

Fred Allebach

3/14/26

Four minutes, 900 words

Versus: 37-page Alternatives Report, 16-page Area Profile, 234-page Existing Conditions Report, 36-page Market Demand Analysis, 32-page Affordable Housing and Anti-Displacement Strategy, 316-page Housing Element

Public Comment 3/24/26 City Council meeting Agenda Item 4.1, South Santa Rosa Specific Plan study session

“An effective land use plan views growth through an equity lens, ensuring that improved community amenities do not come at the cost of displacing existing residents.” [Pace University 2021](#)

The Council can direct staff to explicitly link this land use plan to its potential displacement consequences within the Preferred Alternative. This will ensure that land use decisions are directly tied to mitigation strategies.

Plan area demographics

The whole South Santa Rosa Specific Plan (SSRSP) area qualifies as a disadvantaged community (DAC) with a 53% Latino population. The entire plan area is at-risk for displacement. Maps detailing Plan demographics are available on my [Substack](#).

City has obligation to affirmatively further fair housing and address displacement

To date the SSRSP process has focused on circulation, zoning, land use, and infrastructure improvement alternatives and *not at all on the socio-economic consequences of such improvements*. It is well-known that land use and zoning are tied to housing equity issues and *there is not even one paragraph on this in any of the Alternatives*. Why not?

Moreover, how can the public make an informed Alternatives choice if very real downsides are not disclosed up front and none of the main SSRSP documents are translated to Spanish in a 53% Latino area?

Question for staff and Council: when will the City’s obligation to affirmatively further fair housing come into play? Why not integrate this into the Preferred Alternative? Why hide the ball?

Public investment increases value, taxes, and household costs

Public infrastructure improvements like those laid out in the SSRSP Alternatives Report will increase the value of Plan area property and real estate. Publicly enhanced value creates a tripartite effect: increased profits for property owners and real estate investors, increased tax

revenues for the City, and higher costs for the public, i.e. upsides for the bigger fish and downsides for the little fish.

Housing production trends heavily to market rate

Of the 1000s of new housing units planned to be produced in the SSRSP, in practice, market rate units and prices will dominate. How will the Plan Area's majority disadvantaged community afford this? An increase of overall supply won't help if those units are unaffordable to most people.

Selected Santa Rosa 6th cycle Housing Element affordable housing programs:

- Program H-30: AFFH – Anti-Displacement Strategies,
- Program H-32: Tenant Protection/Eviction Prevention Measures
- Housing Element Program 2: Retention of Affordable Units
- Housing Element Program 3: Protections for Mobile Home Parks
- Housing Element Program 5: Displacement Avoidance

The city has all these things on the books and *meaningful actions* to implement them are called for. The City cannot act to materially impede AFFH. There are plans galore and great aspirations stated. However, the programs and plans are awash in weasel words that largely obligate nothing. If the Council does not make new tenant-protecting *ordinances* and insist that Housing Element quantified goals are met in the Plan area, AFFH and anti-displacement actions will be weak tea.

This is a matter of political will; how strongly will the Council stand up for the people the SSRSP stands to displace? Urban renewal is a known displacement cause.

Actions for the SSRSP that comply with the Housing Element, AFFH, and city Anti-Displacement Strategy

I. Zoning & Land-Use Planning

- Embed anti-displacement strategies and AFFH policies directly into the Preferred Alternative.
- Make Plan area residential housing types match the City's RHNA allocation, don't over-produce Plan area low-density housing.
- Mix up the Todd Creek annexation area zoning with: missing middle, mixed use, varying densities, and transit lines so that racial segregation and car-dependence are not built-in up front.
- Make a hybrid Preferred Alternative with #3 as a base template; break up the strip with hubs, industrial zoning in south Plan area to create jobs, put commercial center in Moorland, pedestrian overpass on Robles with access to Todd Creek Greenway,

automobile and ped/bike crossing at Bellevue, no large percent of high-density housing in Moorland unless area is annexed.

- The city needs to recruit commercial center anchor tenants and have commercial/ retail developer Community Benefit Agreements that will serve local primary household needs (Hispanic market in Moorland, Grocery Outlet on Santa Rosa Ave; all hubs: hardware store, pharmacy, medical clinic, laundry, bank, post office, library, bike shop, pet supplies etc.)
- If intentional recruitment of retail tenants is not done, the city will get liquor and convenience stores, pizza, fast food, storage lockers, tire shops etc. See my Substack for a [walkable to services study](#).

II. Preservation of Existing Affordable Housing

- Preserve existing Affordable Housing, specifically mobile home parks.
- Update and strengthen city mobile home park Closure and Conversion Ordinance, consulting with SoCo Legal Aid to include critical tenant-protecting points. See AB 2782 and SB 610. The City's CCO is out of date, needs more teeth.
- Implement a Mobile home park resident's option of first purchase at an independently assessed value.

III. Strengthening New Production & Inclusion

- Strengthen inclusionary ordinance to 15%–20%, developer penciling issues can't be taken on faith, these need to be verified by a third party, independent audit.
- Insist Housing Element quantified objectives are met for lower-income housing production in the Plan Area.
- Pass a Housing Bond for the Plan area; move quickly to city Public Banking where public-serving outcomes are the goal.

IV. Tenant Protections & Anti-Displacement

- Implement robust tenant protections: rent control ordinance, just cause eviction ordinance, and anti-harassment policies.
- Ensure requests for mobile home park space rent increases goes through a fair and impartial accounting of owner finances and that tenant's considerations are heard too.
- Provide funding for tenant legal services.
- Create rental registry to track displacement, one that keeps tenant info confidential from ICE.
- Adhere to the Homelessness Solutions Strategic Plan and Keep People Housed program to prevent homelessness.
- The Anti-Displacement Strategy calls for *targeted interventions* to protect DACs; what will the Council direct in this regard?
- Implement Right of First Return for displaced residents, to any new affordable housing.

V. Economic Stability

- Enact a minimum wage ordinance so that Santa Rosa DACs have a chance to afford the rent at 30% of their annual income.
- Trickle-down economic development and growth has not worked for DACs here or anywhere else; the City needs to make a conscious effort to protect essential workers and to trickle benefits up through the targeted interventions called for by the City.

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South Santa Rosa Specific Plan (SSRSP) Engagement Advisory Committee member

3/18/26

Less than two pages, 700 words, 3-4 minutes

Public comment on 3/24/26 South Santa Rosa Specific Plan Council study session

I see an unacceptable siloing and eliding of equity in the Plan happening that I hope some members of the Council will call out and ask staff for a good explanation of why.

A quick overview of [SSRSP web page](#) with light comments

The SSRSP has multiple objectives: economic development, functional, neighborhood service-oriented, and focused on affordable housing (AH), sustainability, and equity.

The Alternatives Report is presented as a growth and land use changes foundation for the Plan area.

The SSRSP is linked with City economic development and growth, however, business as usual (BAU) growth has caused inequity world-wide. Inequitable growth and past land use/ zoning is why Santa Rosa is socio-economically segregated today.

(In 11/21 the City declared racism to be a human rights and public health crisis and committed to working on *long-range plans* with anti-racist strategies and policies to heal the harms the City helped cause. If the SSRSP Plan area has 53%+ protected classes and city racism is a human rights crisis, equity should by no means be siloed from other SSRSP objectives.)

In SSRSP and City language, sustainability is used as a weasel word; full cost accounting is not a clear, integral planning goal. Social equity is left out of economic and land use formulations. Even though the City explicitly states that equity and sustainable development are SSRSP project objectives, upon close examination, the equity ball is hidden and elided. Right and left policy hands are acting separately at potential cross purposes.

A Market Demand Analysis was done that identifies lower land values in the Plan area. This justifies public investment to bring future returns to the city and developers. This buy low and sell high CIP forecast is what will stimulate growth *and* what will cause gentrification and displacement, inequity, and further segregation.

In Plan Objectives listed on the web page and below, land use, circulation, and infrastructure are linked to equity, AH, and sustainable development *but* the Alternatives give no indication whatsoever of how this linkage is being addressed in a proactive way.

Plan Objectives: Develop a clear vision for land use, circulation, and infrastructure for South Santa Rosa

- Evaluate the need for paths, sidewalks, and street furniture like benches and seating
- Plan for community serving facilities like libraries and parks
- Develop *health and equity policies* to better the community
- Support *sustainable and resilient development*
- Identify areas for capital improvements and community investment

As part of Plan objectives, an AH and Anti-displacement strategy was prepared. The SSRSP web page also says: “A policy framework will be created to support community health, balanced neighborhoods, transportation, affordable housing, economic resilience, and equity.”

Of the AH and Anti-Displacement Strategy, the web page says, “*Ultimately, this report will help to shape the strategies and policies of the SSRSP to preserve affordable housing and reduce displacement while increasing the availability and quality of housing and other community assets.*”

But land use Alternatives plans make no mention of this.... the Existing Conditions Report and Plan Area Profile show there are serious DAC and DUC issues in the Plan area already. The equity ball, while acknowledged, is hidden at the same time. *When and how will the AH and Anti-Displacement Strategy help shape strategies and policy frameworks of the SSRSP to preserve affordable housing and reduce displacement?* From my previous study session comment, what Anti-Displacement Strategy plans have any actual teeth?

From website FAQs: Who is preparing the SSRSP? Dyett & Bhatia Urban and Regional Planners, W-Trans, 4 Leaf Economic & Planning Systems, and BKF Engineers are listed but *there is no mention of who is creating the balanced neighborhoods, affordable housing, economic resilience, and equity policy framework noted above.* There is no mention in the Alternatives Report of how growth and land use may affect AH, equity, displacement, etc.

If no likely social downsides are mentioned in the Alternatives, when will this shaping of policy frames happen? If BAU growth causes inequity, why is this not being addressed up front through full cost accounting? I see an unacceptable siloing and eliding of equity in the Plan happening that hope some members of the Council will call out and ask staff for a good explanation of why.

