

From: [Buckheit, Lani](#)
To: [PLANCOM - Planning Commission](#)
Cc: [Meads, Shari](#); [Wixon, Mike](#)
Subject: Late Correspondence Items 7.1 and 10.2
Date: Tuesday, September 12, 2023 5:06:00 PM
Attachments: [7.1 - COMBINED Late Correspondence 9.12.pdf](#)
[10.2 - Late Correspondence.pdf](#)

- PLEASE DO NOT REPLY TO ALL -

Chair Weeks and members of the Planning Commission,

The reason for this email is to provide you with late correspondence for items 7.1 – Draft GP and 10.2 – Coffey Self Storage, scheduled for this week’s PC meeting on 9/14. Please see attached.

This will also be added to the agenda.

Thank you!

Lani Buckheit | Administrative Secretary

Planning & Economic Development Department | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404
Tel. (707) 543-3226 | lbuckheit@srcity.org



To: [SR Forward](#)

From: [Mike U](#)

Date: July 17, 2023

Subject:

Re: [EXTERNAL] Comment from SRGP Website

> Comment Submitted by: Name: Mike

. -----Original Message-----

. From: info@santarosaforward.com <info@santarosaforward.com>

. Sent: Monday, July 17, 2023 8:02 PM

. To: info@santarosaforward.com

. Subject: [EXTERNAL] Comment from SRGP Website

>

. Organization: Concern citizen

. Email: msuengr@att.net

. Comment:

Comment: It is obvious that the draft was put together by Liberals.

. There is no scientific evidence there is man made climate change. There
. is natural climate patterns. This State is pushing this climate change
. as an excuse to tax and spend more!

. See all comments.

. https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.santarosaforward.com%2Fmail_forms%2Flisting&data=05%7C01%7Csrforward%40srcity.org%7Ca7033a5b12774d8c2add08db8a1f17f3%7C0d511985462e4402a0b038e1dadf689e%7C1%7C0%7C638255638382328999%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1hZWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Z58XDE7N2GNQgbRZNIbbrzrsU0xtt2HQOXALsycml1eU%3D&reserved=0

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. You received this message because you are subscribed to the Google Groups
"Santa Rosa Forward" group.

From: [Jeff Crowder](#)
To: [SR Forward](#)
Subject: [EXTERNAL] The City's General Plan Draft - August 2023
Date: Sunday, July 30, 2023 11:13:33 AM
Attachments: [Spring Lake Dam Side Algae Bloom_20230730.png](#)

Dear SR Forward,

I have an idea to fix Spring Lakes low water level in the summer months. By my Reckoning there are 3 Springs Creeks, one in Annadel towards Spring Lake, an Overflow Spring Creek on Parktrail Dr. then on on Summerfield that never stops having water in it, all summer long. You could loopback Spring Creek on Summerfield Rd. Through the new Hwy 12 park back to the Lake since it is the same Anadel Trione water. ~70' pump height to get it back to the Lake and this is only needed for about a month out of the year.

Or you could try to hit the 2nd spring on the same property using seismic sonar viewing equipment . It passes by the dock and parking lot at the campgrounds spaces at the north side of the parking lot, about 40' down. Or Set a Well near the Rager Toll Both where the ground seems to be saturated and get that Ground Water back.

There is also a 3rd Spring that runs down Annadel Heights Rd. And Passes the same Summerfield Rd. near Strawberry School. Same Park Water Source as the Lake Spring.

There is also a Trident in the hills and trees at the end of Channel Dr. in Anadel, with elevation drop to the tanks at the lake and a road already up the hill. A Siphoned Well could be placed there getting clean water Straight to the Tanks or to the new water line ran in that road with no Electricity Cost to the City.

[RECON-06]

Quit complaining about water issues in this city and upgrade those trunk line diameters. All for street lighting and sidewalk maintenance revenue, and no pipe maintenance. Surcharges for Residential Irrigation Drips to the Street Gutter are your Issue, especially here in this City.

Taylor Mt. has tons of water, there are also 3 Manzanita Creeks 2 draining from Taylor Mt. and the Creek Splits in two Directions at Grange Rd.

-Δ-----¢

Also, once Farmers Ln. to Kawanna Springs Rd. gets put in, Hoen Ave. will be a route for nighttime city racers & joyriders and the Hwy Extension will be desirable to allow a quick way towards Kenwood. So don't put too many damn hoses next to where the Highway will be near the new park because the Highway will be funded soon.

Sincerely,
Jeff Crowder

Sonoma County Bicycle Coalition

COMMENTS ON DRAFT GENERAL PLAN

SECTION 3: CIRCULATION, OPEN SPACE, CONSERVATION, AND GREENHOUSE GAS REDUCTION

HIGHLY APPROVE

P3-2 This General Plan 2050 aims to expand transportation options further and support the mobility needs of everyone in Santa Rosa to reduce dependence on single-occupant vehicles and fossil fuels.

P3-9 The City's Bicycle and Pedestrian Master Plan calls for adding Class I and Class IV facilities (separated paths) and upgrading existing Class II and Class III on-road facilities to Class I or Class IV.

P3-15 Policy 3-1.2: Promote land use, Transportation demand management (TDM), and street design practices that reduce VMT and dependence on single-occupancy vehicle trips.

Action 3-1.8: Use the Urban Streets Design Guide and the Urban Bikeways Design Guide to plan roadway improvements and new development.

Action 3-1.9: Continue to reduce or eliminate vehicle parking requirements and increase bicycle parking to prioritize a car-free environment in high density areas.

P3-16 Policy 3-1.3: Improve infrastructure, sidewalk and bicycle linkages, and access to transit and active modes of transportation to better meet daily commuting needs and minimize VMT, especially in EPAs and Areas of Change.

Action 3-1.27: Implement traffic-calming techniques on local streets that experience high-speed or cut-through traffic to improve neighborhood livability

Action 3-1.28: Include traffic calming by default in regular paving and maintenance projects unless infeasible due to engineering or in cases where transit or emergency access may be blocked.

P3-19 Action 3-2.25: Improve intersections of bicycle and pedestrian multiuse trails with highly trafficked roads through improvements such as painted crosswalks, beacon lights, or other improvements as warranted to increase user ease and safety. Ensure that there are no physical barriers to bicyclists or pedestrians as they cross high traffic roadways at intersections with Class I or Class IV facilities.

Action 3-2.26: Update the Zoning Code to require the highest level of bicycle facility protection that is practicable, as part of the development review and entitlement process, to encourage bicycle use and comfort.

P3-24 Action 3-4.3: Coordinate with public and private entities to link open spaces with a network of paths and trails, including Sonoma Water access roads and the Bay Area

Ridge Trail. *Comment: YES PLEASE! There are many nice gravel roads along waterways...many of which are locked and marked "no trespassing", I assume to keep homeless folks from camping there.*

PROBLEMS

P3-7 *Comment: Why widen some roads when you are putting others on a diet?*

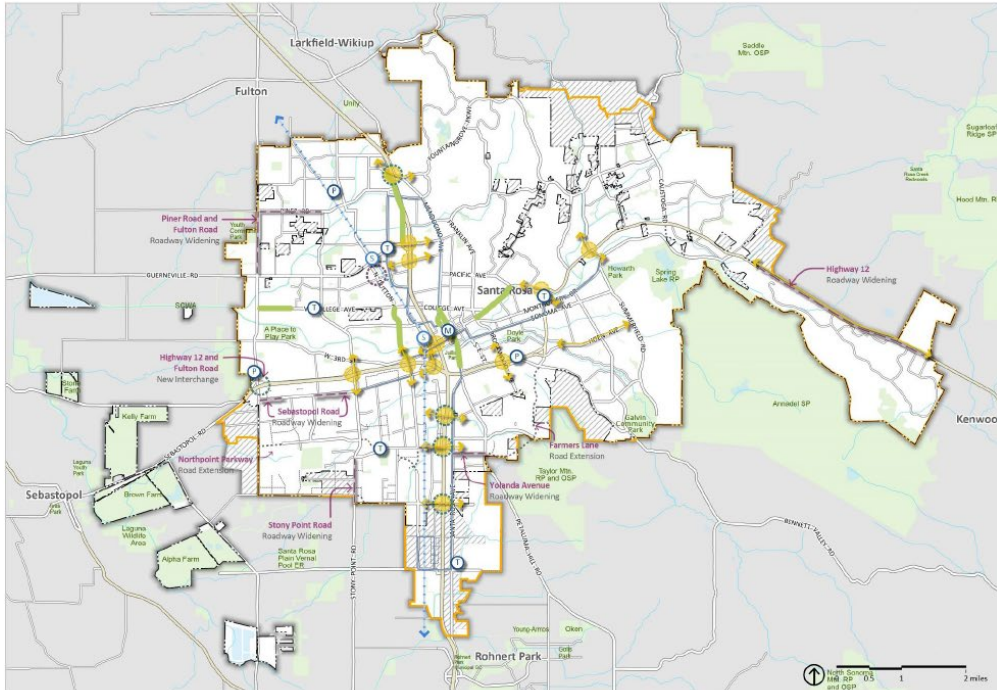


Figure 3-4
Planned Transportation Network Improvements

- City Limits
- Urban Growth Boundary
- City Sphere of Influence
- Planning Area
- Creeks and Waterways
- Parks and Open Space
- Outside of Planning Area

Transportation

- Highways
- Major Roads
- SMART Transit Center
- SMART Rail Line
- Transit Hub
- Transit Mall
- Transit Park-and-Ride
- Roadway Widening
- Road Diets
- New Major Roads
- New Minor Roads
- Improved Pedestrian/Bicycle Connections
- New or Widened Auto Overpass including Pedestrian/Bicycle Enhancements
- New Pedestrian/Bicycle Rail Crossing
- High Frequency Bus Route (10-15 min. headways)

City of Santa Rosa
SANTA ROSA GENERAL PLAN 2010

P3-12 *Comment: Where are the Class IV?*

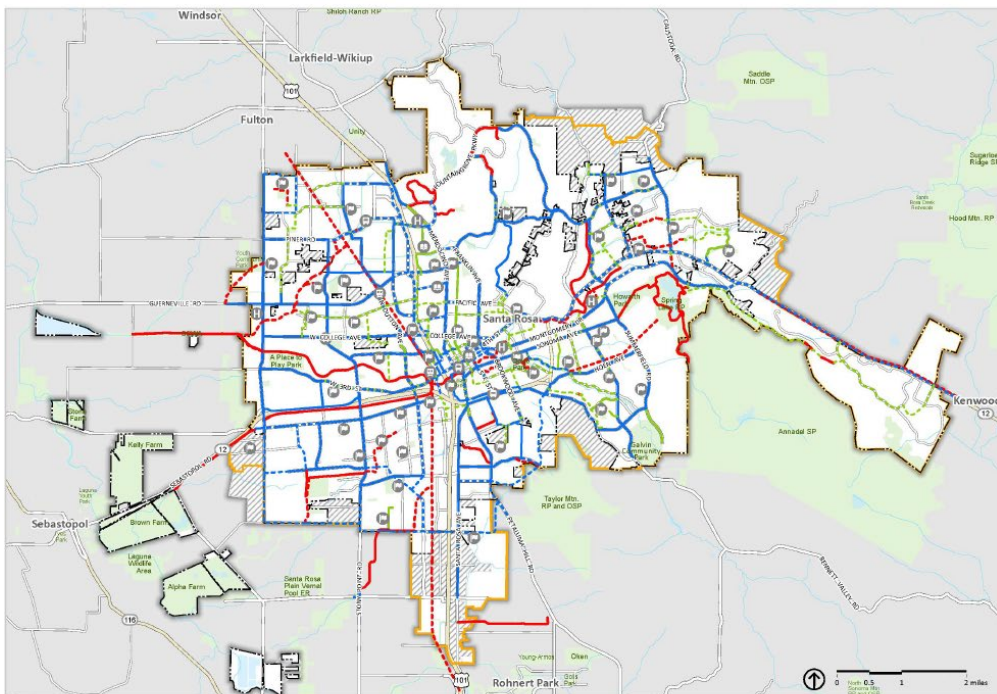


Figure 3-6
Existing and Planned Bicycle Network

- City Limits
- City Sphere of Influence
- Urban Growth Boundary
- Planning Area

Existing Bike Route

- Class 1
- Class 2
- Class 3

Proposed Bike Route

- Class 1
- Class 2
- Class 3

Destinations

- School
- SMART Station
- Transit Hub
- Hospital
- Library

City of Santa Rosa
SANTA ROSA GENERAL PLAN 2010

Adapted from the 2018 Bicycle and Pedestrian Master Plan.

P3-13 **Boulevards** provide multilane access to commercial and mixed-use areas and carry some regional traffic, with vehicle speeds of 30 to 40 mph. Local transit operates on some boulevards.

Avenues connect neighborhoods to commercial centers and other neighborhoods and serve as major transit routes. Vehicle speeds are typically 35 mph.

Main streets provide access to neighborhood commercial and mixed-use areas. Vehicle speeds are typically 25 to 30 mph. Local transit operates on some main streets.

Comment: According to NACTO guidelines cited in Action 3-1.18, streets with speeds >25 mph should have PROTECTED bike lanes (Class IV)!

P3-16 Action 3-1.27: Implement traffic-calming techniques on local streets that experience high-speed or cut-through traffic to improve neighborhood livability: Add rumble strips.

Comment: As a cyclist, riding over rumble strips is very discombobulating and could cause inexperienced cyclist to fall. They are not appropriate where people will cycle!

SECTION 2: LAND USE AND ECONOMIC DEVELOPMENT

APPROVE

P2-27 Policy 2-2.2: Encourage a compact rather than a scattered development pattern for new development proposals, particularly in Areas of Change.

Action 2-2.7: Require compact development that includes services within one-half mile walking and biking distance of residential neighborhoods.

P2-28 Action 2-2.9: Encourage the creation of shared parking areas and shared driveways / vehicle access points in private development.

Comment: I live in a mixed-use development in which parking is shared between commercial employees during the day and residents at night. It has worked well for almost 20 years but is getting more challenging as more of the residents are retired and thus home more of the day.

P2-32 Action 2-6.2: Allow neighborhood centers that include small grocery stores, cleaners, and similar establishments where they can be supported within walking and biking access of residential uses. Ensure that neighborhood centers do not create unacceptable traffic or nuisances for residents due to the hours and nature of their operation. Encourage residential developments that are not within walking distance of convenience shopping to provide small centers on-site.

P2-33 Action 2-6.6: Allow limited support retail and business services—such as cafes, delis, and dry cleaners—where the land use classification is Office or Business Park.

Comment: This will reduce VMT as office workers do not have to go off-site to eat, conduct errands, etc.

Sonia Taylor
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Great6@sonic.net

8 August 2023

Amy Lyle
Supervising Planner- Advance Planning
City of Santa Rosa

Via email

Re: Comments to Santa Rosa General Plan Update

Dear Amy:

Following are my comments on the Santa Rosa General Plan Update documents, including questions, suggestions and comments.

Of course, if you have any questions, please let me know.

Otherwise, thanks for this opportunity to review and respond to the Santa Rosa General Plan update.

Very truly yours

Sonia Taylor

COMMENTS TO SANTA ROSA GENERAL PLAN
8 August 2023
Sonia Taylor • 707-579-8875 • great6@sonic.net

CHAPTER 1: INTRODUCTION

Page 1-12, "SAFE" paragraph: Add being safe from hazards.

CHAPTER 2: LAND USE AND ECONOMIC DEVELOPMENT

Page 2-10, map: I believe #10 Flamingo Center and #11 Montecito are switched. #10 is where the Montecito Shopping Center is, and #11 is where the Flamingo Hotel is. Should be swapped.

Page 2-13, "Notes": Is 25% the current maximum density bonus allowed by CA housing legislation? And, does CA housing legislation limit density bonuses to provision of affordable housing or public amenities? If state law allows higher density bonuses, this Note should accurately reflect the maximum that is allowed/required to be permitted.

Also, isn't CA housing legislation now allowing housing on lands zoned for retail/commercial/parking? If so, that should also be reflected, at least in a Note.

Page 2-20: Are people living and working in the identified "Areas of Change" aware that they are in those areas? Same question for property owners in those areas. What are the plans for outreach to those people to ensure that their comments are reflected in this GP?

Page 2-21: I have long objected to PDAs without accompanying specific plans. In particular, the upper portion of the Mendocino Avenue corridor has never had a specific plan – all that exists is a 2009 Mendocino Avenue "Corridor Plan" that goes from College Avenue and Steele Lane. Further, I strongly object to any areas in or adjacent to the WUI being included in a PDA (I am aware that this is not Santa Rosa's decision to make, but SR should advocate for exclusion of WUI areas from PDAs – see below). For example, Journey's Inn is not in the WUI, although is directly adjacent to the WUI, and during the 2017 Tubbs fire burned to the ground with people losing their lives. PDAs shouldn't be in high hazard areas.

In fact, ABAG prepared a document published in January 2018 (hasn't been updated, which I find interesting) called "Review of Bay Area Wildland Urban Interface: Risks, Plans, Strategies." This report is available at: <https://abag.ca.gov/tools-resources/digital-library/fire-study-finalpdf>

At page 42 of the pdf of the above document, the following is stated:

Local and regional growth strategies should focus future growth outside of highest WUI risk areas. As part of the next Regional Transportation Plan and Sustainable Communities Strategy, ABAG and MTC will consider natural hazards and climate impacts in areas of focused growth. The current plan designates Priority Development Areas, that are projected to absorb the majority of the region's forecasted growth. By area, only .5% of PDAs are in fire hazard severity zones and half of the acreage exposed to fire hazard severity zones is in a single PDA [Pretty sure this is in Santa Rosa!]. Continued focus on driving future growth into PDAs will support a goal of limiting residential exposure to wildfire. Local governments who have areas of growth outside of

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PDA's should work to reduce the amount of new construction occurring in the highest fire risk areas.

Santa Rosa should ensure that ABAG indeed removes all WUI areas from its identified PDA's.

Page 2-23: Again, I object to PDA's without specific plans. Obviously, both the Santa Rosa Avenue corridor and the Mendocino Avenue corridor need specific plans, as well as the remainder of Sebastopol Road, if they are to remain as PDA areas; otherwise they should not be included as PDA's. See comments about all WUI areas being excluded from PDA's, above.

Page 2-25, Action 2-1.1: This should include "prepare Specific Plans for Mendocino Avenue corridor and Santa Rosa Avenue corridor, although no areas in the WUI should be considered a PDA." It should also include the need for a Specific Plan for the portions of Sebastopol Road outside of the existing Roseland Area specific plan.

Page 2-25, Action 2-1.2: This is absolutely backwards. Housing should never be permitted in industrial areas, adjacent to industrial areas, or near enough to industrial areas that the housing will be impacted by the industrial uses. And, if housing is foolishly put in those locations, it shouldn't be the industrial uses who have to "accommodate" the industrial uses, but the other way around. No community can be healthy without adequate industrial areas, which often are required to make noise (as well as having other impacts) up to 24-hours/day. Frankly, every time housing is impacted by industrial uses, the industrial uses lose, and have to move, which is contrary to how it should be. I would request removal of this Action from the GP. If anything in this regard is included in the GP, it should be focused on how residential developments adjacent to industrial uses should be required to accommodate the industrial uses by such techniques as being constructed with excessive insulation, thicker walls, better windows, etc. to minimize noise, light and other impacts.

Page 2-25, Action 2-1.5: Amend this Action, or add a new Action that states that any open spaces required of private development must be constructed and available to the public with the first phase of the development. (There's a long since approved development in Fountaingrove that is all but complete, but I don't believe the public open space required by the original approvals will be "required" to be finalized until the very final stage of the development is complete, which could be another decade, or more).

Page 2-25, Action 2-1.9: Please review the revised proposed CAL FIRE maps showing new fire hazard severity zones on SR's southern border. If necessary, ensure that the WUI is expanded to reflect the probable fire danger areas, and ensure that the risks from this fire danger is adequately reflected in any specific plan. Consider a subscription to Risk Factor, which is the only publically available organization I'm aware of doing nationwide risk analysis for fire, flood, heat and wind. See <https://riskfactor.com/>

Page 2-26, Action 2-1.16: I agree with this action, but have to point out, as I did above and will below, that housing and industrial uses must be kept separate. For industrial uses to thrive, they cannot be required to accommodate housing/sensitive uses, and this should be explicitly stated in every

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policy/action about identification of and preservation of lands designated and zoned for all types of industrial uses.

Page 2-26, Action 2-1.17: Ditto comments above. Even “light industrial” and housing are not compatible.

Page 2-26, Action 2-1.18: Allowing residential uses in areas without industrial uses can be OK, although the usual largest conflict is with trash pickup for commercial operations (discussed below in my comment to Action 5-7.7). Commercial uses can also be compatible with industrial uses, and should be encouraged when appropriate.

Page 2-26, Action 2-1.19: Stop putting housing adjacent to, around and near all industrial uses, even light industrial. This should be explicitly stated in every policy/action about identification of and preservation of lands designated and zoned for all types of industrial uses.

Page 2-27, Goal 2-2: This is a minor graphic notation – some of the Goals throughout the GP are missing a space between the colon and the goal itself.

Page 2-28, Policy 2-2.3: I presume “designed to reduce impacts to community members” means not just any new residents of these mixed use developments, but existing residents who are adjacent to these new mixed use developments. Please clarify.

Page 2-28, Action 2-3.5: Add “unless safety or hazard constraints (such as fire, flood and/or earth quake)” make the midpoint impossible to achieve.

Page 2-32, Action 2-5.9: This did not go well when food trucks were permitted on the White House parking lot site in downtown Santa Rosa. The existing restaurants on 3rd, 4th and 5th streets were negatively impacted. At least that’s my recollection. I’d presume grocery stores wouldn’t be very happy with a farmers market operating near their stores, either, and suspect that permanent stores selling craft items would also not welcome competition from mobile craft vendors. While I generally support the goal of this Action item, I believe that support for existing permanent businesses requires that “all” nonresidential zoning districts be refined, perhaps with clear time limits to ensure the uses are temporary in nature.

Page 2-33, Action 2-6.7: I’ll say it again. HOUSING DOESN’T BELONG IN OR AROUND INDUSTRIAL AREAS, and industrial uses should not be required to spend money and make changes to make it “easier” for housing to coexist with the industrial uses. In fact, the policies to protect industrial lands is undermined by this action.

Page 2-33, Action 2-6.9: This analysis should include such considerations as whether the change to the lands designated for industrial uses will impact other industrial lands in the area. In other words, if you put housing or another sensitive use on a previously industrially designated parcel, that will affect all other surrounding industrial parcels negatively. Frankly, I believe that any industrially designated/zoned

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lands removed from those uses should be required to be replaced somewhere else within city limits, 1 to 1.

CHAPTER 3: CIRCULATION, OPEN SPACE, CONSERVATION, AND GREENHOUSE GAS REDUCTION

Page 3-18, Action 3-2.16: While this is a laudable goal, the reality is that shutting down access to neighborhoods through cul-de-sacs for both pedestrians and bicyclists significantly improves problems neighborhoods otherwise face from homeless individuals.

Page 3-19, Action 3-2.29: The shuttle established to get people between the SMART train and the airport is an example of exactly the type of last mile solution that should be established county-wide.

Page 3-21, Action 3-3.1: Given the proliferation of state laws allowing by right housing construction, this requirement for traffic studies needs to be made into an objective standard requirement. Further, while an individual project may not have a significant impact on traffic, cumulative impacts may be significant.

Page 3-25, Policy 3-4.3: Conservation of creeks and protection of fish requires monitoring of well usage, especially private well usage. Add an Action item to require identification of all private wells and impose reporting requirements on private wells within city limits, including their water use.

In approximately 2008 Paulin Creek went dry overnight during a high heat situation, and Paulin Creek is home to endangered/protected species of fish. After multiple phone calls with city and county agencies I determined that no city/county well had suddenly started pumping water or was pumping more water. Suddenly, several weeks later, Paulin Creek had water in it again. During the process of trying to find out what caused Paulin Creek to go dry overnight, I was disturbed to find out that not only couldn't I get any information about private wells, but I couldn't find out where the private wells are, and certainly couldn't get any information about usage of those private wells. However, given the overnight changes to the water both missing from and returned to Paulin Creek, the only reasonable conclusion I can reach is that I made such a stink about Paulin Creek going dry overnight that a private well owner "uphill" from Paulin Creek stopped taking water out of the watershed.

Private well usage needs to be monitored and controlled to prevent harm to our creeks.

Page 3-26, Action 3-4.14: When state law requires approval of by right housing, CEQA review is not permitted. These standards need to be converted to objective standards, and that should be added to this Action item.

Page 3-30, General Comment: I'm not sure where this goes, but I would propose that we include an Action item that encourages and locates funding to retrofit all buildings (particularly homes) with as much insulation as possible, including all walls, roofs and under floors, as well as installation of at least double paned windows. This is not nearly as "sexy" as installation of solar, but is one of the cheapest ways to reduce energy usage, with the side effect that homes will be much more comfortable for the people inside. All roofs should also be painted white.

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Page 3-31, Action 3-5.12: I have a problem with the phrase “cost-effective.” Cost-effective how? For whom? What is the standard for determining what is cost-effective? Is there a baseline where we don’t care what it costs, and developers are required to do it no matter the cost?

CHAPTER 4: URBAN DESIGN, HISTORIC PRESERVATION, AND ART AND CULTURE

Page 4-5, Policy 4-1.2, Action 4-1.3: The policy has a list of locations, none of which are in fire hazard severity zones nor are hills. Although the policy says “including, but not limited to,” Santa Rosa’s hills, many (if not all) of which are in the WUI, are also “community focal points, visual landmarks, and features that contribute to the identity of Santa Rosa.” Include SR’s hills in this Policy’s listing of locations. For Action 4-1.3, objective standards need to go far beyond Objective Design Standards, and therefore the second and third bullet point should state a goal of developing objective development and other standards to realize those goals. Given state of CA laws allowing by right housing, we need objective standards for development, particularly in fire hazard severity zones/WUI areas, that go far beyond design standards.

Page 4-7, Action 4-1.5: Planting strips with large canopy trees should be required everywhere in Santa Rosa, and not just when “feasible.” Further, the policy of assigning responsibility for all street trees to the property owner adjacent to the street trees is not a good idea, unless there are extreme penalties for not maintaining those trees. We need more trees, which will help with climate change impacts.

Page 4-7, Action 4-1.8: This is critical, particularly in areas where we are building lots of new dense housing that has no on site “open green space” for the residents.

CHAPTER 5: SAFETY, CLIMATE RESILIENCE, NOISE, AND PUBLIC SERVICES AND FACILITIES

Page 5-5, Policy 5-1.3: I believe Santa Rosa will be negatively impacted by other earthquake faults, which should be added to this Policy.

Page 5-12, Action 5-2.7: Install permeable paving and other surfaces (such as parking lots) when possible.

Pages 5-13/14, Introduction: “A key risk management strategy is to regulate the location and intensity of uses in high-risk areas and ensure that new developments address wildfire risk during planning and development review. Ensuring access and evacuation potential for existing development in these areas is also essential to emergency response and can help reduce the need for recovery activities.”

Given the preponderance of CA current and proposed legislation that allows by right housing (with only consideration of objective standards) how will SR accomplish this? Currently SB 35 (codified as Government Code Section 65913.4 and referenced by almost every CA housing “streamlining” law/bill) and SB 423 as proposed allow by right housing development in ALL fire hazard severity zones, including all of SR’s WUI. This needs to be addressed with clear objective standards ASAP.

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Page 5-16, map: The CAL FIRE identified local responsibility area very high fire severity zones are from 2008. When the 2022/23 CAL FIRE state responsibility maps are finalized, apparently then CAL FIRE will identify new and potentially revised local responsibility area fire hazard severity zones. So, this GP map will need to be updated at that time.

Throughout my comments to the wildfire portion of this Section, I will reference the Governor's Office of Planning and Research's Fire Hazard Planning Technical Advisory "manual," the August 2022 version of which is available at <https://wildfiretaskforce.org/oprs-release-of-the-wildfire-ta-and-wui-planning-guide/>

Page 5-17, map: In the CA OPR Fire Hazard Planning Technical Advisory document, at page 44 of the pdf, WUI's have the following identifiers: "wildlands, intermix, interface, occluded and ember zone" – this GP map only includes the WUI, intermix and influence zones (assuming "influence" and "interface" are roughly equivalent?). Inclusion of the "ember zone" is essential for planning, and although expansion of the WUI was determined not to be necessary in 2022, the ember zone is an important area to identify areas at risk. Based on my google research, ember zones appear to be 1.5 to 2 miles in other jurisdictions. Please update this map to include ember zones.

Additionally, add an action item to prohibit the use of wood chips and wood mulch in all WUI areas. As all of us who survived the (relatively) recent fires know, wood chips/mulch make excellent ember cast, causing fires to erupt a mile or more from the main fire focus. Allowing use of wood chips and/or wood mulch in fire hazard severity zones is unacceptable.

Page 5-19, Goal 5-3: Given the preponderance of CA current and proposed legislation that allows by right housing (with only consideration of objective standards) how will SR accomplish this? Currently SB 35 (codified as Government Code Section 65913.4 and referenced by almost every CA housing "streamlining" law/bill) and SB 423 as proposed allow by right housing development in ALL fire hazard severity zones, including all of SR's WUI. Objective policies need to be developed ASAP to ensure new by right housing in the WUI is safe for existing and new residents, including that fire protection services can be provided and evacuations can be safely accomplished.

Page 5-19, Action 5-3.1: I cannot recall the number of times I have asked for what SR requires of developments as a Fire Protection Plan – now, finally, I at least know what is considered a "Fire Protection Plan." Can this table please be inserted into the Zoning Code, or in some location other than a mention in the General Plan that then leads you to the Santa Rosa Community Wildfire Protection Plan? Further, the table in the CWPP doesn't including any requirement for safe evacuations, which I consider a failing, and should be added. State Fire Code only requires that the occupants of a building be able to get out of the building alive, but has no provisions for those people to safely evacuate the area after they're out of the building.

Page 5-19, Action 5-3.2: Per CA's OPR Fire Hazard Planning Technical Advisory report, at page 55 of the pdf, include this suggested policy/action: "Require defensible space maintenance agreements for new development projects and require extension of defensible space maintenance agreements to

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subsequent landowners.” This should also be required for all retrofit/rebuilding, particularly for non single family homes.

Page 5-19, Policy 5-3.2: Short of a policy prohibiting building in SR’s WUI, and given the large number of state bills/laws streamlining by right housing, objective policies need to be developed ASAP to ensure any new by right housing in the WUI is safe for existing and new residents.

Page 5-19: CA’ s OPR Fire Hazard Planning Technical Advisory report, at page 46 of the pdf, has recommendations that should be included as an action: “Prohibit land uses that could exacerbate the risk of ignitions in High or Very High FHSZs, such as outdoor storage of hazardous or highly flammable materials, automobile service or gas stations, or temporary fireworks sales.” (Thankfully, we don’t need to worry about temporary fireworks sales in SR.)

Page 5-19, Action 5-3.9: I think this should be DONE, not “considered.” Additionally, CA’s OPR Fire Hazard Planning Technical Advisory report (at page 46 of the pdf) has additional uses that should be prohibited: “large events or assembly of people, health care facilities, etc.”

Page 5-20, Action 5-3.12: We must do far more than “explore” this proposed action -- we need objective policies to accomplish this proposed action ASAP, or we could potentially end up with by right high density housing, including for those who are most vulnerable, in all SR fire hazard severity zones. Convert this action to actual action, not an exploration.

Page 5-21, Action 5-4.3: These uses should also be prohibited in all of SR’s WUI, for obvious reasons.

Page 5-23, map: These evacuation routes are not necessarily going to be useful to residents. Evacuation routes should be refined to indicate the width of the roads, as well as the likely ways fire will be entering Santa Rosa. For instance, while Chanate and Fountaingrove are considered evacuation routes, they are essentially 2 lane roads and so are only useful because you have no other choices – you certainly don’t want to encourage people who have other choices to use narrow, winding roads that are likely to be fire impacted for evacuations. Also, at least for fire, identification of where fire is likely to come from in various parts of town means that evacuation routes to be used should always be away from the fire, and that information should be included on this map.

Page 5-26, Policy 5-5.6: Per CA’s OPR Fire Hazard Planning Technical Advisory report (at page 53 of the pdf), include these actions: “Identify low risk fire safety areas, including locations that may serve as temporary shelter or refugia during wildfire events” (I believe a Place to Play may be identified as such in either our CWPP and/or our HMP, although I don’t recall), and “Identify fire defense zones where firefighters can control wildfire without undue risk to their lives.”

Page 5-26, Action 5-5.16: This evacuation analysis should have a definitive start and completion date in this action item, and should also have a requirement for regular updates, as well as opportunities for public engagement. The analysis of evacuation routes should evaluate evacuation capability for tenants/residents/guests/students/employees/etc., and must include evacuation times for existing development plus all possible new development, should be cumulative, and should include areas in the

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as yet defined ember zone, as well as all areas impacted by earthquakes and flooding. This overall evacuation analysis shouldn't be allowed to rely on "early evacuations," given both human nature and the possible/probable speed at which a wildfire can impact SR, as we saw in the Tubbs fire.

This evacuation analysis should be used as the basis to develop objective standards requiring evaluation of evacuation safety for all new development, including by right housing development. Given the preponderance of CA by right housing bills/laws, objective standards regarding the safety of evacuations must to be developed.

Additionally, there should be a new Action item that requires evacuation plans be completed and approved by Santa Rosa prior to approval of any new development in SR's WUI of anything other than one single family home. Those evacuation plans must include, among other things, the onsite location of a permanent source of emergency power and the manner the development will evacuate individuals who may not have individual vehicles on site, or who are members of a population requiring assistance, such as seniors. For instance, for a multifamily residential development with reduced parking, senior housing, a hotel, school, office building, or any other facility with residents, tenants, guests, students and/or employees without individual vehicles on site, the evacuation plan must include a requirement for evacuation of those individuals by shuttle or other means, with responsibility for that evacuation borne by the owner of the property.

Page 5-31, Policy 5-6.3: Require analysis of tree coverage in Santa Rosa, including probable loss of existing trees due to future development, and require the planting of trees that won't be lost to future development. (See <https://www.treeequityscore.org/map#11.67/38.466/-122.7467> for one analysis of tree canopy, although those maps unfortunately do not seem to have accounted for tree canopy lost during recent fires, and of course include tree canopy that will ultimately be lost to development.) Add an action item that no parking lot should be permitted to only have solar panels – all parking lots should be required to have trees in addition to solar panels. Add an action item that requires all new development to have white roofs, and incentivizes existing buildings to paint their roofs white.

Page 5-31, Action 5-6.5: Not opening cooling centers unless the low is higher than 75 degrees is unacceptable; high daytime temperatures can kill. Also, evaluate the recent study showing that humidity in combination with heat is even more deadly.

Page 5-32, Action 5-6.16: See above comments for Policy 5-6.3, above. In particular, tree canopy counts should be identified as canopy that is (more or less) permanent and canopy that is on property likely to be developed during the timeframe of this GP. Require maintenance of all street trees, with severe penalties for property owners who remove trees or let them die...or take back control of street trees to the City.

Page 5-40, Action 5-7.7: Broken record here. STOP PUTTING HOUSING NEAR INDUSTRIAL USES. Industrial uses should not have to "accommodate" residential uses. When locating all development, consider noise impacts on all preexisting uses. For instance, the Safeway on Mendocino Avenue had as a condition of development approval that they couldn't receive deliveries after certain hours at night or before certain morning hours. Additionally, one of the big conflicts with commercial and residential is

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always going to be trash pick-up. Commercial trash pick-up is generally at 5 am, or earlier, and that is a severe conflict with adjacent/near residential uses (I deal with it at least once a week). Add an action item that require SR's trash company to address this conflict and pick commercial trash up at a later hour when there are adjacent/near residential uses.

Page 5-42, Recycled Water paragraph: The majority of SR's treated wastewater goes to the Geysers, and I believe that will remain true for at least another 10+ years. Frankly, if that water didn't go to the Geysers, SR would have no way to "reuse" the majority of that treated wastewater in the winter, when no one wants it.

Add an action item to evaluate SR paying to replace broken "clay" sewer laterals city-wide. Wastewater quantities increase exponentially in winter months, largely because of fresh water intrusion through broken sewer pipes (I don't think people flush their toilets more in the winter). I believe SR conducted a pilot project some years ago showing that SR paying to replace broken sewer laterals was cheaper than having to deal with excess winter wastewater, so this should be undertaken and completed.

Page 5-43, Action 5-8.5: How are we going to expand the use of recycled water, when the bulk of it goes (and will continue to go) to the Geysers? Not that I'm opposed to doing so with what recycled water we have access to....

Page 5-44, Action 5-8.15: Can we use permeable paving on city streets, parking lots, etc.?

Page 5-48, Action 5-9.1: How do you visualize partnering with the Police Department in our schools? Isn't this very controversial?

Page 5-52, Action 5-10.9: Sometimes police and/or fire stations must be constructed in hazard risk areas. When that is the case, the site location, site design, building materials, defensible space, etc. considerations must be paramount.

CHAPTER 6: HEALTH, EQUITY, AND ENVIRONMENTAL JUSTICE

Page 6-5, 6-6, 6-7, Table 6-1: It would be nice to have a map of these census tracts.

Page 6-13, Action 6-2.14: Cannabis retailers must also be restricted/prohibited near these sensitive uses (I believe they already are, but should be added here).

Page 6-14, Action 6-3.3: Unless something's changed, SR requires citizenship to serve on boards, commissions, etc. Is that necessary or desirable?

Page 6-15, Policy 6-4.1: Continue the commitment to open government and total transparency; ensure the Open Government subcommittee continues to evaluate and address new ways to ensure that all residents can easily access all information about their government and its actions.

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Page 6-18, Action 6-6.2: Is the word “ethnic” really necessary? Wouldn’t neighborhood and/or small markets cover it?

Page 6-18, Action 6-6.3: I suspect that existing grocery stores would find it irritating (to say the least) to have farmers markets competing directly with them. And, we need grocery stores to stay in business, so I would restrain the locations for farmers markets so they aren’t directly competing with existing permanent markets.

Page 6-20, Action 6-6.10: This should express a preference for full service grocery stores instead of the “niche” stores that only sell select items that generate the most profits.

Page 6-20, Policy 6-6.3: Wine grapes and cannabis must be excluded from all agriculture and farming “facilitated.”

Page 6-20, Action 6-6.15: The growing and/or processing of wine grapes and cannabis must be excluded from this effort.

Page 6-25, Goal 6-8: Parks and other public open spaces should be prioritized in all areas where multifamily housing is being built. Of course, all parts of SR should have adequate parks and public open spaces, but at least single family homes have front/back yards, while most multifamily housing has zero open space. Public open space should be considered as a requirement for all developments, particularly in those areas with limited existing parks/public open spaces.

CHAPTER 7: GLOSSARY

Page 7-5, “Missing Middle Housing”: Missing middle housing is not restricted legally affordable housing, and that should be made clear.

APPENDIX B: CLIMATE CHANGE VULNERABILITY ASSESSMENT

Page 2: “AB 747 added Section 65302.15 to the California Government Code, which will go into effect in January 2022, and will require local governments to identify the capacity, safety, and viability of evacuation routes in the Safety Element or LHMP.” Isn’t this law in effect now? If so, should be changed to reflect that. See comment earlier about the need to prepare a complete evacuation analysis for at least the WUIs, without which it will be impossible to evaluate the “capacity, safety, and viability of evacuation routes,” particularly for future development.

Page 2” “The State of California prepared a guidance document, the *California Adaptation Planning Guide* (APG), to assist communities in addressing climate adaptation and resilience, and complying with Section 65302(g)(4) of the California Government Code.” This link is broken. The correct link is <https://www.caloes.ca.gov/wp-content/uploads/Hazard-Mitigation/Documents/CA-Adaptation-Planning-Guide-FINAL-June-2020-Accessible.pdf>

Thank you for the opportunity to review the Santa Rosa General Plan and taking the time to read our comments. We thought that the City did a good job centering equity in each section of the General Plan and anticipating climate challenges and opportunities for all communities. Climate resilience is reflected in each section of the General Plan. We've provided some policy recommendations where the City can bring more specificity to facilitate implementation, and identified areas where nature-based solutions can further existing goals. Recommendations are drawn from Greenbelt Alliance's [Resilience Playbook Policy Matrix](#) and paired with the corresponding section and goal (underlined) of the General Plan Draft.

Overarching recommendations:

- Add a section to all staff reports that reviews impact on sustainability, resilience, and equity, as well as fiscal impact.
- Mandate annual reporting on General Plan progress be posted on the front page of the city website with a clear dashboard that indicates progress on implementation plans. And clear visuals of how the city is meeting its greenhouse gas emissions reduction goals.
- Provide for systematic reviews of General Plan progress and associated metrics that are transparent, engage the community, and demonstrate measurable equitable outcomes consistent with the Plan's intent.
- Set clear, measurable goals with dates. Example: By X year, require the planting of street trees throughout the City to define and enhance the character of the street and the adjacent development. OR Plant X number of street trees (~25% increase) in the sidewalk tree wells to complete the street tree network by 2040.

2. Land Use and Economic Development

Goal: Design healthy resilient neighborhoods that have the tools to protect residents from a multitude of climate hazards, especially frontline communities that are the most vulnerable to risk. Make sure these places are spaces that reflect the physical and mental needs of residents, creating opportunities for growth and community solidarity.

Increase the density and diversity of land uses across jurisdiction.

- Explicitly specify in polices and grant programs how much of the project budget can go towards the following activities: community engagement, outreach, workforce development, and capacity building (including technical assistance)
- To the extent feasible, give priority to multi-benefit recreational projects that maximize pollution reduction and adaptation, carbon sequestration, heat-island reduction, stormwater capture that increase infiltration, habitat protection and biodiversity, community health improvements, promote innovative public-private partnerships, or a combination thereof.

Build community capacity/knowledge around issues of climate adaptation.

- Create and deliver a range of resources to train residents, city gardening staff, and other institutions on how to incorporate biodiversity, soil, and carbon sequestration techniques into landscaping and gardening projects.

Protect against eco-gentrification and other unintended harms that may come with community improvement projects.

- Provide priority access to housing developed for community residents and those who have been displaced.
- Include displacement avoidance language to ensure that any efforts designed to implement the policy or grant program project are aware of the threat of displacement and build anti-displacement strategies into the effort.

Increase equitable access to safe, affordable, clean, multi-modal transportation.

- Support improvements to transit, bikeways, and sidewalks in disadvantaged communities to make active transportation more accessible and user-friendly while decreasing vehicle speeds, congestion, and air pollution. Prioritize infrastructure projects identified in disadvantaged community profiles.
- Develop a program to establish, maintain, and enforce truck routes in the unincorporated county. This program should establish criteria for designating truck routes, signage, and enforcement mechanisms.

3. Circulation, Open Space, Conservation and Greenhouse Gas Reduction

Goal 3-4: Protect, expand, maintain, and restore natural resources, open space and agricultural land and Goal 3-5: Achieve net carbon neutrality by 2030.

Advance jurisdiction-wide collaboration to continually refine nature-based climate solutions that sequester carbon, restore ecosystems, mitigate flooding, and conserve biodiversity.

Develop policies and procedures to assess carbon sequestration opportunities, prioritize biodiversity and green infrastructure, and maximize local native plants.

- By X year, City departments should develop their own policies and procedures for capital projects to assess carbon sequestration opportunities, prioritize biodiversity and green infrastructure, and maximize local native plants.
- By X year, develop best practices guidelines for improving or maintaining carbon sequestration and retention, while preserving biodiversity and ecosystem services, in the soil, plants, and natural habitats.
- By X year, complete a watershed carbon case study and quantify the value of carbon storage provided by protecting this natural area.

Proactively pursue nature-based and science-based planning, implementation, adaptation, and mitigation strategies.

- Require and incentivize green infrastructure in future developments and when possible, use green infrastructure as a preferred alternative.

- Develop a program to work with public and private landowners to decrease the risk of flooding by advancing watershed management projects that reduce and/or store runoff during rainfall events, including the installation of green infrastructure and Low Impact Development (LID) practices, and improve the condition in the floodplain, for example through floodplain restoration or improvement.

Restore and enhance parks, natural lands and large open spaces.

- By X year, explore expansion of the City’s natural areas preservation system through land transfers and acquisitions of undeveloped/unprotected private and public lands.

Maintain the carbon that is currently held in soil and plants.

- Support the implementation of forest management practices that protect existing carbon stocks by reducing the risk of catastrophic wildfire. At the same time, grow large, mature trees and move surplus biomass to the soil carbon pool via mulching in place, prescribed fire, conservation burns, and off site uses, including compost and mulch production.
- Work with Open Space Districts on strategic land protection and stewardship actions that increase carbon sequestration and minimize conversion to land uses that have a lower capacity to sequester carbon.
- Limit the conversion of open space and protected areas to developed land through enforcing and maintaining urban growth boundaries

Implement regenerative land management practices at the city scale. Practice drawdown, reduce emissions, and improve watershed and human health.

Capture more carbon in soils and plants

- Support local agricultural producers to plan, implement, and scale carbon sequestration.
- Increase our urban forest cover starting with communities impacted by recent fires and disadvantaged communities.

Conduct Carbon Sequestration farming pilot projects and research

- Pilot appropriate carbon sequestration techniques as part of ongoing ecological restoration of degraded habitats.
- Ensure that agricultural easements have standards for Best Management Practices and prioritize conservation of agricultural properties that use or agree to implement regenerative agriculture practices.
- Improve the composting ordinance to advance compost infrastructure and support soil carbon sequestration activities.
- By X year, pilot appropriate carbon sequestration techniques as part of ongoing ecological restoration of degraded habitats.
- By X year, ensure highest and best use of compost made from organics collected from residents and businesses.

Integrate urban greening into planned and future city infrastructure projects, including road improvements, parks, and private development.

Utilize overlay zones, ordinances, or resolutions to create new urban greening zoning requirements in areas regarding flooding, habitat, or other priorities.

- Design roadway projects to be attractive and, where possible, to include trees, landscape buffer areas, public art, public space, and other visual enhancements. Emphasize tree planting and landscaping along all streets.
- Adopt EPA's Storm Smart Cities guidance on how to include urban greening in LHMPs.
- Incorporate urban greening in the CAP by establishing programs, timelines, and collaborations with agencies.
- Require sustainable landscaping practices and a rating system (such as the Bay-Friendly Rated Landscape Program from ReScape California) for new landscapes built within the jurisdiction.

Maximize tree canopy coverage and other urban greening practices throughout the public realm.

- Plant X number of street trees (~25% increase) in the sidewalk tree wells to complete the street tree network by 2040.
- Maximize, where woody vegetation is appropriate, planting coast live oak and other native trees and shrubs throughout the public realm.
- Develop guidelines on specific tree species and management procedures that integrate carbon sequestration, ecosystems services, and biodiversity.
- Establish requirements for major development and redevelopment projects to construct and maintain urban greening projects in the adjacent public right of way.
- By X year, create policy for land under the jurisdiction of the Department of Public Works to require preservation of mature trees during infrastructure modifications using solutions to retain them such as bulb-outs, basin expansion, and sidewalk re-routing.

Focus urban greening projects in areas lacking tree canopy and other urban greenery to provide health and safety benefits to residents, with a focus on vulnerable communities.

Ensure urban forestry plans focus resources on vulnerable communities.

- Map tree canopy gaps in cities and prioritize urban canopy expansion in communities vulnerable to urban heat effects, utilizing tools such as the Tree Equity Score.

Require greening in all new development and redevelopment that supports other community benefits, such as shade for walking and biking routes.

- Include greening elements as a primary project scoring criteria for bike improvements.

Focus green stormwater improvements for areas at risk of flooding with an emphasis on vulnerable communities.

- Map areas at risk of flooding, including those along creeks, low-lying, and coastal. Prioritize urban greening expansion in these spaces.

Pursue new funding mechanisms to support urban greening projects at the local and regional level.

Create new local financing mechanisms both for public and private development.

- Pursue stormwater infrastructure funding and financing options for multibenefit urban greening, including stormwater fees, developer impact fees, fees for offsite green

stormwater infrastructure instead of onsite stormwater treatment, and Enhanced Infrastructure Financing Districts.

Modify regional and state funding requirements to incentivize greening elements within transportation projects.

- Lobby state government and agencies for funding flexibility in state and regional transportation grant programs.

Support state and regional funding strategies.

- Advocate for regional funding sources to support greening projects.
- Advocate for state grant programs to support local planning and project implementation.
- Advocate for greening funding in any potential state climate resilience bonds.

Create permanent funding sources and mechanisms for nature-based solutions.

- Establish alternative fee mechanisms, similar to the SF Carbon Fund, to fund nature-based solutions. By 2023, create permanent code and financial incentives for homeowners and other private landowners to preserve existing mature trees and shrubs and to plant local native species.

5. Safety, Climate Resilience, Noise, and Public Services and Facilities

Goal 5-3: Increase community resilience to future wildfire threats.

Accelerate greenbelts as nature-based solutions to wildfire resilience and risk reduction.

Prioritize increasing greenbelts as strategic locations for wildfire defense through policy and planning.

- Identify existing greenbelts and the best locations for new greenbelts for wildfire defense and risk reduction. Incorporate these locations into comprehensive wildfire planning at regional, county, city, and community levels and in all Municipal Service Reviews.
- Adopt (or renew) local policies that maintain space between cities including urban growth boundaries (UGBs), urban limit lines (ULLs), and community separators—preferably voter approved—to contain growth, prevent sprawl, and reduce wildfire risk.
- Identify and maintain access to low-risk fire safety areas, including locations that may serve as temporary shelter or refuge during wildfire events.

Communities and new developments should incorporate greenbelt zones and recreational zones into the design and placement of homes in a way designed specifically to reduce wildfire risk.

- Create zoning to require communities to be more wildfire resistant by establishing greenbelt zones for carefully landscaped areas inside and around neighborhoods and subdivisions, different from landscape-scale open space buffers and large fuel breaks.
- Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities.

- Subdivisions within State Responsibility Area (SRA) high and very high fire severity classification areas shall explicitly consider designs and layout to reduce wildfire hazards and improve defensibility. For example, requiring clustering of lots in defensible areas, managed greenbelts, water storage, perimeter roads, firesafe roadway layout and design, slope development constraints, fuel modification plans, and vegetation setbacks.
- Site subdivisions relative to landscape features that can act as buffers from oncoming wildfires (like lakes, agricultural lands, and maintained parks and greenbelts).
- Preference vegetation that has relatively high water content in vegetated areas serving as greenbelts or wildfire buffers to avoid ignition.

Enhance stewardship on greenbelts to return beneficial wildfire regimes and increase overall wildfire resilience of the landscapes.

- Establish best management practices for natural and working lands by habitat types to restore beneficial wildfire regimes, managing natural and working lands in ways that are sensitive to native habitats while increasing urban greening and carbon sequestration to the greatest extent feasible.
- Encourage land management plans to incorporate prescribed burning, selective harvest, non-commercial thinning, and traditional forest treatment as practiced by tribes.
- Encourage open space preservation and conservation of sensitive areas within natural and working lands, including wildlands, to achieve multiple benefits including (but not limited to) species and habitat protection, agricultural and forest resource protection, water quality, carbon sequestration and storage, and wildfire hazard and risk mitigation.
- Create a Wildland Fire Suppression Benefit Assessment District to fund vegetation management efforts, support defensible space maintenance on private property, and create fire breaks, greenbelts, and staging areas in strategic locations.

Goal 5-6: Santa Rosa is a resilient city able to adapt to, recover from, and thrive under changing climate conditions.

Invest in urban greening projects, prioritizing EPAs, that improve the physical well-being of communities and protect against risks such as extreme heat and days with poor air quality.

- Prioritize new street tree plantings and increase the tree canopy in disadvantaged communities, in particular areas with a high heat index.
- Increase urban forest cover starting with communities impacted by recent fires and disadvantaged communities.
- Map tree canopy gaps in cities and prioritize urban canopy expansion in communities vulnerable to urban heat effects, utilizing tools such as the Tree Equity Score.
- Prepare an urban forest master plan for the county that includes quantified goals and tracking methods, prioritizing disadvantaged communities.
- Develop and implement a plan to provide clean air refuges like a climate resilience hub during times when outdoor air quality is unhealthy.
- Preserve, restore, and enhance natural landscapes in and near disadvantaged communities for their role in improving air quality and community health.

Protect neighborhoods from multiple climate threats.

- Implement improvements to move or protect critical public assets threatened by rising groundwater.

- Incorporate procedures into emergency and hazard mitigation plans to take care of vulnerable populations during hazardous events.
- Identify vulnerable populations (such as non-English speaking residents, frail older adults, young children, and persons with disabilities) that may need assistance in times of disaster. Develop outreach programs that are geared toward these populations, including multilingual communications.
- Improve resilience planning for climate change, public health emergencies, and other community stressors among non-English speaking and lower-income populations. Increase awareness of sea level rise and flooding risks in the Canal area and in other vulnerable areas, as well as the importance of adaptation measures.
- Indigenous peoples have the right to the lands, territories, and resources which they have traditionally owned, occupied, or otherwise used or acquired. Land rights, recognition, and repatriation should be considered in direct and specific engagement with Tribal Governments through a formal engagement process and alignment with Tribal Government priorities and decisions when identifying greenbelt lands for permanent protection, particularly when public funds are at play.
- Consult Tribal Governments at every step in identifying and stewarding greenbelts for wildfire defense and resilience and incorporate traditional knowledge.
- The County should strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.
- Provide an opportunity for communities to negotiate environmental priorities and projects through community benefits agreements, for example creating public green spaces, adopting sound design standards, or installing green infrastructure and rooftop solar when possible.

Goal 5-9: Help provide superior and lifelong educational opportunities for all community members.

Policy 5-9.1: Provide high-quality educational opportunities for all members of the community, especially children, youth, and seniors.

Action 5-9.1: Work with schools to locate sites and facilities to serve all neighborhoods and the educational needs of all sectors of the population, including:

- School greening to mitigate extreme heat and provide shaded, green areas that facilitate healthy living, learning, and play.

6. Health, Equity, and Environmental Justice

Goal 6-3: Promote meaningful community engagement and empower residents through inclusive communication, outreach, and capacity-building to participate in City planning and decision making.

- Allocate sufficient time and opportunities for engagement to avoid rushing the process and tokenizing community participation. This will promote capacity building so that community stakeholders are able to provide meaningful feedback and decisions.

- Clearly explain potential adverse impacts of a proposed project in plain language that is easily understood by the target community.
- Ensure that public comment is prioritized within the first hour of a public meeting in order to yield best community participation. Expand the range of engagement methods used with communities in meetings by using tools such as live chat options that can capture community voice.

Goal 6-5: Minimize risk of displacement and gentrification while ensuring housing is safe and sanitary for all residents.

This section can be expanded with more specific actions to identify how displacement and risk will be minimized. Some of these recommendations may also be part of the Housing Element.

Ensure everyone has access to housing in a way that takes into consideration the systematic disenfranchisement of frontline communities and addresses the root causes of the housing crisis.

Advance zoning and implementation changes that encourage sustainable, small and mid-sized, multi-family, and workforce housing, especially in lower density neighborhoods.

- Prioritize affordable housing in cultural districts and other relevant geographies with historically marginalized racial or ethnic identities to encourage their stabilization.
- Amend the zoning ordinance to ensure that the City requires zoning to facilitate emergency shelters and limits the City’s ability to deny emergency shelters and transitional and supportive housing under the Housing Accountability Act. The Zoning Code can include locational and operational criteria for homeless shelters such as hours of operation, provisions for operations and management, and compliance with County and State health and safety requirements for food, medical and other supportive services provided on-site.
- Provide financial assistance and education to lower income, small property owners to add housing (such as ADUs) and rehabilitate existing units that are healthy and resource efficient.
- Implement permit streamlining for new housing that exceeds current inclusionary and sustainability requirements.
- Expand form-based zoning to increase multi-family housing in low-density neighborhoods near transit, jobs, services, parks, high quality schools, and other amenities.

Ensure housing and protections for housing during climate hazard events.

- Consider measures to address the potential for loss or displacement of affordable or lower cost housing in the City’s climate change adaptation planning.
- Work with community-based organizations to develop and support temporary housing solutions for lower-income immigrants, older adults, and other at-risk groups during and after an emergency.
- Provide incentives to relocate development out of hazardous areas and to acquire at risk properties, where relocation is not feasible. May also consider an acquisition and buyout program which includes the acquiring of land from the landowner(s) which are typically demolished or relocated with the property restored and future development on the land is

restricted. Requires a supporting funding mechanism like a community land trust or repetitive loss program.

Equitable access to safe and sanitary homes among all communities so that no resident has to live in an unsafe or unhealthy place. Ensure that future improvements in disadvantaged communities will not produce a net loss of affordable housing or the displacement of residents.

- In order for an application for a major development project to be deemed complete, require applicants to document to the City's satisfaction how the project will promote environmental justice, including how the project will ensure the following: - Its costs and benefits will be shared equitably; - Its economic opportunities will be shared equitably; - It will not displace existing residents or businesses in disadvantaged communities; - It will avoid direct, indirect, or unintended negative impacts on the quality of life of residents within disadvantaged communities; - Prioritize clean-up of illegal dumping in disadvantaged communities.
- Obtain funding for, address barriers to, and increase participation in the weatherization program for extremely low, very low, and low-income homeowners, landlords, and renters, as well as in other programs to provide resources to bring older properties up to Code and improve their livability. Make minor home repairs and energy improvements, and improve health and quality of life. Focus these resources on homes in disadvantaged communities, and in particular rental housing and high density housing.
- In collaboration with nonprofit and for-profit developers, obtain funding for and establish community land trusts serving each disadvantaged community that will support long-term community ownership and housing affordability.
- Expand the first-time homebuyer program to provide more education and assistance, prioritizing outreach and marketing in disadvantaged communities to spread awareness of the program.
- Incentivize and streamline public and private investment in new development or redevelopment that promotes community goals in disadvantaged communities, as identified in the community profiles.
- For projects that would significantly impact a disadvantaged community, pursue community benefits agreements that achieve the goals identified in the community profile.
- For projects that would significantly impact a disadvantaged community, pursue community benefits agreements that achieve the goals identified in the community profile.
- By X year, establish codes and regulations that facilitate use of new materials (e.g. cross-laminated-timber) and new technology (e.g. modular housing) to lower costs and increase resource efficiency of construction.
- Assist low-income homeowners in maintaining and improving residential properties through housing rehabilitation and energy efficiency assistance programs Provide financial support to non-profit organizations providing fair housing services.
- Promote the development of a 15 minute neighborhood to provide active, walkable, bicycle-friendly, transit-oriented, mixed-use urban settings for new housing and job growth attractive to an innovative workforce and consistent with the city's environmental goals.

Additional Goals Environmental Justice Goals, Strategies, and Actions

Create equitable processes for executing climate resilience policies, where justice is central to the policy design and implementation.

Recognize the role that institutions have played in the marginalization of frontline communities and uplift the responsibility elected officials have to remediate harm, transform the system, and uphold democratic practices.

- Acknowledge marginalization as the status quo practice of current systems that have been historically designed to exclude certain populations, namely low-income communities, communities of color, women, youth, previously incarcerated people, and queer or gender non-conforming community members. This understanding is important because if concerted efforts are not made to break-down existing barriers to participation, then by default marginalization occurs.
- Create developmental stages that allow the City to recognize where they are at, and set goals for where they can go through conscious and collective practice. This is key to transforming systems and building capacity for communities currently impacted by poverty, pollution, and political disenfranchisement to have increasingly more control over the resources needed to live, such as food, housing, water, and energy.

Transform our system beyond extractive practices to one that prioritizes a healthy environment, high quality jobs, and a green economy, without leaving anyone behind.

Take a holistic and all encompassing approach to phase out fossil fuels while leaving no one behind.

- Until fossil fuel industries are phased out, require any proposed project requiring a use permit for a fossil fuel industry or its accessory infrastructure that would impact a disadvantaged community to include early and substantial community engagement as part of the permitting process. As conditions of approval, such projects must include substantial community benefits that support the goals identified in the community profile.
- In coordination with impacted communities, workers, and business/industry, develop and implement a plan to phase out fossil fuel and other highly polluting industries and transition to just, equitable, and clean industries that offer fair or living-wage jobs. The plan should address site remediation responsibility and strategies to improve the health, safety, infrastructure, job opportunities, and revenue opportunities during the shift to a zero emission/clean energy economy, paying special attention to helping develop new opportunities for how disadvantaged communities will realize economic, health, and other benefits.

Expand access to green jobs, general workforce development, and other economic mobility opportunities.

- Collaborate to develop a “Just Transition” plan and task force that examines the impact of the transition to a cleaner economy on disadvantaged workers, identifies strategies for supporting displaced workers, and develops recommendations for ensuring inclusive employment practices within growth sectors of the economy.

- Expand green construction training and apprenticeship programs to grow the local pool of skilled labor and reduce construction costs.
- Create workforce development and education training programs with career pathways for residents of the project area. Education and training can include pre-apprenticeship programs that are tied to state-certified apprenticeships; training programs that lead to occupations and industries that support proposal implementation, reduce barriers for and reflect the range of employment readiness needs of local residents and individuals with employment barriers, and partner with local workforce development boards and other key stakeholders, including organized labor and education providers; align and enhance high-performing education and training programs that have a proven record of leading to industry-recognized credentials and labor market advancement.



August 13, 2023

Amy Lyle, Supervising Planner – Advance Planning
Planning Division of the Community Development Department
100 Santa Rosa Ave, Suite 3
Santa Rosa, CA 95404

Dear Amy,

Thank you for the hard work you and your team invested to develop the Draft Santa Rosa General Plan 2050, and for your continued efforts to engage and incorporate feedback from stakeholders. This letter summarizes Bikeable Santa Rosa's feedback on the Draft Plan (hereafter "the Plan") that was released for public review and comment last month.

Components We Applaud

Overall, we appreciate the many ways in which the Plan highlights the importance of expanding the city's transportation options – not only biking, but also walking and transit – and the connections it makes between improving street infrastructure and advancing other important priorities. Our General Plan should chart a course toward a future in which Santa Rosans can thrive whether they do or do not own a personal vehicle. There are many elements of this Plan that align with this vision, and we commend them all.

We also appreciate the understanding, woven throughout the document, that creating more livable neighborhoods supported by robust, multimodal transportation options is essential to building an equitable, vibrant Santa Rosa. Our current auto-centric land use and transportation system is one of the key drivers of racial and economic inequity in our community. The Plan therefore rightly recognizes how enhancing safety, connectivity, and mobility will help create a more equal and prosperous future for us all.

For biking specifically, we are grateful for how the Plan reflects the importance of building a complete and connected network of routes that are safe and convenient for users of all ages and abilities, and that provide access to essential services and key destinations, such as schools, employment centers, shopping, hospitals, and open space. Rapid and effective implementation of such a network will not only enhance the viability of active transportation for meeting daily needs, but will make Santa Rosa streets safer for everyone, including drivers.

Finally, we applaud the drafters' understanding of how the circulation element needs to work in concert with other elements of the plan, including land use and zoning, urban design, health, art and culture, historic preservation, and environmental stewardship.

For more on the specific goals, policies, and actions we support, see our detailed feedback below.

Significant Concerns

Despite the Plan's many strengths, we also see considerable room for improvement. Our significant concerns fall into three main categories:

1. Regarding reductions in vehicle miles traveled (VMT) by 2050, we are confused and disappointed by the lack of ambition the Plan seems to show. We simply cannot achieve our climate, equity, traffic, or Vision Zero goals with the modest reduction in VMT projected in this Plan. We wonder where these numbers come from and why the City hasn't done more to determine how to reduce them further.
2. We find multiple instances of language that appears to continue to prioritize traffic speeds and traffic throughput over the creation of safe, convenient, low-stress transportation routes for people not in private vehicles. Although we understand the need to continue to manage traffic flow, the language as written is out of sync with other aspects of the Plan and could undermine many of its stated goals.
3. We are disappointed that the section on greenhouse gas (GHG) emissions fails to acknowledge that transportation is by far the most significant source of activity-based emissions in the city, and thus the most central opportunity for GHG reductions. We think this can be rectified by simply highlighting the ways that the multimodal transportation elements of Chapter 3 can and should be a focus of our GHG reduction strategy as well.

For additional details, please see our feedback in the table below.

Detailed Feedback

Many of the specific policies and actions in the Plan advance priorities and approaches that Bikeable Santa Rosa strongly supports, including:

- Increasing urban density and encouraging development of more vibrant, people-friendly streets and other public spaces (e.g., Policies 2-1.1, 2-2.1, 2-2.2, 2-4.7, and 4-1.5; Actions 2-1.4, 2-1.5, 2-2.1, 2-2.7, 2-4.18, 2-4.19, 2-6.2, 2-6.3, 3-1.9, 3-2.6, 3-2.18, 4-1.7, and 4-3.5)
- Reducing VMT and dependence on single-occupancy vehicles (e.g., Policies 2-5.5 and 3-1.2; Actions 2-2.8, 3-1.5, 3-1.7, and 3-1.11)
- Enhancing active transportation infrastructure, including developing a complete and continuous bicycling network and ensuring it reflects the best-available standards for low-stress design (e.g., Policies 3-1.3 and 3-2.1 and Actions 3-1.8, 3-2.16, 3-2.19 thru 3-2.23, 3-2.25, and 3-2.26)
- Diversifying mobility options and prioritizing active modes (Policy 3-2.2 and Actions 3-1.14, 3-1.16, 3-2.1, 3-2.4, and 3-3.9)
- Enhancing safety for all modes (Actions 3-1.27, 3-1.28, 3-2.5, 3-2.20, 3-2.25, 3-2.26, 3-3.7, and 4-1.9)

At the same time, we see potential for further enhancement of the Plan. In some cases, the proposed policies and actions should be made stronger and/or better aligned with the stated goals of the Plan. There are also many places where clearer language or additional details are needed to enhance understanding or support effective implementation. The table below highlights several areas where we have specific questions, concerns, or requested revisions.

Note: Feedback is presented in the order that specific policies and actions appear in the Plan. Rows marked with a * symbol are those we consider to be of greatest importance.

Reference	Existing Content/Language	Feedback
Figure 3-2, p. 3-5 *	Existing and Projected Vehicle Miles Traveled (VMT) per Service Population	<p>Chart needs context, answering these questions:</p> <ul style="list-style-type: none"> – How are these calculated? – How do these compare to other municipalities, including those with better multimodal infrastructure? – Are these projections assuming the full implementation of the Plan’s proposed policies and actions? <p>The projected reduction in VMT for the Santa Rosa Service Population (~6%) is modest at best. For comparison, the California Air Resources Board’s 2022 Scoping Plan for Achieving Carbon Neutrality calls for a reduction in per capita VMT of 25% by 2030 and 30% by 2045, from a 2019 baseline. In addition, although the widespread adoption of electric vehicles may eventually help to decouple VMT from greenhouse gas emissions and other forms of air pollution, maintaining high rates of driving will continue to result in negative impacts on health, safety, land use, quality of life, and more.</p> <p>Requested change(s): The General Plan should be strengthened as necessary to result in a greater reduction in projected VMT – i.e., 30% or more – by 2050.</p>
Figure 3-4, p. 3-7 *	Planned Transportation Network Improvements Map	<p>Questions:</p> <ul style="list-style-type: none"> – How was this map developed? – How does this map relate to and/or constrain the pending Active Transportation Plan? – Can the pending Active Transportation Plan be more ambitious than this in planning protected infrastructure and road diets? – Why are we planning to add more auto capacity at so many freeway overcrossings if our goal is to reduce VMT? <p>Requested change(s): Remove plans (and related expenses) for adding more vehicular traffic lanes to widened roadways and overcrossings, and replace them with bus/bike-only lanes next to wide pedestrian rights-of-way.</p>
Roadway Classifications, p. 3-11 *	“Roadways in the city fall into four major categories: highways, regional/arterial streets, transitional/[collector] streets, and local streets.”	<p>Research done by nonprofits like Strong Towns and the Vision Zero Network demonstrates that arterial and collector streets with multiple lanes of traffic, speeds between 25 to 45 mph, and multiple driveways, turns, etc. – sometimes referred to as “stroads” – are less</p>

		<p>economically productive, cause more traffic congestion, and are more dangerous for all road users than more traditional streets or roads.</p> <p>Typo: Top of page 3-11, column 2, “connector” should be “collector.”</p> <p>Requested change(s): We would like to see the Plan commit to limiting the use of such roadways in future development and start a project of determining how existing roadways of this type can be converted to either streets or roads, with appropriate design guidance to accompany these transformations.</p>
<p>Roadway Classifications, pp. 3-11, 3-13 *</p>	<p>“The City Design Guidelines define roadways in Santa Rosa; require adequate egress for all travelers, including emergency vehicles; and call for visually attractive streetscapes that complement surrounding uses.”</p> <p>“Boulevards provide multilane access to commercial and mixed-use areas and carry some regional traffic, with vehicle speeds of 30 to 40 mph. Local transit operates on some boulevards. Bicycle and pedestrian amenities may include:</p> <ul style="list-style-type: none"> • Bike lanes or separated bike lanes...” <p>“Avenues connect neighborhoods to commercial centers and other neighborhoods and serve as major transit routes. Vehicle speeds are typically 35 mph. Bicycle and pedestrian amenities may include:</p> <ul style="list-style-type: none"> • Bike lanes or separate bike lanes...” 	<p>Questions:</p> <ul style="list-style-type: none"> – Are the City Design Guidelines included for historical reference or are they meant to be prescriptive and guide future road design? – Where do the Guidelines live? (In-text citation or link in an appendix would be appreciated.) – Who determines what the Guidelines do and don’t include? When were these decisions made? – Can the Guidelines be changed? If so, what is the process of change? <p>Bikeable’s view is that these guidelines are out of date and inconsistent with other elements of the Plan. For example, the Plan recommends (in Action 3-1.8) that the City should use NACTO’s Urban Streets Design Guide and the Urban Bikeways Design Guide, but the guidelines highlighted in this section are inconsistent with those standards – specifically, the recommendation for protected bicycle lanes on any roadways that have a speed limit greater than 25 mph and/or that carry more than 6000 vehicles per day. Reference: https://bit.ly/3YtuugK.</p> <p>Requested change(s):</p> <ul style="list-style-type: none"> – All references to road design guidance should be made consistent throughout the Plan, and any remaining misalignment between applicable standards and guidance should be acknowledged and addressed. – Include an action to update the City Design Guidelines to reflect the best-available standards for increasing safety and reducing conflicts between all road users. (Possibly as part of the existing language for Action 3-2.26.)
<p>Figure 3-6, p. 3-12</p>	<p>Existing and Planned Bicycle Network Map</p>	<p>Questions:</p> <ul style="list-style-type: none"> – Is this map primary for historical reference or future guidance?

		<ul style="list-style-type: none"> – Will it in any way constrain what can and should be done in the pending Active Transportation Plan? <p>Requested change(s):</p> <ul style="list-style-type: none"> – Include a city-wide bicycle route map that displays routes in terms of their experienced comfort levels, rather than the type of bike facility. An example of a city that has done this well is Austin, TX: https://www.austintexas.gov/page/biking-austin. – Further, we request inclusion of a note that the pending Active Transportation Plan will aim to improve the network of high-comfort, low-stress, connected routes accommodating riders of all ages and abilities.
Policy 3-1.2, p. 3-15	“Promote land use, transportation demand management (TDM), and street design practices that reduce VMT and dependence on single-occupancy vehicle trips.”	<p>We strongly support this goal. However, we think that stronger connections could be made between the land use and transportation components of the policy.</p> <p>Requested change(s): Consider adding an action highlighting links between land use and transportation and related goals and policies elsewhere in the Plan, such as: “Continue to support efforts to increase development of high-density housing and related amenities in and around Santa Rosa’s downtown core, with the aim of reducing VMT and dependence on single-occupancy vehicles.”</p>
Action 3-1.8, p. 3-15	“Use the Urban Streets Design Guide and the Urban Bikeways Design Guide to plan roadway improvements and new development.”	<p>We strongly support this.</p> <p>Requested change(s): For clarity, we suggest specifying that these guides are produced by the National Association of City Transportation Officials (NACTO).</p>
Action 3-1.19, p. 3-16 *	“Develop viable solutions for regional through-traffic on north-south corridors, such as by extending Farmers Lane, and travel on east-west corridors, such as by improving the Mendocino Avenue overcrossing of Highway 101, while remaining cognizant of the multimodal need on each corridor.”	<p>Questions:</p> <ul style="list-style-type: none"> – This phrasing confuses us. What is the problem that these solutions are being developed to solve? – What does the word <i>improving</i> mean here? Does it mean widening to accommodate additional traffic lanes? – What does it mean to remain cognizant of multimodal need? <p>Adding capacity for more car traffic, whether regional through-traffic or local traffic, is financially burdensome and will likely more demand, leading to more traffic and less-safe conditions for all users, including drivers. We believe the best solution to reducing traffic is supporting viable alternatives to driving. Further, we believe that roadways designed to allow non-Santa Rosans to travel through our city as quickly as possible don’t help us economically, degrade the value and quality of our</p>

		<p>neighborhoods and business districts, and further burden the City with costs of expensive road maintenance.</p> <p>Requested change(s): Remove or provide additional context, particularly in relation to Policy 3-1.3.</p>
Action 3-1.20, p. 3-16	“Participate in discussions addressing regional through-traffic with SCTA, the County of Sonoma, MTC, and other municipalities.”	Requested change(s): Remove or make consistent with Goal 3-1 and Policy 3-1.3, such as by adding “..., prioritizing investments that reduce VMT and GHG emissions.”
Action 3-1.21, p. 3-16	“Support efforts to acquire local, regional, State, and federal funding for transportation improvements, including reconstruction of key interchanges to accommodate all modes of transportation, including active transportation.”	Requested change(s): Change “including active transportation” to “..., prioritizing investments that make public transit and active transportation viable, attractive options.”
Action 3-1.22, p. 3-17 *	“Explore alternative circulation network improvements to accommodate regional through-traffic, focusing on regional/arterial street circulation and regional transportation routes.”	<p>It sounds like this is proposing continued efforts to widen or expand space for cars on regional and arterial routes. Again, this will likely induce more demand, degrade safety, strain City finances, and displace or disrupt other valuable uses of our public rights-of-way.</p> <p>Requested change(s): Remove or provide additional context, particularly in relation to Policy 3-1.3.</p>
Action 3-1.24, p. 3-17	“Enhance pedestrian and public transportation routes to support safe access to retail food establishments.”	<p>We strongly support this. However, it seems slightly narrow in comparison to other actions in Plan.</p> <p>Requested change(s): We recommend slight revision to be more complete: “Enhance multimodal options (e.g., pedestrian and bicycle routes, public transit service) to support safe access to retail food establishments and other essential services.”</p>
Policy 3-1.4, p. 3-17	“Reduce traffic volumes and speeds in neighborhoods.”	<p>Questions:</p> <ul style="list-style-type: none"> – Why only in neighborhoods? – Don’t Vision Zero and VMT reduction goals necessitate similar actions on other street types? <p>Requested change(s): Expand to include or reference similar objectives on non-neighborhood streets.</p>
Action 3-1.28, p. 3-17	“Include traffic calming by default in regular paving and maintenance projects unless infeasible due to engineering or in cases where transit or emergency access may be blocked.”	<p>We strongly support this.</p> <p>Requested change(s): We recommend slight revision to be more complete: “Include active transportation network improvements and traffic calming by default in regular paving and maintenance projects unless infeasible due to engineering or in cases where transit or emergency access may be blocked.”</p>

<p>Action 3-1.29, p. 3-17</p> <p>*</p>	<p>“Improve traffic flow and reduce neighborhood traffic impacts in all quadrants of the city by completing needed improvements on arterial and collector streets.”</p>	<p>Questions:</p> <ul style="list-style-type: none"> – What constitutes <i>needed improvements</i>? <p>Requested change(s): Remove or specify that needed improvements does not include changes that increase car capacity, increase speeds, or otherwise prioritize single-occupancy vehicle travel.</p>
<p>Policy 3-2.1, p. 3-17</p>	<p>“Plan, build, and maintain a safe, complete, continuous, convenient, and attractive pedestrian, bicycle, and multiuse trail network in Santa Rosa that is equitably accessible for all ages and abilities.”</p>	<p>Wording is potentially confusing – i.e., implying that the network could be composed of primarily off-street trails, although we know this is unintended. Also, we believe it is important to be clearer about the need for the network to improve connectivity throughout the city, in order to enhance multimodal options for meeting daily transportation needs.</p> <p>Requested change(s): Change for clarity, “Plan, build, and maintain a safe, complete, continuous, convenient, and attractive network of designated pedestrian and bicycle routes that connects all neighborhoods and is equitably accessible for all ages and abilities.”</p>
<p>Action 3-2.2, pp. 3-17 to 3-18</p> <p>*</p>	<p>“Support active transportation by pursuing available grants and ensure that the active transportation network, especially approaches to schools, are safe for cyclists and pedestrians, with needed amenities such as sidewalks, crosswalks, bike lanes, and traffic calming.”</p>	<p>We support the City looking for grants to fund this work. However, because these safety improvements are essential, we believe they should be funded whether grants are secured or not, by using transportation funds from the City’s own budget.</p> <p>Requested change(s): Revise to separately highlight the importance of funding and safe routes to schools, and to make funding a greater priority for the City, e.g:</p> <ul style="list-style-type: none"> – “Support active transportation by allocating CIP & general funds, in addition to pursuing grants, for active transportation network improvements.” – “Strive to allocate transportation funding across various modes approximately proportional to the City’s modal split goals and/or aligned with its VMT goals.” – “Ensure that the active transportation network, especially including approaches to schools, is safe for cyclists and pedestrians, with needed amenities such as sidewalks, crosswalks, bike lanes, and traffic calming.”
<p>Action 3-2.3, p. 3-18</p>	<p>“Implement and update the City’s Bicycle and Pedestrian Master Plan, as appropriate.”</p>	<p>Our understanding is that the pending update to this plan will include renaming it to the Active Transportation Plan. For clarity, we think this and other references in the General Plan should be updated accordingly.</p> <p>Requested change(s): “Implement and update the City’s Active Transportation Plan, formerly known as the Bicycle and Pedestrian Master Plan, as appropriate.”</p>

<p>Action 3-2.5, p. 3-18</p>	<p>“Continue to implement the Sonoma County Vision Zero Action Plan and the City of Santa Rosa Vision Zero Implementation Plan to eliminate collisions and traffic fatalities.”</p>	<p>We strongly support this goal. However, we believe it will bring added emphasis and increase the likelihood of success if the General Plan incorporates more of the specific actions outlined in the City’s Vision Zero Implementation Plan.</p> <p>Requested change(s): Integrate additional details from the Santa Rosa Vision Zero Implementation Plan, such as:</p> <ul style="list-style-type: none"> – “Review speeds and posted limits on the High Injury Network, set context appropriate speeds, and implement speed mitigation measures based on findings and legislative authority.” – “Develop and adopt a process to reduce speed limits to 25 mph or below on local roads where appropriate, such as around schools, parks, senior centers, and transit stations.” – “Implement low-cost quick-build projects to rapidly implement bicycle and pedestrian safety improvements along the High Injury Network.” – “Improve routine facility maintenance, particularly along the High Injury Network.” – “Enhance training for law enforcement personnel responsible for crash reporting to address the unique attributes required to accurately report circumstances of crashes involving bicyclists, pedestrians, and other vulnerable road users.” – “Maintain and update the Sonoma County Vision Zero Data Dashboard for all crash and safety data on the Vision Zero website.”
<p>Action 3-2.7, p. 3-18</p>	<p>“If it is not feasible to provide a continuous pedestrian route, provide a safe alternate route that minimizes any extra distance.”</p>	<p>Questions:</p> <ul style="list-style-type: none"> – Are there examples of when it not feasible to provide a continuous pedestrian route? – Does this include when such a route would be in conflict with vehicle travel? If so, how should this be reconciled with Action 3-1.14, which calls for a framework that prioritizes active transportation modes over vehicles? <p>Requested change(s):</p> <ul style="list-style-type: none"> – Clarify under what conditions this might occur and how to ensure that it does not contribute to conditions that continue to prioritize vehicles over other modes. – Expand to apply similar principles for enhancement of the bicycle network.
<p>Action 3-2.10, p. 3-18</p>	<p>“Develop and implement standards and requirements for sidewalks in the auto mall area.”</p>	<p>We agree with the spirit of this action. However, it strikes us as oddly specific in the context of the acknowledged need for sidewalk improvements throughout the city.</p>

		<p>Requested change(s): Provide additional context and/or expand to encompass standards and requirements to address sidewalk deficiencies citywide.</p>
<p>Action 3-2.15, p. 3-18</p>	<p>“Update the Zoning Code to require construction of attractive pedestrian walkways and areas in new residential, commercial, office, and industrial developments.”</p>	<p>We believe it is equally important to maximize opportunities to integrate effective and attractive bicycle facilities with new development, and to ensure that these facilities are connected to the wider active transportation network. In addition, the City should explore opportunities to encourage and support active transportation users, such as requiring secure bike parking or other related amenities in certain development projects.</p> <p>Requested change(s): Expand to encompass bicycle facilities, connectivity to the citywide network, and other efforts to encourage and support active transportation: “Update the Zoning Code to require construction of attractive pedestrian walkways and areas, effective connections to the citywide active transportation network, and facilities to encourage and support active transportation users (such as secure bike parking) in new residential, commercial, office, and industrial developments.” (See additional related comments on Action 3-2.24 below.)</p>
<p>Action 3-2.20, p. 3-19</p>	<p>“Develop street standards with separated and/or protected bicycle lanes.”</p>	<p>Expanding the availability of safe, low-stress cycling routes is a top priority of our campaign and thus we strongly support this action. However, we believe this language could be enhanced by specifying an intention to make the standards applicable in as many circumstances as possible – i.e., so that separated and/or protected bicycle lanes are not merely <i>allowed</i> but <i>preferred</i>, particularly as necessary to guarantee safety and accessibility in line with the character and circumstances of a given roadway.</p> <p>Requested change(s): Expand language to address the priorities above, along the lines of: “Update the City Design Guidelines to reflect the best-available standards for increasing safety and reducing conflicts between all road users, including by making separated and/or protected bicycle lanes and protected intersections the default design preference for new or updated bicycle facilities on all non-neighborhood streets, unless infeasible due to engineering or obstruction of transit or emergency access.” (See also comments on Action 3-2.26 below.)</p>
<p>Action 3-2.21, p. 3-19</p> <p>*</p>	<p>“Provide bicycle lanes along all regional/arterial streets and high-volume transitional/collector streets, prioritizing protected bicycle lanes</p>	<p>We strongly support this action. However, this language leaves it ambiguous what will happen when protected bike lanes are infeasible on these roadways. We support the creation of alternative low-stress routes rather than the</p>

	except where infeasible due to engineering or obstruction of access for transit or emergency access.”	installation of high-stress routes. Class 2 routes on these types of roadways cannot be counted as linkages in the city’s low-stress active transportation network. Requested change(s): Revise to clarify commitment to facilities welcoming to all ages and abilities.
Action 3-2.24, p. 3-19	“As part of the City’s Capital Improvement Program, or street and intersection projects constructed by private developers, install and construct bicycle facilities, including Class I paths, Class II and IIB lanes, Class III route signs and road paint, or Class IV separated paths.”	We strongly support this action. However, we believe this language could be omitted or sharpened in light of our interest in prioritizing safe, low-stress bicycle facilities in line with the character and circumstances of a given roadway. Requested change(s): Consider removing in favor of the proposed changes to 3-2.15, as well as other actions already highlighting the goal of expanding and improving the city’s bicycle network.
Action 3-2.26, p. 3-19	“Update the Zoning Code to require the highest level of bicycle facility protection that is practicable, as part of the development review and entitlement process, to encourage bicycle use and comfort.”	We strongly support this action. However, it is unclear what criteria may be used to determine what is practicable. Requested change(s): Revise to clarify acceptable standards for determining what is practicable and/or what specific exceptions may be made. (See also comments on Action 3-2.20 above.)
Actions 3-3.1 to 3-3.6, pp. 3-21 to 3-22 *	“Make sure that new development does not impede efficient, safe, and free-flowing circulation.”	Although we appreciate the need to continue to manage traffic-related impacts, we are concerned that these actions risk perpetuation of a status quo in which level of service (LOS) for vehicles continues to be effectively prioritized over increasing multimodal options or reducing VMT and GHG emissions. Furthermore, our understanding is that the State no longer endorses the use of vehicle LOS as a metric for designing or prioritizing transportation improvements. Requested change(s): Omit or modify to better balance and integrate with other stated goals, policies, and actions – particularly Action 3-1.14. If kept, balance with the addition of an action to develop and apply multimodal LOS objectives and priorities.
Policy 3-5, p. 3-30 *	“Achieve net carbon neutrality by 2030.”	We strongly support the City’s goals to reduce communitywide GHG emissions and increase resilience to climate-related impacts, and we support many of the specific policies and actions in this section of the Plan. We also recognize the many references to these goals in the Circulation element of the Plan. However, given that transportation is our most significant source of GHG emissions, we feel it is a missed opportunity for the Plan

		<p>not to draw stronger links between transportation and the rest of the policies and actions proposed under Goal 3-5.</p> <p>Requested change(s): Add or incorporate by reference additional policies and actions addressing the role of transportation in communitywide GHG emissions.</p>
Requested addition re emergency access		<p>Although we support exemptions to requirements for protected bike infrastructure where such infrastructure may impede emergency access, we are concerned about circumstances in which such exemptions could be applied prematurely or without the opportunity to explore and collaborate on potential solutions.</p> <p>Requested change(s): Add an action along the lines of: “Work with the Santa Rosa Fire Department and other agencies to develop and apply strategies to minimize and address conflicts between safer bicycle facilities and emergency access.”</p>

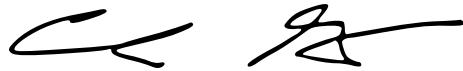
Should you have any questions about the above comments, please contact us at bikeablesr@gmail.com. We would also welcome the opportunity to meet with you to further discuss our feedback and collaboratively develop ideas to further enhance the Plan.

Thank you for your time and consideration.

Sincerely,



Alexa Forrester
Co-Lead, Bikeable Santa Rosa



Chris Guenther
Co-Lead, Bikeable Santa Rosa

From:
Subject:
Date:

[EXTERNAL] Comment from SRGP Web.

Sunday, August 13, 2023 8:12:36 AM

To: info@santarosaforward.com

Comment Submitted by:

Organization: None Given

Name: Kay Renz

Email: kar95403@yahoo.com

Comment:

Comment: My concern is about these new care homes you are allowing to be built. I notice that the majority of them are geared towards seniors who are relatively still mobile, with minimum memory problems and financially able to pay. This is not appropriate planning. We need to build future homes that provide skilled nursing facilities and accept Medi-Cal here in Santa Rosa.

See all comments.

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From: info@santarosaforward.com
To: info@santarosaforward.com
Subject: [EXTERNAL] Comment from SRGP Website

Date: Saturday, September 2, 2023 8:52:10 AM

Comment Submitted by:

Name: Roy Smith
Organization: Farmer, long term County resident Email:
emailrsmith@gmail.com

Comment:

Comment: General Plan Comment: Section 6-6 Food Access and Urban Agriculture

Preface: Santa Rosa's inclusion of Urban Agriculture (UA) in the general plan is welcome and timely. The work of city staff, the Food System Alliance, and CAFF is progressive and admirable. The goal of this letter is provide specific feedback so that zoning changes and ordinance development work effectively for the stated goal – that of ensuring daily access to healthy food.

Key points: 1. UA will not arise spontaneously, as it is not supported by market forces. 2. UA is a public good provided at the cost of the individual private producer. 3. Governments regulate to suppress, de-regulate to encourage. 4. UA's importance goes far beyond Health, Equity, and Justice goals; it is a vital strategy to protect social and political stability during unstable environmental and economic periods.

General UA points to consider:

Governing through the “Precautionary Principle”: Plan 2050 aspires towards the general advancement in resident's well-being through improved food availability. However, the role of government is also to anticipate and plan for potential challenges or disruptions to local conditions. It is now very clear that global agriculture will come under increasingly severe threats, long before 2050, and that UA (and other goals) should be approached in terms of social security, stability,

and hardship prevention. Local government has a responsibility to apply the “precautionary principle” in regards to the economic and physical threats now on the horizon.

This implies a shift from “aspirational” health and equity goals towards a strategic effort to build-in robust residential and peri-residential food production in a rapid manner, similar to domestic production mobilization during both WWI and WWII.

The precautionary principle implies that government should consider and plan for continued food-cost inflation: “affordable” healthy food will not stem from the open retail market.

2. Consider that small-scale food production is uneconomic for the producer. Food today is produced with machines powered by fossil fuels at scale. Producing food for sale using human power cannot provide a living wage at current retail prices.

This fact puts the goals of the Food System Alliance and CAFF at odds with each other. The former seeks to make fresh local food within reach of lower-income residents, while the latter seeks to make farming economically viable at the family level. The result is that fresh produce is too expensive for those in EPA zones, and too cheap for farmers to cover living or land expenses in any zone.

In determining goals, zoning, and ordinances for UA, this core economic disincentive must be considered and mitigated. (See below).

Consider that UA is a public good, providing public services such as social cohesion, dietary health, environmental enhancement, education, disaster mitigation, and economic resilience. Similar public goods are found within health care, water supplies, transport, and security. However, urban agriculture, in contrast, provides the above public goods at private cost.

1. The small-scale domestic producer or local farmer becomes disadvantaged through the act of supplying the local community.

Consider that UA is viable in other countries today, and in the US in the past, and that this is largely due to policies that permit open production and selling of food items.

Consider adopting the term “Food Sovereignty” as a guiding principle, in addition or beyond “Urban Agriculture”. Food sovereignty encompasses the basic constitutional right for all people to meet their core sustenance needs without limitation or interference. It is the only framework that can provide space for UA to spontaneously organize itself.

Specific UA points to consider:

Urban Agriculture is appropriate and complementary in all City zones, including residential. Because it serves the local population directly, at very small scale, nuisance concerns found in other commercial activities are absent here.

UA activities are by their nature self-restricting. (Hours and days of operation, traffic or noise concerns, etc). Ordinances specifying setbacks, parking, hours of operation, the daily removal of stands, etc, are not only unnecessary, but are sufficient to discourage potential producers.

UA should clearly include animal husbandry, cottage kitchen / home restaurant, fresh produce, and the ability to offer items for sale at any given stand that are produced within the Santa Rosa UA foodshed.

The uneconomic nature of UA is addressed in two ways:

Maximize the number of households producing food, rather than prioritizing the ability to purchase fresh food. Shift as much food supply as possible from the retail market, and return it to the domestic household unit.

Amend zoning to permit and encourage low or zero cost land / housing arrangements for market farmers. This can be achieved through a “farm worker” housing zone exemption.

4. Specify in the GP that UA shall remain extensively de-regulated, such that nascent producers retain as much “operational space” as possible to develop viable operations.

This should include the specific inclusion of California's Right-to-Farm (RTF) laws in their entirety.

The RTF should be enshrined within a declaration of Food Sovereignty for all residents.

All zones should be granted UA production and sales venues “By Right”. (Market forces are sufficient alone to eliminate almost all UA venues).

Any zoning or ordinance that restricts or regulates the above should first be demonstrated to have no disincentive impact on producers or patrons.

Thank you for your work and consideration.

- Roy Smith

General Plan 2050

4. Urban Design, Historic Preservation, and Art and Culture

Historical Society of Santa Rosa’s Suggested edits:

Goal, Policies, and Actions	
Page 4.2 (2 nd paragraph)	Include: Heritage Tourism
Page 4.6 Map	Add: Gateways to Preservation Districts
4-1.5 Action	Add: Use compatible street light designs in historic neighborhoods.
Policy 4-2.10	Add: “Social Media” as a method to notify property owners in preservation districts.
4-2.11 Action	Change wording to:” Identify, remove, and/or simplify...” Include: Removing higher fees preservation district homeowners must pay the city for permitted projects.
Policy 4-2.3	Add: “sites” to policy
4.6 Map	Add gateways to designated Preservation Districts
4.8 Historic Resources	
Page 4.8 Heading	Change “Historic Resources” to “Cultural Resources”
Page 4.8 (1 st paragraph)	Add: “buildings” (structures refer to bridges, etc. – define in glossary)
Page 4.8 (2 nd paragraph)	Remove: “Fountaingrove Winery” (no longer standing).
Page 4.8 Bullet Points	The first bullet point needs the following action items: <u>Action Item #1:</u> Update Cultural Heritage Survey/Inventory taken over 30 years ago. Add missing or incomplete decades: 1930-1960. <u>Action Item #2:</u> Make the most current Cultural Heritage Survey available on the City’s website (CHB page, etc.) <u>Action Item #3:</u> Perform survey of significant event sites (i.e., sit-ins, etc.)
Page 4.8 (paragraph prior to Goals, Policies, and Actions.	Change “Saint Rose” to “St. Rose”. Add buildings the have National Register status? (see attached list)
Art and Culture Section	
4-3.5 Action	Add: “...at gateways including those to Preservation Districts”

Other comments:

Suggested new actions:

- Strongly advise adaptive re-use of historic buildings over demolition.
- Require the preservation of building materials if an historic building is approved for demolition.
- Preserve historic aspects of parks while integrating modern uses and amenities.
- Complete the Downtown Historic Context Survey and Statement to forward ongoing preservation efforts.
- Work with local schools and historic organizations to engage and interest residents of all ages in Santa Rosa's history and historic sites, structures, and neighborhoods.

Review consistency of terminology:

- “Historic” vs “Historical”

From: [Jones, Jessica](#)
To: [Meads, Shari](#); [Guerrero Auna, Beatriz](#)
Cc: [Nicholson, Amy](#)
Subject: FW: [EXTERNAL] Biking in Santa Rosa
Date: Monday, September 11, 2023 12:30:08 PM

FYI, see below.

Jess

Jessica Jones | Deputy Director - Planning

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

Tel. (707) 543-3253 | Mobile (707) 292-0963 | jjones@srcity.org



From: Phil Levine <pmlevine@yahoo.com>
Sent: Monday, September 11, 2023 11:41 AM
To: _PLANCOM - Planning Commission <planningcommission@srcity.org>
Subject: [EXTERNAL] Biking in Santa Rosa

Dear Planning Commissioners,

I recently moved to Santa Rosa and live in Spring Lake Village. As a senior riding my e-bike, I want to be able to safely ride around town and therefore I support the recommendations made by Bikeable Santa Rosa in their letter to you, detailing both what works well in the Draft General Plan, but also where significant improvements are needed.

Sincerely,
Phil Levine

From: [Jones, Jessica](#)
To: [Meads, Shari](#); [Guerrero Auna, Beatriz](#)
Subject: FW: [EXTERNAL] 9/14/23, Agenda item 7.1, General Plan
Date: Tuesday, September 12, 2023 8:38:44 AM

Jessica Jones | Deputy Director - Planning

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

Tel. (707) 543-3253 | Mobile (707) 292-0963 | jjones@srcity.org



From: Samantha Feld <sami.feld@gmail.com>
Sent: Tuesday, September 12, 2023 8:26 AM
To: _PLANCOM - Planning Commission <planningcommission@srcity.org>
Subject: [EXTERNAL] 9/14/23, Agenda item 7.1, General Plan

Dear Commissioners:

I am a resident of downtown Santa Rosa and I wish for a safer, healthier, more vibrant Santa Rosa, where my family and I can safely walk and bike. I support the recommendations made by Bikeable Santa Rosa in their letter to you, detailing both what works well in the Draft General Plan, but also where significant improvements are needed. Specifically, the following elements should be explicitly articulated:

- A commitment to the speedy completion of at least 25 miles of a low-stress active transportation network, and further expansions in connectivity beyond that
- The use of National Association of City Transportation Officials (NACTO) design guidelines for Urban Streets as the default standards for design of streets within the City's control
- An ambitious goal for reduction in Vehicle Miles Traveled (and the removal from the GP of any projects that will induce greater use of single-occupancy vehicles)
- The removal of parking minimums throughout the city as a whole

Thank you for your consideration!

Samantha Feld
8th Street
Santa Rosa CA

From: [Jones, Jessica](#)
To: [Meads, Shari](#); [Guerrero Auna, Beatriz](#)
Subject: Fwd: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan
Date: Tuesday, September 12, 2023 12:35:44 AM

Jessica Jones | Deputy Director - Planning

Planning and Economic Development Department | [100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404](#)

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Begin forwarded message:

From: allison.ford@sonoma.edu
Date: September 11, 2023 at 5:46:36 PM PDT
To: _PLANCOM - Planning Commission <planningcommission@srcity.org>
Subject: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan

Dear Commissioners,

My name is Dr. Allison Ford, and I am a resident of Santa Rosa, formerly of district 4, recently moved to district 5. I am a Professor of Environmental Sociology at Sonoma State University. I moved to Santa Rosa to work at SSU in 2020 and am excited about the possibility that the General Plan will make Santa Rosa an even more pleasant place to live. Although there are many things I love about Santa Rosa, ease of transportation is not one of them. I often feel unsafe when moving around town on foot, on bike, and sometimes even in my car. I believe much can be done to improve these conditions, and, along with my fellow citizens and friends in Bikeable Santa Rosa, I am writing to request that you ensure that Santa Rosa's new General Plan puts us on the path to a genuinely multi-modal transportation future.

I wish I could be there for the Thursday meeting to tell you this in person, but I teach late Thursday nights. But I hope lots of Bikeable folks show up to relay just how important it is to us that we take the General Plan as an opportunity to build safer, more pleasant, community oriented bikeable, walkable streets, with robust public transportation networks. I met the folks at Bikeable Santa Rosa when they were just beginning to convene, and have been part of the steering committee ever since. As a member of Bikeable, I support our letter dated August 13, 2023, and will reiterate here the elements in the plan that we hope to see:

- A commitment to the speedy completion of at least 25 miles of a low-stress active transportation network, and further expansions in connectivity beyond that
- The use of National Association of City Transportation Officials (NACTO) design guidelines for Urban Streets as the default standards for design of streets within the City's control

- An ambitious goal for reduction in Vehicle Miles Traveled (and the removal from the GP of any projects that will induce greater use of single-occupancy vehicles)
- The removal of parking minimums throughout the city as a whole

Although I can't be present at the Thursday meeting, I am invested in the public process, and excited about the possibilities that develop when citizens and their representatives work together to build something that benefits the whole community. I often relay to my students the importance of participating in the public process. Some of them don't know it's an option. Some of them feel jaded, or cynical about their ability to make a difference, or rather, about the ways their efforts will be received. I hope I can someday soon point to a beautiful, safe, pleasant, and fun low-stress active transportation network throughout Santa Rosa as an example of what can happen when you participate in the public process.

Commissioners, thanks for the work you do for our community. I look forward to seeing how you move forward.

Sincerely,

Allison Ford, PhD
Assistant Professor
Department of Sociology

Sonoma State University

allison.ford@sonoma.edu

Pronouns: she/her/hers

From: [Jones, Jessica](#)
To: [Meads, Shari](#); [Guerrero Auna, Beatriz](#)
Subject: FW: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan
Date: Tuesday, September 12, 2023 8:38:33 AM

Jessica Jones | Deputy Director - Planning

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Tel. (707) 543-3253 | Mobile (707) 292-0963 | jjones@srcity.org



From: Andrew Rich <andrewnrich@gmail.com>
Sent: Tuesday, September 12, 2023 8:17 AM
To: _PLANCOM - Planning Commission <planningcommission@srcity.org>
Subject: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan

Dear Planning Commissioners,

I support the recommendations made by Bikeable Santa Rosa in their letter to you, detailing both what works well in the Draft General Plan, but also where significant improvements are needed.

Sincerely,

Andy rich

From: [Jones, Jessica](#)
To: [Meads, Shari](#); [Guerrero Auna, Beatriz](#)
Subject: Fwd: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan
Date: Tuesday, September 12, 2023 12:36:10 AM

Jessica Jones | Deputy Director - Planning

Planning and Economic Development Department | [100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404](#)

Tel. [\(707\) 543-3253](#) | Mobile [\(707\) 292-0963](#) | jjones@srcity.org

Begin forwarded message:

From: Liana Whisler <lwhisler28@gmail.com>
Date: September 11, 2023 at 6:06:45 PM PDT
To: _PLANCOM - Planning Commission <planningcommission@srcity.org>
Subject: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan

Dear Commissioners,

I'm writing to request that you ensure that Santa Rosa's new General Plan puts us on the path to a genuinely multi-modal transportation future by explicitly articulating these elements in the Plan:

A commitment to the speedy completion of at least 25 miles of a low-stress active transportation network, and further expansions in connectivity beyond that
The use of National Association of City Transportation Officials (NACTO) design guidelines for Urban Streets as the default standards for design of streets within the City's control

An ambitious goal for reduction in Vehicle Miles Traveled (and the removal from the GP of any projects that will induce greater use of single-occupancy vehicles)

The removal of parking minimums throughout the city as a whole

Sincerely,

Liana Whisler