

Katrina Braehmer

From: Fred Allebach <fallebach@gmail.com>
Sent: Thursday, November 13, 2025 6:40 AM
To: South SR Specific Plan; Nicholson, Amy; Scott Orr; Katrina Braehmer; mstapp@srcity.org; Fleming, Victoria; Audrianna Jones; Calum Weeks; caitlin cornwall; David Hoffman
Subject: housing near transit (and services) in a just society

EXTERNAL

<https://apnews.com/article/housing-shortage-public-transit-massachusetts-california-b2a727ab4c570fff1e549e726ea801e0>

442 words, 1-3 minutes

Good morning,

An AP housing piece fyi, with Urban Institute boosting. Housing near transit strikes me as a good idea but in the case of Santa Rosa and the 101 Corridor, one of the critical benefits, walkability to services beyond just transit needs to be ensured for it to work. Boosting transit use has to be made attractive, or else as soon as someone gets a car, no bus ever again. The circular ridership vs. bus service level situation needs to be solved for the transit piece to work.

The South Santa Rosa Specific Plan area needs a pharmacy, a Grocery Outlet, hardware store, laundromat, a park, pathways/trails along creeks, and frequent bus service every 10-15 mins. For transit oriented development to be successful these and other hub services have to happen in areas like Yolanda, Kawana Springs and near the Santa Rosa Ave. mobile home parks; getting these services in place are SR city General Plan Equity Equity Priority Area Actions. The county has similar plans and ideas. These Actions need to happen. How?

Perhaps contacts with ACE, Grocery Outlet, and Walgreens franchising people could help the city and county get what they and the public want for transit hub business services by

staying in touch with potential company players and potential franchise operators as the SSRSP unfolds. Talk with some Grocery Outlet franchisers locally; *same exact items* as Safeway and Whole Foods for \$4 - \$5 less per item.

Challenge: planners find out how Grocery Outlet franchising works and be ready to help pull the trigger on available properties. Have an incentive program to give property owners a regulatory/ fee/ tax break if they work with planners to flesh out making transit oriented development successful. The desired services have to be lined up and made possible.

An example that partially works: the shopping center on Montecito and Middle Rincon, lots of low-income multi-family apts on a busy street, a hardware store, laundry, and grocery. The only problem, Olivers is too expensive to serve the concentration of lower-income Latinos that live in that area. Rincon Valley Park is not walkable from there. In this case, the grocery box can't really be checked bc rather than solve planning equity issues it creates more cost burden.

How to fund this planning staff time? Prune back police and fire shares of municipal budgets, cap them both at 50% of the budget. Free up that money for other critical service needs. Police and fire costs play on ginned-up safety fears and are like runaway military spending, someone needs the spine to cut this budget black hole back to size, primarily by not condoning all the new toys.

very best, Fred

cc'd to NAACP Housing Committee members Audrianna and Cal, Caitlin at Sonoma Valley Collaborative, and David Hoffman at NBOP and Redwood Forest Friends Meeting

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

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Katrina Braehmer

From: Fred Allebach <fallebach@gmail.com>
Sent: Sunday, December 14, 2025 8:36 AM
To: Fred Allebach
Subject: fyi a public comment on the South Santa Rosa Specific Plan

EXTERNAL

532 words, 2-3 minutes

Fred Allebach

12/14/25

South Santa Rosa Specific Plan public comment

My hope is that, given that the South Santa Rosa Specific Plan area (SSRSP) is...

- a Santa Rosa (SR) and Plan Bay Area Equity Priority Area
- mapped as Santa Rosa top 25% below poverty
- has the lowest Measure of America Human Development Index score in Sonoma County (SoCo)
- a current-LAFCO-mapped disadvantaged unincorporated area
- a food desert
- a SoCo Environmental Justice Community area with high asthma and heart disease scores
- has a concentration of former EPA Superfund sites
- has high Cal EnviroScreen 2.0 air and groundwater pollutant scores
- is adjacent to the high-socio-econ disparity Sheppard and Roseland Census Tracts, and the disadvantaged community South Park neighborhood
- and has 17 or 18 parcels with mobile home park land use designations, and four mobile home parks subject to the SR rent control ordinance
- among other scores, layers, and facts of a similar nature

... that SR and SoCo Planning staff who direct the SSRSP consultant Dyett and Bhatia, will have the vision to look beyond business as usual to ensure there are alternatives that squarely address and mitigate these above-noted negative social and environmental conditions, and that the city and county decision makers will work in conjunction with their planning staff to seriously address these issues.

As I understand it, the SSRSP is mainly an infrastructure-based plan that seeks to set land use conditions that will guide and make way for future development. In this planning scenario, developers will key in on the SSRSP area for the cheaper land prices and future profit potential that derives from the above-noted negative social and environmental conditions.

I don't believe anyone thinks that business interests, through a putative invisible hand, will solve the above-noted negative socio-econ-environmental conditions. This leaves it on local jurisdictions to make rectifying these wrongs and disparities their and our business and not just talk and words.

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

The US and the world are now at a crossroads when an old order is changing. Masses of people have not realized hoped-for material gains but rather are in serious decline. Now is a great time to change the channel and envision and plan for the world we'd like to see where social and environmental injustice are not taken for granted as emergent properties of how we do business.

We can do way better as SoCo polities and residents and that is our call at the crossroads of history. I'd like to see the SSRSP be in the vanguard of a new type of planning that puts old-order business as usual in the rear-view mirror. The shocking socio-econ-environmental stats for the SSRSP area should be a call to action and this call should be seen in Plan Alternatives. Answering this call to action is how we productively address current trends to fascist authoritarianism.

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

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Katrina Braehmer

From: Fred Allebach <fallebach@gmail.com>
Sent: Tuesday, December 30, 2025 1:30 PM
To: South SR Specific Plan; Nicholson, Amy; Osburn, Gabe; jjones@srcity.org; ktoomians@srcity.org; Basinger, Megan; Mendoza, Jennifer; Hennessey, Dan; Scott Orr; Katrina Braehmer
Subject: finishing 2025 strong! with an eye on the South Santa Rosa Specific Plan

EXTERNAL

Fred Allebach

12/30/25

Fred asks AI how to atone for urban renewal and freeway segregation?

I used underline in the text to emphasize what I think are important equity planning points. I don't believe it's feasible to imagine Hwy 101 would be relocated. Union and minority hiring requirements are cited by some as raising the cost of housing production but perversely this makes the case that you can't serve social good or the poor without further exploiting the working class in the process. That illustrates a double negative rationale. Syracuse, NY is a good example of a heavily free-way segregated city and trying to implement progressive planning therein.

Atone for urban renewal and freeway segregation?

Atoning for urban renewal and freeway segregation involves a multi-faceted approach of **reinvestment, redesign, and community empowerment**, including funding highway removal/reconfiguration, creating community land trusts, prioritizing transit-oriented development, ensuring equitable hiring for construction jobs, and implementing policies that center the needs of harmed communities for economic and cultural restoration.

Policy & Infrastructure Solutions

- **Fund Deconstruction**: Create grant programs (like the proposed Restoring America's Neighborhoods Grant) to help states remove or redesign "obstructive highways" built through communities of color, turning them into boulevards, green spaces, or transit corridors.
- **Community Land Trusts**: Allocate freed-up land for community-controlled land trusts to generate wealth and affordable housing for existing residents, preventing displacement.
- **Invest in Transit & Green Space**: Shift focus from highway expansion to better public transit, pedestrian-friendly zones, and infrastructure that reconnects neighborhoods.
- **Equitable Development**: Implement policies for transit-oriented development (TOD) that ensure new housing remains affordable and accessible to low-income residents.

Community & Economic Justice

- **Reparative Justice:** Prioritize reinvestment in communities historically harmed by these projects to build community health, economic opportunity, and cultural joy.
- **Racial Equity in Hiring:** Mandate that local workers and minority-owned businesses benefit from construction jobs created by revitalization projects.
- **Community-Led Planning:** Ensure residents have genuine power in planning processes, requiring deep community engagement beyond standard public meetings to achieve "concrete reconciliation".

Systemic & Cultural Shifts

- **Change Planning Culture:** Foster a shift within transportation and planning agencies to acknowledge past harms and prioritize equity, moving away from patterns that favor affluent areas.
- **Reform Modeling Tools:** Update transportation modeling to better account for social equity and long-term community impacts, not just traffic flow.

Examples in Action

- **Syracuse, NY (I-81):** Activists pushed for land trusts, hiring equity, and community control in the highway's reconstruction.
- **Montgomery, AL:** Renaming streets (like Fred D. Gray Ave) symbolizes reconciliation, but physical reinvestment is key.
- **Washington, D.C. & Philadelphia:** Planners are actively engaging residents at local events and through planning institutes to build trust and participation.

Changing planning culture to atone for the harms of urban renewal and freeway segregation requires a fundamental shift towards **equity, community empowerment, and reparative justice.** Key strategies involve:

Acknowledge Harm and Prioritize Equity

- **Acknowledge the past:** Planning agencies must formally acknowledge the intentional role their profession played in causing harm to communities of color through redlining, highway routing, and urban renewal projects.
- **Establish explicit goals:** Clearly state that the primary goal of all planning and development is to eliminate racial and economic disparities and prioritize the needs of those most affected.
- **Mandate accountability:** Ensure plans include measurable outcomes for equity and implement monitoring and evaluation processes to track progress and be transparent about shortcomings.

Empower Impacted Communities

- **Redistribute power:** Shift decision-making authority to residents of historically marginalized communities. This can involve creating democratic institutions with non-elites represented on governing boards, such as in community land trusts.
- **Relentless and authentic engagement:** Move beyond standard public meetings and engage residents where they gather, such as at community festivals or block parties.

- **Compensate participants:** Pay community members for their time and expertise during planning processes and cover associated expenses like transportation and child care.
- **Use local data:** Rely on community-collected data and insights from community-based organizers to better understand and address specific local needs, rather than solely relying on national data sources.

Reform Practices and Policies

- **Update transportation modeling:** Reform outdated tools that prioritize vehicle traffic flow over social equity and long-term community impacts.
- **Implement racial equity impact assessments:** Use tools that assess potential discriminatory impacts of proposed policies and projects before they are implemented.
- **Mandate training:** Provide technical staff and policymakers with better training on equity issues and historical context.
- **Reform zoning codes:** Modify exclusionary zoning to allow for diverse housing types (e.g., multi-family homes) to increase density and housing affordability in opportunity-rich neighborhoods.

Direct Reparative Actions

- **Prioritize reinvestment:** Focus financial assistance and infrastructure funding on repairing the damage in communities harmed by past policies, ensuring new investments preserve and strengthen local culture and prevent displacement.
- **Support land trusts:** Establish and fund community land trusts to generate wealth and create permanent affordable housing for existing residents on land freed by highway removal or other revitalization efforts.
- **Integrate art and storytelling:** Use creative methods to document and celebrate community history and culture, making the planning process a space for healing and social-cultural reclamation.

Reforming modeling tools for atoning for urban renewal and freeway segregation requires a paradigm shift that integrates **social equity, community well-being, and historical context** into the core of transportation planning.

Key Reforms to Transportation Modeling Tools

- **Integrate Social Equity Metrics:** Current models often lack standardized ways to measure equity. New tools need to explicitly track impacts on historically excluded groups using indicators like household income, race/ethnicity, and access to opportunities (jobs, healthcare, education).
- **Acknowledge and Model Historical Harms:** Modeling should incorporate historical data, such as redlining maps and past displacement statistics, to understand how existing infrastructure has shaped current disparities. Visual tools like ArcGIS StoryMaps can help illustrate these histories and their ongoing consequences.
- **Shift Focus from Traffic Flow to Access and Opportunity:** Traditional models prioritize automobile speed and traffic flow, which historically justified highway expansion through urban cores. Reformed models should measure access to destinations via various modes (transit, walking, biking) and focus on improving connectivity for the most vulnerable residents.
- **Account for Induced Demand:** Current models often underestimate induced travel (additional vehicle travel resulting from expanded roadways). More accurate models should incorporate induced demand

to prevent the self-perpetuating cycle of highway expansion that further entrenches car dependence and disproportionately impacts marginalized communities.

- **Incorporate Quality of Life (QOL) Dimensions:** Models should move beyond mobility metrics to include QOL indicators like physical, mental, and social well-being. This includes assessing environmental burdens such as air pollution, noise, and safety.
- **Utilize Mixed-Method Data Collection:** Relying solely on large-scale datasets is insufficient. Planners must integrate qualitative, community-generated data through focus groups and co-designed workshops to capture nuanced community needs and lived experiences.
- **Ensure Data Transparency and Accessibility:** The data and assumptions used in planning models should be transparent and accessible to the public. Open-source tools like [FlowmapBlue](#) can allow communities to visualize and analyze data themselves, fostering greater public engagement and trust.

Institutional and Cultural Shifts

- **Mandate Collaboration:** Encourage closer collaboration between equity advocates, community-based organizations (CBOs), and technical analytical units within planning agencies.
- **Provide Staff Training:** Transportation professionals need better training in social sciences, ethnic studies, and equity issues to understand the context and impact of their work.
- **Center Community Decision-Making:** True reform means positioning residents as collaborators and decision-makers in the planning process, not just passive recipients of "public input".
- **Align Funding with Equity Goals:** Use equity as a key criterion for funding decisions and grant applications (e.g., the federal Reconnecting Communities program) to incentivize the use of reformed modeling practices.

Equitable development is a planning and investment approach ensuring all community members, especially marginalized groups, participate in and benefit from growth, tackling issues like poverty, economic barriers, and environmental injustice by creating affordable housing, green spaces, better infrastructure, and inclusive decision-making to reduce disparities and prevent displacement. It's about making sure economic progress creates fair opportunities and outcomes for everyone, not just some, by addressing systemic racism and unequal resource access.

Key Principles & Goals:

- **Inclusivity:** All residents have a voice in shaping their communities.
- **Affordable Housing:** Preventing displacement through strategies like [community land trusts](#) and [rent stabilization](#).
- **Economic Opportunity:** Ensuring benefits (jobs, resources) are shared widely.
- **Environmental Justice:** Fair distribution of environmental benefits (parks, clean water) and burdens.
- **Addressing Disparities:** Actively reducing gaps between different neighborhoods and groups.

Examples in Practice:

- **[Green Infrastructure](#):** Building parks, trails, and urban forests in underserved areas.
- **Community-Led Planning:** Empowering residents to direct development projects.

- **Preservation:** Using tools like [community land trusts](#) to keep housing affordable long-term.

In essence:

It's moving beyond general economic growth to *just* growth, where no one is left behind and communities are strengthened from within, not just redeveloped from the outside.

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

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Katrina Braehmer

From: Fred Allebach <fallebach@gmail.com>
Sent: Sunday, January 11, 2026 7:44 AM
To: Scott Orr; Katrina Braehmer
Cc: Chris Coursey; Caitlin Vejby
Subject: South Santa Rosa Specific Plan, future annexation of SoCo portion of plan area with attention to mobile home park issues
Attachments: SSRSP DUCs copy.jpeg; SSRSP public comment 12-14-25.docx; SSRSP letter to S. Orr, K. Braehmer 11126.docx

4 minutes for this email

Fred Allebach

1/11/26

South Santa Rosa Specific Plan, future annexation of SoCo portion of plan area with attention to mobile home park issues

Hi Scott and Katrina,

cc to Supervisor Chris Coursey and Cait Vejby of SoCo Legal Aid

I've been studying up on the SSRSP from various angles. The SoCo portion of the SSRSP has five mobile home parks (MHP), all of which qualify as DUCs on the recent LAFCO DUC map. (See attached.)

It looks like there is strong inertia for annexation in the SSRSP and it's likely the MHP DUCs would have to be included. Given that the SSRSP is primarily an economic development/ urban renewal type of infrastructure plan, it is top heavy on business development even as the whole plan area and neighboring areas are majorly depressed and made up of DACs and DUCs, as shown on many demographic indicator maps. (See attached piece outlining these stats.)

I don't think any development plan will somehow magically address systemic social inequities through promised future economic vibrancy and therefore, intentional work by staff and electeds is called for to ensure that the SSRSP DAC and DUC populations are not displaced through all-too-common gentrification and the default tipping of plans to higher dollar interests.

I think that as SSRSP planning unfolds there will be pressure to close and convert the five SoCo MHPs to market rate housing and/or to change the land use altogether. These parks are currently zoned high and medium density residential by the county. This would displace current low-income and BIPOC residents thereby getting rid of a critical naturally occurring affordable housing resource in the area. There will also be pressure to try and avoid annexing these MHP DUCs and to cherry pick what land gets annexed.

What I'd like to present to you here is an ask to update and strengthen the SoCo mobile home park *closure and conversion ordinance* and the *SoCo rent control/ rent stabilization ordinance*. A related ask, make a SoCo MHP land use designation for SoCo MHPs to add a layer of protection for residents. This would be a hedge against the powerful preying on the weak, and against urban renewal-type of forced relocation.

Santa Rosa and SoCo have a lot of policies and plans that address well-known socio-economic inequities. A SoCo initiative to beef up the county MHP rent control and closure and conversion ordinances would be a good chance for the County to walk its equity talk.

SSRSP materials have a lot of talk about the social dimensions of the plan even as it remains mostly an economic development/ infrastructure initiative. If this attention to plan area social equity issues is to be meaningful, I suggest that one concrete action that could be taken would be for the county to substantially strengthen the above-noted ordinances.

A Sonoma MHP group has paid over \$20,000 to have a template MHP closure and conversion ordinance drawn up. This template ordinance has critical points that protect MHP residents' interests and is available for your consideration. This Sonoma MHP group is asking for the moon and heaven too; Legal Aid could help zero in on what the critical points to include in a closure and conversion ordinance would be.

At the end of the day, a strengthened SoCo MHP ordinances would help all county MHPs and would be a solid move to protect a class of residents in need of all the help they can get.

Very best regards,

Fred Allebach

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

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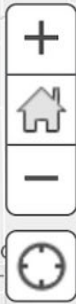
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Katrina Braehmer

From: Fred Allebach <fallebach@gmail.com>
Sent: Tuesday, February 10, 2026 7:58 AM
To: South SR Specific Plan
Cc: Caitlin Vejby
Subject: SSRSP-area Block Group DAC/ DUC study with suggestions for targeted interventions and a discussion of Plan-specific AFFH and annexation issues
Attachments: Plan Area DAC study with equity comments and suggestions final.docx

EXTERNAL

Fred Allebach

2/10/26

SSRSP-area Block Group DAC/ DUC study with suggestions for targeted interventions and a discussion of Plan-specific AFFH and annexation issues (15 minutes. This is the real stuff with no AI help!)

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- DUCs and annexation
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Study of South Santa Rosa Specific Plan showing Plan-area DAC or DUC Block Groups

DAC and DUC Block Groups vulnerable to displacement in the SSRSP include: the whole northern section of the Plan Area, two Block Groups along the mid-Plan Area east of Santa Rosa Ave and also adjacent to the Todd Creek annexation area, and north Moorland Ave. The other Block Groups have significant DAC and DUC components, one missing DUC status by \$400.00

Block Groups are not mentioned in the Alternatives Report or the Plan's Affordable Housing and Anti-Displacement Strategy. The Strategy could be updated to more exactly show probable displacement of DACs at the Block Group level. The Plan's call for targeted interventions to address the large scope of Plan-area DAC/ DUC equity issues justifies targeting demographic analysis to the Block Group level.

Dyett and Bhatia show that the whole Plan Area has an MHI that qualifies as a DAC.

As time goes by and Santa Rosa-SoCo DACs and DUCs are increasingly displaced by a North Bay rising tide of wealth, Block Groups subject to displacement will shift out of DAC and DUC status. Displacement of Plan-area DACs/ DUCS will make priority actions, mitigations, and funding for these cohorts less likely because the Block Groups will no longer be DACs. Doing nothing makes equity issues literally go away.

Census categories in order of size: Place, Tract, Block Group, Block. Acronyms listed at bottom.

Block Group method

Current CA MHI is \$99,122.00 DAC status is 80% and less of state MHI. 80% of state MHI is \$79,297. Anyone who lives in a Block Group where the majority MHI is less than \$79,297 lives in a DAC or DUC Block Group.

SoCo current MHI is \$104,674 80% of SoCo MHI is \$83,739, \$4,442.00 higher than the state figure. A SoCo DAC COLA is not made anywhere in the SSRSP, though in order to see and respond to the actual COL, and to make a local targeted analysis as called for by the Plam, it should be.

Links to Census Reporter, Plan-area DAC/ DUC Block Groups. The Census Reporter maps in the links below will telescope in and out and show street names, to see where the Block Groups sit in the Plan area. 2022-24 ACS data used.

Tract 1514.06 BG1 This whole Block Group is SDAC-level MHI, located in the northern plan area where city-centered Alternative 2 proposes high density housing.

pop. 1,716, median age 41.2, 781 households, 2.2 per household

57% Latino, 32% white, 1% Black, 5% Asian, 5% two

MHI \$46,311

70% renter, 16% female head of household

45% multi-unit, 43% single unit, 5% MH, 7% RV

\$225,700, median value of owner-occupied units

Tract 1514.05 BG2 This whole Block Group is DAC-level MHI, located on east side of Santa Rosa Ave., northern section of Alternative 1 mixed use area.

pop. 3,252, median age 32.3, 982 households, 3.3 per household

50% Latino, 39% white, 7% Black, 2% Asian, 1% two

MHI \$66,865

48% renter, 14% female head of household

38% mobile home, 34% single unit, 28% multi-unit

\$153,800 median value owner occupied unit

Tract 1514.05 BG3 The Block Group is 44.6% DAC, with 41% mobile homes for housing type. Located south of Robles, east side of Santa Rosa Ave., southern section of Alternative 1 mixed use area. Here is where a Block-level mapping tool can show where Plan-area DACs and DUCs are.

Pop. 740, median age 34.5, 287 households, 2.6 per household

68% white, 32% Latino

MHI \$98,697

32% renter, female head of household 62% (widows)

44% single unit, 41% mobile home, 15% multi-unit

\$750,000 median value owner occupied home

Tract 1532.02 BG2 57.6% DAC

This Block Group is part of a state SB 535 Environmental Justice community. Located at North Moorland Ave. The MHI chart at the link above has further links that show this **Block Group is 57.6% DAC**. Click link to show data, then click link to view table, then add up all the % income below \$74,999.

pop 1,733, median age 29, 509 households, 3.4 persons per household

82% Hispanic, 9% Asian, 4% white, 5% two

58% male

MHI data lacking but can be teased out by a table-level addition of the MHI described below

\$22,996 per capita income

61% renter, 20% female head of household

53% multi-unit/ 47% single unit

Median value of owner-occupied home \$645,700

Tract 1532.02 BG1 This Block Group is 42.8% DAC and is extremely close (by \$400) to being majority DAC and it would be with a SoCo COLA. Located at South Moorland Ave.

Pop. 808, median age 46.6, 314 households, 2.5 per household

58% Latino, 33% white, 1% Black, 3% Asian, 4% other, 1% two

MHI \$79,677

48% renter, 6% female head of household

72% single unit, 21% multi-unit, 7% mobile home

\$880,400 median value owner occupied home

BG 1, Tract 1514.05, This Block Group is an SDAC and contains the Santa Rosa Mobile Estates mobile home park. Located off East Robles on the southern border of Todd Creek annexation/ pipeline parcel.

Pop. 2,370, median age 31.1, 839 households, 2.8 persons per household

52% Latino, 31% white, 4% Black, 9% Asian, 4% two

MHI \$56,777

88% renter, 29% female head of household

75% multi-unit, 14% MH, 9% single unit, 2% RV

Local knowledge, mapping specificity, Plan Area DUC/ DACs are located *exactly where large-scale land use changes are planned*

This short study shows the locations of DAC and DUC Block Groups in the Plan Area. **DAC and DUC Block Groups are located *exactly where large-scale land use changes are planned*. Big social costs for the most vulnerable are likely.** This study shows a finer-grained location of where Plan Area lower-income cohorts will experience displacement pressure.

By generating Plan Area data, Dyett and Bhatia has shown that they have mapping tools like the DistrictR tool that can detail out specific areas. With mapping resources like this, the city and consultant should be able to show exactly where Plan Area DAC and DUC cohorts are and thus where the most displacement pressure will be given various land use options.

That the Plan has a universal component to annex the Todd Creek parcel and build 2000 market rate units of single-family housing, with a low inclusionary percent. This shows that the Bennett Valley wealth footprint will likely creep into adjacent DAC and DUC areas and cause displacement.

This potential for displacement should be addressed by a more exact demographic location methods consistent with the targeted intervention approach called for in the Affordable Housing and Anti-Displacement Strategy and the Alternatives Report.

Options to mitigate here could begin with an acknowledgment that single family zoning is equivalent to modern day redlining, which runs counter to AFFH law in local Housing Elements. Pre-zoning the Todd Creek annexation area to have medium and high-density multi-family housing zoning along all annexation area's main arteries with planned-for transit could be done, just like in the rest of Santa Rosa. And/or to mix up the annexation-area zoning so it won't be a monolithic block of yellow-zoned, low-density housing.

Targeted interventions to implement Plan, Strategy, AFFH, Equity Priority, and Anti-displacement goals

A renter registry to track demographic shifts, as well as comparing Block Group data over time to see how the MHI fluctuates. You can't manage what you don't measure. Social costs are important to measure too. As renters get displaced, with a renter registry the city and county can up their mitigations game.

Updated and strengthened closure and conversion ordinances (CCO) for city *and* county mobile home parks would better protect vulnerable mobile home park residents from displacement. This is IMHO, low-hanging fruit. The city and county would have to resist landlord lobby pressure to dilute the CCOs. If rents are already unsupportable for many in the Plan Area, how can it be that the landlord class says they are not making a profit? Who's the real victim here? In an economy of a 1%, 10% and 90%?

Pivotal mobile home park Closure and Conversion Ordinance pieces, can be confirmed with Cait Vejby of Legal Aid

Park closures and conversions could very well happen as a result of the SSRSP gentrification. An updated Santa Rosa Closure and Conversion Ordinance (CCO) would address potential displacement issues that state housing law is designed to address.

AB 686 suggests, using "Place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement." "Strategies to stem the tide of displacement, including robust tenant protections." "Strategies to preserve mobilehome parks." And "as part of a larger anti-gentrification and anti-displacement strategy, adoption of policies that promote opportunities for tenants to purchase their buildings upon notification of an intent to sell by their landlords."

If a large, 2000-unit market rate housing project goes into the SSRSP, with a revitalization effort where amenities overall will get boosted, prices will go up. On one hand this meets city economic goals but state law says this can't happen and also throw the poorest protected classes under the bus as part of the deal. AB 686 calls for the preservation of affordable housing, "transforming racially and ethnically concentrated areas of poverty into areas of opportunity (without displacement)".

Suggested CCO pieces: A required closure impact report that also has a relocation plan. Unit owners compensated for "in-place value" of their home, all as decided by a local government-chosen consultant just as local gov't chooses CEQA consultants. With the assessed value of the unit, it's critical to not have a lowball estimate; make park owners put money on the table to pay the fee for the report, like CEQA. For example, Harmony and other speculative park owners try to strong arm a closure to jack up rents

and prices, if they have to put \$200,000 on the table to pay for a closure impact report this could take away sham closure threats.

State law for closures and conversions does not spell out the details and local gov't has the freedom to do that detail work, to be very specific about what is included in a CCO: a relocation plan, closure impact report, accurate assessment of resident's income, in-place value of units assessed by a gov't-chosen consultant, a finding on availability of affordable housing appropriate to income levels, consistency with no-net-loss law, what the relocation area is/ within 30 miles? Within SoCo?

Concern that Plan is too economy-centric and underplaying legit equity goals

Plans that accept market inertia as business as usual, without intentional policy interventions to protect low-income residents, will see increasing displacement. The Strategy calls for intentional policy interventions to address social costs of possible gentrification. State Housing Element and AFFH law is squarely aimed to counteract this sort of invisible hand, economy-only inertia.

The market economy is not somehow a law of nature. *People choose economic values* and we can choose more equitable and benign methods. We don't have to take a bad deal. To date the US economy is extremely inequitable and stilted to the very top. We don't have to buy into or follow an economic model that distributes resources so poorly.

Place-based revitalization has to actually do what it says and remediations for local inequity have to actually work and accomplish AFFH goals.

When I lived in Sonoma Valley I saw that the Housing Element and AFFH was something to try and work around to preserve the status quo. I'm not sure if Santa Rosa is the same but judging by the sheer amount of single-family housing in Santa Rosa, Mile's Law, and the majority electeds who are under the sway of low-density zoning advocates and status quo preservationists, it stands to reason that there would be systemic resistance to AFFH, and that staff has to respond to that or lose their jobs. In Sonoma this was/is a nuanced political dance of how to appear to conform to AFFH but not really. This is manifested in the wording of Housing Element programs and policies, and of AFFH provisions and equity goals that leave room for plausible deniability of meaningful action and pretty well don't obligate the city to do much. I hope I'm wrong about this in Santa Rosa!

How to have the Plan adequately emphasize stated and integral Housing Element and AFFH social equity pieces?

I have a concern that even as equity programs and policies are clearly spoken about and linked to the Plan, that whenever the Plan gets spoken of in public and in outreach materials it's all about land use, infrastructure, and economic priorities. I'd like to see framing more on a whole-package, full cost accounting, Sustainability triple bottom line level where not only economic and environmental sustainability take precedence.

The Report says: "The SSRSP will develop a vision for land use, circulation and infrastructure, including development and public realm standards, *community health and equity policies*, capital improvements, and parks, coupled with necessary implementation actions and investment priorities. The Plan will seek to *set the stage for diverse, amenity-rich housing development as well as neighborhood-serving commercial uses, to meet the needs of the various neighborhoods within the Planning Area*, as well as commercial and industrial uses." Italics mine.

Where will this *setting the stage* include clear plans in the Alternatives Report to address local inequity, and be consistent with city and county Equity Priority Actions, Housing Element AFFH programs, and Strategy targeted interventions that are key to the Plan?

To be consistent with city equity policies and to encourage *neighborhood-serving commercial uses, and to meet the needs of the various neighborhoods*, the city should explicitly address DAC and DUC concerns as the Plan unfolds, with these cohorts properly identified on at least a Block Group level.

The Strategy shows a chart with anti-displacement mitigations based on Santa Rosa's Housing Element and AFFH state-law programs. These plans should be explicitly noted and referred to in the Alternatives Report, to inform land use decisions that will bear upon strong gentrification potential and displacement. How can people choose Alternatives land use options if they are not aware of the potential social costs? Trump has ignored social costs and equity, I would hope that Santa Rosa and Sonoma County won't do so as well by underplaying them.

DUCs and annexation

The LAFCO DUC map shows three mobile home park areas contiguous with the Todd Creek annexation area, these MHPs would have to be annexed along with the pipeline project. If the LAFCO Board determines that the Moorland area is contiguous with the pipeline parcel, Moorland would have to be included in any pipeline annexation as well.

The LAFCO staff and Board, city staff, some electeds, and Ken McNab are steering away from an annexation of Moorland by saying that Moorland is not contiguous to the Plan Area, by judging that Hwy 101 is barrier equivalent to a river or mountains. (Feb 2026 LAFCO meeting.) This even though *Moorland a known DUC by SB 535 metrics and is in the Plan Area* and so must by definition be contiguous with the Plan.

Establishing better connectivity across Hwy 101 and better access to resources within the Plan Area is an important place-based revitalization planning piece, to address Moorland's status as a Hwy 101 segregated area same as Roseland. Moorland is clearly keyed in on by the Plan in multiple ways as an area calling for increased integration with Santa Rosa. Here, many Plan specifics counter the notion that Moorland is not contiguous. The Plan actually tries to make it more so integrated. That the LAFCO Board might find Moorland not contiguous would amount to a subjective, political decision that might turn out different with a more progressive Board. As well, a finding of non-contiguity would run counter to many stated Plan objectives seeking to loop Moorland closer to the city.

To look for ways to not annex Moorland can be seen as an example of DUC cherry picking, i.e., that decision makers try to find ways to not annex DUCs.

Note, the main opposition to any annexations is always cost-based. "It will cost too much", is an argument made even in the best of times. This makes current anti-annexation cost arguments sound kind of like the boy who cried wolf. Future Plan completion may just as well be in a time of economic upswing. Santa Rosa is counting on the Plan to boost the economy; the costs-too-much argument is not really airtight; it's a conservative choice consistent with maintaining an segregated status quo.

Acronyms

CA California

MHI median household income

SSRSP South Santa Rosa Specific Plan

SoCo Sonoma County

MH mobile home

DAC disadvantaged community

SDAC severely disadvantaged community

DUC disadvantaged unincorporated community

LAFCO Local Agency Formation Commission

EJ environmental justice

COL cost of living

COLA cost of living adjustment

ACS US Census American Community Survey

Strategy SSRSP Affordable Housing and Anti-Displacement Strategy

AFFH Affirmatively Furthering Fair Housing

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

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Katrina Braehmer

From: Fred Allebach <fallebach@gmail.com>
Sent: Sunday, February 22, 2026 9:11 AM
To: planningcommission@srcity.org; citycouncil@srcity.org; Conor McKay
Subject: Public comment: Planning Commission agenda item 8.1, South Santa Rosa Specific Plan (SSRSP) Alternatives Report
Attachments: SR PC SSRSP comment v.1.docx

EXTERNAL

Fred Allebach 2/21/29

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

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

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

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

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

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

Identification of socio-economic disparities

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

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

None of this registered in the Alternatives Report. Nada.

A Trojan Horse?

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

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

Spanish outreach materials oversight

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

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

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

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

If all this highly nuanced and detailed info is only accessible to a person of privilege like me, and that after weeks of study, what is the accessibility quotient for BIPOC DAC and DUC commenters?

The walkable services near transit will save the world story

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

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

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

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

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

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

Add the Green Checkmate to the story

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

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

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

Revitalization, how and for who?

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

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

Dangers of too much yellow zoning

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

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

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

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

Moorland annexation

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

Case for Moorland annexation: the Santa Rosa Mobile Estates mobile home park on East Robles Ave. is part of an annexable DUC island that the Todd Creek annexation would have to take in. This DUC island is in a Census Block Group that is also a Latino community of interest, the same community of interest as in Moorland. This community of interest is contiguous to Moorland. Moorland is in the Plan area, is an SB 535 DUC, is heavily Latino and is next to a DUC Block Group to the east that is heavily Latino. To not annex Moorland as a required piece of the potential Todd Creek annexation would be an example of DUC cherry picking that LAFCO is supposed to prevent. If Moorland won't be annexed as part of the Todd Creek annexation, IMO the whole annexation deal should be off.

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

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

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

Hybrid: specific Alternative pieces

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

Hybrid: zoning and overall Plan Area residential units

In this hybrid Preferred Alternative, reduce whole Plan Area high-density housing units by 1000 overall and reallocate those to higher resource opportunity areas in Santa Rosa. Don't try to stuff all city RHNA on Santa Rosa Ave. Reduce overall density on Santa Rosa Ave and shift remaining density to and pre-zone the Todd

Creek annexation area to take a fair share of Santa Rosa Ave-centered density. This is to say, pre-zone the Todd Creek annexation area to be integrated up front with transit and commercial centers worked in there too, reduce the low-density zoning there by 50% and mix all zoning types well. Put the missing middle combining zone throughout the Todd Creek annexation area. Don't allow the Todd Creek annexation area to be a center of creeping single family home unsustainability that pushes Plan Area DACs and DUCs out.

Hybrid: market rate housing and penciling claims

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

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

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

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

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

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

Hybrid Plan Area housing price points have to match 6th cycle RHNA

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

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

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

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

Where is that chart, those figures and that analysis in the Alternatives Report so survey takes can make a choice based on that info too?

*(1)

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

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

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

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

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Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Wednesday, March 11, 2026 7:35 AM
To: citycouncil@srcity.org; planningcommission@srcity.org; BOS; PlanningAgency
Subject: Tree Equity score info and comments on South Santa Rosa Specific Plan fyi
Attachments: Tree Equity map with layers.jpg; SR % low income.jpg; displacement risk 2022.jpg; renter units 2022.jpg; Healthy food priority areas copy.jpg; Equity Priority Areas map.jpg; communities of concern copy.jpeg; SR non-white population.jpg; SR MHI.jpg; SSRSP boundary map.jpg

EXTERNAL

about 600 words, five-six minutes

Members of the Santa Rosa City Council, SoCo Board of Supervisors, and respective Planning Commissions,

Please see the tree equity score website <https://www.treeequityscore.org/map> and note that tree canopy is an aggregating indicator of overall Santa Rosa and adjacent unincorporated area inequity.

The attached maps show that lower tree equity scores (i.e. lack of canopy) are a very close match to Santa Rosa patterns of racial and income segregation and that higher resource opportunity areas (single-family, low-density zoned, white) have more canopy, more resources.

Less canopy, i.e. the 101 Corridor, the Santa Rosa Ave strip, and the South Santa Rosa Specific Plan area (SSRSP), is where the city intends to put the bulk of its 6th cycle RHNA housing, in the lowest resource opportunity, worst environmental quality areas of the city.

Rather than this being seen as going against the spirit of AFFH (Affirmatively Furthering Fair Housing) or putting new low-income housing in higher resource opportunity areas, this "strip stuffing" plan is framed as "revitalization" and cutting edge planning to put dense housing in walkable areas near transit. There is a whole story being sold here... one that allows avoidance of having to deal with integrating established white, low-density areas in the city. This is what I call *the Green Checkmate*, the city UGB prevents any outward movement to prevent sprawl and single-family-zoned NIMBYs prevent dense infill to protect neighborhood character.

The Green Checkmate, now boosted by fire evac alarmism, amounts to modern redlining and none of the proponents ever admit the systemic segregation and privilege that underlies it all.

Assumptions about *revitalization* don't necessarily pan out because revitalization is also akin to gentrification which causes displacement. New market rate housing will likely be dominant in the SSRSP area. Mass transit is on the wane post-Covid. Tell me if you want to walk on Santa Rosa Ave and what chances low-income-appropriate, household daily needs retail will go there in any urban/ land use revitalization?

Furthermore, the KMac pipeline project/ annexation area that is part of all South Santa Rosa Specific Plan proposed land use maps, is about all low-density zoned, with about 2000 market rate homes proposed; this is where the proposed Todd Creek Greenway and big new park would go. All the good canopy goes to race and wealth segregated areas, in this case, continued systemic segregation seems to be being planned up front.

The city is not pushing the KMac or the Moorland annexations but clearly annexation is on the table as part of SSRSP planning. So far, annexation positioning looks like an end run around LAFCO-prohibited cherry picking of high-dollar areas while leaving contiguous low-resource areas (Moorland) out.

My point for your consideration and for the upcoming South Santa Rosa Specific Plan Council study session. How will the SSRSP not make Santa Rosa segregation worse? What Housing Element, AFFH, Anti-Displacement Strategy measures will be put front and center in the SSRSP so that this modern urban renewal project will not recap the worst aspects of 1960s urban renewal racial displacement? What chances are there that city measures will be more than just talk?

My suggestion is to **ask staff for a detailed list of city plans to address potential displacement so the Council can know up front, explicitly, how the city plans to address the likely negative socio-economic consequences of the SSRSP on the majority low-income Latino population in the Plan Area?** Will these plans seem strong and actionable to you? Which actions are more or less likely to work? What will the Council have to decide if you want stronger measures? A strengthened mobile home park Closure and Conversion Ordinance to protect vulnerable, low-income tenants?

and other local Who at the city is responsible for seeing that equity stays front and center along with economic development and growth?

very best regards, Fred Allebach

-for some of my SSRSP and other local studies, see my Substack

<https://fredallebach.substack.com/archive?sort=new>

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

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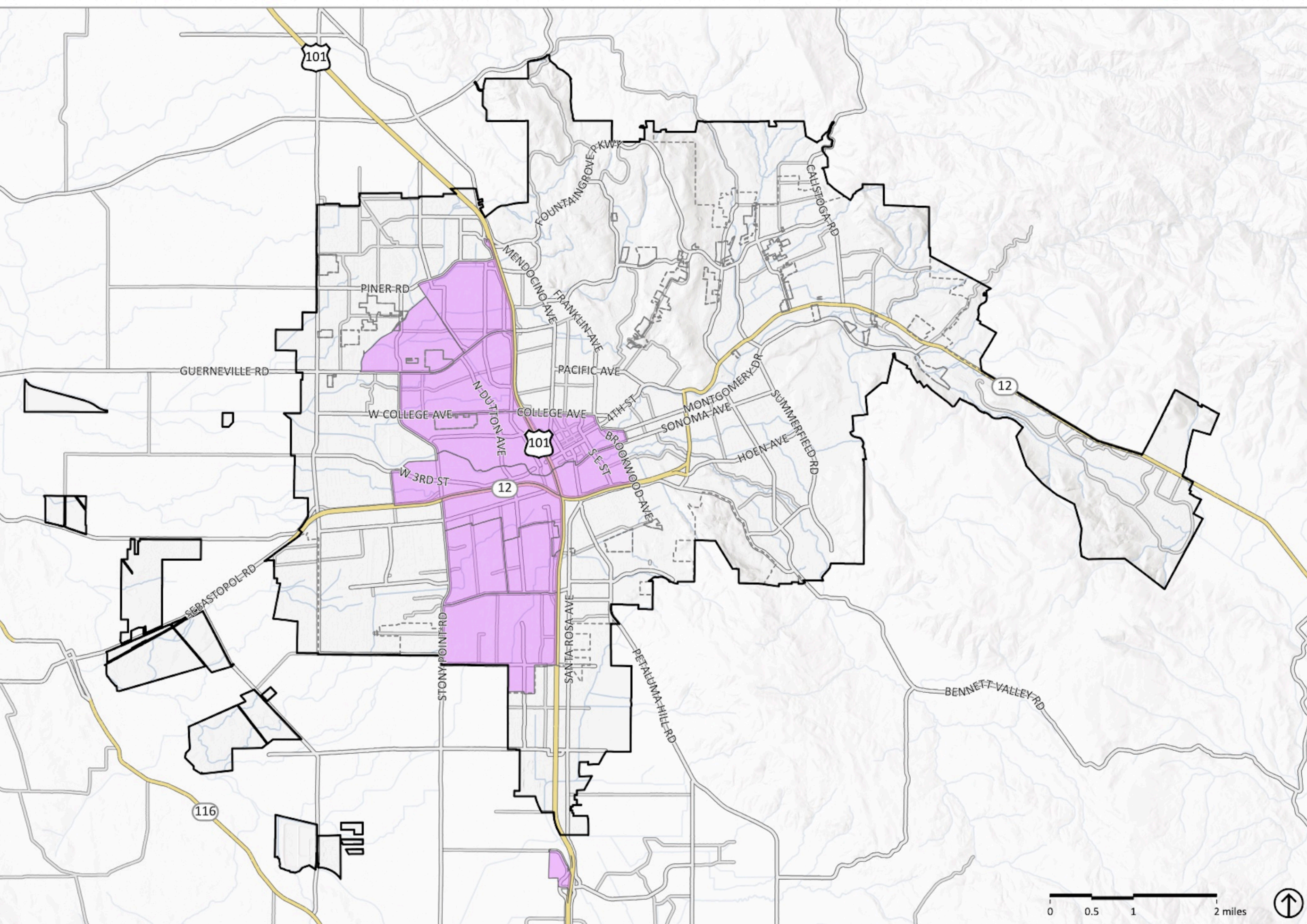
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Figure 2-9

Communities of Concern

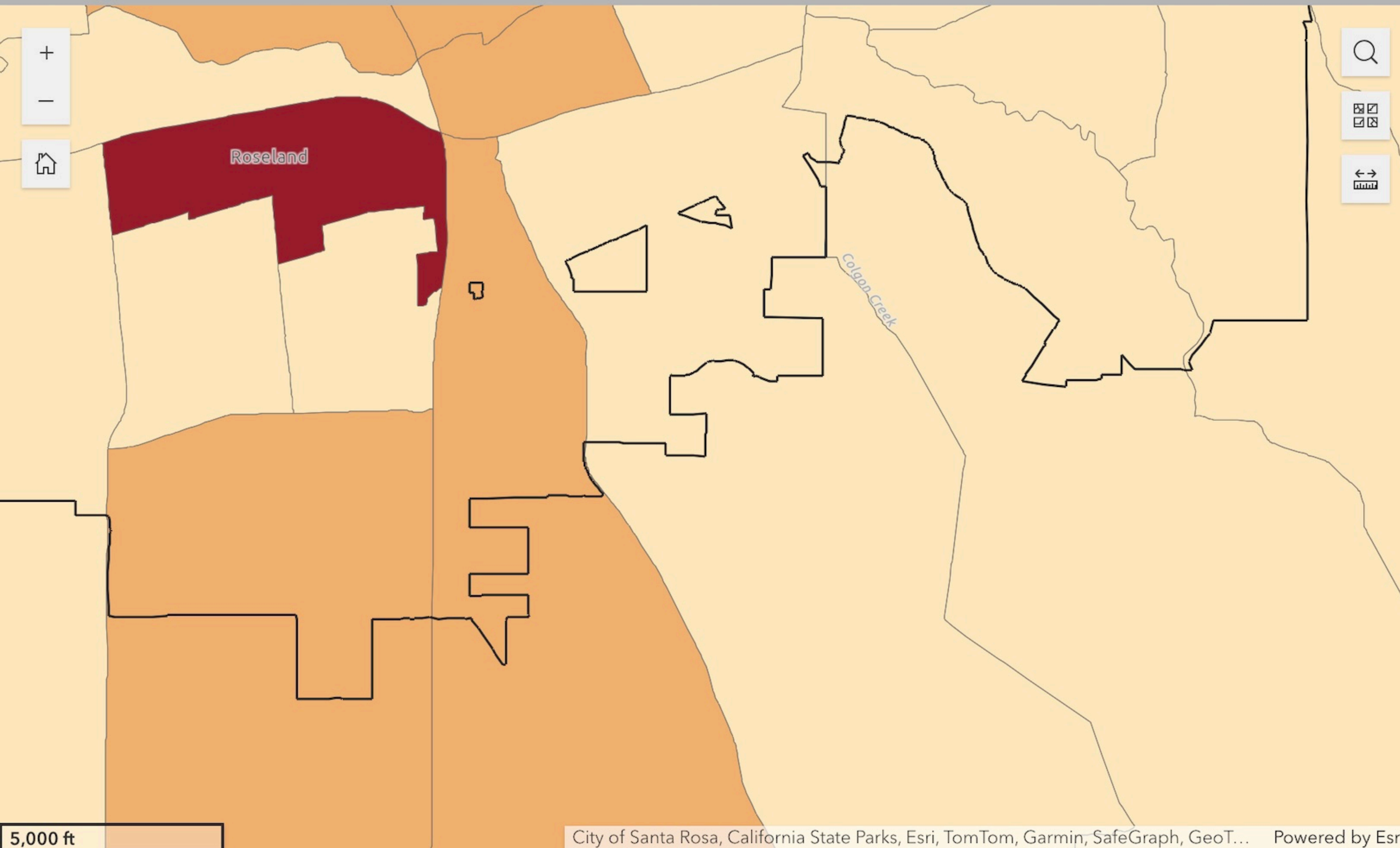
Communities of Concern Class

- High
- Higher
- Highest
- Planning Area
- City Limit



**SANTA
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FORWARD**

Plan Our Future Together



Disproportionate Housing Needs/Displacement Risks

Recommended

Estimated Displacement Risk - Overall Displacement (UCB, Urban Displacement Project, 2022) - Tract

Overall Displacement Risk

-  Low Data Quality
-  Lower Displacement Risk
-  At Risk of Displacement
-  1 Income Group Displacement
-  2 Income Groups Displacement

Layer List by Topic Area

2025) - Tract

Estimated Displacement Risk - Overall Displacement (UCB, Urban Displacement Project, 2022) - Tract



Estimated Displacement Risk 0% to 50% (UCB, Urban Displacement Project, 2022) - Tract



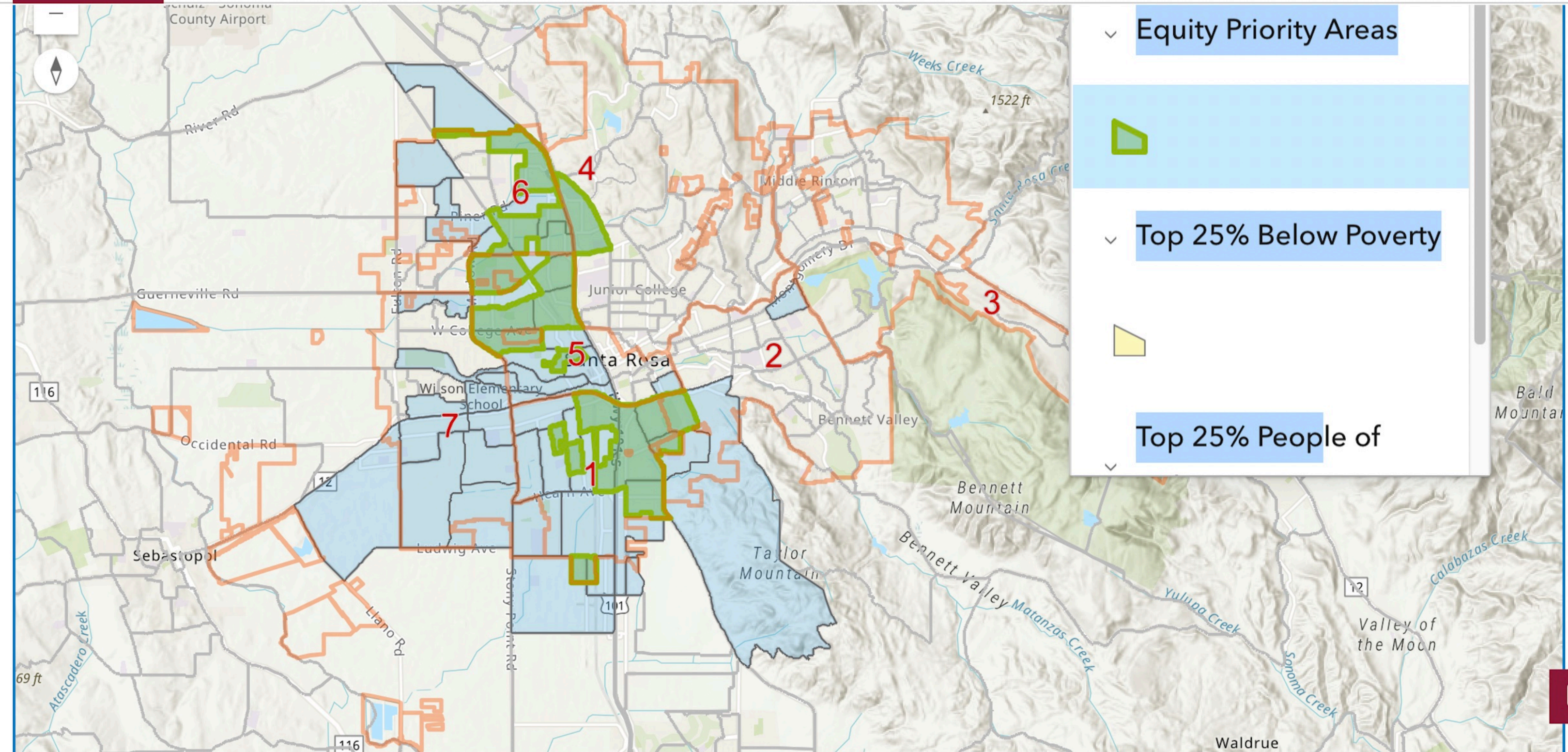
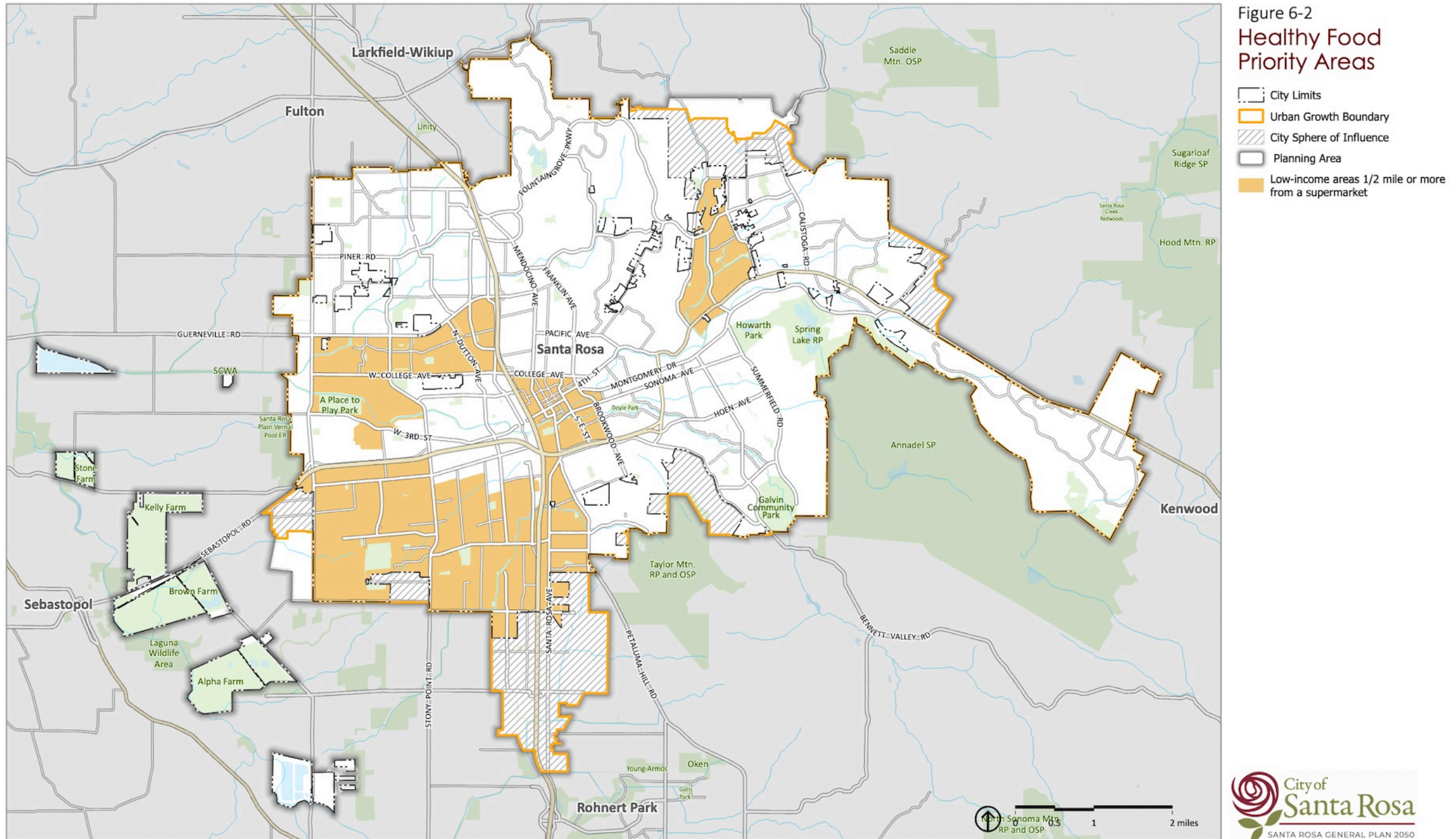
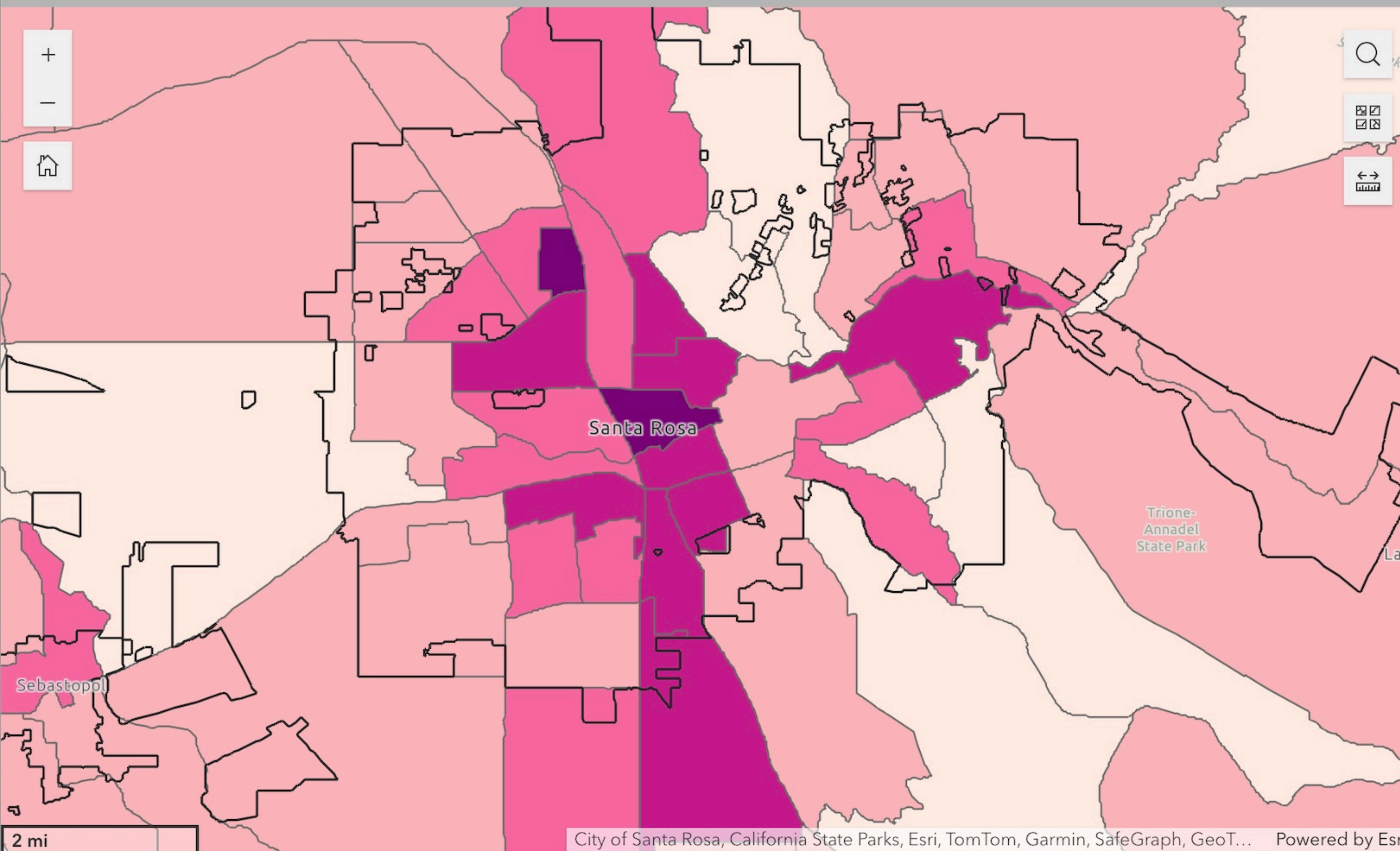


Figure 6-2
Healthy Food
Priority Areas



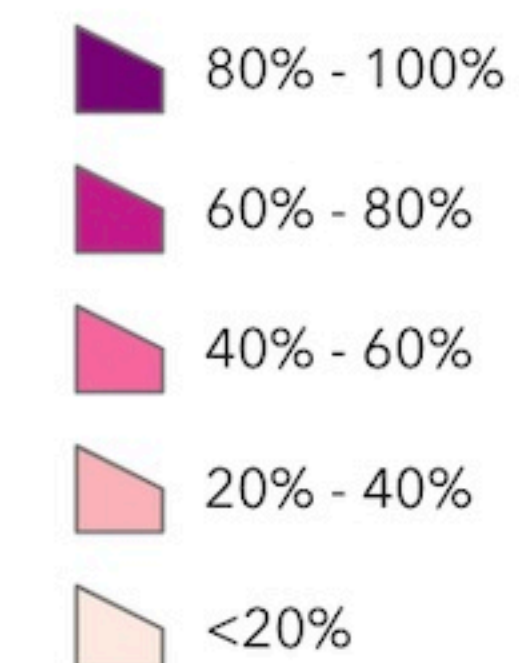


Disproportionate Housing Needs/Displacement Risks

Recommended

Renter Occupied Housing Units (ACS, 2018-2022) - Tract

Percent of Renter Occupied Households



Layer List by Topic Area

- | | | |
|---|---|---|
| Percent of Units Lacking Complete Kitchen (ACS, 2018-2022) - Tract |  |  |
| Percent of Units Lacking Complete Plumbing (ACS, 2018-2022) - Tract |  |  |
| Point In Time Count (HUD, 2023) - CoC Level |  |  |
| Renter Occupied Housing Units (ACS, 2018-2022) - Tract |  |  |

California Estimated Displacement Risk Model

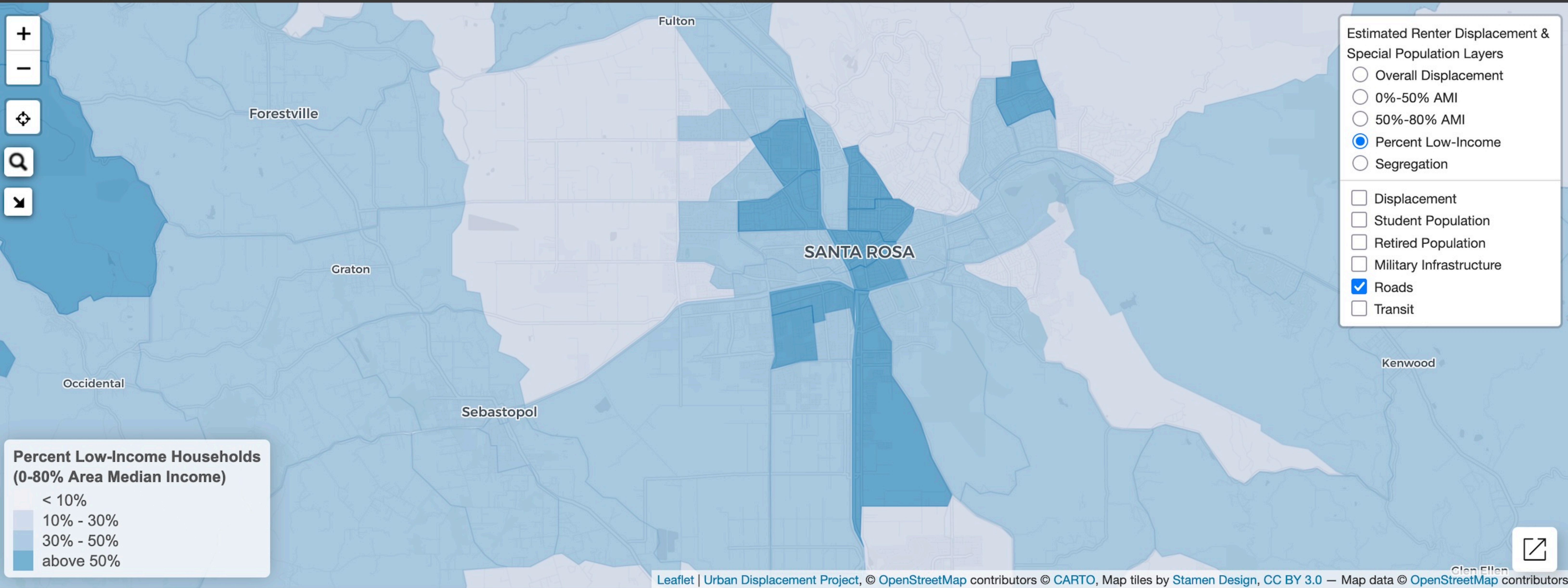


Figure 2-11
Santa Rosa
Median Income

Legend

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

Median Household
Income (est. 2020)

- \$0 - 12,400
- \$12,400 - 48,600
- \$48,600 - 84,800
- \$84,800 - 121,000
- \$121,000 - 200,100

Source: ESRI, US Census

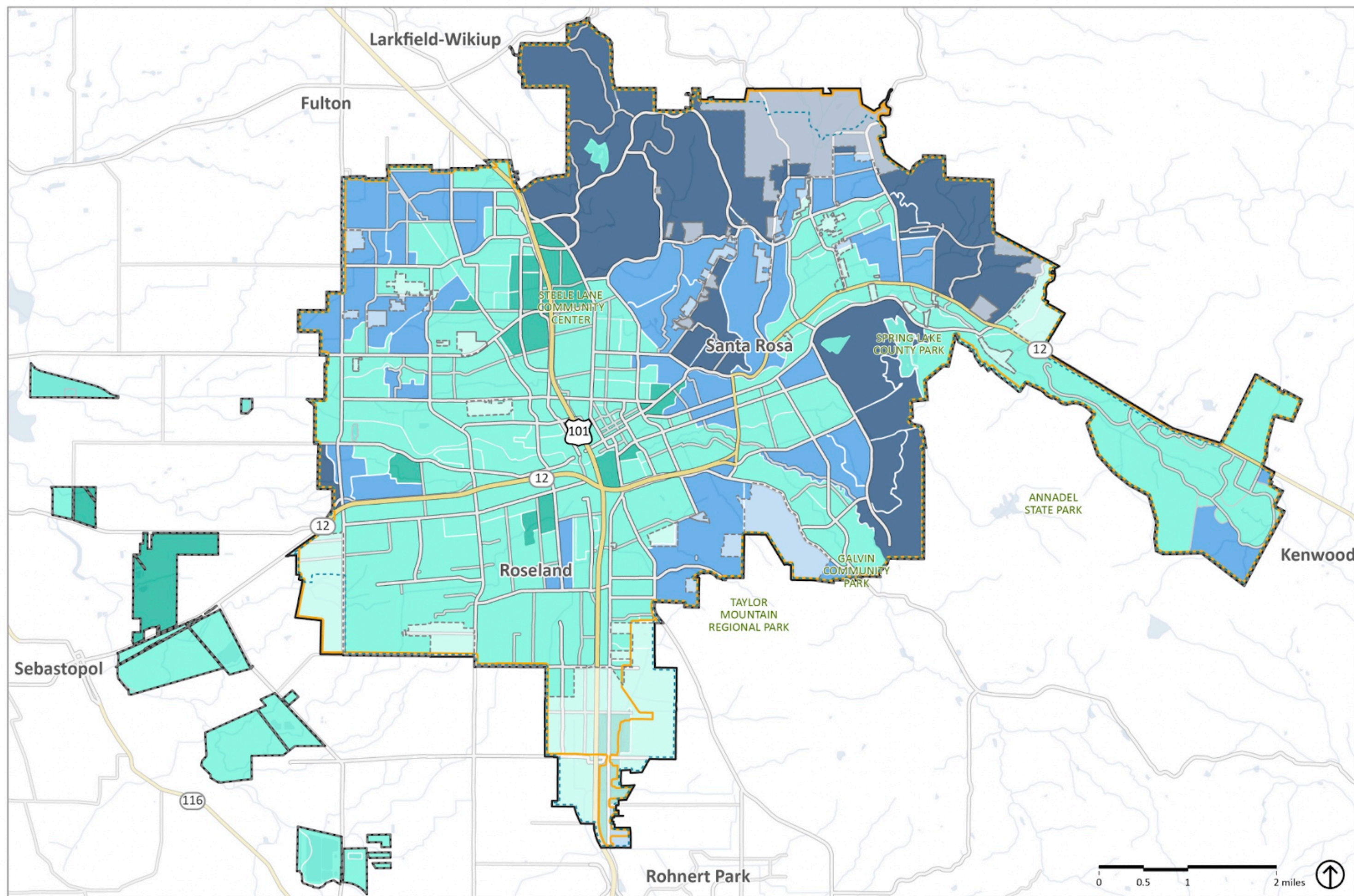
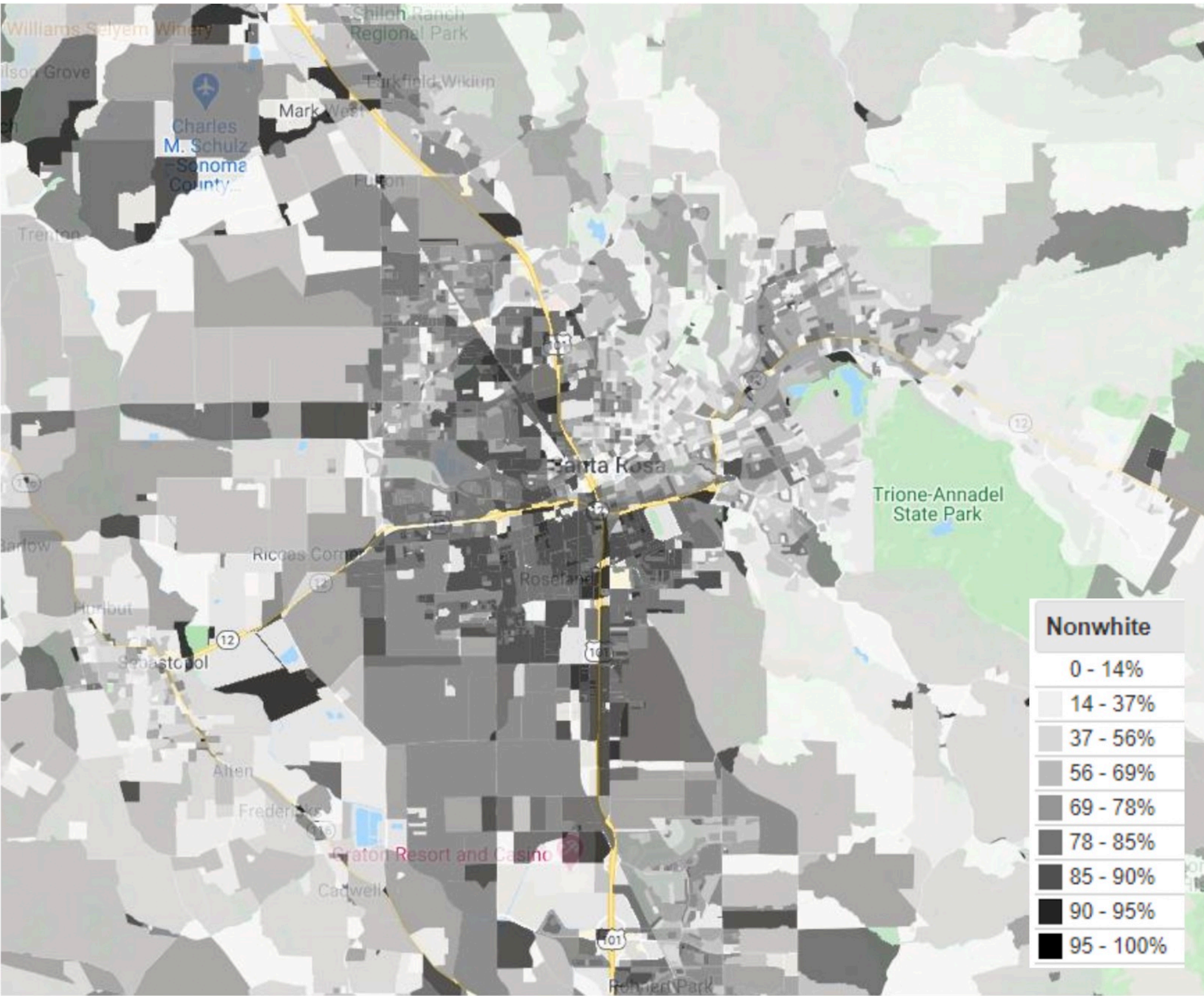
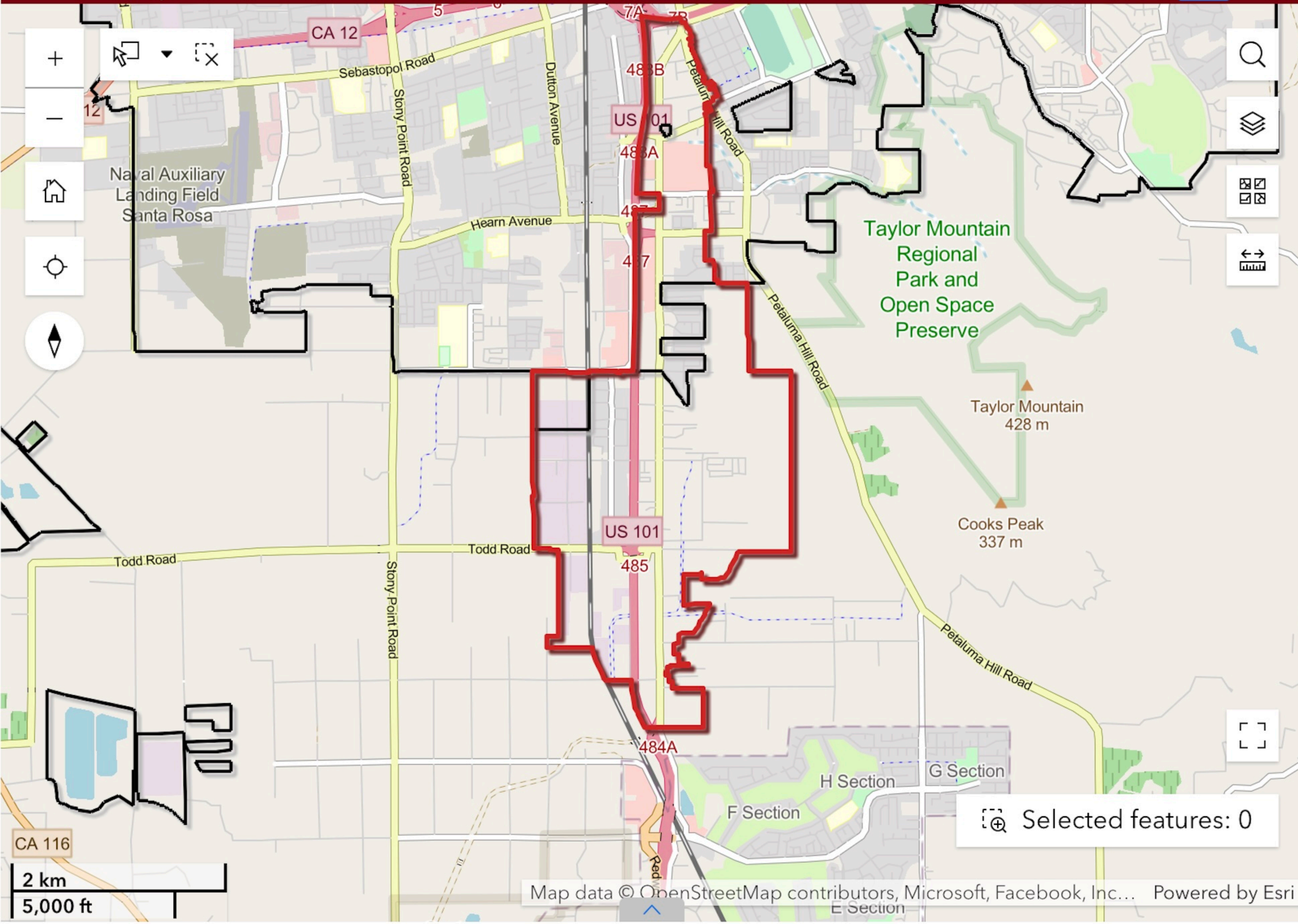


Figure 2-7. Santa Rosa Nonwhite Population





South Santa Rosa Specific Plan



Selected features: 0



TREE
EQUITY
SCORE

National Explorer

Search for a location

1 Find your score

- Search a location or address, or browse the map of nearly 200,000 Tree Equity Scores.

2 Uncover the hidden story behind where trees are in your community.

- Click or tap the shaded areas on the map to discover more information.
- Toggle map layers to explore patterns.
- Identify areas with the greatest need for investment.

3 Make the case with data and reports.

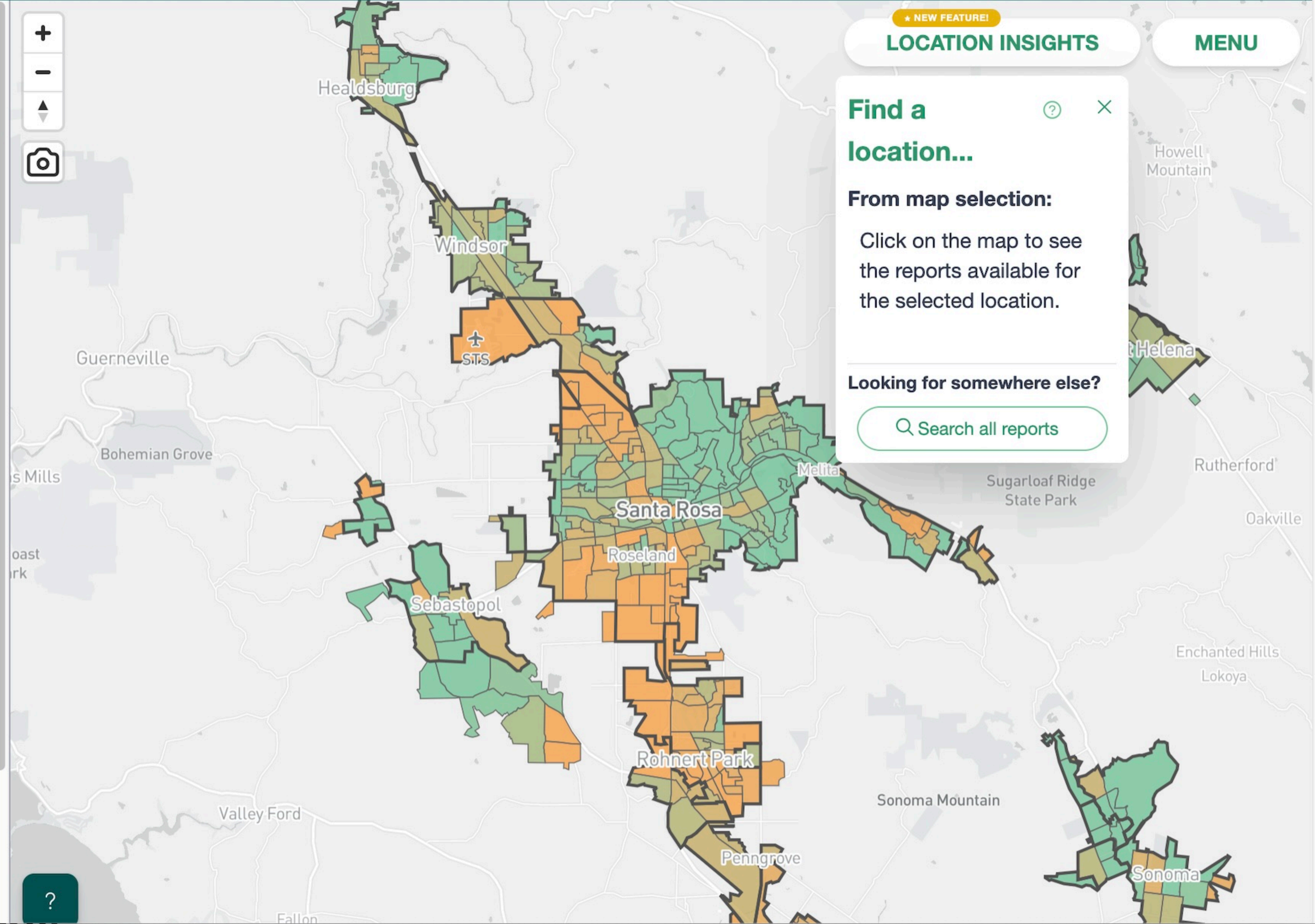
- Compare neighborhood information.
- Customize dynamic reports for any locality, county, congressional district, or state..
- Set targets and calculate tree planting need and the potential benefit to health, economy and environment.

Layers

Filters

<70

100



Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Sunday, March 15, 2026 6:53 AM
To: citycouncil@srcity.org
Subject: Public Comment 3/24/26 City Council meeting Agenda Item 4.1, South Santa Rosa Specific Plan study session
Attachments: SSRSP public comment 32426 Council study session.docx

Fred Allebach

3/14/26

Four minutes, 900 words

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

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

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

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

Plan area demographics

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

City has obligation to affirmatively further fair housing and address displacement

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

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

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

Public investment increases value, taxes, and household costs

Public infrastructure improvements like those laid out in the SSRSP Alternatives Report will increase the value of Plan area property and real estate. Publicly enhanced value creates a tri-partite effect: increased profits for property owners and real estate investors, increased tax revenues for the City, and higher costs for the public, i.e. upsides for the bigger fish and downsides for the little fish.

Housing production trends heavily to market rate

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

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

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

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

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

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

I. Zoning & Land-Use Planning

- Embed anti-displacement strategies and AFFH policies directly into the Preferred Alternative.
- Make Plan area residential housing types match the City's RHNA allocation, don't over-produce Plan area low-density housing.
- Mix up the Todd Creek annexation area zoning with: missing middle, mixed use, varying densities, and transit lines so that racial segregation and car-dependence are not built-in up front.
- Make a hybrid Preferred Alternative with #3 as a base template; break up the strip with hubs, industrial zoning in south Plan area to create jobs, put commercial center in Moorland, pedestrian overpass on Robles with access to Todd Creek Greenway, automobile and ped/bike crossing at Bellevue, no large percent of high-density housing in Moorland unless area is annexed.
- The city needs to recruit commercial center anchor tenants and have commercial/ retail developer Community Benefit Agreements that will serve local primary household needs (Hispanic market in Moorland, Grocery Outlet on Santa Rosa Ave; all hubs: hardware store, pharmacy, medical clinic, laundry, bank, post office, library, bike shop, pet supplies etc.)

- If intentional recruitment of retail tenants is not done, the city will get liquor and convenience stores, pizza, fast food, storage lockers, tire shops etc. See my Substack for a [walkable to services study](#).

II. Preservation of Existing Affordable Housing

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

III. Strengthening New Production & Inclusion

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

IV. Tenant Protections & Anti-Displacement

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

V. Economic Stability

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

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

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do not click any web links, attachments, and **never** give out your user ID or password.

Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Wednesday, March 18, 2026 7:51 AM
To: citycouncil@srcity.org
Cc: Osburn, Gabe; jjones@srcity.org; Nicholson, Amy; Conor McKay; South SR Specific Plan; Basinger, Megan; jnutt@srcity.org
Subject: Public comment #2 on 3/24/26 South Santa Rosa Specific Plan Council study session

Fred Allebach

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

3/18/26

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Friday, July 3, 2026 8:38 AM
To: citycouncil@srcity.org; Peter Martin; Hennessey, Dan; Osburn, Gabe; Basinger, Megan; Jones, Jessica; Nicholson, Amy; McKay, Conor
Subject: Future Santa Rosa flood hazards, impact on DACs, ways to get \$ and mitigate
Attachments: SR Creek model flood map Appendix C.docx

EXTERNAL

Fred Allebach

7/3/26

Members of the City Council and Santa Rosa Water, Planning and Economic Development, Housing Authority, and Public Works staff,

Abstract

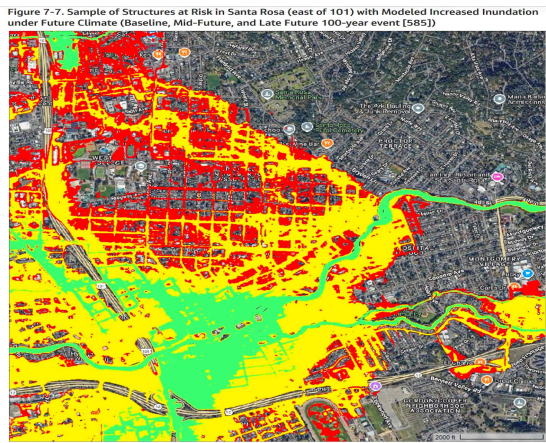
Have a look at the Russian River Watershed Resilience project and its draft conclusions for current and future flood hazards in central and southwest Santa Rosa and the intersection of vulnerable DAC communities here. What can be done? Think of projects and mitigations and pursue Prop 4 funds to address these issues.

Good morning,

I've been studying the Russian River Watershed Resilience project ([RRWR](#)) and its conclusions that have water and planning implications for central and southwest Santa Rosa. At the RRWR website, at the top, go to the *Plan* drop down menu to see the Documents. Appendix C has the Vulnerability Assessment.

The RRWR project is a well-conceived, well-written study on regional water resource-related hazards made worse by climate change, especially at the intersection with vulnerable communities. The RRWR specifically puts equity as a central piece of its whole approach.

Increasingly severe urban flooding on Santa Rosa Creek is identified as a salient issue. This has implications for the Downtown Station Area Specific Plan, whose current population has a high percentage of DACs of various flavors. Fig 7-7 from Appendix C p. 77



Flooding is an ever-present hazard for mobile home parks that are frequently sited in low-lying areas. This is likely also an issue in the South Santa Rosa Specific Plan in the Colgan Creek area where future flooding issues are anticipated. Northeast quad mobile home parks are sited right on Brush Creek and its tributaries. Matanzas Creek flooding could impact future Fairground development.

I realize the City is having financial difficulties and number one, is concentrating on ways to boost revenue and to develop Plans that will generate future economic growth. Disadvantaged communities (DACs) and social equity issues are an inconvenient truth here. DACs call to be addressed but there are few decision maker champions, even though near 40% of Santa Rosans meet DAC criteria for median household income (MHI) and of those, many severely. It's as if we can only talk about the Doritos and Cheetos of economic development but never the negative health outcomes of all that. The City (and many others) pay good lip service to DAC issues but then put them in a silo and action languishes. Given that social equity is a core piece of sustainability, we can do better. Economic negative externalities can't just be ignored.

That the City currently has budget issues does not obviate the need to plan for future flood hazards and to take appropriate steps to not put new development right in the middle of expected flood hazard areas. The City also has maintenance and upgrade needs for the Spring Lake and Howarth Park urban flood control project.

One answer here is that the City aggressively pursue Prop 4 funding to meet future flood control and mitigation issues as they intersect with the City's ample DAC population. Focus Prop 4 fund seeking on the intersection of DACs and flood hazards in central and southwest Santa Rosa.

Appendix C. Russian River Watershed Resilience Pilot Study Vulnerability Assessment

Document No.: 260320094600_ddf02df4

Summary See bold text for critical points.

Russian River Watershed communities are increasingly exposed to widespread and intensifying impacts from flooding, wildfire, extreme heat, and drought-driven water supply disruptions. Climate hazard modeling and vulnerability analyses show that hazard footprints expand substantially under future conditions. **Social vulnerability is already elevated across the region, with 40 to 50 percent of residents falling within the moderate to highest sensitivity tiers for each hazard. Many of the residents who are most socially vulnerable also live in areas facing the highest hazard levels, compounding risk and leading to disproportionate exposure now and in the future.**

This assessment indicates that **neighborhoods in Santa Rosa**, the Ukiah Valley, the Cloverdale–Healdsburg–Windsor corridor, and the communities surrounding Lake Mendocino **face the most significant and overlapping climate pressures in the Russian River Watershed.**

Across all hazard types, the assessment identifies a **consistent set of geographic hotspots where high sensitivity and high exposure overlap most acutely. These priority areas include Santa Rosa** and the Santa Rosa Plain; the Ukiah–Redwood Valley–Calpella corridor; the Cloverdale Healdsburg–Windsor corridor; the lower Russian River communities including Guerneville, Monte Rio, and Forestville; and neighborhoods surrounding Lake Mendocino.

Drought and water-supply sensitivity are especially pronounced in the upper watershed and across the Santa Rosa Plain, where nearly half the regional population falls within the top two drought-sensitivity tiers, reflecting widespread dependence on groundwater, fractured-rock wells, and climate-sensitive surface water allocations

Wildfire sensitivity is highest in foothill and WUI communities throughout central and southern Sonoma County, extending north toward Ukiah and Redwood Valley, driven by steep terrain, limited evacuation capacity, and older or isolated housing stock

Extreme heat vulnerability is most concentrated in major valley population centers—particularly in Santa Rosa, Rohnert Park, Cotati, Sebastopol, and the Windsor–Healdsburg–Cloverdale corridor—where inland temperatures are projected to rise sharply

Flood vulnerability is centered along the lower mainstem corridor and in the Ukiah–Redwood Valley basin, where modeled inundation intersects neighborhoods with high baseline social sensitivity.

Together, these findings underscore that the watershed’s greatest equity challenges emerge in places where structural socioeconomic vulnerability intersects directly with increasing climate hazard intensity and geographic expansion. The same communities most burdened by limited mobility, cost pressures, and rural infrastructure gaps are also those facing the steepest increases in flood extent, wildfire probability, extreme heat days, and drought-driven water supply stress.

These overlapping pressures create a landscape of compounding and mutually reinforcing risks, **making clear that equitable adaptation must prioritize the watershed’s identified hotspot regions—particularly central and southwest Santa Rosa, the Ukiah–Cloverdale–Healdsburg–Windsor corridor, the lower Russian River communities, and drought-sensitive areas around Lake Mendocino and basin-margin wells.**

These locations represent the watershed’s clearest frontline communities, where early and sustained investment is most likely to reduce disparities and strengthen long-term climate resilience.

Recommendations for Implementation

These patterns show where adaptation implementation should be prioritized based on hazard type—**urban stormwater and drainage in Santa Rosa**; wildfire evacuation, home-hardening, and fuels reduction across mid-valley communities and the Mayacamas; **heat-safety and cooling access from Ukiah through Windsor and Santa Rosa**; and water-supply reliability, recharge, and small-system support around Lake Mendocino and foothill groundwater-dependent areas.

Adaptation strategies for the Russian River Watershed should therefore be phased and implemented to put these most affected communities at the forefront, directing early investments where social sensitivity and climate hazard exposure overlap most strongly. The State of California has increasingly aligned climate-resilience funding with equity mandates, creating substantial opportunities for the Russian River Watershed to advance adaptation strategies in ways that directly benefit the communities identified in this assessment as most exposed and most sensitive to climate impacts. Most notably, **Proposition 4—the State’s \$10 billion climate resilience bond approved by voters in November 2024—requires that at least 40 percent of all bond funds directly support disadvantaged and vulnerable communities as defined in statute. This requirement positions the watershed’s high-sensitivity, high-exposure neighborhoods—such as central and southwest Santa Rosa, the Ukiah–Cloverdale–Healdsburg corridor, and drought-sensitive communities around Lake**

Mendocino—to compete strongly for major state investments in flood resilience, wildfire prevention, extreme-heat mitigation, ecosystem restoration, and water-supply reliability.

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

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Figure 7-7 presents inundation maps for Santa Rosa, focusing on the area north of Santa Rosa Creek and East of Highway 101. The light green band reflects estimates of flooding under current climate at the 100-year return interval event. With increased precipitation by mid-future (585 scenario), flooding extends out to areas covered in yellow. With late future precipitation (LF-585), flooding extends to areas shown in red. Figure 7-8 presents a similar image for the area west of Highway 101 and north of Highway 12.

Figure 7-7. Sample of Structures at Risk in Santa Rosa (east of 101) with Modeled Increased Inundation under Future Climate (Baseline, Mid-Future, and Late Future 100-year event [585])

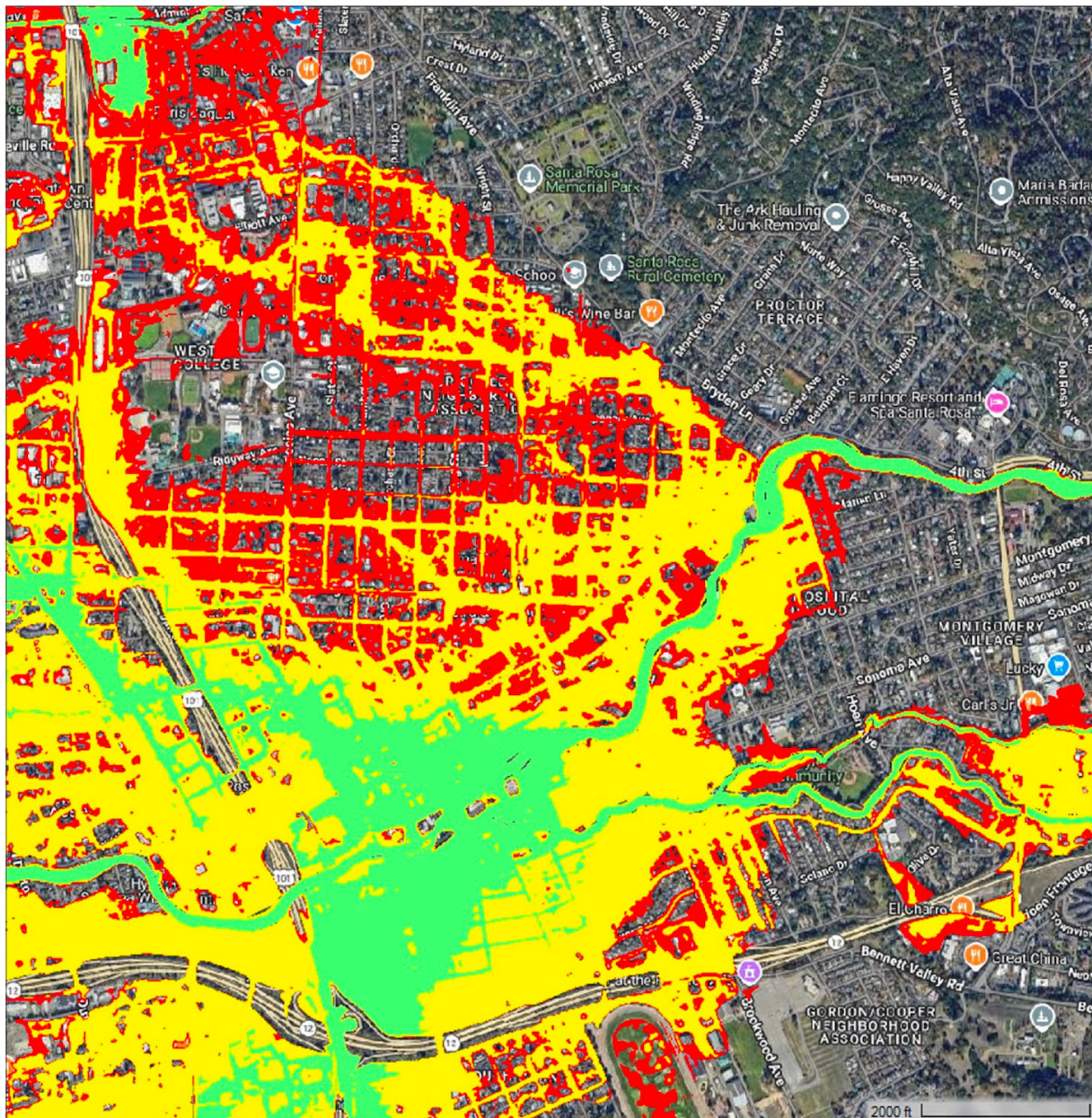
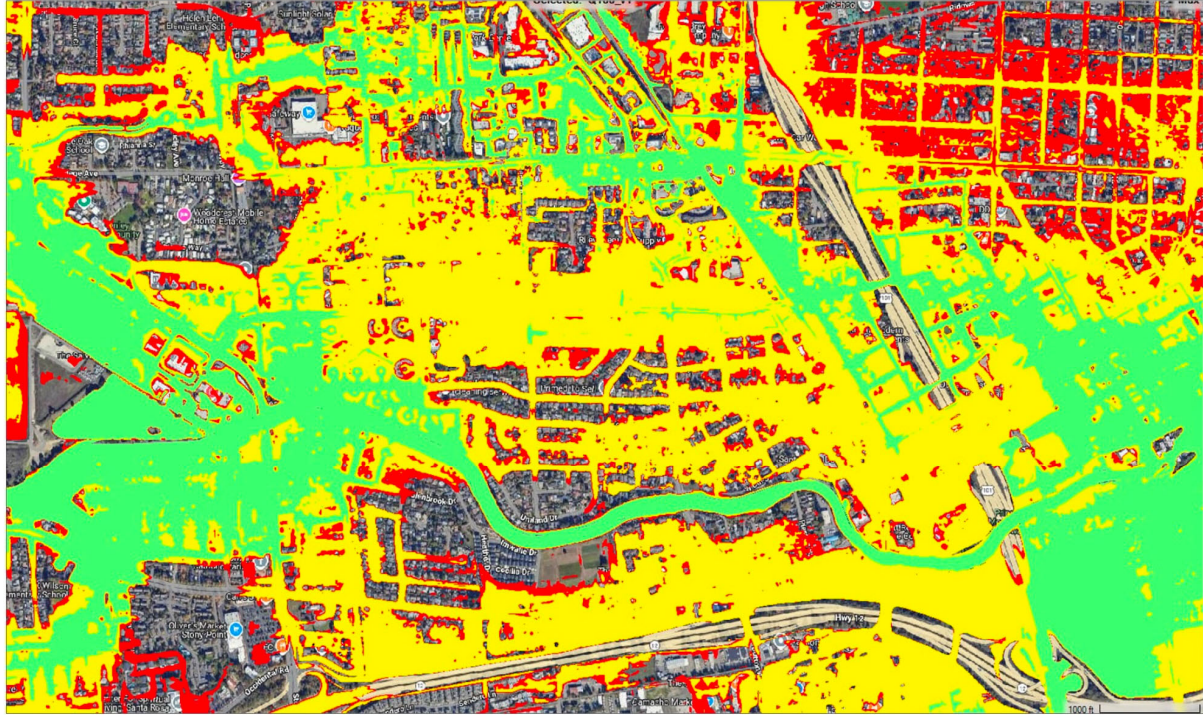
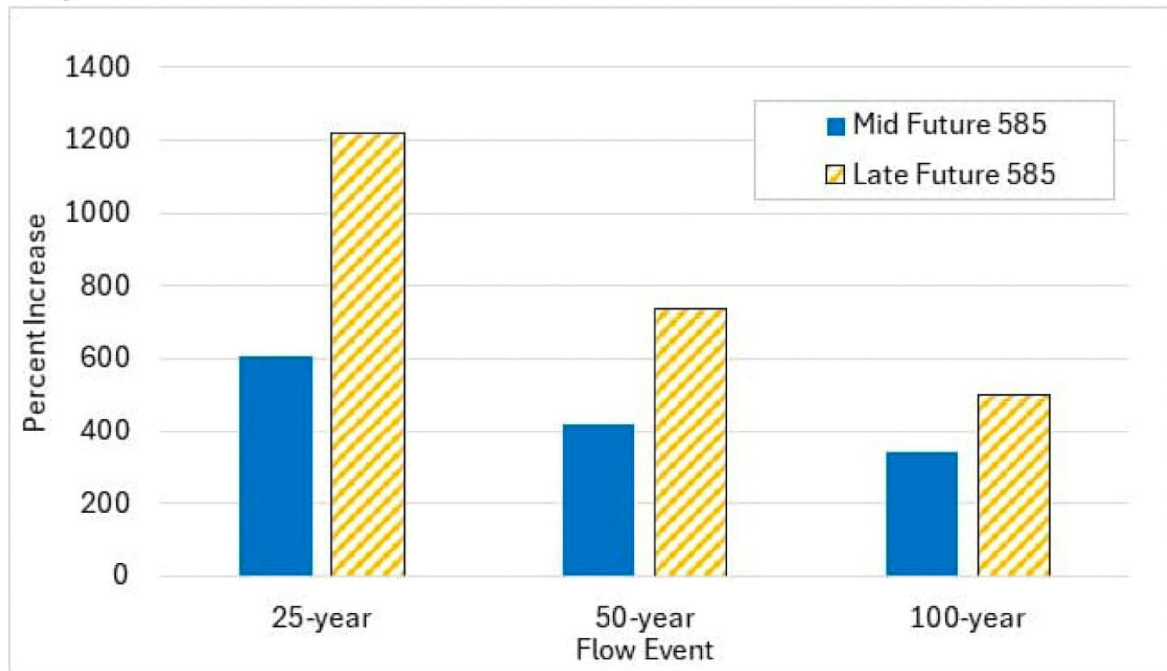


Figure 7-8. Sample of Structures at Risk in Santa Rosa (west of 101) with Modeled Increased Inundation under Future Climate (Baseline, Mid-Future, and Late Future 100-year event [585])



See below...

Figure 7-10. Increase in Modeled Residences at Risk in Santa Rosa Creek Watershed for 25-, 50-, and 100-year 24-hour storm



Projected flood impacts to housing in the Santa Rosa Creek watershed are significantly higher on a percentage basis, as Santa Rosa Creek does not have the conveyance capacity required to transport even the current 25-year flow without overtopping its banks. In the mid-future, models predict a 600 percent increase in the number of structures flooded by the 25-year flood, from under 500 structures to over 3,300 structures. In late-future conditions, results show a 1,200 percent increase in residences impacted, to over 6,200 structures. At the 100-year flood level, the increases are smaller in percentage terms but larger in number of structures impacted, increasing from 2,600 in the baseline to 11,600 in mid-future and 15,700 in late future conditions. The Santa Rosa Creek watershed is more densely populated than the Russian River watershed, hence the large increases with increased flows under future climate scenarios.

It is important to note that the flood modeling was performed specifically to support understanding of potential changes under a range of future climate and should not be viewed or used as definitive future outcomes. The flood analysis did not include updates to elevation mapping or refinements to models and should not be used to assess specific property risks.

Along the Russian River, future climate is projected to nearly double the number of residences vulnerable to 100-year flood inundation.

Projected flood impacts to residences in the Santa Rosa Creek watershed are significantly higher as Santa Rosa Creek does not have the conveyance capacity required to transport even the

current lower flood flows without overtopping its banks. In the mid-future, models predict a 600 percent increase in the number of structures flooded by the 25-year flood event. In late-future conditions, results show a 1,200 percent increase in residences impacted. At the 100-year flood level, the increases are smaller in percentage terms but larger in number of structures impacted, increasing from roughly 2,600 in the baseline to 11,600 in mid-future and 15,700 in late future conditions. The Santa Rosa Creek watershed is more densely populated than the Russian River watershed, hence the large increases with increased flows under future climate scenarios.

Flood vulnerabilities under future climate are significant in residential areas near Santa Rosa Creek. While such residences are not within the current 100-year floodplain, increased runoff from projected future storm events is expected to result in a larger floodplain.

Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Sunday, July 12, 2026 7:34 AM
To: citycouncil@srcity.org; BOS
Cc: Scott Orr; Katrina Braehmer; dguhin@sonoma-county.org; Osburn, Gabe; Jones, Jessica; Nicholson, Amy; McKay, Conor; Basinger, Megan; Jason Nutt
Subject: housing production down, housing protections need to go up

EXTERNAL

Fred Allebach

7/12/26 331 words, three minutes

I'm writing with a few thoughts from this 7/12/26 P-D Santa Rosa housing [piece](#).

One thought regarding the South Santa Rosa Specific Plan: if predictable gentrification and displacement will not be counteracted by new lower-income affordable housing production in this and other Specific Plan areas then other strong-tea targeted interventions along City and County policy and program avenues will be needed.

These types of low-income resident protections will put local jurisdictions at odds with the powerful landlord class and its lobbying and legal arms and as such, decision makers will need political will and spine to stand up to them, and the willingness to fight in court if need be, as Petaluma has done.

The Petaluma *test case argument* can only go on for so long before lack of action impacts more local low-income cohort displacement.

This legal fight will generally be over flavors of sustainability, what silo: *right to profit* versus *right to an equitable society*, and whether local government will stand up and be counted to represent its essential worker residents? Faith in the market will not serve lower-income residents if markets aren't producing affordable housing. Government has to step up.

Policies to consider: updated and strengthened mobile home park closure and conversion ordinances, a stronger slate of tenant protections across the board.

Otherwise, with affordable housing production looking bleak and all costs rising, low-income residents including seniors and BIPOC communities look to have the squeeze put on them from all angles and if our local governments can't back this cohort more strongly, they will increasingly be forced out of cities and the County. If we don't want a wealth and race-segregated society here, we need to figure out some countermeasures with teeth.

As Co-Chair of the Santa Rosa-SoCo NAACP Branch Housing Committee, I am very concerned. Maybe meeting 6th cycle RHNA will not pan out and if so, local governments can make up the difference with stronger tenant protection policies.

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

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From:
Sent:
To:
Subject:

Fred Allebach

SSRSP Engagement Advisory Committee Member

7/16/26

South Santa Rosa Specific Plan (SSRSP), [Preferred Alternative](#) comments and suggestions

Two intro points

One, the Preferred Alternative vetting should not be a cat and mouse game and exercise of staff and decision makers trying to elide and avoid concrete equity actions. My opinion: Preferred Alternative language needs to clearly and specifically obligate equity actions not just suggest them.

Two, the full Preferred Alternative report is not translated to Spanish, only an abbreviated version. The report is only 20-some pages. I don't believe this is acceptable for a Plan area that has majority Latino population. The full report should be translated to Spanish and re-issued ASAP, if this can't be done by early next week, the Preferred Alternative meeting schedule should be revised and extended.

Comments and suggestions

In my comments below I will first quote the Preferred Alternative, then comment on that quote and topic.

1.1 Intro, Project background

The SSRSP "*will guide... equity policies...*" Italics mine.

"The Plan will set the stage for diverse, amenity rich housing development as well as neighborhood serving commercial uses that meet the needs of the various neighborhoods within the Planning Area."

The Plan needs planned-for and dedicated affordable housing (AH) proportional to City and County RHNA (Regional Housing Needs Assessment) allocation; commercial and retail services must be targeted and intentionally recruited to meet the actual needs of local neighborhoods, can't leave it to the market which will bring liquor and junk food convenience stores etc.

"The Plan will also outline unified City/County policies for this area, providing the basis for any future annexations of unincorporated sites."

This is where a Sonoma County (SoCo) and Santa Rosa updated and strengthened mobile home park (MHP) closure and conversion ordinance (CCO) and formal SoCo MHP land use designations can come in. This is also where the politics around a Moorland annexation may come in.

“The Planning Area faces a high risk of displacement and includes a disproportionate share of lower-income households, as identified in recent census data, the Existing Conditions Report, and the Anti-Homelessness and Anti-Displacement Strategy. In response, the Specific Plan **may** integrate policies and implementation actions that address these conditions, such as preservation of existing affordable housing, tenant protections, and anti-displacement measures such as no net loss, right-to return, and relocation assistance.”

It’s good this got put in. Nothing like this statement was in the previous Alternatives. The critical word here is *may*; saying *will* would be much better and to specify exactly what will be done. A mobile home park CCO fits here. The anti-displacement strategy calls for targeted program and policy interventions; the public needs to see what those targets will actually be in the Preferred Alternative.

1.3 Feedback on Alternatives

“Mobile home parks were assumed to be preserved in all Alternatives.”

If they will be preserved, they need protections from hostile takeovers by speculators who will raise space rents, drive current residents out, and destroy MHPs as naturally occurring affordable housing.

“The City Council also called for investing in and improving the Moorland neighborhood, while not adding more density there, and ensuring that equity and anti-displacement strategies are incorporated.”

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General Plan Housing Elements. How will the Plan adhere to AFFH? Will we end up in a situation where the market runs prices up and the City does not meet its mandatory Housing Element and RHNA goals? What then?

2.1 Land Use

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This is where many MHPs are. For neighborhood-serving commercial and retail uses, what would serve MHP residents best? A Grocery Outlet? A hardware store? Laundromat? If retail is to actually serve neighborhoods, stores have to sell and provide what people want and need, at price points they can afford. This same holds true for Robles Ave. commercial centers east and west of the freeway. Intentional recruitment of neighborhood-appropriate retail by the City is called for.

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with an updated CCO common to the City and County, MHP speculators could not close parks and then redevelop them as market rate housing.

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This looks great, just need to insure access from low-income areas, especially from the west side of the Plan area.

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

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Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Saturday, July 18, 2026 10:13 AM
To: Chris Coursey; Scott Orr
Cc: Sean Hamlin; Katrina Braehmer
Subject: SSRSP thoughts to share for the County side of the process
Attachments: Notes from 5727 SoCo PC meeting.docx; draft letter to Supervisor Coursey and Pernmit Sonoma.docx; Strategy piece.docx; Preferred Alternative comments 71626.docx

EXTERNAL

Good morning,
I've been heavily invested in the SSRSP to see that this does not turn into another plan where the interests of low-income and BIPOC residents are put in last place. In the last few days since the Preferred Alternative came out I've produced the following documents.

I know it's a lot but nevertheless could have value to you or have a few good ideas here or there. I'm a liberal/ social democrat who is interested in reform, not revolution. 🧐 🌟

One, the 5/7/26 SoCo SSRSP PC meeting was not noted in the Preferred Alternative as a decision maker meeting. This was disappointing bc the SoCo PC had some clear equity messages that IMHO deserve to be noted and included and were not. My feeling is that all staff always try to underplay specific equity commitments bc they imply expenditures and staff time that middle of the road decision maker bodies don't support... part of a pattern of systemic discrimination.

Two, I have an NAACP Branch letter *drafted* that makes a connection with the SoCo Office of Equity's Racial Equity Analysis and the SSRSP. I'm not sure what will fly here or if the letter will make it out of the NAACP Branch process, but it seems

reasonable to me that some facsimile of my ideas may apply to the SSRSP anyhow. Basic idea; if the BOS has to sign off on the SSRSP, then the SSRSP has to be consistent with County equity policy from the OOE.

Three, in the short Strategy piece, I try and find concrete equity actions that will apply to the SSRSP, based on AFFH law. For General and Specific Plan consistency, a great way to finesse contradictions is to use a sustainable development frame that make SSRSP equity an equal pillar in the Plan, with actions required; there's your mitigations.

Four, is selected quotes and comments/ suggestions on the Preferred Alternative.

All for now. The SSRSP timeline is short so I wanted to get some darts on the board ASAP.

very best regards, Fred

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

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Fred Allebach

5/7/26

Notes from South Santa Rosa Specific Plan presentation to Sonoma County Planning Commission

Acronyms

SSRSP South Santa Rosa Specific Plan

SoCo Sonoma County

PC Planning Commission

DUC/ DAC disadvantaged unincorporated community, disadvantaged community

LAFCO Local Agency Formation Commission

KMac Ken McNab, a current and former SoCo city planner and city manager who is fronting a development cohort including Doug Bosco and other local big investors

NPOP North Bay Organizing Project

MHP mobile home park

CCO Closure and Conversion Ordinance

Abstract

The SoCo PC was substantially more concerned with and focused on equity issues than the Santa Rosa PC, however the sense of this meeting was left out of the recently issued Preferred Alternative's summary of SSRSP decision maker meetings. Not sure if this is an intentional downplay of equity issues? This is sort of a serious oversight for equity people. My sense was that this meeting would tip the scales to more equity focus in the SSRSP, yet it is not mentioned.

Meeting

Scott Orr and Katrina Braehmer were present from Permit Sonoma. Jessica Jones, Amy Nicholson and Conor McKay were present from Santa Rosa Planning and Economic Development.

PC questions

Reed, asks about annexation. Scott says it is very expensive and that the Alternatives are not related to annexation chances.

Striplen, mentions fire smart technology on east side of Plan area; vulnerable communities, wants to know how DUCs are determined? He notes that city and county MHP policy and land use does not match, wants more annexation data

Kapolchok, cost/ benefit of infrastructure improvements? (Katrina says Fall 2026) How will interim land use work? Big money and change afoot needed for infrastructure, what do Plan Area property owners do in the interim?

McCaffery, a SMART train stop in Plan area? No, but yes to a transit hub at Todd and Santa Rosa Ave.; a landscape and lighting district for sidewalks? Bonds issued? A lot of standing water when it rains. (Fred's additional note: the Colgan Creek area has need for SSRSP flood mitigation, esp. with future climate changes calling for heavier, flashier rains with a larger flood footprint; Colgan Creek in the northern part of the Plan Area where high density housing and thick commercial use is planned.)

Public comment

A good showing by social justice advocates, Lina Blanco of NBOP, Cait Vejby of Legal Aid, Fred Allebach, the Moorland resident's group, and one MHP person who notes hostile takeover and increased fees in his unincorporated area park in a process similar to that in Petaluma with Harmony now.

PC questions

McCaffrey, PC to look at Preferred Alternative now? concerned with DACs, with DACs not accessing the Alternatives

Scott Orr, the three Alternatives don't change the DACs, yes the infrastructure needs help, that's the reality but the outcome is that the city and county adopt the same plan

McCaffrey, annexation? What is the process? can areas be cherry picked?

Katrina, some initial internal discussions about annexation, KMac/ Todd Creek project, 1,600 units; DUC is a LAFCO term; adjacent MHPs, Moorland; if contiguous a DUC must be annexed

Amy Nicholson, no city-initiated annexation, will be an applicant-driven annexation; two east side projects both with housing, 500-600 acres; Santa Rosa City Council directed staff to look into costs, services, infrastructure; LAFCO will have an upcoming June 2026 meeting on DUCs. (Fred's personal note, Amy did not mention the LAFCO Hwy 101 boundary issue as it relates to contiguity and annexation; the LAFCO DUC/annexation process has been in considerable flux and has changed, is still in process with parties debating Moorland contiguity and inclusion or not; for this meeting staff was not fully prepared with all the ins and outs of DUCs and annexation, pertinent details were left out, no one staff commanded all the info.)

McCaffrey, sees a Todd Creek annexation-Moorland nexus, wants an Alternative that unifies east and west of freeway

Kopolchok, likes the comments, a LAFCO DUC is a specific thing, suggest to speak with Cynthia Olsen at LAFCO about annexation; she is hesitant about mixed use in the Alternatives, mixed use is not a market-successful model, 40 units per acre is very high density, if too high it won't be developed, the state makes it so you can't go back and lower the zoning, the density has to be transferred to another parcel; for high density housing near shopping, "how are we asking people to live?", what does this mean for quality of life? She wants to see more parks

Reed, there is an opportunity to connect Moorland with a Robles crossing

Striplen, likes Kopolchok's comments, cites public comment, look at Alternatives through an equity lens, "a package of actions to protect these communities" in Santa Rosa and SoCo; the public will be more comfortable if they know jurisdictions have it covered, go back to the blackboard

Marquez, protective zoning and a Closure and Conversion Ordinance for MHPs, what options does SoCo have to prioritize a CCO?

Katrina, SoCo has CCO updated in 2023; there are closure and conversion issues; there is a program in the SoCo Housing Element to look at the SoCo CCO; a use permit is required if you want to close a MHP; Santa Rosa has MHP land use, SoCo does not and could do that, and do more protections for MHPs

Marquez, echoes Striplen on Alternatives; fire hazard and poor infrastructure leads to pedestrian deaths, pollution exposure; pay a lot of attention, protect people who live there now, and future residents; use development to finance infrastructure improvements; there is a flood plain to the west, use as storm catchment area; increase the park plans; annexation by application goes to the city, utilities come from the city

Amy N., Todd Creek annexation pipeline project was discussed by Santa Rosa City Council, applies for rezoning

McCaffrey, likes Alternative #3, likes crossing at Robles, keep industrial areas, have housing near a rail station; land use and layout is one thing, policy and displacement is another, "just as important to look at that"

Fred Allebach 7/17/26

NAACP Housing Committee

Draft of potential NAACP letter to Chris Coursey and Permit Sonoma

Formal Request for an Office of Equity Racial Equity Analysis (REA) and Strong Anti-Displacement Mitigations for the South Santa Rosa Specific Plan (SSRSP)

Dear Supervisor Coursey and Permit Sonoma Leadership,

The NAACP Housing and Executive Committee submits this letter to express our concerns regarding the South Santa Rosa Specific Plan (SSRSP). As an urban renewal initiative in an area with a large population of Black, Indigenous, and People of Color (BIPOC) and economically Disadvantaged Communities (DACs) the SSRSP plan for 6000+ new housing units, likely mostly market rate, at a time when 100% affordable housing is on a major downswing, carries a high risk of gentrification and BIPOC and DAC community displacement.

Because Sonoma County must ultimately approve this plan, County equity standards must be accounted for. We are formally asking Permit Sonoma and the County to conduct a comprehensive Racial Equity Analysis (REA) in alignment with the Sonoma County Office of Equity (OOE) guidelines, and to commit to specific, concrete, binding, actionable, and funded displacement mitigations in the SSRSP. The Anti-displacement Strategy calls for specific safeguards and targeted actions: "These challenges must be addressed in the South Santa Rosa Specific Plan to ensure that community members can remain in their homes and that new residents can find housing options at the appropriate level of affordability."

Our concerns and expectations align with the six categories of the OOE REA framework:

- **1. Program and Policy Description:** The SSRSP directly impacts five core OOE REA focus areas: housing, planning/development, transportation, economic development, and workforce equity. County policy dictates that an REA must be applied from a project's inception to address disparities before they become entrenched. Has Permit Sonoma initiated this required analysis?
- **2. Data Collection & Disparities:** Existing demographic data shows the presence of dense BIPOC, disadvantaged communities (DACs), and disadvantaged unincorporated communities (DUCs) within the Plan Area. We are concerned by language in the City's SSRSP Anti-Displacement Strategy that downplays the negative externalities of gentrification as "unproven." The data clearly shows that inequitable outcomes and displacement are highly likely without intervention.
- **3. Community Engagement:** Language and outreach barriers have severely limited DAC and BIPOC community input. The SSRSP Alternatives survey received fewer than 130 responses. Furthermore, critical documents—including the full Preferred Alternative and the Anti-Displacement Strategy—have not been translated into Spanish due to City-

cited cost constraints. This is unacceptable for a primary Latino area. However, lack of survey data and successful outreach does not obscure the obvious: this community has urgent housing and economic needs that will be harmed by gentrification and displacement.

- **4. Analysis, Strategies, & Mitigations:** We urge the County to reject weak, passive policies that identify problems but obligate no real action. We demand concrete, actionable, and binding mitigations that explicitly protect economically vulnerable residents and increase racial equity.
- **5. Implementation:** The socioeconomic risks of this project are fully known and predictable. Past urban renewal projects have a poor track record that can be avoided now. The County and City must outline exactly how mitigation strategies will be enforced, how unintended consequences will be corrected, and how resources will be allocated to protect BIPOC and DAC/ DUC residents.
- **6. Accountability:** By serving as a sign-off partner, Sonoma County is fully accountable for the outcomes of the SSRSP. To uphold your own institutional commitments to equity, the County must ensure the SSRSP conforms to an OOE-led Racial Equity Analysis.

Bottom Line:

We refuse to accept a performative equity process. The core purpose of this letter is to demand that Sonoma County secure strong, enforceable and actionable mitigations against SSRSP-induced gentrification and displacement. This requires a dedicated allocation of long-term resources, staffing, and funding. If the County is to reserve specific funds or demand concrete SSRSP programs to safeguard these vulnerable communities, it must do so now at Plan inception.

Thank you for your attention to this critical matter.

Sincerely,
Santa Rosa-Sonoma County NAACP Branch Executive Committee

Fred Allebach

SSRSP Engagement Advisory Committee Member

7/16/26

South Santa Rosa Specific Plan (SSRSP), [Preferred Alternative](#) comments and suggestions

Two intro points

One, the Preferred Alternative vetting should not be a cat and mouse game and exercise of staff and decision makers trying to elide and avoid concrete equity actions. My opinion: Preferred Alternative language needs to clearly and specifically obligate equity actions not just suggest them.

Two, the full Preferred Alternative report is not translated to Spanish, only an abbreviated version. The report is only 20-some pages. I don't believe this is acceptable for a Plan area that has majority Latino population. The full report should be translated to Spanish and re-issued ASAP, if this can't be done by early next week, the Preferred Alternative meeting schedule should be revised and extended.

Comments and suggestions

In my comments below I will first quote the Preferred Alternative, then comment on that quote and topic.

1.1 Intro, Project background

The SSRSP "*will* guide... equity policies..." Italics mine.

I agree, *will* implies action, it's not a should, or a maybe.

"The Plan will set the stage for diverse, amenity rich housing development as well as neighborhood serving commercial uses that meet the needs of the various neighborhoods within the Planning Area."

The Plan needs planned-for and dedicated affordable housing (AH) proportional to City and County RHNA (Regional Housing Needs Assessment) allocation; commercial and retail services must be targeted and intentionally recruited to meet the actual needs of local neighborhoods, can't leave it to the market which will bring liquor and junk food convenience stores etc.

"The Plan will also outline unified City/County policies for this area, providing the basis for any future annexations of unincorporated sites."

This is where a Sonoma County (SoCo) and Santa Rosa updated and strengthened mobile home park (MHP) closure and conversion ordinance (CCO) and formal SoCo MHP land use

designations can come in. This is also where the politics around a Moorland annexation may come in.

“The Planning Area faces a high risk of displacement and includes a disproportionate share of lower-income households, as identified in recent census data, the Existing Conditions Report, and the Anti-Homelessness and Anti-Displacement Strategy. In response, the Specific Plan **may** integrate policies and implementation actions that address these conditions, such as preservation of existing affordable housing, tenant protections, and anti-displacement measures such as no net loss, right-to return, and relocation assistance.”

It’s good this got put in. Nothing like this statement was in the previous Alternatives. The critical word here is *may*; saying *will* would be much better and to specify exactly what will be done. A mobile home park CCO fits here. The anti-displacement strategy calls for targeted program and policy interventions; the public needs to see what those targets will actually be in the Preferred Alternative.

1.3 Feedback on Alternatives

“Mobile home parks were assumed to be preserved in all Alternatives.”

If they will be preserved, they need protections from hostile takeovers by speculators who will raise space rents, drive current residents out, and destroy MHPs as naturally occurring affordable housing.

“The City Council also called for investing in and improving the Moorland neighborhood, while not adding more density there, and ensuring that equity and anti-displacement strategies are incorporated.”

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Fred Allebach

7/18/26 337 words, 4 minutes

Addressing the SSRSP Anti-Displacement Strategy

The SSRSP Anti-Displacement Strategy (the Strategy) states displacement risk is high. Safeguards are called for. Many safeguards are already outlined in City and County Elements under AFFH law provisions: preserving and producing deed-restricted affordable housing, permanent supportive housing, Project Homekey initiatives, condo conversion restrictions, no net loss initiatives, and tenant protections such as rent stabilization, just cause eviction ordinance, mobile home park protections, tenant rights ordinances, relocation assistance, right of first return etc.

As well, 6th cycle RHNA calls for near 40% of new regional housing to be targeted to Low and Very Low-income households. New Plan Area market rate housing will be out of reach for most current Plan Area residents. Yet, the Plan pipeline has a developer-initiated 2000-unit market rate, low-density zoning annexation in the wings, which will exclude DACs, run against AFFH law, and run up prices all over.

Since many features of development and concomitant gentrification are also essential components of successful urban planning, we find ourselves dealing with contradictory goals, with various cohorts standing to win or lose. Enhanced amenities price out the local poor. This is why the SSRSP Preferred Alternative needs more of a win-win, sustainable development frame, one that puts equity on par with environment and economy. We don't want to see the negative externalities of past urban renewal development act at odds with the modern social and environmental goals stated in the Plan and its supporting documents.

Since Specific Plans must be consistent with General Plans, the perfect way to finesse elements in tension is to promulgate a sustainable growth frame and explicitly put strong equitable development features into the SSRSP Preferred Alternative.

The Strategy states: "These challenges must be addressed in the South Santa Rosa Specific Plan to ensure that community members can remain in their homes and that new residents can find housing options at the appropriate level of affordability."

We can do this, develop, make new amenities and have them be accessible to all. The bottom line is how much political will decision makers can bring to account for Plan Area BIPOC communities, DACs and DUCs. Planning staff has to present such options in the first place to get the ideas on the decision maker table .

Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Friday, July 24, 2026 7:39 AM
To: citycouncil@srcity.org; Osburn, Gabe; Jones, Jessica
Subject: Public comment for Santa Rosa City Council 7/26/26 TOC (Transit Oriented Communities) policy Study Session

EXTERNAL

Fred Allebach

7/23/26

820 words, five minutes

Public comment for Santa Rosa City Council 7/26/26 TOC (Transit Oriented Communities) policy Study Session

With a national attack on DEI (diversity, equity and inclusion) and as Santa Rosa-SoCo NAACP Housing Committee Co-Chair I am working locally to advance housing equity ideals and programs. In this TOC grant program study session item, I will zero in on housing equity applications as they apply to mobile home parks (MHP) which are cited by staff as meeting the City's scoring requirements for a TOC grant.

Housing has Three Ps: production, preservation, and protection. Few if any new mobile home parks are now being produced and otherwise, 100% AH (affordable housing) production is currently in a major downturn.

What is left for the City policy-wise on housing now is preservation and protections (1). As noted in the TOC study session staff report, the City administers a state mobile home rehab loan program for low-income unit owners. This is good. MHP protections are covered by the City MHP rent stabilization ordinance (RSO). The RSO has some issues that could be improved but not here.

For AH preservation, the City has a MHP Closure and Conversion Ordinance (CCO) for which staff is claiming full preservation value for TOC grant scoring. My opinion, *the CCO only partially covers the preservation angle for TOC grant scoring because the City has discretion to strengthen it*. The current CCO is a weaker tea policy. Also, the study session staff report does not specify if the City CCO is citing state law provisions or the City's own CCO ordinance for: tenant relocation assistance plan, tenant protections, and benefits and relocation payments?

Some questions here by Council members and/or explanation by staff would be good.

An angle

State law AB 2782 (2020) for MHP CCOs does not spell out details and local gov't has the discretion to do local detail work about what is included in a CCO. Lack of details leaves the City and MHP residents open to legal challenges. **I suggest consulting with Legal Aid and requiring that five points be updated and strengthened in the City's MHP CCO:** 1 relocation plan, 2 closure impact report, 3 accurate assessment of resident's income, 4

in-place value assessment of units done by a gov't chosen consultant, 5 a finding on availability of affordable housing appropriate to income levels within the greater Santa Rosa area.

In the TOC staff report, limited staff time and funds are cited as reasons why the City can't do much to strengthen AH policies and programs.

If MTC (Metropolitan Transportation Commission) TOC funds are in the offing, earmark 25% of these to fund staff time to directly benefit City anti-displacement strategy for MHPs with a stronger CCO ordinance. The Council can direct this earmarking.

The only study session action on AH equity for TOC grant purposes is a by-right ministerial housing ordinance. This is passive and contingent on waiting for a development application and the only likely AH would be a 15% AH inclusion in a market rate project. (2)

This TOC study session's purpose is to receive information and provide policy direction. An updated CCO is a policy item not cited by staff and one that would provide tangible equity benefits in affected TOC areas and for all City MHPs, for example in the South Santa Rosa Specific Plan (SSRSP). The Council can direct this and direct that a portion of potential TOC funds received be allocated to doing the CCO update.

The city is looking to cash in on the benefits of having MHP dense-housing within a half mile of a train stop. MHPs are cited as AH. MHPs are under attack by unscrupulous speculators in Santa Rosa and the Santa Rosa immediate area. MHP naturally-occurring AH status is under active and objective threat (3). Let's have the City CCO ordinance beefed up through this TOC process so MHP residents are not just pawns to get a grant but the residents are inherently valued as core community members needing City protection and get updated benefits that respond to the times.

(1) Part of City housing protections is stated in the AH and Anti-Displacement Strategy which calls for specific safeguards and targeted actions: "These challenges must be addressed (in the SSRSP) to ensure that community members can remain in their homes and that new residents can find housing options at the appropriate level of affordability."

(2) For this by-right ministerial housing ordinance, the inclusion could be bumped up to 20% or 25%. Sonoma has a 25% inclusionary ordinance and it has objectively not deterred developers. The main deterrents are too much red tape, too many fees, NIMBYs, and CEQA.

(3) See CCO court cases in Petaluma and Windsor. It's not acceptable for Santa Rosa to treat these as test cases with a wait and see strategy while Santa Rosa and SSRSP MHPs are under the same exact threat now.

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

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Santa Rosa-Sonoma County Branch

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July 21, 2026

Formal Request from the Santa Rosa-Sonoma NAACP Housing Committee for an Office of Equity Racial Equity Analysis (REA) and Strong Anti-Displacement Mitigations for the South Santa Rosa Specific Plan (SSRSP)

Dear Supervisor Coursey and Scott Orr, Director of Permit Sonoma,

The NAACP Housing and Executive Committee submits this letter to express our concerns regarding the South Santa Rosa Specific Plan (SSRSP). As an urban renewal initiative in an area with a large population of Black, Indigenous, and People of Color (BIPOC) and economically Disadvantaged Communities (DACs) the SSRSP plan for 6000+ new housing units carries a high risk of gentrification and BIPOC and DAC community displacement.

Because Sonoma County must ultimately approve this plan, County equity standards must be accounted for. We are formally asking Permit Sonoma and the County to conduct a comprehensive Racial Equity Analysis (REA) in alignment with the Sonoma County Office of Equity (OOE) guidelines, and to commit to specific, concrete, binding, actionable, and funded displacement mitigations in the SSRSP. The Anti-displacement Strategy calls for specific safeguards and targeted actions: "These challenges must be addressed in the South Santa Rosa Specific Plan to ensure that community members can remain in their homes and that new residents can find housing options at the appropriate level of affordability."

Our concerns and expectations align with the six categories of the OOE REA framework:

- **1. Program and Policy Description:** The SSRSP directly impacts five core OOE REA focus areas: housing, planning/development, transportation, economic development, and workforce equity. County policy dictates that an REA must be applied from a project's inception to address disparities before they become entrenched. Has Permit Sonoma initiated this required analysis?
- **2. Data Collection & Disparities:** Existing demographic data shows the presence of dense BIPOC, disadvantaged communities (DACs), and disadvantaged unincorporated communities (DUCs) within the Plan Area. We are concerned by language in the City's SSRSP Anti-Displacement Strategy that downplays the negative externalities of gentrification as "unproven." The data clearly shows that inequitable outcomes and displacement are highly likely without intervention.
- **3. Community Engagement:** Language and outreach barriers have severely limited DAC and BIPOC community input. The SSRSP Alternatives survey received fewer than 130 responses. Furthermore, critical documents—including the full Preferred Alternative and the Anti-Displacement Strategy—have not been translated into Spanish due to



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City-cited cost constraints. This is unacceptable for a majority Latino area. However, lack of survey data and successful outreach does not obscure the obvious: this community has urgent housing and economic needs that will be harmed by gentrification and displacement.

- **4. Analysis, Strategies, & Mitigations:** We urge the County to reject weak, passive policies that identify problems but obligate no real action. We demand concrete, actionable, and binding mitigations that explicitly protect economically vulnerable residents and increase racial equity.
- **5. Implementation:** The socioeconomic risks of this project are fully known and predictable. Past urban renewal projects have a poor track record that can be avoided now. The County and City must outline exactly how mitigation strategies will be enforced, how unintended consequences will be corrected, and how resources will be allocated to protect BIPOC and DAC/ DUC residents.
- **6. Accountability:** By serving as a sign-off partner, Sonoma County is fully accountable for the outcomes of the SSRSP. To uphold your own institutional commitments to equity, the County must ensure the SSRSP conforms to an OOE-led Racial Equity Analysis.

Bottom Line:

We hope to not see performative equity process. The core purpose of this letter is to request that Sonoma County secure strong, enforceable and actionable mitigations against SSRSP-induced gentrification and displacement. This requires will, dedication, and the allocation of resources, staffing, and funding. If the County is to reserve specific funds or demand concrete SSRSP anti-displacement programs to safeguard these vulnerable communities, it must do so now at Plan inception.

Thank you for your attention to this critical matter.

Sincerely,
Kirstyne Lange, President
Santa Rosa-Sonoma County NAACP Branch

Fred Allebach
Audrianna Jones
Co-Chairs, Housing Committee

Katrina Braehmer

From: Planner
Sent: Wednesday, August 5, 2026 8:55 AM
To: Katrina Braehmer; Doug Bush
Subject: FW: APN 134-182-063 (450 E. Todd Road) – Request for Residential Land Use Consideration in the South Santa Rosa Specific Plan

From: Farhad <farhadmatin@gmail.com>
Sent: Wednesday, August 5, 2026 6:48 AM
To: Planner <planner@sonomacounty.gov>
Subject: APN 134-182-063 (450 E. Todd Road) – Request for Residential Land Use Consideration in the South Santa Rosa Specific Plan

EXTERNAL

Dear Planning Staff,

I am the owner of APN 134-182-063, located at 450 E. Todd Road. I appreciate the work that has gone into preparing the South Santa Rosa Specific Plan and the opportunity for property owners to provide input.

I respectfully request that the City and County consider redesignating my property from its current Rural Residential (RR-10) designation to an appropriate urban residential designation as part of the South Santa Rosa Specific Plan.

I recognize the property contains floodplain, riparian corridor, scenic resource, and valley oak habitat constraints. I believe these resources can be preserved through thoughtful clustered development while allowing housing on the least constrained portions of the property.

I respectfully request that the property be evaluated for an urban residential designation, included in future infrastructure, sewer, water, circulation, and annexation analyses as appropriate, and that staff continue to work with me throughout the planning process.

My goal is to be a cooperative participant in the planning process and to help identify a land use designation that advances housing objectives while protecting the site's natural resources.

If appropriate, I would appreciate this email being forwarded to the South Santa Rosa Specific Plan project team and included in the public record for APN 134-182-063.

Thank you for your time and consideration.

Sincerely,

Farhad Matin

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Katrina Braehmer

From: Frederick Allebach <fallebach@gmail.com>
Sent: Sunday, August 9, 2026 4:27 PM
To: planningcommission@srcity.org; citycouncil@srcity.org; BOS; PlanningAgency
Subject: Public comment on South Santa Rosa Specific Plan (SSRSP) Preferred Alternative

EXTERNAL

Fred Allebach

SSRSP Engagement Advisory Committee member

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

8/9/26

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

Prelude

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

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

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

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

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

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

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

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

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

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

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

Meaningfully address displacement and equity considerations

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

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

Preferred Alternative Survey

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

The survey has questions about the PA, land use, and transportation Alternative features, looking for feedback. None of the questions however broach displacement and equity issues and give respondents an

opportunity to weigh in there. Feedback is steered away from potential and likely negative externalities and along a narrow channel that avoids addressing these core, foundational issues. Isn't planning supposed to have analysis of what could go wrong? If the PA is the foundation, where are specific equity and displacement policy and actions aspects built on it? How can decision makers direct here when no negative externality options are on the PA table? That these are being evaluated and might happen is not good enough to decide on now; now is the time to ask staff, "where's the beef?"

Synthesis of SSRSP and PA feedback?

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

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

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

SSRSP decision maker meetings

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

General Plan consistency?

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

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

Annexation

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

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

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

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

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

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

EAC (Engagement Advisory Committee) process

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

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

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

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