



[EXTERNAL] South Santa Rosa Specific Plan (SSRSP), Preferred Alternative comments and suggestions

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Two intro points

One, the Preferred Alternative vetting should not be a cat and mouse game and exercise of staff and decision makers trying to elide and avoid concrete equity actions. My opinion: Preferred Alternative language needs to clearly and specifically obligate equity actions not just suggest them.

Two, the full Preferred Alternative report is not translated to Spanish, only an abbreviated version. The report is only 20-some pages. I don't believe this is acceptable for a Plan area that has majority Latino population. The full report should be translated to Spanish and re-issued ASAP, if this can't be done by early next week, the Preferred Alternative meeting schedule should be revised and extended.

Comments and suggestions

In my comments below I will first quote the Preferred Alternative, then comment on that quote and topic.

1.1 Intro, Project background

The SSRSP "*will* guide... equity policies..." Italics mine.

"The Plan will set the stage for diverse, amenity rich housing development as well as neighborhood serving commercial uses that meet the needs of the various neighborhoods within the Planning Area."

The Plan needs planned-for and dedicated affordable housing (AH) proportional to City and County RHNA (Regional Housing Needs Assessment) allocation; commercial and retail services must be targeted and intentionally recruited to meet the actual needs of local neighborhoods, can't leave it to the market which will bring liquor and junk food convenience stores etc.

"The Plan will also outline unified City/County policies for this area, providing the basis for any future annexations of unincorporated sites."

This is where a Sonoma County (SoCo) and Santa Rosa updated and strengthened mobile home park (MHP) closure and conversion ordinance (CCO) and formal SoCo MHP land use designations can

come in. This is also where the politics around a Moorland annexation may come in.

“The Planning Area faces a high risk of displacement and includes a disproportionate share of lower-income households, as identified in recent census data, the Existing Conditions Report, and the Anti-Homelessness and Anti-Displacement Strategy. In response, the Specific Plan **may** integrate policies and implementation actions that address these conditions, such as preservation of existing affordable housing, tenant protections, and anti-displacement measures such as no net loss, right-to return, and relocation assistance.”

It’s good this got put in. Nothing like this statement was in the previous Alternatives. The critical word here is *may*; saying *will* would be much better and to specify exactly what will be done. A mobile home park CCO fits here. The anti-displacement strategy calls for targeted program and policy interventions; the public needs to see what those targets will actually be in the Preferred Alternative.

1.3 Feedback on Alternatives

“Mobile home parks were assumed to be preserved in all Alternatives.”

If they will be preserved, they need protections from hostile takeovers by speculators who will raise space rents, drive current residents out, and destroy MHPs as naturally occurring affordable housing.

“The City Council also called for investing in and improving the Moorland neighborhood, while not adding more density there, and ensuring that equity and anti-displacement strategies are incorporated.”

This is important. The Council directed this because of public pressure. This is where equity advocates can hold the line and ask that specific equity and anti-displacement strategies be implemented on a developmental time scale as the Plan unfolds. NBOP, the Tenant’s Union, and Legal Aid can help to provide specific points. For mobile home parks, I think two or three solid policies are reasonable to ask for. With a big laundry list of MHP asks, critical wins might be diluted.

In the list of previous SSRSP decision maker meetings, the meeting with the SoCo Planning Commission was left off the list. This is a serious omission because the SoCo Planning Commission weighed in hard and persuasively to support Plan equity measures. This needs to be corrected in the text and the sense of the SoCo Planning Commission meeting’s recommendations need to get into this report.

2. Preferred Alternative

“Community feedback on the three Alternatives guided development of the Preferred Alternative, including the following: Support for the mixed-use development and bicycle and pedestrian improvements along Santa Rosa Avenue from Alternative 1; Support for high-density housing within city limits from Alternative 2; A preference for distributed parks and open space; and A preference for improved east-west connections to Santa Rosa Avenue and no increase in residential density in the Moorland neighborhood.”

It’s important to point out that *community feedback* here is from less than 130 surveys. This shows that few people can have a big impact. Staff and planners are also guiding the outcome with what they think makes sense too. Putting high density housing within city limits is what the City and County both want to meet their RHNA goals. A challenge here will be to see that 40% of the Plan housing meets the needs of Low and Very Low-income categories, as is called for in RHNA, AFFH (Affirmatively Furthering Fair Housing, law) and City and County General Plan Housing Elements. How will the Plan adhere to AFFH? Will we end up in a situation where the market runs prices up and the City does not meet its mandatory Housing Element an RHNA goals? What then?

2.1 Land Use

“The central stretch of Santa Rosa Avenue—where vacant sites and reuse opportunities are the greatest—is reimagined as a pedestrian-friendly boulevard, featuring ground-floor neighborhood-serving commercial uses, along with higher-density housing.”

This is where many MHPs are. For neighborhood-serving commercial and retail uses, what would serve MHP residents best? A Grocery Outlet? A hardware store? Laundromat? If retail is to actually serve neighborhoods, stores have to sell and provide what people want and need, at price points they can afford. This same holds true for Robles Ave. commercial centers east and west of the freeway. Intentional recruitment of neighborhood-appropriate retail by the City is called for.

“Lower-density new neighborhoods are planned in the east, consistent with the General Plan. Parks and open spaces are located to maximize access by residents and connection from creekside pathways.”

This is where the Todd Creek pipeline annexation is in play, ~2000 low-density market rate units. This is where the bulk of Plan gentrification will come from because the higher MHI (median household income) originating here will drive up all local prices. The General Plan can't have contradictory and inconsistent elements. If AFFH is also in the General Plan and Housing Element for both City and County, the Plan needs to account for how this very large market rate project will affect gentrification and displacement for existing low-income neighborhoods. This means concrete, *will do* targeted equity programs and policies, not maybe. If the bulk of Plan Area housing ends up market rate, which is likely, that is a total recipe for displacement.

The Plan could rezone the east side area so that the plan was not in effect setting up a future segregated, white single family home community. It's reasonable to ask how the creation of 2000 unified low-density homes works with AFFH law? Aren't we supposed to be moving to more integration and not more segregation? The City and County need to look at the whole picture and context, and make decisions that conform with AFFH law.

As well, almost all the new parks and greenways are on the east side of the Plan Area. Street, sidewalk and bike access from the west side needs to be put in at the same time the new park system is developed. Keep integration in mind.

The Plan has Bellevue and Todd going through to Petaluma Hill Rd., maybe need one more new through street to Petaluma Hill Rd for fire evac purposes, Robles Ave. would be good here.

Mobile Home Parks

“Residential mobile home development of two or more mobile home units, and densities range from 4 to 18 units per acre. Mobile homes and manufactured homes are the only allowed housing type. This designation is applied to existing mobile home parks.”

Santa Rosa has a MHP land use type; the County does not. Any unincorporated MHPs that would be part of the Todd Creek annexation will need to be reclassified by the County as MHP land use ahead of annexation. The County could do this now as part of Plan strategy to prevent displacement because then, in combination with an updated CCO common to the City and County, MHP speculators could not close parks and then redevelop them as market rate housing.

“The projected buildout includes 6,300 new housing units, with the largest portion projected in new Mixed Use areas along Santa Rosa Avenue, followed by Low Density Residential to the east and High Density Residential in the north. The additional housing units would bring the existing population of about 11,500 people to a total of 26,300 residents in the Planning Area.”

The Plan so far does not address or refer to RHNA and AFFH and how the Plan intends to address the clear need for new affordable housing as part of the Plan’s whole new housing mix. What is the plan for equity in new housing? Leaving it to the market is not a plan, that’s a recipe of continued inequity.

Table 2.2 shows housing density but not projected AMI (area median income) or MHI categories. I think some projection of the MHI categories for housing, such as Above Moderate (market rate)-income, Moderate-income, Low-income, Very Low-income, and Extremely Low-income, is called for. Without a plan to meet AFFH and RHNA, housing buildout is left to the market and market rate housing will dominate, which will cause gentrification and displacement. This is a reasonable projection and the Preferred Alternative should explicitly address this realistic scenario and put forth concrete plans to one, build new affordable housing align with City and County RHNA and two, to prevent displacement of existing low-income households. For SSRSP equity and the Plan’s anti-displacement strategy, the Three Ps of housing need to be addressed: production, preservation, protection.

2.2 Parks and Open Space

This looks great, just need to insure access from low-income areas, especuallly from the west side of the Plan area.

2.3 Transportation networks

Put Robles through to Petaluma Hill Rd. as a new fire evac route. I like Robles as an east-west bike route. I like all protected bike lanes; there is so much traffic on Santa Rosa Ave, with drivers frustrated by congestion and not paying proper attention to pedestrians and bikes; bike and pedestrian safety needs all the Plan focus it can get.

Make north-south and east-west alternate routes to take away the strip-development/ strippy sense of Santa Rosa Ave.

I’m concerned about the Preferred Alternative referring to *potential* alternate crossing of Hwy 101. In the Plan Area, Hwy 101 is a key community-dividing structural feature. The Robles Ave bike and pedestrian crossing should be a certain transportation piece, not potential. This would link the Andy Lopez Park to the rest of the park system as well.

3.3 Plan adoption

“The feedback generated from the community engagement that follows this report will inform the development of a final Preferred Alternative. That feedback will include input from decision-makers at the Planning Commission and City Council. The final Preferred Alternative will describe the preferred land use and circulation for the future of South Santa Rosa.”

This summary needs to refer to the introduction and how the SSRSP *will* guide equity policies. Keep up the good work and make the Preferred Alternative adhere to full cost accounting, triple bottom line sustainability where equity is a critical piece and not an afterthought and an inconvenient truth.

"We don't know where we're going but we have to stick together in case somebody gets there."
Ken Kesey