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# Final Initial Study/Mitigated Negative Declaration
# Mill Creek Development Project
# Town of Windsor, Sonoma County, California

## State Clearinghouse Number 2018102030

Prepared for:
**Town of Windsor**
9291 Old Redwood Highway, Building 400
Windsor, CA 95492
707.838.1021

Contact: Kenneth MacNab, Community Development Director

Prepared by:
**FirstCarbon Solutions**
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
925.357.2562

Contact: Jason Brandman, Project Director
Grant Gruber, Project Manager

Date: December 17, 2018

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# SECTION 1: INTRODUCTION

Although not required by the California Environmental Quality Act (CEQA) and CEQA Guidelines, the Town of Windsor has evaluated the comments received on the Mill Creek Development Project Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND). The Responses to Comments and Errata, which are included in this document, together with the Draft IS/MND, Draft IS/MND appendices, and the Mitigation Monitoring and Reporting Program, comprise the Final IS/MND for use by the Town of Windsor in its review and consideration of the Mill Creek Development Project.

This document is organized into three sections:

- **Section 1—Introduction.**
- **Section 2—Responses to Written Comments:** Provides a list of the agencies, organizations, and individuals who commented on the Draft IS/MND. Copies of all of the letters received regarding the Draft IS/MND and responses thereto are included in this section.

The Final IS/MND includes the following contents:

- Draft IS/MND (provided under separate cover)
- Draft IS/MND appendices (provided under separate cover)
- Responses to Written Comments (Section 2)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

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# SECTION 2: RESPONSES TO WRITTEN COMMENTS

## 2.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Draft IS/MND is presented below. Comments have been summarized and responses have been provided. The following public agencies and individuals submitted comments to the Town of Windsor.

### State Agencies

State Clearinghouse (SCH)
California Department of Toxic Substances Control (DTSC)

### Local Agencies

Sonoma Marin Area Rail Transit (SMART)

### Individuals

Sam Salmon (SALMON)
Lois Fisher (FISHER)

## 2.2 - Responses to Comments

### 2.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the Town of Windsor, as the lead agency, evaluated the comments received on the Final IS/MND (State Clearinghouse No. 2018102030) for the Mill Creek Development Project, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final IS/MND for the project in accordance with CEQA Guidelines Section 15132.

### 2.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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STATE OF CALIFORNIA

# GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

November 13, 2018

Emanuel Ursu
Town of Windsor
9291 Old Redwood Highway
Windsor, CA 95492

Subject: Mill Creek Development Project
SCH#: 2018102030

Dear Emanuel Ursu:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on November 9, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

TOWN OF WINDSOR
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# Document Details Report
## State Clearinghouse Data Base

**SCH#** 2018102030
**Project Title** Mill Creek Development Project
**Lead Agency** Windsor, City of

**Type** MND Mitigated Negative Declaration

**Description** The project applicant, Windsor Mill Community, LLC, is proposing to develop 360 condos on the project site. The units would be allocated among 22 multi-story buildings. The proposed project would be accessed from an extension of Bell Road. The project would provide amenities including a pool, spa, fitness center, and club room. A through-street extension of Bell Rd and a new pedestrian bridge connection from the project site to Windsor Creek ES would also be included as part of the project. The project requires approval of a use permit, a tentative subdivision map, and design review.

## Lead Agency Contact

**Name** Emanuel Ursu
**Agency** Town of Windsor
**Phone** (707) 838-1021 **Fax**
**email**
**Address** 9291 Old Redwood Highway
**City** Windsor **State** CA **Zip** 95492

## Project Location

**County** Sonoma
**City** Windsor
**Region**
**Lat / Long** 38° 32' 37" N / 122° 48' 45" W
**Cross Streets** Bell Rd/Johnson St
**Parcel No.** 164-010-020
**Township** 8N **Range** 9W **Section** 13 **Base** MDBM

## Proximity to:

**Highways** 101
**Airports** Sonoma County
**Railways** Northwestern Pacific
**Waterways** Windsor Creek
**Schools** Windsor Creek ES
**Land Use** LU: Former casting mill; Z: HDR, MDR, LDR; GP: HDR, MDR, LDR

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 4; California Department of Education; Office of Emergency Services, California; Regional Water Quality Control Board, Region 1; Air Resources Board, Major Industrial Projects; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

**Date Received** 10/11/2018 **Start of Review** 10/11/2018 **End of Review** 11/09/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

## State Agencies

### *Office of Planning and Research, State Clearinghouse (SCH)*

*Summary*

The agency stated that no State agencies had submitted comments to the State Clearinghouse as of the close of the 30-day public review period.

The agency stated that the Town of Windsor has complied with the requirements of CEQA.

*Response*

Please note that the California Department of Toxic Substances Control (DTSC) submitted comments directly to the Town of Windsor, which have been previously addressed. No other State agencies provided comments to the Town either directly or via the State Clearinghouse.

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**From:** Roman, Isabella@DTSC <Isabella.Roman@dtsc.ca.gov>
**Sent:** Thursday, November 15, 2018 10:24 AM
**To:** Ken MacNab <kmacnab@Townofwindsor.com>
**Cc:** Pettijohn, Julie@DTSC <Julie.Pettijohn@dtsc.ca.gov>; Boruck, Jennifer@DTSC <Jennifer.Boruck@dtsc.ca.gov>
**Subject:** Mill Creek Development Project Draft IS/MND Formal Comment

Hello,

I am representing a responsible agency reviewing the Draft Initial Study/Mitigated Negative Declaration for the Mill Creek Development Project. We previously reached out during the open comment period and didn't receive a response until 11/13 at which point the comment period had already ended. The following is our formal comment.

We requested information about any previous Phase 1 Environmental Site Assessments or environmental sampling. In your voicemail message, you indicated that you were unaware of any Phase 1 Environmental Site Assessments for the property. We recommend that you look into the past land uses of the property (which could include conducting a Phase 1 Environmental Site Assessment) and based on this, consider the need for environmental sampling. The property is bounded by a rail line, and rail lines have historically been associated with elevated levels of polycyclic aromatic hydrocarbons, metals and pesticides. Because the proposed development is residential in nature, information about the soil quality is necessary in order to protect public health. Soil characterization should be completed before construction activities disturb the soil and before residences are built.

You indicated that your consultant checked DTSC's and Water Board's online databases Envirostor and GeoTracker. While this gives important information on the history and status of any site, it does not give a complete picture of potential contamination. The sites captured on these databases are sites that have been ordered to be cleaned up or sites that have entered a Voluntary Cleanup Agreement with DTSC or Water Board. If a property is not listed on Envirostor this does not mean that it is not contaminated, it just means that it hasn't previously been identified and recognized by DTSC or Water Board. If no sampling has been conducted on the property so far, there is no information to base the conclusion that the property is safe enough for residential use.

Thanks,

Isabella Roman
Environmental Scientist
Site Mitigation and Restoration Program
Department of Toxic Substances Control
700 Heinz Avenue Suite 200
Berkeley, CA 94710
(510)-540-3879

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### *California Department of Toxic Substances Control (DTSC)*

*Summary*

DTSC provided the following comments.

- The agency inquired if a Phase I Environmental Site Assessment or other environmental sampling had been prepared for the project site.
- The agency noted that the project site previously supported activities that resulted in hazardous materials releases.
- The agency noted that the project site is bounded by a rail line, which can be associated with elevated levels of polycyclic aromatic hydrocarbons, metals, and pesticides.
- The agency stated that review of the GeoTracker and Envirostor databases by itself does not provide a complete picture of potential contamination. The agency stated that if no sampling has been conducted, there is no basis to conclude that the property was is safe enough for residential use.

*Response*

The IS/MND noted on page 68 that the project site is listed on the "Cleanup Program Site" database (GeoTracker Database No. T0609793191) and previously contained industrial uses that released petroleum hydrocarbons and trichloroethylene into the soil and groundwater. The first soil investigation was conducted in 1990. Between 1990 and 2012, several more soil, soil vapor, and groundwater investigations were conducted to characterize the extent of the contamination. As part of these activities, contaminated soil was removed on several occasions including in 1993 and 1995, and a building was demolished in the mid-2000s. After more than two decades of soil, soil vapor, and groundwater sampling and monitoring, the North Coast Regional Water Quality Control Board (RWQCB) issued a "Case Closed" letter on March 3, 2014, signifying that the site had been remediated to its satisfaction. The IS/MND concluded that exposure to hazardous materials from past land use activities was less than significant and did not require mitigation. To be clear, this conclusion is based on the determination made by the RWQCB—an authoritative source regarding remediation of hazardous materials sites.

The soil, soil vapor, and groundwater sampling and monitoring reports are posted on the State Water Resources Control Board's GeoTracker website. The most recent reports show that concentrations of petroleum hydrocarbons and trichloroethylene are within acceptable exposure levels.

The proposed project would not involve any disturbance to the Sonoma Marin Area Rail Transit (SMART) rail line. Soil sampling associated with remediation of the underground storage tank within the project site included testing for metals such as cadmium, chromium, lead, nickel, and zinc. All results were below Environmental Screening Levels. Given that the site was extensively evaluated for hazardous materials over 20+ year period, there is no evidence suggesting that further investigation of undetected polycyclic aromatic hydrocarbons, metals, or pesticide concentrations that pose a substantial health risk is warranted.

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**From:** Ken MacNab
**To:** EUrsu@m-group.us; jbrandman@fcs-intl.com
**Cc:** Grant Gruber
**Subject:** FW: SMART Comments on IS/MND - Mill Creek Development Project
**Date:** Thursday, November 15, 2018 2:34:20 PM

Hi Emmanuel, Jason-

Below are comments received from SMART on the IS/MND for Mill Creek. Please include and address in the response to comments.

Thanks-

Ken

**From:** Libby Payan <lpayan@sonomamarintrain.org>
**Sent:** Thursday, November 15, 2018 2:28 PM
**To:** Ken MacNab <kmacnab@Townofwindsor.com>
**Subject:** SMART Comments on IS/MND - Mill Creek Development Project

Hi Ken! SMART's comments are listed below. I've been having spotty internet issues all day, so I'm wondering if that is somehow correlated to the email not sending to Emmanuel directly. Anyways, thanks for offering to forward it over!

Good Afternoon Emmanuel,

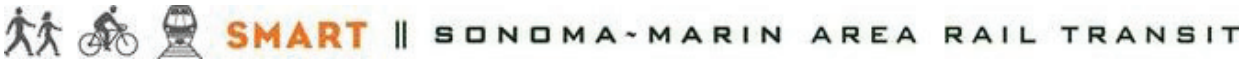
Thank for the opportunity to comment on the Initial Study/Mitigated Negative Declaration on the Mill Creek Development Project, located at 8703 Bell Road. SMART would like to offer the following comments on the project:

1. SMART will work with the developer in regards to the multi-use pathway that is planned to be constructed on SMART's property along the project's frontage, approximately from Johnson Street to the vehicular bridge on the southern portion of the project.
2. Any vegetation planted directly adjacent to the SMART Right-of-Way (ROW) must stay out of our ROW and all maintenance must be the responsibility of the developer. No access will be authorized or allowed from SMART's property to maintain the vegetation without written approval.

If you have any questions, comments or concerns please don't hesitate to contact me. I can be reached by phone at (707) 794-3079 or by email at: lpayan@sonomamarintrain.org

Best,

**Elizabeth "Libby" Payan |** Assistant Planner |Direct (707) 794-3079 | Fax (707) 794-3037 | 5401 Old Redwood Hwy, Suite 200, Petaluma, CA 94954 | lpayan@sonomamarintrain.org | www.SonomaMarinTrain.org | www.BeTrackSMART.org



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## Local Agencies

### *Sonoma Marin Area Rail Transit (SMART)*

*Summary*
The agency stated that it will work with the applicant to construct the multi-use pathway within SMART's right-of-way along the project frontage.

The agency stated that any vegetation planted directly adjacent to the SMART right-of-way must stay out of the right-of-way and maintenance is the responsibility of the applicant. SMART will not allow access to its right-of-way for vegetation maintenance purposes.

*Response*
Construction of the multi-use pathway within SMART's right-of-way is independent of the proposed project. The project does provide internal pedestrian facilities that would connect with the multi-use pathway.

An internal roadway will be located along the project frontage with the SMART right-of-way. No landscaping is proposed between the small area between the roadway and the SMART right-of-way.

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Sam Salmon

956 Milsom Place

Windsor, CA 95492

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TOWN OF WINDSOR

November 7, 2018

Comments to Mill Creek Development Project / Initial Study/Mitigated Negative Declaration

Gentle people

Please accept the following comments and questions arising from my review of the above stated document:

On page 77 of the document under Environmental Evaluation b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, there is a "Less than significant impact" finding.

In the second paragraph on page 78, it is stated:

"The project proposes to develop 360 units on a 20.2-acre site, which would result in a density of 17.8 units/acre. Therefore, the project 's density will be consistent with the density in each respective land use designation. As a result, the project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project that was adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant."

I would have expected if the statement that the project was consistent with each land-use designation considered by the document that a finding of "No Impact" would be found rather than a "less than significant" finding. More to point however, is the clear and inescapable fact that in the last paragraph on page 77, directly in response to the question asked in b) the following is stated:

"**Less than significant impact.** The Windsor General Plan currently designates the project site High Density Residential (16 to 32 units per acre), Medium Density Residential (8 to 16 units per acre) and Low Density Residential (5-8 units per acre). In addition, the project site is within the Station Area/Downtown Specific Plan (Specific Plan) and is designated a mixture of Village Residential (5-8 units per acre), Medium Density Residential (6-16 units per acre), and Compact Residential (12-24 units/acre), with a Potential New Park designated in the area but with no specific location."

The next two paragraphs on page 78 makes the following conclusion:

"The project site is located within the Specific Plan area. The ~~Statin~~ Specific Plan was developed to be consistent with the General Plan, and updates to the General Plan 2040 consistent with the Specific Plan. Therefore, should there be any inconsistencies between the two, the Specific Plan would be the applicable regulatory document. The Specific Plan also states that where an inconsistency between the Specific Plan and Zoning Ordinance exists, the Specific Plan would supersede.

The project proposes to develop 360 dwelling units on a 20.2-acre site, which would result in a density of 17.8 units/acre. Therefore, the project's density will be consistent with the density in each respective land use designation. As a result, the project would be consistent with the General Plan, Specific Plan and the Town Zoning Ordinance."

Contrary to the conclusion found above, I fail to see any other conclusion but one that finds the project is inconsistent with the General Plan and Specific Plan as well as the Zoning Ordinance. The General Plan states in the Medium and Low-Density designations maximums of 16 and 8 units where the projects average is stated to be 17.8. The Specific Plan designation of Medium and Village Residential densities at a maximum of 16 and 8 respectively. Both the General Plan and Specific Plan densities are consistent with the Zoning Ordinance. I can only state that to the lay person reviewing this document that they would be misled by the findings as they are clearly in error. If the 20.2-acre site has three distinct zoning areas, the 17.8 unit per acre average used in the findings of "less than significant" can only be consistent with one of the three zones, High Density 16 to 32 units per acre. This same 17.8 units per acre density cannot be found consistent with the other two distinct zoning areas, Medium 8-16 units and Village Residential 5-8 units. While it is true that both the General Plan and Specific Plan encourage high-density residential uses to locate in areas with good transit and access and close to major shopping and service areas, this concept was considered when the Zoning Ordinance was made consistent with both the General Plan and specific Plans and placed on the 20.2 acre site, that is three distinct zoning areas.

The General Plan in it's first goal under Residential Development (pg. 2-14) provides clear guidance on this issue.

"Goal LU-2: Residential Development; Promote the preservation and development of residential neighborhoods that provide a variety of housing types, densities, and designs that address the diverse needs of Windsor residents of all ages and socio-economic groups.

LU-2.1 Housing diversity. The Town shall support the development of diverse housing types and lot sizes throughout the town to accommodate a range of affordability levels and socio-economic and age diversity."

These General Plan goals are important in our Town's development. We currently have 90 plus single family homes on smaller lots in construction of Hembree Road near Shiloh Road where pricing is in the seven to eight hundred thousand dollars each. We have approvals for 360 apartments in the Bell Village development near Oliver's. We also have some veteran, low income and senior housing projects in our pipeline but we have no housing for what might be referred to as the missing middle such as the Village and Medium Residential land-use zonings portray to provide.

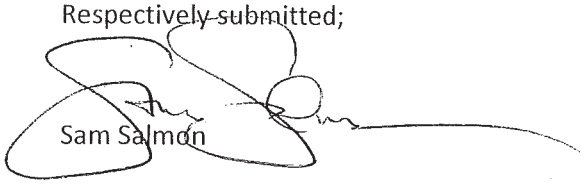
Zoning Code -Chapter 27.08 C. VR (Village Residential) District.

"The VR zoning district is intended for areas appropriate for a mixture of housing types on small lots. The allowable density ranges from five to eight units per acre. The lower end of the density range may be appropriate adjacent fo the SR or ER zoning districts, with the higher end of the range appropriate near neighborhood centers, parks and transit stops. The VR zoning district is consistent with the Low Density Residential land use classification of the General Plan.

D. MDR (Medium Density "Residential) District. The MDR zoning district is intended for areas appropriate for multi-family housing and is suitable near activity centers and along major thoroughfares. This zoning district allows for a variety of residential opportunities including small single-family units, row houses, town homes, and small apartment complexes."

These two zoning districts appear appropriate for the 20.2-acre site. While some may believe this project has great merit and is appropriate, the General Plan and Specific Plan zoning designations currently in place provide for a variety of housing type which were intended to meet our General Plan goals of providing housing diverse groups of people with differing affordability levels, socio economic and age diversity. if there is disagreement with the zoning as provided though our established processes, the means of obtaining jurisdictional approval would be one of a zoning change and General Plan/Specific Plan Amendment where the project merits could be studied and the analysis of how it fits within the Town's future be provided to our residents and any others interested in our community's development. This study and negative declaration of environments impacts should be rejected as it fails to meet the legal requirements as stated within the laws of California.

Respectively submitted;



Sam Salmon

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## Individuals

### *Sam Salmon (SALMON)*

*Summary*

The author disputes the IS/MND's conclusion that the project is consistent with the density limits set forth in the General Plan. The author states that the project's average density of 17.8 dwelling units per acre exceed the 8 dwelling units per acre set forth for the Low Density Residential land use designation and the 16 dwelling units per acre set forth for the Medium Density Residential land use designation.

The author believes that Medium Density Residential and Village Residential zoning districts are appropriate for the project site.

*Response*

The stated density of 17.8 dwelling units per acre is the averaged density across the entire project site. Allowable and proposed densities within each individual land use designation applicable to the project site are shown in Table 2-1. As shown in the table, the project is consistent with the density limits set forth in both the General Plan and Specific Plan.

**Table 2-1: Project Consistency with General Plan and Specific Plan**

| Acres | General Plan Land Use Designation (Allowable Density) | Specific Plan Land Use Designation | Allowable Units | Mill Creek Development Proposed Units | Mill Creek Dwelling Units Per Acre |
|---|---|---|---|---|---|
| 11.6 | High Density Residential (16-32 dwelling units/acre) | Compact Residential (12–24 dwelling units/acre) | GP: 185–371<br>SP: 139–278 | 253 | 21.8 |
| 4.3 | Medium Density Residential (8-16 dwelling units/acre) | Medium Density Residential (8-16 dwelling units/acre) | Both: 34–69 | 69 | 16.0 |
| 4.9 | Low Density Residential (5-8 dwelling units/acre) | Village Residential (5-8 dwelling units/acre) | Both: 24–39 | 39 | 8.0 |
| 20.8 | — | — | GP: 243–479<br>SP: 197–386 | **360** | — |

The project is proposing development of attached dwelling units in the VR (Village Residential) and MDR (Medium Density Residential) Zoning Districts. Attached dwelling units are an allowable housing type in both Zoning Districts. Attached dwelling units are also identified as being an allowable housing type in the "Low Density Residential" 2040 General Plan Land Use Designation and the "Village Residential" Land Use Designation of the Windsor Station Area/Downtown Specific Plan. Having a single type of housing on the project site will not preclude achievement of broader General Plan and Specific Plan objectives calling for a variety of housing types, as both plans establish land use designations that serve to accommodate a range of housing types. In the area of the project site, a variety of housing types already exists, including single-family detached homes to the east and apartments and condominium/townhome units to the north. The housing type being proposed by the project is consistent with the Town's General Plan, the Windsor Station Area/Downtown Specific Plan and Zoning Ordinance.

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## Initial Study/Mitigated Negative Declaration - Mill Creek Development Comments

By Lois Fisher, CNU, LEED-ND

November 12, 2018

**Comments:** Overall the plan circulation looks passable. 'Defensible Space' views of residents to the creek are missing in the southern part of the design. The 'head-in' parking along the creek loop makes the project look like an apartment complex rather than a downtown neighborhood. The project is in three zones in the Specific Plan: Compact Residential, Medium Density Residential and Village Residential.

Here are my suggested changes to make the project compliant with the Downtown Specific Plan:

1. **Porches and Stoops:** The porches are not elevated a minimum of 2' as required in the Specific Plan. An enlargement detail is needed to show how the porches are elevated, connecting the front door, the elevated porch or stoop directly to the sidewalk. A door is now shown between the front door and the porch. What is this for? The porch needs to be between the front door and the street so it can act as a transition space between the public street and the private unit. The area behind the front porch needs to be an active use-not bedrooms. What are those uses directly behind the stoop? It appears to be a living room which is fine.

**TABLE 3-1: DEVELOPMENT STANDARDS – VILLAGE RESIDENTIAL (VR)**

| District | VR | Additional Development Standards | Ref |
|---|---|---|---|
| **Density, Lot, and Block Size** | | | |
| Density (Dwelling Units per Gross Acre) | 5-8 | | |
| Minimum Lot Size (sq ft) | 5,000 | | |
| Minimum Lot Width (ft) | 60 | | |
| **Building Form and Location** | | | |
| Maximum Building Height (ft) | 35 | | A |
| Minimum (or maximum if specified) Setback (ft) | | See Chapter 27.20. | |
| Front | 13 min; 20 max | | B |
| Front (Infill Development) | The average of the front setbacks of the two nearest buildings on the same block face or the minimum setback shown above, whichever is less | | |
| Street Side | 10 | | C |
| Interior Side | 5 | | D |
| Rear | 20 | | E |
| Garage | 18 from front property line or back of sidewalk, whichever is greater | | F |
| Attached Garage, from Rear Property Line | 5 | | G |
| Garage, from Primary Façade | 5 | | H |
| Distance Between Structures | See Section 27.08.050 | | |
| Accessory Structures | See Section 27.34.170 | | |
| Projections | See Chapter 27.20 | | |
| Porch or Stoop Minimum Height Above Sidewalk (ft) | 2 | | |
| Stoop Minimum Length and Width (ft) | 6 | | |

From page 3-12:

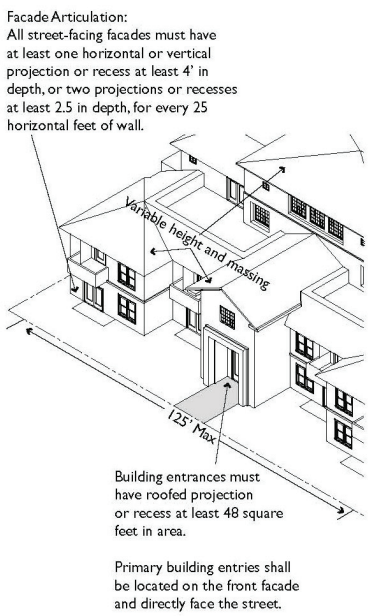
C) Building Entrances.
1. *Location.* Primary building entries shall be located on the front façade and directly face the street.
2. *Design.* Primary building entries shall incorporate a projection (e.g., porch) or recess, or combination of projection and recess at least 48 square feet in area. The minimum width of the entry feature shall be 20 percent of the width of the street-facing façade. Alternative designs that create a welcoming entry facing the street such as a prominent porch provided for side doors, or entry courtyard that provides a direct walkway to the street may be allowed.

From page 3-17:

(D) **Residential Multiple-Unit Development.** The following standards apply to Multiple-Unit development.

1. *Building Length.* The maximum dimension of any single building shall not exceed 125 feet; exceptions may be granted with Planning Commission approval, based on the finding that adequate design features have been incorporated to create visual variety and avoid a large-scale, bulky, or monolithic appearance.
2. *Architectural Articulation.*
   a. Variable Massing. Adjacent buildings and buildings on the same block shall exhibit variation in height and massing.
   b. Façade Detailing and Materials. Each side of a building that is visible from a public right-of-way shall be designed with a complementary level of detailing and quality of materials. Parking garages, ancillary structures, and carports shall be designed to be architecturally compatible with the main building.
   c. Façade Articulation. All street-facing facades must include vertical projections or recesses at least four feet in depth, or two projections or recesses at least 2.5 feet in depth, for every 25 horizontal feet of wall. If located on a building with two or more stories, the articulated elements must be greater than one story in height, and may be grouped rather than evenly spaced in 25-foot modules. Building entrances and front porches and projections into required yards such as stoops, bays, overhangs, fireplaces, and trellises count towards this requirement.
3. *Universal Design.* For projects within one-half mile from the Station and with 20 or more dwelling units, 10 percent of the units shall be designed to be habitable by persons with disabilities.
4. *Building Entrances.* Primary building entries shall be located on the front façade and directly face the street, and shall incorporate a projection (e.g., porch) or recess, or combination of projection and recess at least 48 square feet in area. Alternative designs that create a welcoming entry facing the street such as a prominent porch provided for side doors, or entry courtyard that provides a clear and direct walkway to the street may be allowed.
5. *Parking Access.* Garages shall be accessed from a side street or alley whenever possible. Curb cuts shall be minimized and located in a manner least likely to impede pedestrian circulation.
6. *Paving.* The maximum amount of paving in street-facing yards is 50 percent of the required yard.

**Figure 3-9:**
Residential Multiple-Unit Development






2. **Corner Units**: Corner units are required to have enhanced architecture. Here is a quote from page 3-12 of the Specific Plan:

(B) Building Design.
1. *Corner Lots.* Buildings on corner lots shall have enhanced architecture (windows, bay windows, doors, wraparound porches, projections, changes in roofline) on both street frontages. These enhanced architecture features shall be provided for a minimum of 50 percent of the side street frontage elevation."

On my marked-up plan view sketch, Appendix A, I have circled the corner units that need wraparound porches so the tenants can survey both streets or the street and nearby units from their unit for neighborhood safety.

3. **Detached Garages behind the sidewalk**: At both the north and south entrances to this proposed neighborhood, detached garages without any 'eyes-on' the street are the first thing that people will see. These 'dead' spaces need to be replaced with units with tenants watching over the public realm for safety.

> (D) Garage Location.
>
> 1. *Detached Garages.* Detached garages shall be located in the rear half of the lot. The Planning Director may approve a detached garage in the front half of the lot subject to the front setback requirements where the size, shape, topography, location, surroundings or existing structures of the property makes it infeasible to locate the garage in the rear half of the lot.

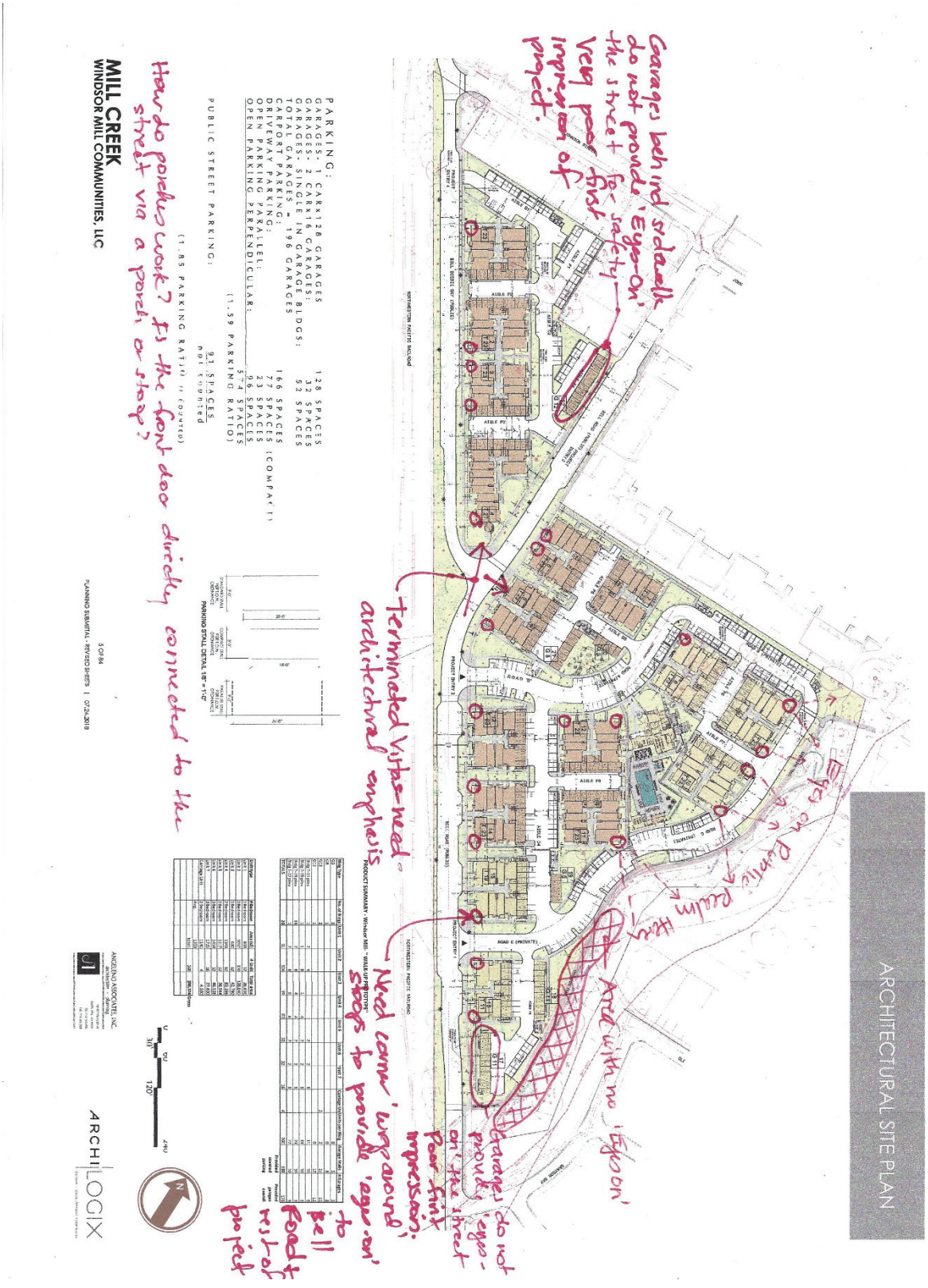
4. **Terminated Vistas**: At two points at the intersection of Bell Road and Bill Beedie Way special attention needs to be paid to the architecture as they terminated vistas happen in those locations. Towers or cupolas are examples of architectural elements that would be appropriate at those locations.

5. **Individual Building 'Look'**: The architecture looks monolithic. Per the Specific Plan page 3-17:

> 2. *Architectural Articulation.*
> a. Variable Massing. Adjacent buildings and buildings on the same block shall exhibit variation in height and massing.
> b. Façade Detailing and Materials. Each side of a building that is visible from a public right-of-way shall be designed with a complementary level of detailing and quality of materials. Parking garages, ancillary structures, and carports shall be designed to be architecturally compatible with the main building.
> c. Façade Articulation. All street-facing facades must include vertical projections or recesses at least four feet in depth, or two projections or recesses at least 2.5 feet in depth, for every 25 horizontal feet of wall. If located on a building with two or more stories, the articulated elements must be greater than one story in height, and may be grouped rather than evenly spaced in 25-foot modules. Building entrances and front porches and projections into required yards such as stoops, bays, overhangs, fireplaces, and trellises count towards this requirement.

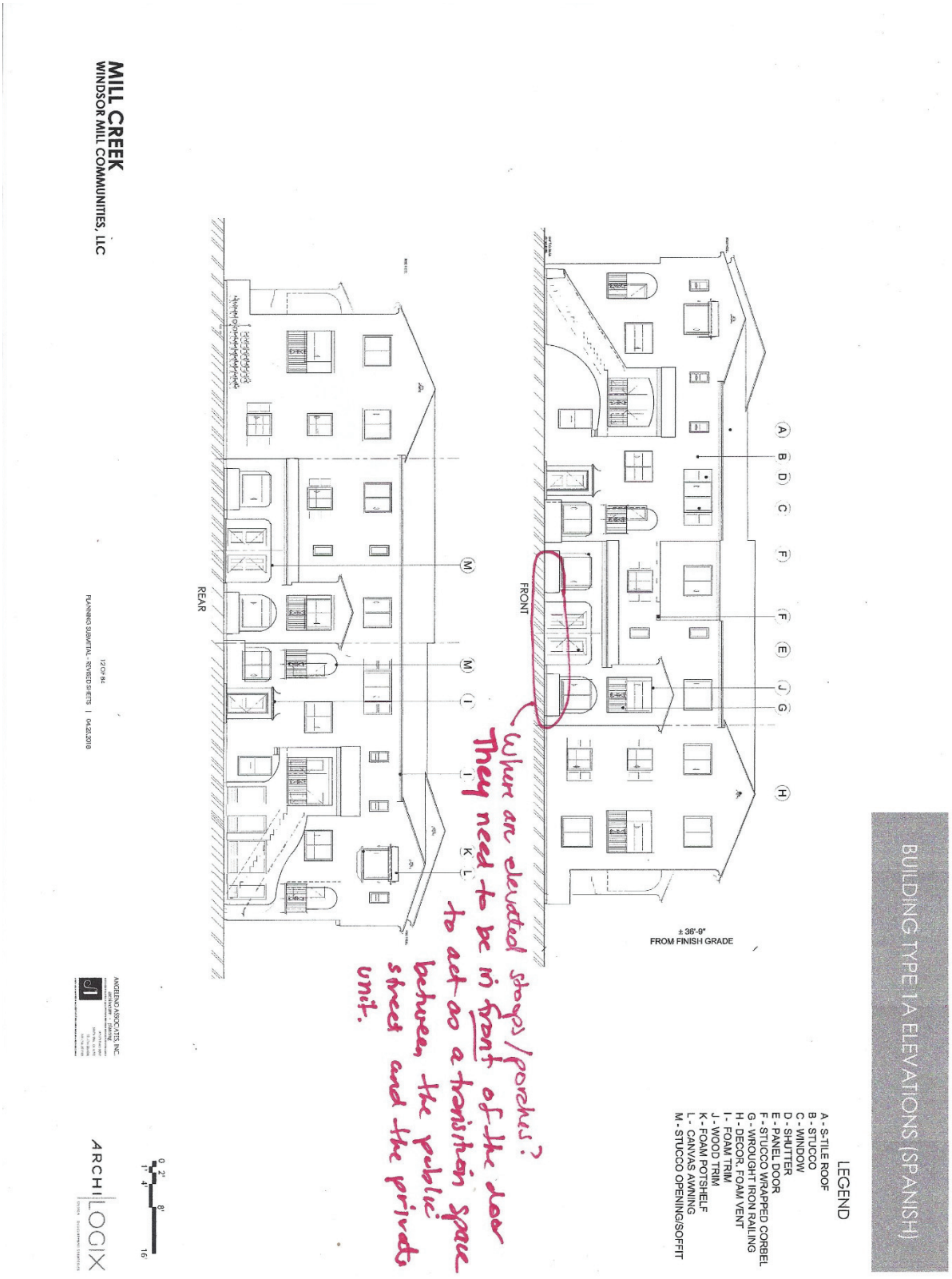
The ground front doors are next to each other. It would look more upscale to have the two units separated and outfitted with individual porches instead of the current 'duplex' look. Vertical articulation so that the buildings look like a collection of vertical buildings instead of one large horizontal building are needed.

## Appendix A: Site Plan Comments



## Appendix B: Floor Plan Comments

## Appendix C: Elevation Comments



## *Lois Fisher (FISHER)*

*Summary*

The author provides extensive comments on project design and architecture and does not provide any comments about the IS/MND's conclusions

*Response*

No comments were made regarding the IS/MND's conclusions and, thus, no further response is necessary.

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