	SMART Station, ¼ mile to the south, the Transit Mall, ½ mile to the southwest, and West Third Street, where multiple bus lines operate approximately ¼ mile to the south. The Project is also one block south of bus line 10 on West 9th Street.
Policy 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.	Compliant. The Project introduces 40 new residential units within the Station Area. New residents may increase patronage at existing downtown retail and restaurant establishments and may contribute to revitalizing the downtown where housing is limited and the economy has been impacted negatively by the recent wildfires and the COVID-19 pandemic.
Goal LU-2: Significant new development is focused in Opportunity Areas and on catalyst sites.	Compliant. The Project would construct 40 residential units within the North Railroad Opportunity Area.
Policy LU-2.1: Regulate building intensity and form based on floor area ratio (FAR). Maximum allowable base FAR prior to application of any bonus shall be as shown on Map LU-5.	Compliant. The Project proposes one five-story building with a floor area ratio (FAR) of 3.19 which is at the upper limit of the maximum base FAR of 4.0 identified for the Project site per Map LU-5.
Policy LU-2.7: Require new development within the Core Mixed Use, Station Mixed Use, Maker Mixed Use, and Neighborhood Mixed Use designations to achieve the mid-point or higher of the maximum FAR in all cases where FAR is established. Exceptions are allowed where parcel configuration, historic preservation or utility constraints make the mid-point impossible to achieve. On properties where no FAR is established the building's height shall be controlled through the applicable zoning.	Compliant. The Project proposes a FAR of 3.19 on a site permitting up to 4.0 where the midpoint of the FAR would be 2.0.
Goal LU-4: A diverse range of housing opportunities suitable for people of all incomes, abilities, and stages of life.	Compliant. The Project offers 38 market-rate units and 2 affordable units with unit sizes ranging from 414-625 to square feet.
Policy LU-4.1: Increase the supply of residential units Downtown and expand the range of housing opportunities available.	Compliant. The Project would create an additional 40 housing units in the Downtown area.
Policy LU-4.4: Promote the use of innovative building methods and materials and the development of alternative housing types, including co-housing, accessory dwelling units, tiny homes, single-room occupancy units, and smaller/micro units that are affordable by design.	Compliant. Each of the 40 units proposed would contain one bedroom, ranging from 414-625 to square feet, allowing a greater concentration of units within the building and offering smaller units that are affordable by design.

Policy LU 4.8: Preserve and expand affordable housing Downtown with the following actions: • Provide funds to renovate older buildings in exchange for rent restrictions; and • Encourage the integration of deed-restricted affordable units within housing developments; and • Discourage the conversion of older rental apartments to condominiums.	Compliant. The Project proposes 38 market-rate residential units with 2 units reserved for affordable households. Demand and Regional Housing Needs Allocation for housing in the City reflects a need for additional housing units for all income levels.
Mobility	
MOB 1-7: Incorporate traffic calming measures such as bulbouts where feasible at intersections to slow vehicle speeds and increase the visibility of pedestrian crossings.	Compliant. The Project introduces wide sidewalks, ADA compliant ramps, and pedestrian crosswalk striping at the intersection of Wilson Street and 8th Street.
Goal MOB-2: A comfortable, convenient bicycle and pedestrian network that is a viable, attractive alternative to the automobile.	Compliant. The Project would introduce residents to an area with existing and planning bicycle and pedestrian networks. Frontage improvements include wide sidewalks, enhanced crosswalks, and installation of a Class III bicycle route along Wilson Street. The Project site is also adjacent to the existing SMART Class I bike route and approximately ¼ mile from the 3rd Street Class II bike route, both of which connect to the SMART station, the Transit Mall, and employment centers.
Policy MOB 2.1: Establish bicycle lanes and pedestrian routes that connect key destinations by implementing the 2018 Bicycle and Pedestrian Master Plan.	Compliant. Wilson Street is proposed as a Class III bicycle route in the 2018 Bicycle and Pedestrian Master Plan and the Project proposes stenciling Class III bicycle routes along Wilson Street adjacent to the Project site.
Policy MOB-2.8: Provide bicycle parking as a street amenity throughout the Downtown Station Area and ensure adequate short- and long-term bicycle parking at the Downtown SMART Station and Transit Center.	Compliant. The Project proposes six exterior bicycle parking spaces.
Policy MOB-2.9: Within the Core and Station Areas, visually highlight crosswalks and heighten pedestrian comfort with curb bulb-outs, changes in paving material or striping, signage, and/or signalization.	Compliant. The Project proposes new crosswalk markings at the intersection of Wilson Street and 8th Street. Class III signage would also be installed along Wilson Street within the Smart Station Area.
Goal MOB-4: Frequent, reliable and safe transit service within the Downtown Station Area and to points beyond.	Compliant. The Project site is within ¼ mile of the Downtown Smart Station, within ½ mile of the Transit Mall, and within 0.15 mile of Route 10 identified as part of the future high-frequency transit network.

Policy MOB-4.1: Focus the highest intensity development within a ¼-mile of high frequency transit, including the Downtown SMART station, the Transit Center, and corridors with bus headways of 15-minutes or less.	Compliant. The Downtown SMART Station is located less than ¼ mile from the Project site and proposes 40 residential units in a five-story building.
Goal MOB-6: A balanced supply of parking that supports both quality of life and business vitality.	Compliant. Five parking spaces are proposed at the ground level tucked under the proposed building. The Project is well served by adjacent transit options within walking distance, including the Downtown SMART Station and the Transit Mall.
Policy MOB-6-4: Prohibit new stand-alone surface parking lots and encourage the conversion of existing parking lots to increase housing density.	Compliant. The Project proposes locating five parking spaces under the building at the ground level and no stand-alone surface parking is proposed.
Urban Design and Civic Spaces	
DG-9: Crime prevention strategies should be incorporated into the design of active street frontages, particularly in the vicinity of the SMART Downtown Station and the Downtown Transit Center, including lighting and design features which activate the space and minimize "lurking spaces."	Compliant. The Project orients towards Wilson Street with ground floor patios, living room windows, and balconies overlooking the Pedestrian realm. The western portion of the property fronts along the SMART corridor and restricts access via a gate. Wall mounted lighting is provided on the building façade and at entries.
Design Guideline DG-13: Locate entrances and upper-story windows such that they look out onto and, at night, cast light onto, sidewalks and pedestrian paths.	Compliant. Proposed residential street-facing windows and balconies would increase visibility of sidewalks and improve pedestrian safety on Wilson and 8th Streets.
Design Standard DS-16: Buildings shall include architectural design features that create visual interest and avoid a large- scale, bulky or "boxlike" appearance, shown in Figure UDCS-3. . .	Compliant. The building design include variety in the wall planes through use of recesses, balconies, color, and linear features and provides variety in height of the front façade along 8th Street by using a sloped trim cap at the roof.
Design Standard DS-18: Street-facing residential units should be designed such that windows of primary living areas face the street.	Compliant. Each residential unit contains open floor space adjacent to a balcony which faces east or west, accessed through glazed doors. All residential units along Wilson Street are proposed to have street visibility from primary living areas.
Design Guideline DG-19: Colors should be harmonious; however, color contrast is encouraged to create contrast and accentuate architectural forms and features.	Compliant. The proposed colors pallet creates visual interest and articulate the building form by highlighting projections and various architectural features.
Design Guideline DG-21: Recessed and projected balconies should be introduced as part of a composition that contributes to the	Compliant. The Project proposes projected balconies for each residential unit that contributes to the scale and balance of the building façade.

scale and proportion of the residential building façades.	
Design Guideline DG-36: Residential developments should be designed to maximize sunlight, privacy, ventilation, and scenic views from living areas.	Compliant. The building orients each unit to the east or west with glazed windows and doors and access to private balconies, thereby maximizing sunlight, ventilation, and scenic views while maintaining privacy, particularly at upper floors.
Design Guideline DG-42: Wherever possible, entrances to parking lots, structures, or podiums should be located along the side of a building and accessed from an alley or a driveway along the side of the property.	Compliant. Parking access is provided through an access driveway west of building accessed from 8th Street.
DG-43: Design of parking lots, structures, or podiums should prioritize personal safety and security with pedestrian-friendly sidewalks, open stairwells, adequate nighttime lighting, direct sight lines, and regular upkeep.	Compliant. The Project proposes onsite parking behind an access gate with lighting and direct access to the building lobby. The Project site is visible from Wilson and 8th Streets with wide pedestrian-friendly sidewalks and wall mounted external lighting. Stairwells are accessed from the interior of the building.
DG-46: Encourage curb-space designated for short-term pickup and drop-off in support of delivery, taxi and ride hailing services.	The Project is located within ½ mile of the Downtown SMART Station, ½ mile of the Transit Mall, and is well served by existing and proposed bicycle infrastructure. An access drive entering from 8th Street and exiting onto Wilson Street provides off-street vehicular access for available parking spaces which can be used for short term vehicle pickup and drop-off.
Public Services and Sustainability	
Policy PSS-3.3: Require that all development provide its fair share of funding for necessary improvements to public services and utilities in the Downtown Station Area.	Compliant. The Project is subject to standard Development Impact Fees to offset the cost of public infrastructure, services, and utilities.
PSS 3.7: Encourage the regular maintenance of stormwater facilities on private property, including inlets and conduits, in order to reduce the occurrence of localized flooding during heavy storms.	Compliant. This is imposed on all development projects as a standard condition of approval.
Goal PSS-4: A pleasant, healthy sound environment conducive to living and working.	Compliant. The residential Project would result in negligible noise level increases. See also response below for Policy PSS-4.2.
Policy PSS-4.2: Require residential and other noise-sensitive land uses to meet interior noise standards. If windows must be closed 100 percent of the time to achieve this standard, a fresh air ventilation system must be utilized.	Compliant. The Project site is located within the 70-75 dBA noise contour as provided in Map PSS-3, and as such an Environmental Noise Assessment (ENA) was prepared by Illingworth & Rodkin (March 2022) demonstrating that

For projects within the 60-65 dBA contour shown on Map PSS-3, standard dual pane windows are acceptable to meet the standard, consistent with the California Building Code. For projects where ambient noise conditions exceed 65 dBA as shown on Map PSS-3, require an acoustical study to demonstrate that interior noise standards can be met.	interior noise standards can be met with use of sound rated windows, doors, and building materials. The Project proposes STC 58 exterior wall materials, STC 33 windows and doors at bedrooms, and STC 30 windows and doors at living rooms.
PSS 4-7: Require developers to mitigate noise exposure to sensitive receptors from construction activities. Mitigation may include a combination of techniques that reduce noise generated at the source, increase the noise insulation at the receptor, or increase the noise attenuation as noise travels from the source to the receptor (e.g. through the incorporation of barriers).	Compliant. The Project is subject to an condition of approval, implementing DSASP Policy PSS-4.2, which requires residential land uses proposed where ambient noise conditions exceed 65 dBA as shown on DSASP Map PSS-3 to prepare an acoustical study to demonstrate that interior noise standards can be met.
PSS 4-8: Reduce vibration impacts associated with construction activities by requiring construction contractors to implement measures to help reduce vibration levels at nearby sensitive receptors. Measures to reduce vibration levels include, but are not limited to, the following: • Operating heavy equipment as far as practical from residential uses; • Using smaller bulldozers (operating weight less than 20,000 pounds) when grading must occur within approximately 50 feet of residential uses or other vibration sensitive uses.	Compliant. The Project is subject to conditions of approval, which implement mitigation measure NOI-3a as identified in the DSASP EIR.
Policy PSS-5.4: Ensure that development projects within the Downtown Station Area require their contractors, as a condition of contract, to reduce construction-related emissions through the implementation of Bay Area Air Quality Management District (BAAQMD) recommended best practices for mitigating construction-related emissions.	Compliant. This is imposed as a project condition of approval. As such, BAAQMD best management practices (BMPs) are required to be implemented during Project construction.

As demonstrated in the table above, the Project is in compliance with relevant DSASP goals and policies, including policies that address potential environmental impacts as identified in the DSASP SEIR. The following provides an overview of the Project's compliance with Land Use, Mobility, Urban Design and Civic Plan, and Public Services Sustainability Policies identified in the DSASP:

Project Compliance with LU Policies

The Project proposes construction of 40 residential units, five percent of which, two units, being affordable units, in a five-story building at a site where no residential units currently exist. Unit sizes range from 414-625 square feet. Each unit is proposed to contain one bedroom, thus reducing the size and materials required for each unit. The Project proposes a FAR of 3.19 which approaches the maximum Floor Area Ratio (FAR) of 4.0 at the Project site as provided in Map LU-5 in the DSASP.

Project Compliance with Mobility Policies

The Project implements mobility policies identified in the DSASP SEIR that avoid or reduce potential environmental impacts. Improvements proposed by the Project related to mobility include improved sidewalks and pedestrian crossings at Wilson Street and 8th Street and Class III bicycle lane facilities along Wilson Street. Six exterior bicycle parking spaces are proposed adjacent to the northern building entry door for Project residents. The Project site is located less than ¼ mile north from the Downtown SMART Station and provides high density residential in close proximity to the station.

Project Compliance with Urban Design and Civic Space Guidelines

The Project design includes a color palette which relates to and is consistent with the approved colors for Buildings A and B currently under construction. Recesses and projections in the building facades including balconies and ground level entries compliment horizontal and vertical lines and color blocks which break the massing into a smaller scale and create contrast and visual articulation. Parking is proposed at the ground level with direct pedestrian access to the building from the garage. Pedestrian safety along 8th Street and Wilson Street is prioritized by limiting vehicular access to a single one-way drive aisle from a curb cut entry at Wilson Street through an exit at 8th Street. Lighting is proposed around the building, providing additional security during low-light and nighttime hours.

The Project does not require or propose rehabilitation, preservation, or adaptive reuse of a designated historic resource. The Project proposes to integrate in function and design with Building A and Building B currently under construction to the north of the Project site.

Project Compliance with Public Services and Sustainability Policies

The Project complies with public services and sustainability policies. The Project applicant would be required to pay development impact fees to offset the cost of improving or expanding public facilities and service improvements and to pay a fair share of the costs of the City's planned improvements identified in the DSASP. The Project is subject to all applicable impact fees which would be assessed at the time of building permit application.

The Project complies with policies related to stormwater, is outside of the 500- and 100-year floodplain, and the storm drainage system is designed consistent with local and regional guidance. The Project proposes to capture runoff from the site's two drainage management areas (DMA) and convey flows to new storm drain infrastructure onsite. Bioretention, pervious areas, or pervious pavement surfaces are proposed to capture, treat, and minimize the stormwater volume entering storm drains.

The Project, as a residential development, complies with policies related to noise-sensitive land uses. Noise attenuation measures would be incorporated into the Project design to ensure that interior noise standards are met, including an acoustically effective mechanical ventilation system or a standard central air system equipped with a switch which allows the fan to circulate air without furnace operation due to the Project site being located within an area with elevated ambient noise levels associated with linear noise sources including

the SMART corridor, roadways, and Highway 101. Noise attenuation measures identified in the ENA and incorporated into the Project design include STC 33 sound rated windows and doors for bedrooms and STC 30 sound rated windows and doors in living rooms for identified units with windows and doors on the northern, western, and southern facades of the building. In addition, the Project proposes STC 58 sound rated exterior wall assemblages. As demonstrated in the ENA, noise attenuation measures can meet interior noise standards of 45 dBA L_{dn} or less in habitable rooms.

The Project complies with policies regarding air quality and is not subject to air quality or health risk modeling based on the site's location. The Project site is located a distance of greater than 1,000 feet from identified sites on DSASP Figure 3.1-1, including the BoDean Company site and the Superior Supplies Inc. site. Additionally, the Project is located a distance of greater than 1,000 feet from major sources of major toxic air contaminants (TAC). Furthermore, as a condition of approval, the Project is required to implement best management practices (BMPs) as provided by the Bay Area Air Quality Management District (BAAQMD).

Summary of Project Compliance with DSASP

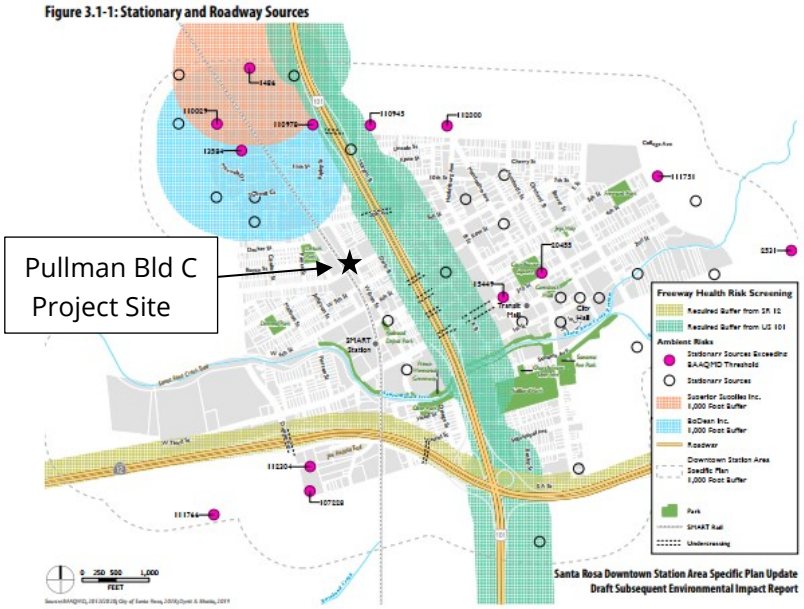
As demonstrated above, the Project is consistent with the various DSASP implementing policies related to land use, mobility, urban and civic spaces, public services and sustainability, and urban design and civic plan guidelines. Therefore, the Project would not introduce any new or more severe impacts relative to the DSASP EIR.

4.2. DSASP SEIR REVIEW OF APPLICABLE MITIGATION MEASURES

The proposed Project was also evaluated relative to the DSASP SEIR to determine if the Project has the potential to result in a new or more severe environmental impacts and to identify mitigation measures applicable to the Project. The following summarizes the impact categories for which mitigation measures were identified the DSASP SEIR and assesses applicability of mitigation measures to the subject Pullman Phase II – Building C Project.

Air Quality

The DSASP SEIR determined that buildout of the Specific Plan would expose sensitive receptors to substantial pollutant concentration resulting in a potentially significant environmental impact. In addition to implementing land use, mobility, and public services and sustainability policies, the SEIR identifies Mitigation Measures AQ-1 through AQ-3, which apply to project sites that are located within 1,000 feet of a major source emitter as identified in DSASP Figure 3.1-1 Stationary and Roadway Sources. As depicted in DSASP Figure 3.1-1 below, the Pullman Phase II – Building C Project site is located outside of the 1,000-foot buffer from major stationary and roadway sources and therefore is not subject to AQ-1, AQ-2, or AQ-3.



Cultural, Historic, and Tribal Cultural Resources

The DSASP SEIR determined that buildout of the Specific Plan would result in potentially significant environmental impacts to cultural, historic, and tribal cultural resources. In addition to implementing urban design and civic services policy 2-3, the SEIR identifies Mitigation Measures CUL-1a and CUL-1b. Measure CUL-1a requires that age-eligible properties be evaluated to identify historic resources prior to development. Measure CUL-1b requires that projects avoid or minimize effects on identified historic resources. The structure located at 701 Wilson was evaluated consistent with the mitigation measures and policies. Based on a violation of Santa Rosa City Code Section 18-20-010, the property owner was issued a notice to demolish on December 21, 2021. The Chief Building Official determined that the deteriorated condition of the building is so extensive that the structure is unsafe, the health and safety of the public is substantially endangered, and it is unreasonable to repair the structure. On April 11th, 2022, the City issued a demolition permit for the removal of the existing building pursuant to Zoning Code Section 20-58.070, which is considered a distinct and separate action from the proposed Pullman Phase II – Building C Project. There are no other buildings or structures onsite. Therefore, the Project is compliant with Mitigation Measure CUL-1a and CUL-1b.

Energy, Greenhouse Gasses, and Climate Change

The DSASP SEIR determined that buildout of the Specific Plan would result in less than significant environmental impacts to energy and greenhouse gases and climate change with incorporation of implementing land use, mobility, public services and sustainability, and design guidelines policies. No mitigation measures were identified in the SEIR for these environmental categories and none are required to be imposed on the subject Project. The DSASP was reviewed for consistency with the City's Climate Action Plan (CAP). Table 3.3-8 presented in the DSASP SEIR identifies implementing policies and concludes that that Specific Plan is consistent with the City's CAP. Furthermore, the proposed Project has been reviewed for consistency with the City's CAP and must demonstrate adherence to mandatory measures unless otherwise specified. If a project cannot meet one or more of the mandatory CAP measures, substitutions may be made at the discretion of the Community Development Director. Compliance at the project level with the City's CAP is imposed as a standard condition of approval. There are no mitigation measures required by the SEIR for energy or greenhouse gases and climate change. As demonstrated herein, the Project complies with relevant

DSASP policies, there have been no substantial changes proposed requiring major revisions or with respect to the circumstances under which the Project is being undertaken, and no new information of substantial importance has been identified since the DSASP SEIR was certified.

Hydrology and Water Quality

The DSASP SEIR determined that buildout of the Specific Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge with incorporation of implementing public services and sustainability policies. No mitigation measures were identified in the SEIR, as impacts to hydrology and water quality were determined to be less than significant. As demonstrated herein, the proposed Project has been reviewed for consistency with the relevant policies. The City's regulation for stormwater capacity and discharge and treatment of runoff are imposed as standard conditions of approval. As demonstrated herein, the Project complies with relevant DSASP policies and there have been no substantial changes proposed requiring major revisions or with respect to the circumstances under which the Project is being undertaken, and no new information of substantial importance has been identified since the DSASP SEIR was certified.

Noise

The DSASP SEIR determined that buildout of the Specific Plan would not result in the generation of a substantial temporary or permanent increase in ambient noise level and that impacts would be less than significant with incorporation of implementing public services and sustainability policies. No mitigation measures were identified in the SEIR related to noise. As demonstrated herein, the proposed Project has been reviewed for consistency with the relevant policies including PSS 4-2, which requires an acoustical study for projects where ambient noise conditions exceed 65 dbA. The Project site is located within an area with an identified 65-70 dB noise environment under existing conditions and a projected noise environment of 70-75 dB under future conditions. Accordingly, the Project was subject to preparation of an acoustical study to demonstrate that interior noise standards can be met. The Environmental Noise Assessment (ENA)[2] recommends several design strategies to achieve indoor noise standards including sound rated windows, doors, and wall assemblages, as well as air circulation systems that allow windows to remain closed. The Project has been designed to incorporate the design recommendations of the ENA to achieve indoor standards of 45 dBA L_{dn} in habitable rooms. The recommendations of the ENA have been incorporated into the project design and imposed as conditions of approval. Therefore, the Project complies with relevant DSASP policies related to noise, there have been no substantial changes proposed requiring major revisions or with respect to the circumstances under which the Project is being undertaken, and no new information of substantial importance has been identified since the DSASP SEIR was certified.

Public Facilities

The DSASP SEIR determined that buildout of the Specific Plan would result in less than significant environmental impact to public facilities with implementation of urban design and civic services policies and public services and sustainability policies. Furthermore, the SDEIR recommended Mitigation Measure PF-1 which requires that the City of Santa Rosa identify potential locations for new neighborhood and community parks to satisfy demand. As a project that implements the DSASP, the Project is subject to development impact fees, including parkland and recreational fees that are levied by the City to acquire, construct, and maintain

[2] 701 Wilson Street, Pullman Phase II-Building C, Santa Rosa, CA Environmental Noise Assessment, prepared by Illingworth & Rodkin, March 30, 2022.

public facilities, including parklands. The Project site is not identified as a potential location for a public facility or park and would not conflict with the City's ability to maintain existing or construct planned public facilities. Rather, the Project's contribution through payment of development impacts fees would advance the City's ability to secure and construct additional parkland to meet anticipated demands generated by buildout of the Specific Plan. Payment of development impact fees is a standard condition of Project approval. Therefore, the Project would contribute funds to be levied by the City in constructing, maintaining, or acquiring parkland, there have been no substantial changes proposed requiring major revisions or with respect to the circumstances under which the Project is being undertaken, and no new information of substantial importance has been identified since the DSASP SEIR was certified.

Transportation

The DSASP SEIR determined that buildout of the Specific Plan would not conflict with the circulation system, VMT standards, substantially increase hazards due to geometric design features, or result in inadequate emergency access with implanting mobility policies. No mitigation measures related to transportation were required as part of the SEIR. The Project site is located within a Priority Development Area (PDA), is proximate to transit, and is located within ¼ mile of a major transit stop, the Downtown SMART Station, and therefore screens out from a VMT analysis. As demonstrated herein, the Project complies with relevant DSASP policies, there have been no substantial changes proposed requiring major revisions or with respect to the circumstances under which the Project is being undertaken, and no new information of substantial importance has been identified since the DSASP SEIR was certified.

Utilities and Service Systems

The DSASP SEIR determined that buildout of the Specific Plan would not require or result in the relocation or construction of expanded utilities or service systems and that sufficient water supplies would be available during normal, dry, and multiple dry years with implementing public services and sustainability policies and design guidelines. No mitigation measures related to utilities and service systems were required as part of the SEIR. As demonstrated herein, the Project complies with relevant DSASP policies, there have been no substantial changes proposed requiring major revisions or with respect to the circumstances under which the Project is being undertaken, and no new information of substantial importance has been identified since the DSASP SEIR was certified.

5. APPLICABLE CEQA PROVISIONS AND FINDINGS

The following discussion presents the relevant provisions of CEQA with which the proposed Project complies. It provides an overview of the Community Plan Exemption and Government Code Section 65457 along with a determination of consistency with a Program level EIR pursuant to 15182 as a residential development project that is undertaken to implement and is consistent with the Downtown Station Area Specific Plan for which a SEIR was certified. This section concludes with the CEQA finding and determination that the Project is exempt from further environmental review.

5.1. CEQA GUIDELINES SECTION 15182

Government Code Section 65457 as implemented under CEQA Guidelines Section 15182 provides a statutory exemption for projects that are consistent with an adopted specific plan for which an Environmental Impact Report (EIR) was certified.

Section 15182 provides the following guidance:

(a) General. Certain residential, commercial and mixed-use projects that are consistent with a specific plan adopted pursuant to Title 7, Division 1, Chapter 3, Article 8 of the Government Code are exempt from CEQA, as described in subdivisions (b) and (c) of this section.

(b) Projects Proximate to Transit.

(1) Eligibility. A residential or mixed-use project, or a project with a floor area ratio of at least 0.75 on commercially-zoned property, including any required subdivision or zoning approvals, is exempt if the project satisfies the following criteria:

(A) It is located within a transit priority area as defined in Public Resources Code section 21099(a)(7);

(B) It is consistent with a specific plan for which an environmental impact report was certified; and

(C) It is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board has accepted the determination that the sustainable communities strategy or the alternative planning strategy would achieve the applicable greenhouse gas emissions reduction targets.

(2) Limitation. Additional environmental review shall not be required for a project described in this subdivision unless one of the events in section 15162 occurs with respect to that project.

(3) Statute of Limitations. A challenge to a project described in this subdivision is subject to the statute of limitations periods described in section 15112.

(c) Residential Projects Implementing Specific Plans.

(1) Eligibility. Where a public agency has prepared an EIR on a specific plan after January 1, 1980, a residential project undertaken pursuant to and in conformity to that specific plan is exempt from CEQA if the project meets the requirements of this section. Residential projects covered by this section include but are not limited to land subdivisions, zoning changes, and residential planned unit developments.

(2) Limitation. If after the adoption of the specific plan, an event described in Section 15162 occurs, the exemption in this subdivision shall not apply until the city or county which adopted the specific plan completes a subsequent EIR or a supplement to an EIR on the specific plan. The exemption provided by this section shall again be available to residential projects after the Lead Agency has filed a Notice of Determination on the specific plan as reconsidered by the subsequent EIR or supplement to the EIR.

(3) Statute of Limitations. A court action challenging the approval of a project under this subdivision for failure to prepare a supplemental EIR shall be commenced within 30 days after the lead agency's decision to carry out or approve the project in accordance with the specific plan.

(d) Fees. The Lead Agency has authority to charge fees to applicants for projects which benefit from this section. The fees shall be calculated in the aggregate to defray but not to exceed the cost of developing and adopting the specific plan including the cost of preparing the EIR.

APPLICABILITY OF THE PROJECT TO CEQA GUIDELINES SECTION 15182

The proposed Project implements and is consistent with the Downtown Station Area Specific Plan (DSASP) and the certified subsequent environmental impact report prepared for the DSASP, and therefore meets the provisions under CEQA Guidelines Section 15182 as follows:

1. *Projects Proximate to Transit.*

The Project proposes a transit-oriented residential development approximately 1,000 feet from the SMART station in Downtown Santa Rosa and as such is designated as a transit priority area under PRC Section 21099(a)(7). The Project is located within the Neighborhood Mixed Use Land Use Designation of the DSASP, which allows for multi-family residential development in all-residential buildings. The entire DSASP including the Project site is located within an identified PDA, which implements and is consistent with Plan Bay Area, the regional Sustainable Community Strategy. Therefore, the Project satisfies criteria based on proximity to transit and is exempt from further CEQA review.

2. *Residential Projects Implementing Specific Plans.*

The Project is located within the boundaries of the Downtown Station Area Specific Plan (DSASP) in the Neighborhood Mixed Use (NMU) land use designation and zoning district. Development intensity is guided by floor area ratio (FAR), which varies by parcel and permits a maximum of 4.0 FAR at the Project site. The Project proposes a FAR of 3.19 with 40 residential units on a 0.2-acre Project site located within ½-mile of the SMART station in Downtown Santa Rosa. The Project implements and is consistent with the DSASP and the 2020 Subsequent Environmental Impact Report (SEIR) certified on October 13, 2020. Therefore, as a residential development, the Project satisfies this criterion by conforming to the DSASP for which a SEIR was certified and a Notice of Determination was filed for on October 16, 2020. No further environmental review is warranted.

5.2. GOVERNMENT CODE SECTION 65457

Government Code Section 65457 contained in Title 7, Division 1, Chapter 3, Article 8 provides that:

(a) Any residential development project, including any subdivision, or any zone change that is undertaken to implement and is consistent with a specific plan for which an environmental impact report has been certified after January 1, 1980, is exempt from the requirements of Division 13 (commencing with Section 21000) of the Public Resources Code. However, if after the adoption of the specific plan, an event as specified in Section 21166 of the Public Resources occurs, the exemption does not apply unless and until a supplemental environmental impact report for the specific plan is prepared and certified in accordance with the provisions of CEQA. After a supplemental environmental impact report is certified, the exemption specific in this subdivision applies to projects undertaken pursuant to the specific plan.

(b) An action or proceeding alleging that a public agency has approved a project pursuant to a specific plan without having previously certified a supplemental environmental impact report for the specific plan, where required by subdivision (a), shall be commenced within 30 days of the public agency's decision to carry out or approve the project.

Public Resources Code Section 21166 provides that "when an environmental impact report has been prepared for a project pursuant to [CEQA], no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:

(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

APPLICABILITY OF THE PROJECT TO GOVERNMENT CODE SECTION 65457

As discussed above, the Project proposes construction of 40 residential units within the Downtown Station Area Specific Plan (DSASP). An environmental impact report (EIR) was certified in October 2007 and a subsequent environmental impact report (SEIR) was certified in October 2020, which analyzed new environmental impacts resulting from changes made to the DSASP. As discussed herein, the Project implements and is consistent with the DSASP and the October 2020 SEIR. Certification of the SEIR satisfies the provisions of Public Resources Code 21166, no subsequent changes are proposed to the Project that require major revisions of the EIR, no substantial changes to the circumstances have occurred, and no new information has become available since the SEIR was certified. Therefore, as a residential development project undertaken to implement and is consistent with the DSASP for which a SEIR was certified, Government Code Section 65457 is satisfied, and no further environmental review is warranted.

5.3. CEQA GUIDELINES SECTION 15162

Section 15162 of the CEQA Guidelines states that when an EIR has been certified for a project, a subsequent EIR is not required unless it is determined that:

1. Substantial changes are proposed requiring major revisions of the previous EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes have occurred with respect to the circumstances under which the project is undertaken requiring major revisions of the previous EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR;
    b. Significant effects will be substantially more severe compared to the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

APPLICABILITY OF THE PROJECT TO CEQA GUIDELINES SECTION 15162

As discussed above, an environmental impact report (EIR) was certified in October 2007 and a subsequent environmental impact report (SEIR) was certified in October 2020, which analyzed new environmental impacts resulting from changes made to the DSASP. As discussed herein, the subject Pullman Phase II – Building C Project implements and is consistent with the DSASP and the October 2020 SEIR. Certification of the SEIR satisfies the provisions of Public Resources Code 21166. Therefore, CEQA Guidelines Section 15162 is not triggered since a subsequent EIR was certified in 2020, and since its certification, no substantial changes have been proposed requiring major revisions, no substantial changes have occurred with respect to the circumstanced under which the Project is being undertaken, and no new information of substantial importance has been identified. Whereas none of the conditions specified in Section 15162 are present, no further CEQA documentation is warranted.

5.4. CEQA DETERMINATION AND SUMMARY OF FINDINGS

As summarized above and presented herein, the proposed Project is eligible for the following CEQA provisions:

Residential Project Consistent with Specific Plan. The Project is a residential development within the City's adopted DSASP, for which a SEIR was certified. Pursuant to Government Code Section 65457, the proposed Project is eligible for a statutory exemption from CEQA review as it involves residential redevelopment of the Project site which has been planned for as part of the City of Santa Rosa Downtown Station Area Specific Plan and analyzed in the certified Environmental Impact Report (EIR) and Subsequent Environmental Impact Report (SEIR). Pursuant to CEQA Guidelines Section 15182, the proposed Project implements and is in conformity with the DSASP and the SEIR and is eligible for an exemption from further CEQA review.

The proposed Project would implement applicable policies and implementing polices of the DSASP, conditions of approval, uniformly applied development standards, and mitigation measures identified in the DSASP EIR. With implementation of required mitigation measures imposed as conditions of approval, the Project would not result in a substantial increase in the severity of significant impacts that were previously identified in the program level EIR and SEIR, nor would the Project introduce any new significant impacts that were not previously identified. Therefore, there would be no additional environmental impacts beyond those analyzed in the Downtown Station Area Specific Plan EIR and SEIR.

We do hereby certify that the above determination has been made pursuant to State and Local requirements.

Jessica Jones 6/7/2022

Signature: **Date**

City of Santa Rosa

6. REFERENCE DOCUMENTS

6.1. TECHNICAL REFERENCES

1. Notice and Order to Demolish, issued by the City of Santa Rosa, December 21, 2021
2. Greenhouse Gas CAP Appendix E Checklist, received February 15, 2022
3. Phase 1 Environmental Site Assessment, prepared by Harris and Lee Environmental Services, February 2022
4. Focused Traffic Study for the Pullman Lofts Phase II Project, prepared by W-Trans, dated December 2, 2022
5. Geotechnical Investigation, prepared by PJC & Associates, Inc, February 7, 2022
6. Project Design Narrative, prepared by BKV Group, February 9, 2022
7. Building C Project Plan Set, prepared by BKV Group, received April 11, 2022
8. Noise Analysis prepared by Illingworth & Rodkin, March 30, 2022

6.2. OTHER DOCUMENTS REFERENCED

9. Bay Area Clean Air Plan, prepared by the Bay Area Air Quality Management District, 2017
10. California Environmental Quality Act Air Quality Guidelines, prepared by the Bay Area Air Quality Management District, May 2017
11. California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit, Order No. R2-2015-0030, NPDES Permit No. CA0025054, October 8, 2015, https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/151008_0030_phaseIpermitrenewal.pdf
12. Downtown Station Area Specific Plan Environmental Impact Report, prepared by Design, Community, and Environment for the City of Santa Rosa, October 9, 2007
13. Downtown Station Area Specific Plan Subsequent Environmental Impact Report, prepared by Dyett and Bhatia for the City of Santa Rosa, October 2020
14. Downtown Station Area Specific Plan, prepared by Dyett and Bhatia for the City of Santa Rosa, October 2020
15. Santa Rosa 202 Urban Water Management Plan, prepared by City of Santa Rosa and West Yost Associates, June 10, 2021
16. Santa Rosa Climate Action Plan, prepared by the City of Santa Rosa, June 12, 2012
17. Santa Rosa General Plan 2035 prepared by the City of Santa Rosa, November 3, 2009
18. Santa Rosa General Plan Environmental Impact Report prepared by ESA, March 2009
19. Santa Rosa Housing Action Plan, 2016
20. Santa Rosa Municipal Code, Title 18 Buildings and Construction
21. Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021, prepared June 2021
22. Sonoma County Transportation Authority, Moving Forward 2050 Sonoma County's Comprehensive Transportation Plan, September 2021

23. Sonoma County Water Agency 2020 Urban Water Management Plan, prepared by Brown and Caldwell, June 2021

24. State Water Resources Control Board, Construction General Permit Order 2009-0009-DWQ, http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml