

From: [Frederick Allebach](#)
To: [PLANCOM - Planning Commission](#); [CityCouncilListPublic](#); bos@sonoma-county.org; PlanningAgency@sonoma-county.org
Subject: [EXTERNAL] Public comment on South Santa Rosa Specific Plan (SSRSP) Preferred Alternative
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Fred Allebach

SSRSP Engagement Advisory Committee member

Co-Chair Housing Committee, Santa Rosa-SoCo NAACP Branch

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Where's the beef? Public comment on South Santa Rosa Specific Plan (SSRSP) Preferred Alternative

Prelude

My comments here are essentially the same as I've made all along, the Preferred Alternative does not appear to take Plan area inequity, potential gentrification and displacement seriously. Mitigations for the latter are not explicit. Actions are not disclosed.

Given that housing has the Three Ps, production, protection, and preservation. And that production of affordable units is currently economically infeasible. We are left with two areas to mitigate inequity and displacement in the SSRSP. Both preservation and protection involve passing and enforcing ordinances to protect residents, tenants, and wage earners.

Since the SSRSP anti-displacement strategy calls for targeted actions, questions for decision makers: are current ordinances and laws adequate as is? Do we need more? If more, please say exactly what more. Below I will make a case for more.

The "Preferred Alternative, will serve as the foundation of the land use and transportation changes associated with the Specific Plan."

Land use here serves as a place holder to subsume all the Plan's potential socio-economic consequences, good and bad, yet while the Preferred Alternative (PA) does mention displacement and equity. Staff reports keep referring to the SSRSP and the PA as being only about land use and transportation, leaving actions to address displacement and equity in a planning limbo. The PA and staff report say displacement and equity are being *evaluated and may be enacted on*.

The basis for action is in the four core SSRSP technical background reports (Existing Conditions Report, Plan Area Profile, Affordable Housing and Anti-Displacement Strategy, Market Demand Analysis)

"... four core documents that collectively provide a *comprehensive foundation for planning* (italics mine). The Existing Conditions Report, Plan Area Profile complements this with detailed insights into population, housing, zoning, and employment characteristics to support data-driven growth aligned with community needs. The Affordable Housing and Anti-Displacement Strategy evaluates current affordability conditions and policies while *evaluating* new approaches to preserve housing and reduce displacement. Finally, the Market Demand Analysis assesses economic and real estate trends using both public and proprietary data to guide feasible and sustainable development strategies."

How do these four core documents play into the SSRSP Preferred Alternative (PA)? Will we see them as explicitly referred to as obligatory components?

If these are part of the *comprehensive foundation for planning*, why are they not or barely mentioned in the PA plans?

The scope of SSRSP area inequity is known from the core background reports. Why is there about only one sentence on this in the PA? This is where IMHO city Planning Commission, City Council, and BOS need to step up and not take a technocratic spoon-feeding of what this is all about. What it is, is a modern urban renewal project.

We know in the past urban renewal was called *urban removal*. It acted to segregate and displace. Urban Renewal was a national planning boondoggle. Assuming no one wants to do that again, where in the staff report is any indication of mitigating urban renewal's negative externalities? Why doesn't the PA even mention this? Planning means plans to address possible negatives. Why are staff and consultant doggedly not addressing this and potential negative externalities? When will they be addressed, by whom and where? Details are needed.

Meaningfully address displacement and equity considerations

Decision making bodies have the chance now to specifically direct the SSRSP Preferred Alternative (PA) so that it does indeed meaningfully address displacement and equity considerations. Unless the City Planning Commission, Council, and Board of Supervisors (BOS) members speak up to ask for these things to be included, inequity and displacement mitigations will be underplayed and manifested as conditional and unrequired.

If you are given no clear SSRSP inequity and displacement mitigation options in the staff report, you have to generate those options yourselves. For help you could look to the many non-profits here that specialize in addressing these issues: Legal Aid, NAACP Branch, Health Equity Rising, North Bay Organizing Project, SoCo Tenant's Union, North Bay Jobs with Justice, SEIU, Working Families Party, SoCo Mobilehome Owner's Association

Preferred Alternative Survey

The 26-page-only Preferred Alternative (PA) is not translated to Spanish in a majority Latino area. An 8-page abbreviated summary is available in Spanish.

The survey has questions about the PA, land use, and transportation Alternative features, looking for feedback. None of the questions however broach displacement and equity issues and give respondents an opportunity to weigh in there. Feedback is steered away from potential and likely negative externalities and along a narrow channel that avoids addressing these core, foundational issues. Isn't planning supposed to have analysis of what could go wrong? If the PA is the foundation, where are specific equity and displacement policy and actions aspects built on it? How can decision makers direct here when no negative externality options are on the PA table? That these are being evaluated and might happen is not good enough to decide on now; now is the time to ask staff, "where's the beef?"

Synthesis of SSRSP and PA feedback?

If the PA is a *synthesis of feedback* received and "Many community members, in addition to the Santa Rosa and Sonoma County Planning Commissions, and City Council members emphasized the need for the establishment of anti-displacement and other equity-related strategies with the adoption of the Specific Plan", why is there no mention of how this feedback will be folded into the adoption of final Plan? When will this feedback turn into any

actions?

Staff and the consultant have not synthesized displacement and equity feedback into the PA. All that's said is that something *may* be done and that Plan gentrification and displacement consequences are being evaluated. We are at the approval stage here; inequity and displacement mitigations need to be explicit.

If the Council directed staff to pay attention to equity issues and the SoCo Planning Commission came out very strong with the same, is the above quoted sentence all we get in the PA? Where's the beef? This is like a cat and mouse game of hiding the equity ball. Why isn't there more direct mention of these issues in the staff report and in plans for the final Plan?

SSRSP decision maker meetings

The past SoCo Planning Commission SSRSP study session is not mentioned in the staff report sequence of SSRSP decision maker meeting dates, but is mentioned obliquely at another point. The strongest public body voice for Plan-area equity is not noted in the staff report. I pointed this out before the current staff report was written and was given assurances this was not intentional. However, with the continued omission of listing the SoCo Planning Commission SSRSP meeting, what does that say about giving credence to the one meeting where equity and displacement concerns were forcefully voiced?

General Plan consistency?

If General Plan Elements must align, how will the Plan ensure that AFFH (Affirmatively Furthering Fair Housing) and RHNA (Regional Housing Needs Allocation) are complied with in the 6000 new Plan-area housing units? 40% of Plan area units will be for Low and Very Low-income households? Santa Rosa has a significant, long-term Very Low-income unit RHNA underproduction. When will we make that up and address the core of the current housing crisis?

Keeping essential workers close to work so that VMT (vehicle miles traveled) and GHG (greenhouse gas) footprint are kept down is a core planning goal. The MTC (Metropolitan Transportation Commission) SSRSP grant is climate-centered. The housing has to align and the City make the incentives to get what housing is needed.

Annexation

The staff report sheds light on how Moorland and Todd Creek area annexations have been precursors to the Plan. The Todd Creek pipeline project annexation, if accepted by voters, would be a shoo-in for the City because of how 2000 market rate units would stimulate the economy; Todd Creek is a money maker overall. Moorland annexation as part of Todd Creek however, has been resisted because it will cost money and resources. Looks like anti-SB-244 cherry-picking to me.

The approx. 2000 low-density Todd Creek market rate units are reasonably going to be a prime cause of SSRSP gentrification. Why plan for more obvious white, wealth segregation? How will the City's AFFH plans align with this? Todd Creek pipeline area land use should be rezoned with a much greater variety so as to plan for more diversity there, not more monoculture. Low density zoning is exclusionary zoning, the SSRSP does not need to add to that in Santa Rosa.

Santa Rosa Ave MHPs (mobile home parks) pro-action seems warranted

As we know, MHP residents in SoCo and its cities are under threat of hostile takeover by profit-driven speculators who act to force residents out through sham closures and illegally raising space rents, fees, and costs. This is a direct threat to the area's naturally occurring affordable housing.

Unincorporated and maybe incorporated Santa Rosa Ave MHPs are on wells in a generally polluted aquifer area. These places need to be on city water and the SSRSP would presumably do that ASAP. As well, SoCo does not have MHP land use designation and could rezone as part of Plan approval.

SoCo and the City could also adopt updated and strengthened MHP CCOs (Closure and Conversion Ordinances). MHPs are 18% of the housing in the SSRSP Plan area.

EAC (Engagement Advisory Committee) process

We don't need surveys or specific feedback to see the Plan area socio-economic disparities and know that affordable housing at 30% and below of annual income is the most critical aggregating sustainability indicator. Core displacement mitigations need to center on Affordable Housing and the Three Ps, period. This means Plan-area Moderate, Low, and Very Low-income units need to be built, preserved and protected, proportional to the majority lower-income population in the Plan area.

The PA needs specific plans for this, and for MHPs.

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