

**From:** [Fred Allebach](#)  
**To:** [PLANCOM - Planning Commission](#); [CityCouncilListPublic](#); [McKay, Conor](#)  
**Subject:** [EXTERNAL] Public comment: Planning Commission agenda item 8.1, South Santa Rosa Specific Plan (SSRSP) Alternatives Report  
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Fred Allebach 2/21/29

### **Public comment: Planning Commission agenda item 8.1, South Santa Rosa Specific Plan (SSRSP) Alternatives Report**

For agenda-specific suggestions on the Alternatives Report, skip to Moorland annexation and Hybrid Alternatives discussion below.

See my Substack for a [post](#) showing Plan Area maps and charts that back the points made in this comment.

### **Initial statement and case to send the Alternatives Report and survey back to the drawing board**

The Alternatives Report hides potential Plan social costs as if this were just about land use, circulation, and VMT. In the Alternatives Report there are nine pages on VMT (vehicle miles traveled) and environmental impacts and zero pages or any charts and maps on existing social conditions even though there is objectively tons of material to show these disparate conditions concentrated in the Plan area. \*(1)

It could be a mistake that Planning has been merged with Economic Development in Santa Rosa because this creates a built-in, internal conflict of interests at the department. Why? Because economic behavior is often the cause of social maladies and such causation is rarely analyzed or disclosed because that would take away power from the big fish. A better mission and title would be *Planning and Sustainable Development*, with a full cost accounting, triple bottom line policy frame.

### **Identification of socio-economic disparities**

I wrote an SSRSP public comment letter on 12/14/25 which I assume made its way to Dyett and Bhatia, that noted that the Plan Area is a: SoCo Environmental Justice (EJ) Community, a Plan Bay Area Equity Priority Area, is Santa Rosa top 25% for poverty, has among the lowest HDI scores in the county, has a concentration of former EPA superfund sites and other clean-up sites, is surrounded by low-income Tracts and Block Groups, has a high concentration of mobile home parks, is a food desert, that Moorland is an SB-535 EJ Community, that the whole Plan Area has high displacement risk, that the whole Plan Area has a DAC-level MHI and that some Block Groups in the Plan Area qualify as severely disadvantaged communities. (DAC = disadvantaged community, MHI + median household income, DUC = disadvantaged unincorporated community)

I said in the letter: “If local government takes great pains to identify social and environmental maladies, it is reasonable to expect this same government will address them in a productive way. The tacit remedy can’t default to the very same invisible hand that created these issues in the first place. It’s not good enough to identify shocking disparities and then leave them be through remedies that imply no action.”

None of this registered in the Alternatives Report. Nada.

### **A Trojan Horse?**

This makes the Alternatives Report into a business-as-usual (BAU) Trojan Horse that hides, elides, and minimizes large and likely negative socio-economic impacts in the land use plans. Plan Area DAC and DUC Census Block Groups are exactly where major land use changes are planned. Will the Plan fix the above-noted conditions? How? Why aren’t any of the above pre-existing conditions and their remedies spelled out in the Alternatives? If they will be addressed as part of the Preferred Alternative or in the final Plan, when? How?

Given that the SSRSP is basically a modern urban renewal project, what steps will the city take to not repeat the displacement that characterized 1960s urban renewal and freeway segregation? Why is there zero indication of that in the Alternatives Report? If such an outcome can reasonably be foreseen, why is it ignored in the Alternatives? How can the public give meaningful feedback if likely Plan outcomes are not even mentioned?

### **Spanish outreach materials oversight**

As of 2/22/26, the six-week-long survey has been out for a month and there is no Spanish translation for it or for Alternatives Report, this not mentioned in the staff report. For a plan with 53% Latino the bulk of whom are DACs, this is a fairly serious oversight. If outreach is part of the dance, how can the city not be targeting a critical majority group right up front?

If 53% of the Plan Area is Latino and the bulk of those don’t have a college education or have English as a first language, how will they dig into potential Alternatives consequences if the Affordable Housing and Anti-Displacement Report is not in and won’t be translated to Spanish? How can people make a meaningful Alternatives choice if there are no social costs charts and/or maps that show what might happen to them?

The main SSRSP web page does have Spanish language conversion tab and there are Plan contextual supporting reports about displacement and affordable housing, and references to the Housing Element and [AFFH](#) (Affirmatively Furthering Fair Housing.) This all however, takes a tremendous amount of time and study to understand.

The process has a Trojan Horse quality to it, so much unseen, so much implied, that feedback will never be gotten from the people most impacted. My sense is that the outcome is largely pre-baked. A charade of outreach will be done but bigger fish will decide everything anyway.

If all this highly nuanced and detailed info is only accessible to a person of privilege like me,

and that after weeks of study, what is the accessibility quotient for BIPOC DAC and DUC commenters?

### **The walkable services near transit will save the world story**

I'd like to draw the Planning Commission's attention to a story more grounded in faith and aspiration than fact. This story, linked with ABAG funding and PDAs (priority development areas), is of walkable services near transit that will save the world from excess human impact.

This story is unproven and falls short and fails to address Bay Area/ Santa Rosa systemic segregation and runs counter to the spirit, sense, and letter of AFFH law. Why? Because gentrification is the likely outcome. Because about 100% of single-family home neighborhoods in the city remain unchanged. Because all high density and most RHNA us being dumped on the poorest, strippest, already depressed areas under the guise of advanced environmental planning.

I'm asking decision makers to change the channel, look at their faith regarding the walkable services near transit story, and make an effort to see the actual.

How will the Plan and the Alternatives address the objective fact of poverty and disadvantage in the Plan Area? What chance is there that affordable resident serving retail for the DACs and DUCs in the Plan Area will materialize? Land use changes will magically fix existing negative socio-economic conditions? Can the plans in this regard be made a little more explicit?

If it's the invisible hand that will magically *revitalize* the poor, can we at least disclose that the hoped-for results will come by magic?

See my Substack walkable services study [here](#).

### **Add the Green Checkmate to the story**

The walkable services near transit story is part of what I call the Green Checkmate, where UGBs forbid all outward growth and established wealthy white neighborhoods forbid any dense infill near them. An already redlined status quo is the baseline. If we can't get out of that land use planning box, what's left is the worst locations to focus future development on. It looks like the city is seeking to dump all its RHNA in the least desirable area of town and then assert that this will somehow magically revitalize the area.

From a story true believers' standpoint, SSRSP Alternatives could be seen as virtuous. They could also be seen as a doom loop for the majority DAC population in the Plan Area, where yellow-zoned NIMBYs have checkmated poor and BIPOC populations into the worst areas (against AFFH law) and now promulgate the fiction that stuffing all new growth there will magically revitalize everything.

It looks to me like the rich and wealthy will run off with all the candy like they always do, and that trends of growing inequality can equally well be managed by Bay Area liberals as by conservatives who don't even pretend to care about the less well off.

## **Revitalization, how and for who?**

In my opinion, there is no convincing way to show that "revitalization" will not displace low-income cohorts in Plan Area. Is the public supposed to take it on faith that the Plan will somehow benefit the 6000 low-income Latinos in the plan area? If gentrification and higher costs are the likely outcome, how? Which Alternative addresses that?

When people take the survey, how do they know what vision for the future they are choosing if critical social costs pieces are left unaddressed?

## **Dangers of too much yellow zoning**

Targeted interventions to reduce displacement are not mentioned anywhere in the Alternatives, improved sidewalks and more bus stops are not enough. The huge patch of yellow zoned land in the Todd Creel annexation area is an obvious perpetuation of segregation, makes 2000 new NIMBYs, extends Bennett Valley wealth footprint into Plan area, and is the source and cause of obvious displacement risk. Allowing this much yellow zoning as drawn in all Alternatives would be a BAU Faustian Bargain with outdated past sprawling, segregated development patterns. If dense infill is such a great idea, why not plan it for the Todd Creek annexation area too? A three-minute bus ride off the strip is hardly planet destroying for an electric bus...

## **Send the Alternatives Report back to the drawing board with direction for comprehensive inclusion of social costs**

Does the \$1.2 million ABAG grant mean that some version of SSRSP Alternatives, devoid of social analysis, are a foregone conclusion? Social equity is just not on the agenda? An economic and environmental-only siloed Trojan Horse will squeak through? Somehow the city and county will have to pick up the social equity pieces after a Preferred Alternative is chosen?

I think the City can do better and that the Alternatives Report process needs to go back to the drawing board so it can present a full cost accounting, triple bottom line-based set of alternatives. If we are going to use the word sustainability anywhere related to the Plan, the social pillar needs to be included as an equal piece of planning.

## **Moorland annexation**

As seen in the staff report, a Moorland annexation has been a critical South Santa Rosa planning piece for a long time. The SSRSP itself is specifically a city-planned-for precursor for a Moorland annexation as noted in the staff report. IMHO, Planning Commission members need to weigh in on potential Moorland annexation, be aware of the LAFCO process (I have notes from the Feb. 2026 meeting), annexation rules, the Moorland contiguity issue, the Moorland data issue, Moorland as an SB 535 community, and the politics and biases therein by the LAFCO Board.

Case for Moorland annexation: the Santa Rosa Mobile Estates mobile home park on East Robles Ave. is part of an annexable DUC island that the Todd Creek annexation would have to

take in. This DUC island is in a Census Block Group that is also a Latino community of interest, the same community of interest as in Moorland. This community of interest is contiguous to Moorland. Moorland is in the Plan area, is an SB 535 DUC, is heavily Latino and is next to a DUC Block Group to the east that is heavily Latino. To not annex Moorland as a required piece of the potential Todd Creek annexation would be an example of DUC cherry picking that LAFCO is supposed to prevent. If Moorland won't be annexed as part of the Todd Creek annexation, IMO the whole annexation deal should be off.

Arguments against Moorland annexation: it's not contiguous because the freeway is a barrier, it would cost the developer and the city too much money, there is not enough data to show Moorland is a DUC.

Counter arguments: freeway segregation is a known fact; one of planning's goals is to reduce segregation, the freeway is a barrier to breakdown locally, not accept; the Plan Alternatives spend a lot of time trying to integrate areas west of the freeway; annexation is a past and ongoing goal; there is adequate data, objective and proxy, to show Moorland is a DUC, just have to want to find it (I can demonstrate with Census data from the 2023 ACS Survey update); anti-annexationists always say it will cost too much.

### **Suggested Preferred Alternative, a Hybrid with Alt #3 as a base template**

#### Hybrid: specific Alternative pieces

From Alt #1 put the Robles Ave crossing, greenway connections, and bike/ ped improvements. The Robles crossing will be critical to access to Tiid Creek greenway and From Alt #1 put the higher commercial land use in the southern Plan Area to potentially create jobs by using vacant and underutilized areas. From Alt #2 put a commercial center in Moorland; increased density in Moorland contingent *only if annexed*. From Alt #3 mix high, medium and low density throughout the whole of the Santa Rosa commercial center *and* the Todd Creek annexation area, keep the three commercial centers, keep the Bellevue crossing.

#### Hybrid: zoning and overall Plan Area residential units

In this hybrid Preferred Alternative, reduce whole Plan Area high-density housing units by 1000 overall and reallocate those to higher resource opportunity areas in Santa Rosa. Don't try to stuff all city RHNA on Santa Rosa Ave. Reduce overall density on Santa Rosa Ave and shift remaining density to and pre-zone the Todd Creek annexation area to take a fair share of Santa Rosa Ave-centered density. This is to say, pre-zone the Todd Creek annexation area to be integrated up front with transit and commercial centers worked in there too, reduce the low-density zoning there by 50% and mix all zoning types well. Put the missing middle combining zone throughout the Todd Creek annexation area. Don't allow the Todd Creek annexation area to be a center of creeping single family home unsustainability that pushes Plan Area DACs and DUCs out.

#### Hybrid: market rate housing and penciling claims

Market-rate, low-density, single-family home zoning *is* modern redlining, why even do it? Don't be extorted by a developer cohort who says the yellow zone is all that pencils. For penciling claims to be valid and not anecdotal, the public needs an independent audit and to see the books, see the capital at stake, and to see projected profit margins. Anecdotal and proxy accounting evidence re: *penciling* should not be allowed.

The city should not be extorted to take a project that goes against AFFH and that would be a driver of displacement. A greenway and a big park are nice Todd Creek annexation amenities to walk/ n=bike to, but they will not serve low-income cohorts if they get displaced.

Hybrid: recruit commercial center retail anchor tenants who will actually serve core household needs

The city needs to recruit and get commercial center retail anchor tenants that actually serve the Plan area's low-income residents daily shopping needs and if these cannot be retained then the whole walkable meme is basically a pipedream. Suggested anchor retail: Hispanic market, pharmacy, bank branch, laundromat in Moorland; Grocery Outlet, hardware store, post office, medical clinic, library branch on mid Santa Rosa Ave. If the city can't do this, then what are people walking to for services?

Left to the market, BAU retail does not meet daily, healthy household needs

Without retaining selected retail tenants, Plan area retail will likely end up like it is everywhere else in the city, as nails, salons, tires, cannabis, smoke shop, pizza, massage, car wash, liquor, bars, convenience stores, and fast food and the upshot will be that everyone still needs to drive to needed services because Santa Rosa is a sprawling, car-centric city and Santa Rosa Ave is a nasty strip that can't really be made into a nice place. Without actual resident serving retail, more bus stops and sidewalks and bike paths won't magically fix bus ridership issues, gnarled traffic danger to pedestrians and bikes on huge streets, and when surrounding services are all already sprawled over the city and 101 Corridor.

Hybrid Plan Area housing price points have to match 6<sup>th</sup> cycle RHNA

If new housing that costs 30% and less of annual income of the majority DAC Plan area resident's MHI cannot be built, how do you spell displacement? Plan Area housing should at least match RHNA percentages mandated for Very Low, Low, Moderate and Above Mod MHI. In no way should a plan be approved for 2000 market rate, low density units concentrated towards Petaluma Hill Rd. and then more market rate on Santa Rosa Ave as well. How do you spell segregation?

**Beware Alt 1:** high chance that mixed use retail will fail considering online shopping trends and doubtful if city can get appropriate resident serving anchor tenants in mixed use commercial or commercial centers.

**Beware Alt 2:** putting all new changes over a serious Latino DAC looks like a major displacement recipe.

**Overall beware:** If the SSRSP and Alternatives are a vision for the future, without addressing obvious social costs, how is it not business as usual segregation and recapping 1960s mistakes of urban renewal and freeway segregation? Yes, it could be seen as a virtuous cycle plan for Santa Rosa from the vantage of top players and the whole growth, jobs, tax revenue story. It can also be seen as a displacement doom loop for the 6000+ DACs in the Plan area. How does the Plan address a likely doom loop outcome for this DAC and DUC cohort? Where is that chart, those figures and that analysis in the Alternatives Report so survey takes can make a choice based on that info too?

\*(1)

This lack of addressing social costs is a kind of planning Kabuki theater, a blind spot, where the tremendous, shocking evidence of social inequity, while known and studied with a solid government-study paper trail, ultimately gets hidden and ignored, and then where addressed, is strategically done so as to not obligate any substantive action.

Why do we still have systemic segregation in the deep blue Bay Area if there is not a deep countervailing force to prevent integration and progressive planning? Why do I have to fight to get what's clearly known front and center in things like the SSRSP?

My take is that yellow-zoned, white, Boomer NIMBYs are the main electorate; they determine the bulk of politicians, who then hire the staff, who then appoint the commissions. Miles's Law and yellow-zoned sensibilities run the show here. This is why there are so few elected progressives in a supposedly deep blue area. This is why unsustainable low-density housing interests rule, protect their turf from change and force all new growth into objectively the worst locations and then rationalize that this is not an AFFH problem. The systemic racism is so deeply ingrained that white people of privilege can't even see it, as noted by Ta-Nahisi Coates in his books.

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

Ken Kesey