



November 12, 2024

Ms. Karen Weeks, Chair  
City of Santa Rosa Planning Commission  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404

RE: Comments on Draft EIR for the Santa Rosa 2050 General Plan

Dear Ms. Weeks:

Thank you for the opportunity to provide comments on the Draft EIR for the Santa Rosa 2050 General Plan. This letter is being submitted on behalf of property owners in the Todd Creek area of unincorporated southeast Santa Rosa, who have had a long-standing interest in annexing and developing their land with needed housing. Our comments on the Draft EIR and Draft 2050 General Plan document are summarized below followed by a more detailed statement.

**The Draft Santa Rosa 2050 General Plan and corresponding Draft EIR do not recognize that a major planning study is underway for the 1,900-acre south Santa Rosa area (South Santa Rosa Specific Plan). Both the 2050 General Plan and Draft EIR should acknowledge this effort and anticipate that large areas of land within the south Santa Rosa area will be annexed over the next 25 years. More specifically, the Draft EIR should be revised to: (1) note the potential for large annexations to occur in the south Santa Rosa area; and (2) consider any potential impacts that may be associated with future annexation of land within the south Santa Rosa area.**

The Todd Creek area presents the single greatest opportunity for the City to secure its housing future. Its development will accommodate a variety of housing types at all income levels that will meet the needs of Santa Rosa residents, including young adults, families, empty nesters and seniors. Annexation and development of the Todd Creek area will also create a new neighborhood with amenities that are currently lacking for residents of the 1,300 existing homes along the south Santa Rosa Avenue corridor. This new neighborhood will feature a community park, neighborhood-serving stores, and access to open space areas. Future development will also help to support and sustain the operation of transit service along Santa Rosa Avenue by bringing hundreds of new homes in close proximity to bus routes serving the downtown area.

The City has recognized the opportunities presented by the Todd Creek area and has included it as part of the South Santa Rosa Specific Plan study area. The South Santa Rosa Specific Plan is a major planning effort that includes the City's Santa Rosa Ave Corridor Priority Development Area (PDA), the County of Sonoma's South Santa Rosa Ave PDA, and the Moorland Avenue and Industry West areas on the west side of Highway 101. In total, the South Santa Rosa Specific Plan encompasses approximately 1,900 acres – the largest of any Specific Plan prepared by the City.

It was surprising to find that there is no recognition of the South Santa Rosa Specific Plan planning effort in the current draft of the 2050 General Plan document or the Draft EIR for the 2050 General Plan. The City has been in discussions with representatives of the County of Sonoma about possible annexation of the south Santa Rosa area and is also aware of the development interests of property owners in the Todd Creek area. Large-scale annexations of land within the 1,900-acre South Santa Rosa Specific Plan area – whether City-initiated or developer initiated – are likely to occur within the time frame of the 2050 General Plan. Both the 2050 General Plan and Draft EIR should acknowledge this. The 2050 General Plan should provide guidance on the overarching planning interests to be addressed or achieved by the Specific Plan process and how future annexations in the south Santa Rosa area will be integrated into the City's long-range plan for growth and development. The Draft EIR should note the potential for future large-scale annexations in the south Santa Rosa area as part of the project description and consider potential impacts as appropriate.

Thank you for your consideration of these comments.

Respectfully,



Ken MacNab  
KMac Advising, LLC  
[ken@kmacadvising.com](mailto:ken@kmacadvising.com)

cc: Amy Nicholson, Supervising Planner





Attachments:

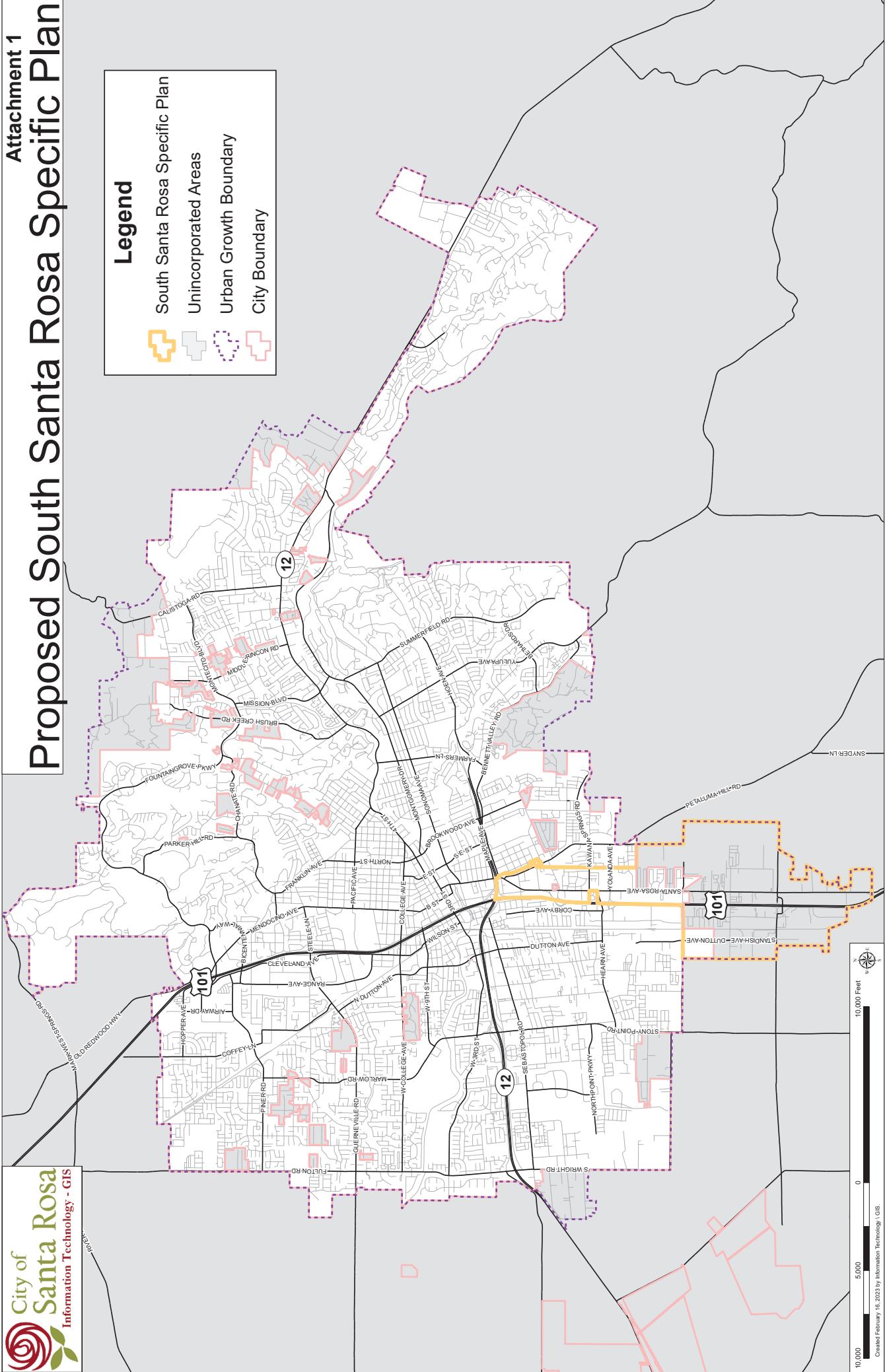
Map of South Santa Rosa Specific Plan Area  
Map of Todd Creek area

# Proposed South Santa Rosa Specific Plan

Attachment 1

**Legend**

-  South Santa Rosa Specific Plan
-  Unincorporated Areas
-  Urban Growth Boundary
-  City Boundary

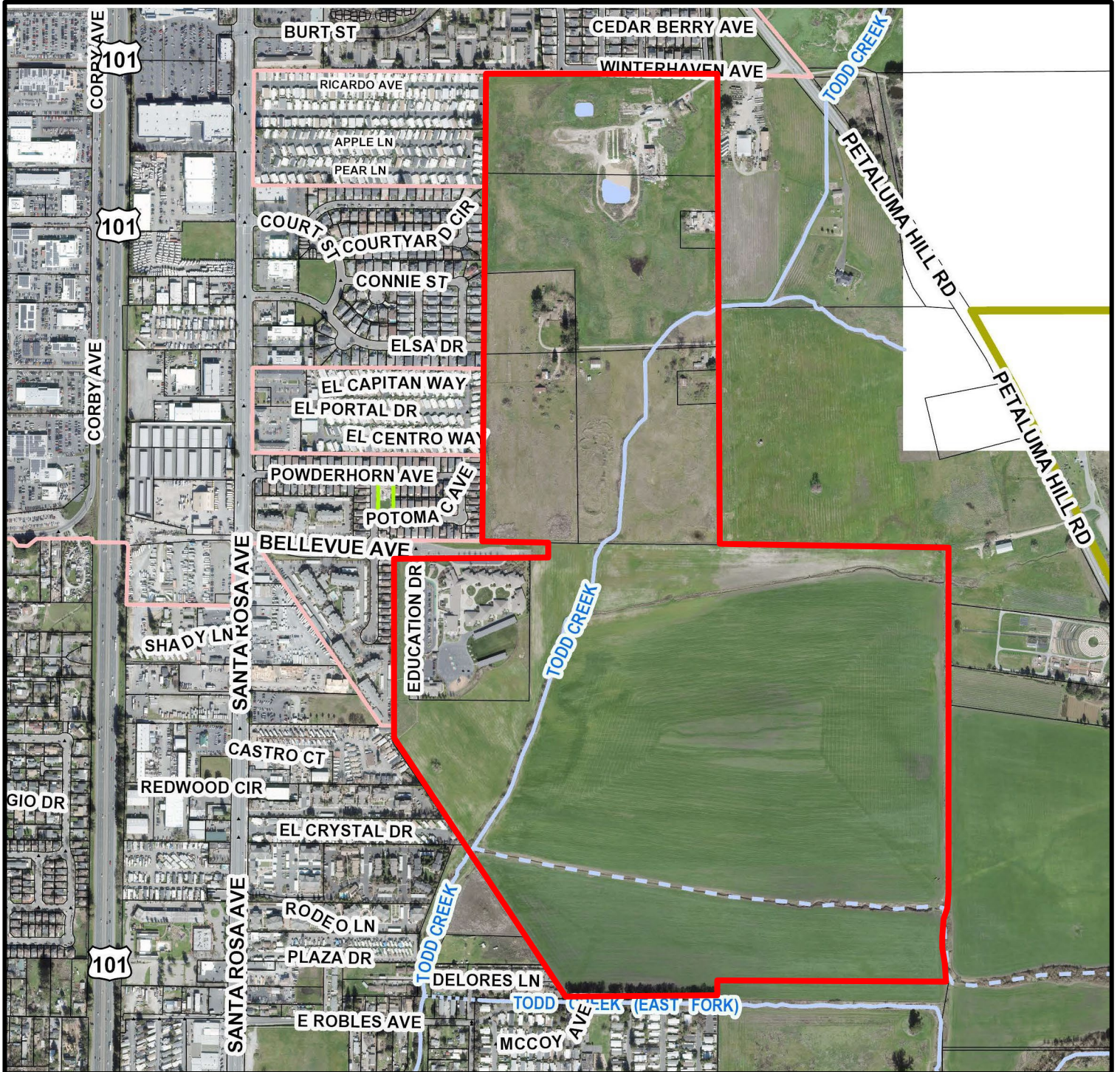


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 Created February 18, 2023 by Information Technology | GIS





# TODD CREEK AREA



SOURCE: City of Santa Rosa GIS

## LEGEND

- City Limits
- Todd Creek Area



1" = 9,600'





## MEMORANDUM

**DATE:** November 13, 2024

**TO:** Chair Weeks and Members of the Planning Commission

**FROM:** Nancy Woltering, Senior Planner

**CC:** Amy Nicholson, Supervising Planner

**SUBJECT:** **Revised Figure 4.4-3, General Plan 2050 Draft Environmental Impact Report (EIR)**

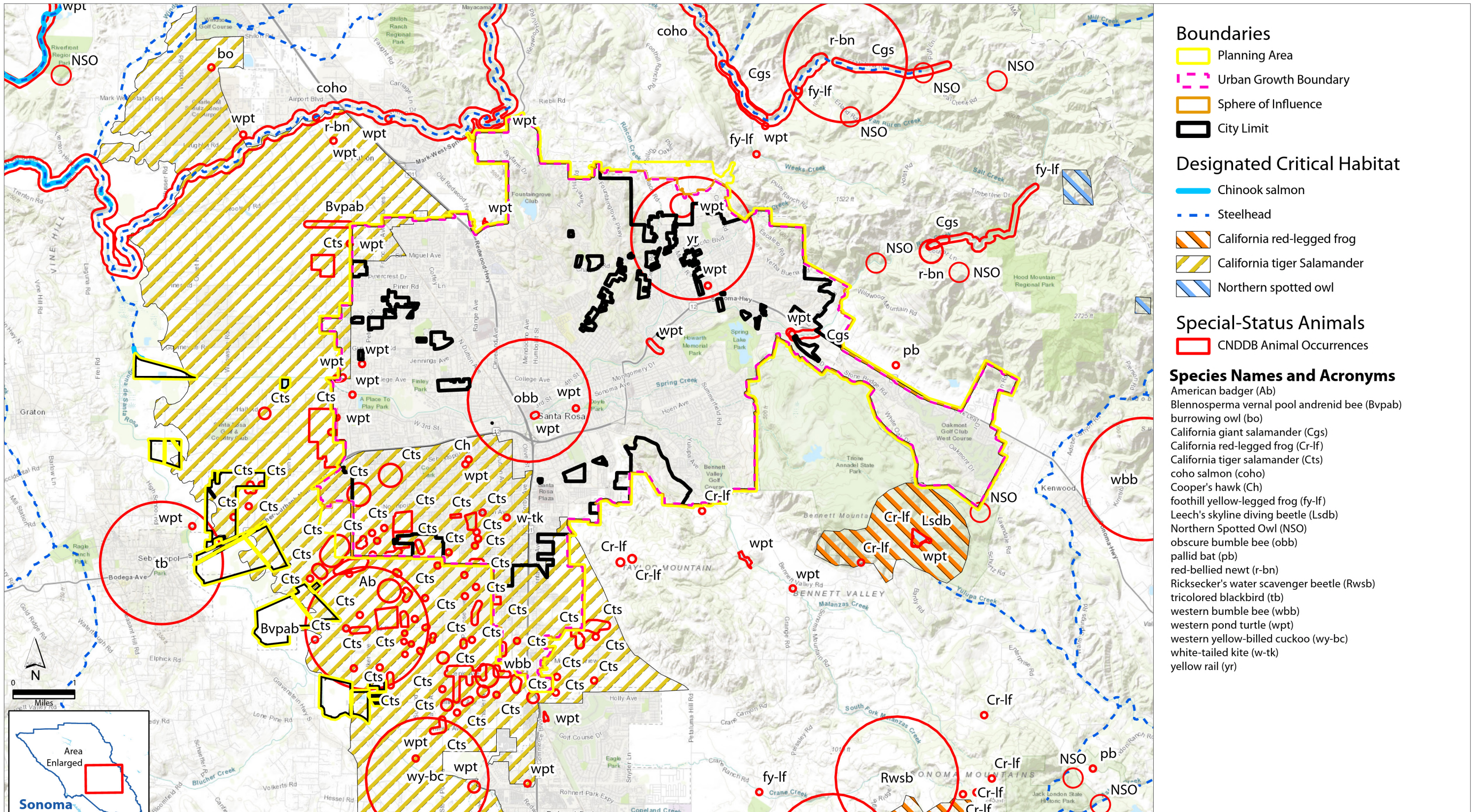
The city received a public comment noting that the species names and acronyms had been left off of Figure 4.4-3, Special Status Animals and Critical Habitats, in the General Plan 2050 Draft EIR. Figure 4.4-3 has been corrected and now includes the species names and acronyms in the legend (Attachment 1). The updated Figure will be included in the Final EIR.

Attachment

Attachment 1: Revised Figure 4.4-3, General Plan 2050 Draft EIR



**BIOLOGICAL RESOURCES**



Source: California Natural Diversity Database release date 4/1/2023 accessed on 4/6/2023; USFWS critical habitat data release date 3/23/2023 accessed on 4/6/2023; Basemap by: ESRI. Map produced by www.digitalmappingsolutions.com 8/5/2024.

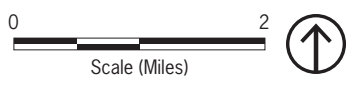


Figure 4.4-3  
Special-Status Animals and Critical Habitats