

**San Rosa General Plan 2050  
Public Comments**

# I. Community Comments



**From:** [Dodd, Jeff](#)  
**To:** [Woltering, Nancy](#); [Altamirano, Gino](#)  
**Cc:** [Jones, Jessica](#); [Andrea Howard](#)  
**Subject:** RE: [EXTERNAL] Community Shopping Center (CSC) Designation  
**Date:** Saturday, March 9, 2024 12:46:25 PM  
**Attachments:** [!](#)

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Nancy:

Thanks for your reply to Gino's email. You state: "We appreciate that your client wants to ensure ongoing operation of the Community Shopping Center at Montgomery Village. The draft General Plan 2050 provides for that use into the future." While the draft update discusses the vision and policies for CSCs, it does not apply the designation to an areas on the land use map. The classification is moot/irrelevant without designating the area where it applies. We appreciate staff addressing this issue and appreciate any updates you can provide.

Thanks,  
Jeff

**Jeff Dodd**  
**Coblentz Patch Duffy & Bass LLP**

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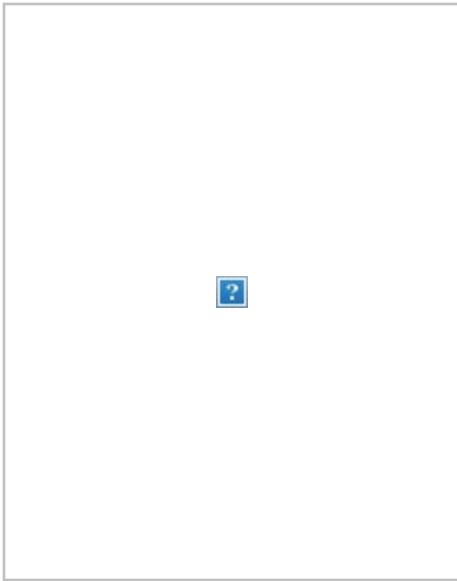
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**From:** Woltering, Nancy <nwoltering@srcity.org>  
**Sent:** Friday, March 8, 2024 10:01 AM

**Subject:** RE: [EXTERNAL] Community Shopping Center (CSC) Designation

Hi Gino,  
Thank you for your email requesting clarification about the Community Shopping Center (CSC) use designation. The language describing the 'Community Shopping Center' in the draft General Plan 2050 is nearly identical to the language in the existing General Plan, as indicated below:

Draft General Plan 2050:



General Plan 2035:



The focus of the Mixed Use designation at Community Shopping Center sites is to allow both Medium Density Residential Development and Retail and Business Services (which includes Community Shopping Centers). We appreciate that your client wants to ensure ongoing operation of the Community Shopping Center at Montgomery Village. The draft General Plan 2050 provides for that use into the future, but we will raise your concern at our next team meeting to see if additional clarification can be added.

The Land use Diagram adopted December 14, 2021 (attached) includes the following language: *“Stripes indicate areas designated for multiple land uses. Single use or a mix of uses is permitted”*.

I have cc'd our Deputy Director, Jessica Jones, and our Consultant, Andrea Howard at PlaceWorks, so that we can discuss adding this footnote to the new Land use Diagram, or to include other clarifying text.

Thank you for participating in this process and bringing your client's concerns to our attention.

Best,  
Nancy

**Nancy Woltering, AICP CEP | Senior Planner - Advance Planning**

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

Tel. (707) 543-4688 | Cell (707) 291-6197 | [nwoltering@srcity.org](mailto:nwoltering@srcity.org)

email signature cropped



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**Sent:** Thursday, March 7, 2024 2:33 PM

**To:** Woltering, Nancy <[nwoltering@srcity.org](mailto:nwoltering@srcity.org)>

**Subject:** [EXTERNAL] Community Shopping Center (CSC) Designation

Dear Nancy,

I wanted to follow-up on our discussion on the General Plan's *Community Shopping Center (CSC)* use designation. As we discussed, the General Plan 2035 identifies CSC-designated properties with a green/red star on the land use diagram. However, the draft Land Use & Economic Development chapter of the *General Plan 2050* update does not provide any identification.

Our client, Montgomery Village, is very concerned they are losing the CSC designation. How can they confirm that they will retain the CSC designation if it is not located on the map, nor referenced in any text? I understand there was a discussion in the planning process (before your involvement) that the City should not locate CSC areas on the new land use map to encourage housing within those areas. Did I get that right? If so, we would appreciate any additional context that you can provide.

Thank you,  
Gino Altamirano

**Gino Altamirano** | Paralegal  
**Coblentz Patch Duffy & Bass LLP**

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[www.coblentzlaw.com](http://www.coblentzlaw.com)

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**From:** [Suzanne Grady](#)  
**To:** [Woltering, Nancy](#)  
**Cc:** [Laurel Chambers](#); [Wendy Krupnick](#)  
**Subject:** [EXTERNAL] Sonoma County Food System Alliance interest in public comment  
**Date:** Thursday, March 14, 2024 11:19:14 AM

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Greetings,

As you may recall, Sonoma County Food System Alliance co-hosted a community engagement event with the City of Santa Rosa Planning Dept. on August 22nd, 2023. During that event we encouraged people to contribute public comment through the platform konveio. In continuing to do our work related to general plan advocacy, I noticed the platform link is no longer active and would like to request access to public comments made.

Please let us know how to proceed.

Thank you!

Suzi Grady, as part of the Food System Alliance Coordinating Committee

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Suzi Grady (she/her)  
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**To:** [SR Forward](#)

**From:** [Mike U](#)

**Date:** July 17, 2023

**Subject:**

Re: [EXTERNAL] Comment from SRGP Website

> Comment Submitted by: Name: Mike

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

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

. Subject: [EXTERNAL] Comment from SRGP Website

>

. Organization: Concern citizen

. Comment:

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

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

See all comments.

. --

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

**From:** [Jeff Crowder](#)  
**To:** [SR Forward](#)  
**Subject:** [EXTERNAL] The City's General Plan Draft - August 2023  
**Date:** Sunday, July 30, 2023 11:13:33 AM  
**Attachments:** [Spring Lake Dam Side Algae Bloom\\_20230730.png](#)

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Dear SR Forward,

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

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

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

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

[RECON-06 ]

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

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

-Δ-----¢

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

Sincerely,  
Jeff Crowder

Sonia Taylor

8 August 2023

Amy Lyle  
Supervising Planner- Advance Planning  
City of Santa Rosa

Via email

Re: Comments to Santa Rosa General Plan Update

Dear Amy:

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

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

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

Very truly yours

Sonia Taylor

## COMMENTS TO SANTA ROSA GENERAL PLAN

8 August 2023

Sonia Taylor

### CHAPTER 1: INTRODUCTION

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

### CHAPTER 2: LAND USE AND ECONOMIC DEVELOPMENT

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

## COMMENTS TO SANTA ROSA GENERAL PLAN

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

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

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

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

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

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

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

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

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

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

## COMMENTS TO SANTA ROSA GENERAL PLAN

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Sonia Taylor

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## COMMENTS TO SANTA ROSA GENERAL PLAN

8 August 2023

Sonia Taylor

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

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

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

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

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

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

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

### CHAPTER 6: HEALTH, EQUITY, AND ENVIRONMENTAL JUSTICE

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

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

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

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



## COMMENTS TO SANTA ROSA GENERAL PLAN

8 August 2023

Sonia Taylor

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

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

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

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

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

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

### CHAPTER 7: GLOSSARY

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

### APPENDIX B: CLIMATE CHANGE VULNERABILITY ASSESSMENT

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

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

From:  
Subject:  
Date:

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[EXTERNAL] Comment from SRGP Web.

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

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Comment Submitted by:

Organization: None Given

Name: Kay Renz

Comment:

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

--

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**From:** [Woltering, Nancy](#)  
**To:** [Meads, Shari](#); [Guerrero Auna, Beatriz](#)  
**Cc:** [Lyle, Amy](#)  
**Subject:** Comments made by participants while looking at the GP Boards 8-30-23  
**Date:** Thursday, August 31, 2023 11:57:12 AM

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Several comments made by participants at the GP Workshop at Maria Carrillo HS last night include:

1. Please show the Southeast Greenway on the Parks map.
2. Please include a map of the City's Historic Districts in the General Plan so that people are aware of them, and discuss why they are important.
3. Discuss improvements, community center, etc. proposed along Hearn and clarify why the Roseland Library is being closed.
4. Include policies with "teeth" so that development "fronts on" and allows for eyes on the City's creeks and the SE Greenway.
5. We need heating and cooling centers in every district—to ensure all residents have access to facilities.

**Nancy Woltering, AICP CEP | Senior Planner - Advance Planning**

Planning & Economic Development | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404  
Tel. (707) 543-4688 | Cell (707) 291-6197 | [nwoltering@srcity.org](mailto:nwoltering@srcity.org)



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

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

Comment Submitted by:

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

Comment:

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

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

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

General UA points to consider:

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

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

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

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

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

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

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

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

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

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

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

Specific UA points to consider:

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

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

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

The uneconomic nature of UA is addressed in two ways:

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

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

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

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

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

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

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

Thank you for your work and consideration.

- Roy Smith

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

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FYI, see below.

Jess

**Jessica Jones | Deputy Director - Planning**

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

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



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

Dear Planning Commissioners,

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

Sincerely,  
Phil Levine

**FW: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan**

Jones, Jessica &lt;jjones@srcity.org&gt;

Mié 13/09/2023 8:50

Para:Guerrero Auna, Beatriz &lt;BGuerreroAuna@srcity.org&gt;;Meads, Shari &lt;SMeads@srcity.org&gt;

**Jessica Jones | Deputy Director - Planning**

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**From:** Charlie Ristad Vrobel**Sent:** Tuesday, September 12, 2023 9:56 PM**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>**Subject:** [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan

Dear Planning Commissioners,

Hello. I would like to be able to use my bike to get around Santa Rosa, but the current street conditions are too stressful and unsafe. Only good city planning can fix this. Please make sure the General Plan supports people who travel outside of private automobiles.

If we are to keep adding housing and increasing the population, then we must have safe walking/riding around the city. Let's support safety and make Santa Rosa a DESIRABLE place to live by having modern bike lanes and a pedestrian-centered focus. Let's think long-term people!!!

Sincerely,

Charlotte Vrobel



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

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**Jessica Jones | Deputy Director - Planning**

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

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



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

Dear Commissioners:

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

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

Thank you for your consideration!

Samantha Feld

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

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**Jessica Jones | Deputy Director - Planning**

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

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

Begin forwarded message:

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

Dear Commissioners,

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

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

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

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

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

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

Sincerely,

**Allison Ford, PhD**  
Assistant Professor  
Department of Sociology

Sonoma State University

[allison.ford@sonoma.edu](mailto:allison.ford@sonoma.edu)

Pronouns: she/her/hers

**FW: [EXTERNAL] Safer streets are a priority for my family !**

Jones, Jessica <jjones@srcity.org>

Mié 13/09/2023 9:21

Para:Guerrero Auna, Beatriz <BGuerreroAuna@srcity.org>;Meads, Shari <SMeads@srcity.org>

**Jessica Jones (she/her) | Deputy Director - Planning**

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

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



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**From:** Ken M

**Sent:** Tuesday, September 12, 2023 9:16 PM

**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>

**Subject:** [EXTERNAL] Safer streets are a priority for my family !

Dear Planning Commissioners,

Hello. My kids and I would like to be able to use my bike to get around Santa Rosa, but the current street conditions are too stressful and unsafe ( Have you tried to bike thru Farmer's Lane and College ave?? Yikes!!) Only good city planning can fix this. Please make sure the General Plan supports all Santa Rosans who travel outside of private automobiles.

Sincerely,

Ken Mercado

**FW: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan**

Jones, Jessica &lt;jjones@srcity.org&gt;

Mié 13/09/2023 8:49

Para:Guerrero Auna, Beatriz &lt;BGuerreroAuna@srcity.org&gt;;Meads, Shari &lt;SMeads@srcity.org&gt;

**Jessica Jones | Deputy Director - Planning**

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

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

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**From:** Minona Heaviland**Sent:** Tuesday, September 12, 2023 10:14 PM**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>**Subject:** [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan

Dear Commissioners,

I'm writing to you because I'm concerned that the General Plan does not take bold enough steps to address climate change adaptation and resilience to improve public health and support a vibrant economy. In order to adapt to the new climate including wildfires and drought in new extremes, we need to increase the density of Santa Rosa and create a vibrant, walkable, bikeable community where resources are conserved and people can be provided for and protected. In order to improve the livability and success of Santa Rosa as a community, I request that you address the following in the General Plan:

1. A more ambitious goal for reduction in Vehicle Miles Traveled (and the removal from the GP of any projects that will induce greater use of single-occupancy vehicles). In addition, new projects should be assessed for impact fees based on VMT rather than LOS. ABAG has some technical assistance that can assist with this transition: <https://abag.ca.gov/technical-assistance/vehicle-miles-traveled-vmt-fee>
2. A commitment to the completion of at least 25 miles of a low-stress active transportation network, and further expansions in connectivity beyond that.
3. The use of National Association of City Transportation Officials (NACTO) design guidelines for Urban Streets as the default standards for design of streets within the City's control.
4. A commitment to reducing vehicular speeds and improving pedestrian and bicycle safety around all business districts and schools. Just today a 13-year-old girl was hit by a car walking home from school. We need to improve safe routes for teenagers to be able to walk or ride their bike so that they can transport themselves and get exercise that is important for their development.
5. The removal of parking minimums throughout the city as a whole

Sincerely,

Minona Heaviland

Santa Rosa resident and working mother

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

---

**Jessica Jones | Deputy Director - Planning**

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

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



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

Dear Planning Commissioners,

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

Sincerely,

Andy rich

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

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**Jessica Jones | Deputy Director - Planning**

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

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

Begin forwarded message:

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

Dear Commissioners,

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

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

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

The removal of parking minimums throughout the city as a whole

Sincerely,

Liana Whisler

**[EXTERNAL] Comment from SRGP Website**

info@santarosafoward.com <info@santarosafoward.com>

Mié 13/09/2023 14:54

Para:info@santarosafoward.com <info@santarosafoward.com>

Comment Submitted by:

Name: Diane Ballard

Organization: Resident of West Santa Rosa

Comment:

Comment: I recommend NO bathrooms be installed in the westgate park on Westbrook Drive.

It would bring the homeless to our sweet neighborhood park.

I like Bike lanes wherever you can put them .

Can money be put to the mediums in the city streets. All look like we are letting the city go downhill.

Thank you

--

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**FW: [EXTERNAL] General Plan update- connectivity**

Jones, Jessica &lt;jjones@srcity.org&gt;

Mié 13/09/2023 15:27

Para:Guerrero Auna, Beatriz &lt;BGuerreroAuna@srcity.org&gt;;Meads, Shari &lt;SMeads@srcity.org&gt;

**Jessica Jones (she/her) | Deputy Director - Planning**

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

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**From:** Thea Hensel**Sent:** Wednesday, September 13, 2023 3:11 PM**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>**Subject:** [EXTERNAL] General Plan update- connec vity

Dear Commissioners,

I would like to ask for considera on of the items listed below as the Greenway develops and the surrounding neighborhood changes and the 3 parcels zoned for development are sold and plans for those sites come before you.

- Safe crossings must be implemented as well as protected Class IV bike lanes to access the Greenway
- Connectivity from the Greenway to local schools and existing and planned bike lanes must be included in any development surrounding the Greenway
- The Greenway shall provide opportunities to enhance City goals for GHG targets with infrastructure such as solar capture, recharge of storm water, EV charging stations as examples.
- Developers shall be inclusive in their designs to provide easy access to the Greenway, and integrate the opportunities for Greenway amenities in their design plans when submitting to the Planning Commission.

Thank you for your time and consideration as you review the opportunity to put teeth into plans going forward in the coming decades.

Regards,

Thea Hensel

CoChair, Southeast Greenway Campaign

**FW: [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan**

Jones, Jessica <jjones@srcity.org>

Jue 14/09/2023 7:54

Para:Guerrero Auna, Beatriz <BGuerreroAuna@srcity.org>;Meads, Shari <SMeads@srcity.org>

**Jessica Jones (she/her) | Deputy Director - Planning**

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

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



---

**From:** Sam Basse

**Sent:** Wednesday, September 13, 2023 8:43 PM

**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>

**Subject:** [EXTERNAL] 8/14/23, Agenda item 7.1, General Plan

Dear Planning Commissioners,

As a resident, homeowner, and future father here in Santa Rosa, I strongly support the recommendations made by Bikeable Santa Rosa in their letter to you, detailing both what works well in the Draft General Plan, but also where significant improvements are needed.

Sincerely,  
Sam Bassetti

**From:** [Denise Jacquin](#)  
**To:**  
**Subject:** [EXTERNAL] Comment about draft GPU  
**Date:** Sunday, September 17, 2023 12:22:23 PM

---

Dear City of Santa Rosa,

Will you inform me what section and page on the draft general plan is the section on housing? I have a Section 8 voucher and I would like to make a comment to require acceptance of section 8 vouchers in perpetuity for a percentage of affordable housing units.

Please reference a section of the draft general plan where I can read the housing section

Sent from my iPhone

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**FROM:** [info@santarosafoward.com](mailto:info@santarosafoward.com)  
**To:** [info@santarosafoward.com](mailto:info@santarosafoward.com)  
**Subject:** [EXTERNAL] Comment from SRGP Website  
**Date:** Monday, September 25, 2023 1:48:17 PM

---

Name/Organization: None Given

Comment:

Comment: In crafting such a grand and ambitious document it will be important to be realistic above all. The biggest reality is that we are on the verge of extinction. We must consider every action we take in light of our current state, if not, nothing else will matter. thanks for your efforts. Mike Turgeon 707-569-4043.

**Subject:** [\[EXTERNAL\] Comment from SRGP Website](#)

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**Date:** Sunday, October 1, 2023 4:06:46 PM

Comment Submitted by:

Name: Kerry Fogarty

Organization: Local musician and health care worker at Kaiser Santa Rosa

Comment: Thank you for the incredible work that has gone into this plan! It's terribly impressive and forward thinking. However, I have a concern about Chapter 4, Urban Design, Historic Preservation and Art and Culture.

I see that goal 4-3 is "Support an empowered, thriving, and inclusive Santa Rosa community connected through the power of art." I don't understand how that goal will be achieved given the City Manager has repeatedly denied requests to support the City's Public Art Program, by increasing Public Art staff to at least two people.

If the City is

committed to placemaking, art in public spaces, and community connection through art, it's going to take a robust Public Art Program, not just the bare minimum.

The plan states, "Arts have the power to connect people, promote cultural inclusion and diversity, create civic pride and a sense of community, stimulate the local economy, and inspire the creative spirit." Personally, I truly believe that. But I have not seen City leadership indicate their support for the arts. In fact, the City's allocation of resources tells me the arts are not a priority whatsoever.

Thanks for taking the time to read my comment!

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## General Plan Comments

Since the mid- 80's the City has tried to develop mixed use projects. To date there has not been a single successful one. My overarching comment/question is "Why?" The new General Plan is basically a rehash of the things we have attempted to do since the 80's without success. The Moore Building was the first and since it was completed the ground floor has been unoccupied. Another attempt was Courtside Village where we actually went in and changed some of the ground floor commercial to residential and to this day there is a lot of vacant ground floor space.

When Bob Blanchard was Mayor the Mayor's Institute on City Design came to Santa Rosa to evaluate our downtown and made recommendations on how to achieve success. Their overarching comment was you need to focus and concentrate. Perhaps someone should go back and review the recommendations in that report.

One of the comments from the team that has always stuck with me was to concentrate our focus to have success with ground floor commercial/residential development was the fact that for every new block of ground floor commercial we develop you need to add (and I admit I forget the exact number) something like 1500 **new** residential "doors". At the time I did the calculation based on the General Plan in place and Santa Rosa had the capacity, assuming 2.5 people per door to support a total of 9 blocks of ground floor commercial based on the population at the end of the General Plan time period. Their point was we had already rezoned and far more than that as this type of mixed use. Currently we have it on Santa Rosa Avenue, Mendocino Avenue and in all the various plans we have adopted for specific areas. We are anything but focused on that type of development City wide.

With the Mendocino Avenue and Santa Rosa Avenue corridors there is an inherent disconnect with that ground floor retail space and the available space above for residential development to make the commercial successful. Basically we can't fit that many units above the retail to make it work.

We should be asking developers and lenders what they need to see to make these uses happen and we should be laser focused on the downtown core.

I question the wisdom in the Downtown Station Area Plan of switching from the existing form based height requirements back to FARs. Floor area ratios work well in large cities with large blocks but in our small downtown the reality with the small lot sizes, particularly on 4th Street it renders properties undevelopable unless a developer can amass a number of separate parcels. This is also a question to ask the development community, and by development community I mean developers from outside Santa Rosa in addition to the local developers. We need the input from people who actually have developed such projects and ask them what they need for them to be successful.

With the shift away from brick and mortar retail to online we need to think about what the real use of ground floor spaces should be. Ground floor residential can be successful in urban areas with some simple design considerations. Downtown San Diego has developed a number of ground floor residential projects and the key to success for them is simply raising the first floor units 3 to 4 feet above the sidewalk for separation.

Outside the downtown I think the City is missing a lot in terms of considering horizontal rather than vertical mixed use. All of our Area Plans and the General Plan are full of sexy images of hip urbanites sipping wine and cappuccinos at the sidewalk cafe with trendy flats rising above

as if Santa Rosa's future is going to be one giant Rockridge District in Oakland. That will never be our reality. From a livability standpoint look at successful neighborhoods in Santa Rosa. One is the McDonald/Grace Tract/Town & Country neighborhood. While that is successful part of it is because it is a wealthy one. But the design considerations are the same. Another successful neighborhood is the Bennett Valley Shopping Center neighborhood. It features two shopping centers which are fully leased out and a diverse community surrounding and supporting it. Housing ranges from above median residential development to condominiums and apartments. Economically everything from wealthy to Section 8 housing. I would consider the Bennett Valley area around the shopping center to be a good example of successful horizontal mixed use.

There are areas where we eliminated that potential. In Southeast Santa Rosa we rezoned the Community Shopping Center originally planned for there to residential. Now with significant residential development happening on that property the area while not technically a food desert only has a Smart and Final and Lola's Market for food shopping.

My apologies for the long winded rant. I have been involved in the planning effort in Santa Rosa for 40 years now and really do want the City to be successful. My frustration is that with every new Area and General Plan we come up with it is just a rehash of the same things we have been doing unsuccessfully for all that time. Isn't that the definition of insanity?

Scott P. Bartley, AIA

Community member, Peter Stanley, comments on Chapter 2. Land Use and Economic Development



# 2

## Land Use and Economic Development



## 2. Land Use and Economic Development

How land is used in Santa Rosa can make a big difference in how people feel about and interact in local neighborhoods and in how the local economy operates. A successful new business, residential development, or active community use where once was a vacant lot can begin transforming a whole neighborhood, improving everything from the safety of kids going to school to new landscaping along streets and supporting local pride and revitalization. Such positive change can also revitalize local commercial areas and bring critical jobs and community amenities to the city, increasing economic access and vitality. Identifying feasible locations for new and expanded educational, vocational, and employment opportunities can start the process to help local youth and adults develop meaningful careers close to home. Recognizing all this, General Plan 2050 seeks to reinforce local pride, increase local investment, and bolster the vitality of the city as a whole. This chapter supports thoughtful land use planning and economic development strategies to enhance and build on neighborhood assets, address current challenges, increase economic and environmental vitality, increase personal opportunity, and improve quality of life for everyone in Santa Rosa.

Santa Rosa's growth pattern over the past century and a half has heavily influenced the physical form of its neighborhoods. Santa Rosa began with the establishment of the downtown

area as a commerce center for the surrounding agricultural and timber region. The city developed from this central core along a series of commercial corridors into newer, more suburban neighborhoods.

The construction of Highway 101, which started in 1949, physically divided the east and west sides of the city. Though the highway facilitates connections between Santa Rosa and the rest of the region and state, it disrupts connections within the city. Policies and actions in this chapter and others are intended to bridge some of these gaps.

### Chapter Contents

- General Plan Priority Areas and Populations
- Land Use
- Economic Development

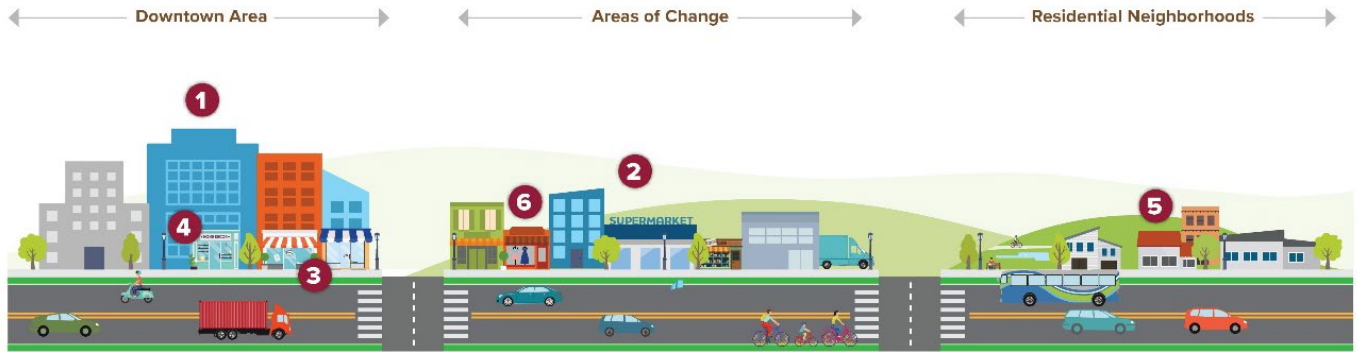
The goals in this chapter reflect Santa Rosa's priorities and implement the community's vision for the future. These goals, associated policies, and actions especially support the following statements from the Santa Rosa Vision (shown in full in Chapter 1, Introduction):

- **Just:** Social and environmental justice are achieved for everyone—all abilities, ages, ethnicities, gender identities, immigration status, income levels, language speakers, races, religions, sexual orientations and identities, EVERYONE.
- **Sheltered:** A diverse mix of high-quality, safe, thoughtfully designed, efficiently planned, and well-served housing at all affordability levels is available throughout the community to accommodate everyone, including formerly homeless, immigrants, local workers, multigenerational households, seniors, students, and formerly incarcerated people.
- **Successful:** Top employers gravitate; Black-, Latino/Latina-, and other minority-owned businesses are in all corners of the community; equitable investments are made in all neighborhoods; local shops, food and beverage establishments and food trucks, and entertainment spaces support a vibrant city; and meaningful work in a thriving economy is available for people of all ages and backgrounds.

**Figure 2-1** illustrates some of the key concepts addressed in this chapter.

Figure 2-1: Visualizing the Concepts

# ▶ **LAND USE AND ECONOMIC DEVELOPMENT**



**1**  
Mixed Use Downtown Neighborhood



**2**  
Mixed Use Corridor



**3**  
Street Dining/  
Retail Activities



**4**  
Jobs-Training Balance



**5**  
Neighborhood  
Entrepreneurship



**6**  
Resilient Economic  
Growth



## General Plan Priority Areas and Populations

A number of policies and actions in this General Plan give priority to specific areas or populations in Santa Rosa. Though a policy or action may apply broadly, this prioritization means that the City will first concentrate efforts on historically underserved communities and/or core neighborhoods to advance key aims of environmental justice, social equity, and complete communities. These priority areas and populations are Equity Priority Areas, Equity Priority Populations, and Areas of Change, described in the following sections.

### Equity Priority Areas

Low-income communities and communities of color often bear a disproportionate burden of pollution exposure and associated health risks. Environmental justice seeks to correct this inequity by reducing pollution exposure in these communities and ensuring that their input is considered in decisions that affect them. Senate Bill 1000, the Planning for Healthy Communities Act, requires general plans to identify the communities that suffer most from economic, health, and environmental burdens and address environmental justice for these communities. SB 1000 calls these “disadvantaged communities,” and the General Plan terms them “Equity Priority Areas” or “EPAs” to recognize the immediate importance of addressing these issues.

The California Communities Environmental Health Screening Tool (CalEnviroScreen) is the primary method for identifying EPAs. CalEnviroScreen quantifies a range of factors related to pollution burden and population characteristics (e.g., poverty, educational attainment, and age) to derive a composite score for each census tract compared to the rest of the state. In general, the higher the score, the more impacted a community is. Census tracts in

the highest quartile of scores (i.e., 75 to 100 percent) are considered EPAs, although the law (Senate Bill 535) encourages cities to work with community members and stakeholders to refine the boundaries of these communities and identify additional communities, if appropriate, to support planning efforts that improve environmental justice. CalEnviroScreen identifies two Santa Rosa census tracts as EPAs under SB 535: one at the southeast intersection of Highways 101 and 12 and another south of Hearn Avenue west of Highway 101, shown on **Figure 2-2**. The City of Santa Rosa has worked with the community to identify additional vulnerable areas with overlapping concentrations of people of color and people living in poverty, shown on **Figure 2-3**. Santa Rosa’s EPAs, shown on **Figure 2-4**, include the EPAs identified by SB 535 and the areas with overlapping concentrations of people of color and people living below the poverty line.

**Equity Priority Areas or EPAs** are areas in Santa Rosa where residents suffer most from economic, health, and environmental burdens. EPAs are identified following Guidance from the State tool, CalEnviroScreen 4.0, and additional input from community members and stakeholders. This General Plan addresses environmental justice needs pursuant to SB 1000 and health and equity considerations of EPAs with goals, policies, and actions in each chapter that prioritize EPAs, as appropriate. Chapter 6, “Health, Equity, and Environmental Justice,” has the highest concentration of these goals, policies, and actions.

**Environmental Justice** is the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

*Source: California Government Code, Section 65040.12(e)*

## Equity Priority Populations

Similar to the EPA designation, the City of Santa Rosa has identified 10 Equity Priority Populations based on characteristics that contribute to vulnerability and/or the likelihood of being underserved in a variety of areas, including environmental justice, equity, health, and safety. These populations are:

1. Low-income individuals and families
2. Racial or ethnic groups experiencing disparate health outcomes
3. Seniors, children, youth, and young adults
4. Individuals with disabilities
5. Immigrants and refugees
6. Outdoor workers and farmworkers
7. Individuals who have limited English proficiency
8. Unhoused people
9. Lesbian, gay, bisexual, transgender, queer, intersexual, asexual, and other LGBTQIA+ communities
10. Individuals who are incarcerated or who have been incarcerated

Though it is not a requirement under SB 1000, one or more Equity Priority Populations may be prioritized in General Plan goals, policies, and actions, as appropriate.

## Areas of Change

The creation of General Plan 2050 included extensive community engagement to identify a preferred land use and circulation diagram. Figure 1-4 in the Introduction details the major

circulation network and land use actions programmed in General Plan 2050. Community members favored an approach that did not result in any changes to land use designations from the previous general plan, and instead prioritized development in 21 specific “Areas of Change,” depicted on **Figure 2-5**. These are places where the City will focus efforts to address housing, services, connectivity, and/or infrastructure needs and help provide complete neighborhoods with goods and services that are easily available. Accordingly, some policies and actions in this and other chapters focus on Areas of Change for implementing actions related to active transportation infrastructure, quality housing, healthy food options, opportunities for social connections, and access to parks and commercial services.

**Areas of Change** shown on **Figure 2-5** are places the City will focus efforts to address housing, services, connectivity, and/or infrastructure needs to help make these complete neighborhoods.

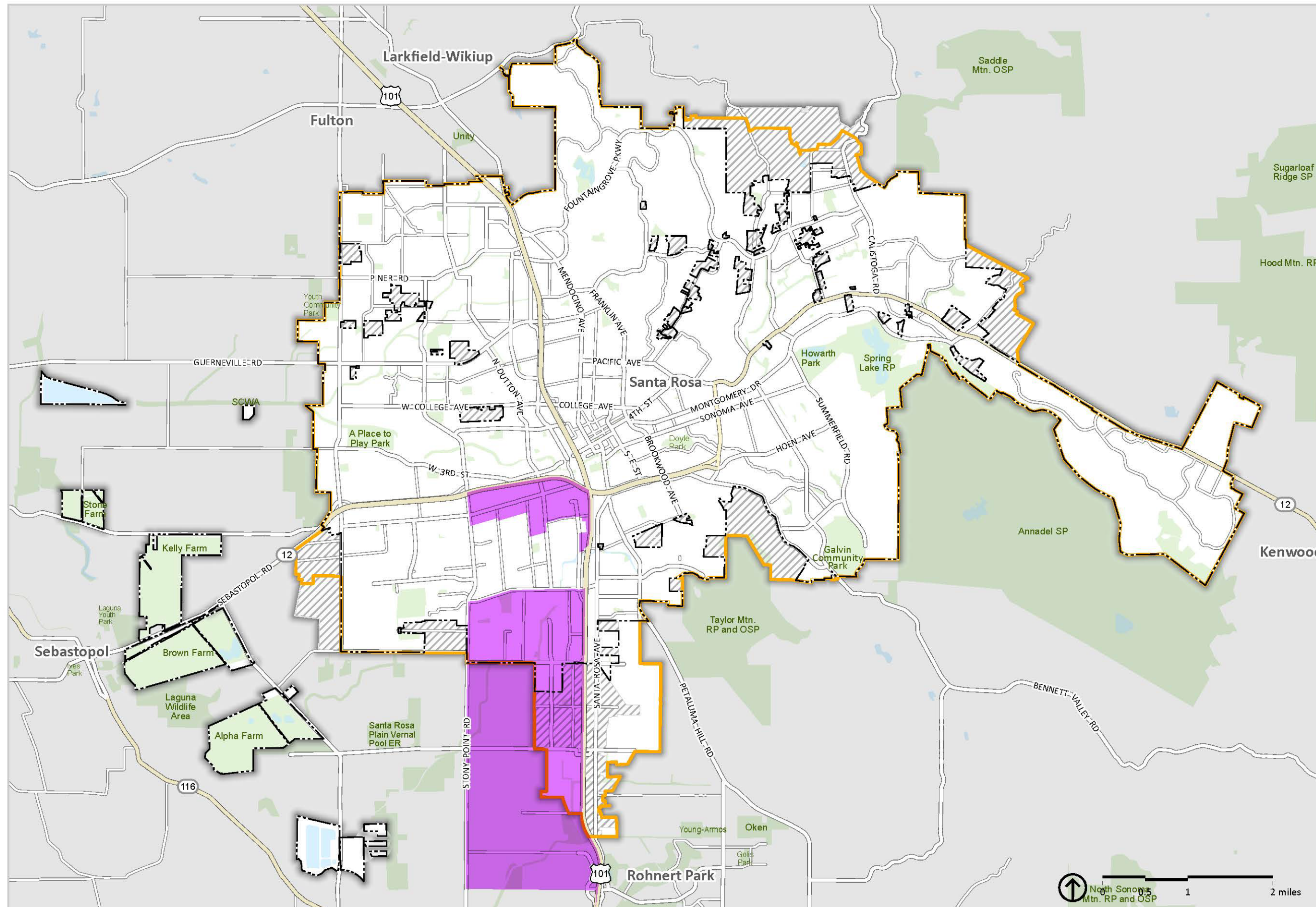


Figure 2-2  
Disadvantaged  
Communities  
Under SB 535

- City Limits
- Urban Growth Boundary
- City Sphere of Influence
- Planning Area
- Disadvantaged Communities Under SB 535

Source: City of Santa Rosa 2023





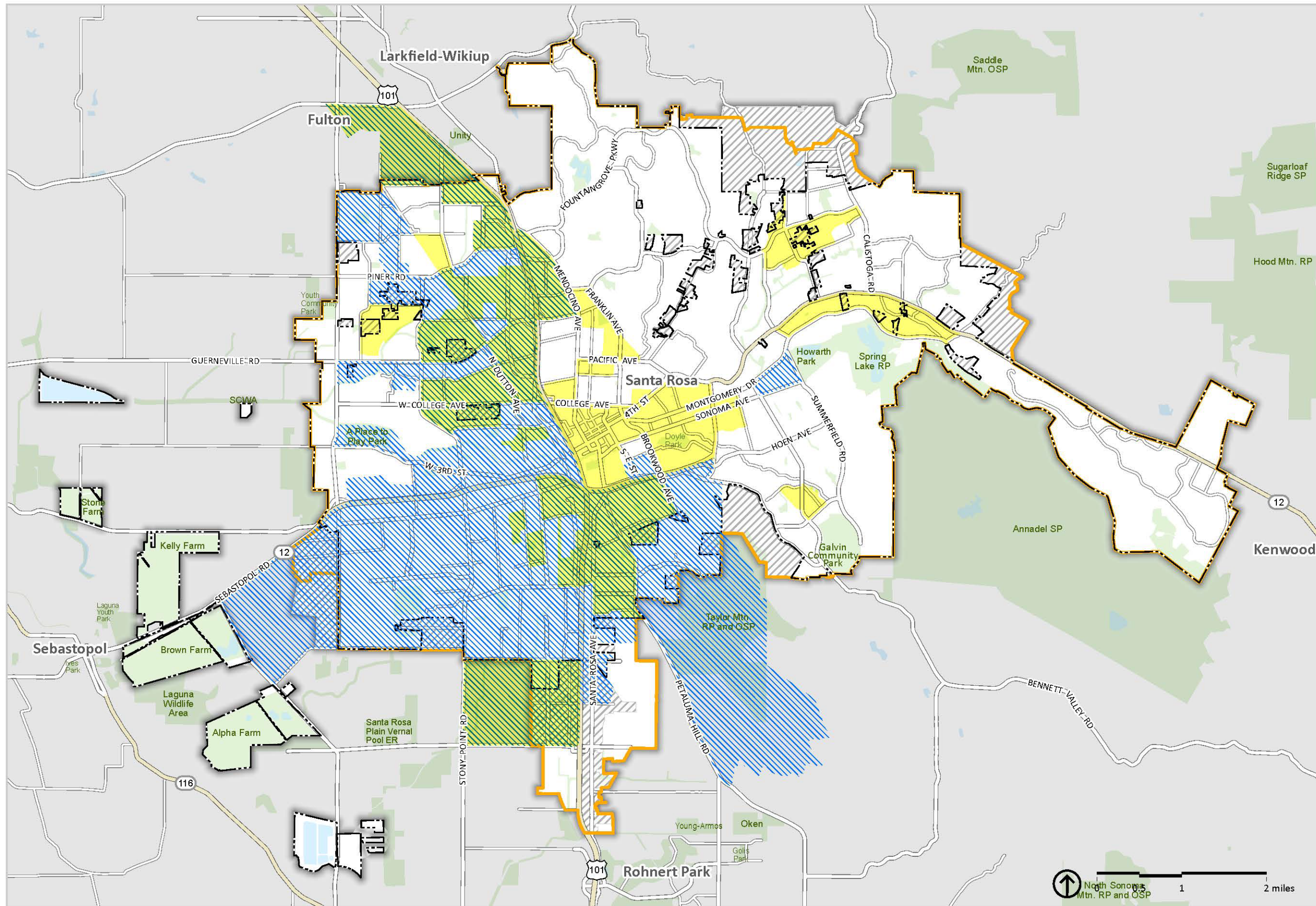


Figure 2-3  
Concentrations of People of Color and People Below the Poverty Line

- City Limits
- City Sphere of Influence
- Urban Growth Boundary
- Planning Area
- Poverty Top 25%
- Minority Top 25%

Source: City of Santa Rosa 2023



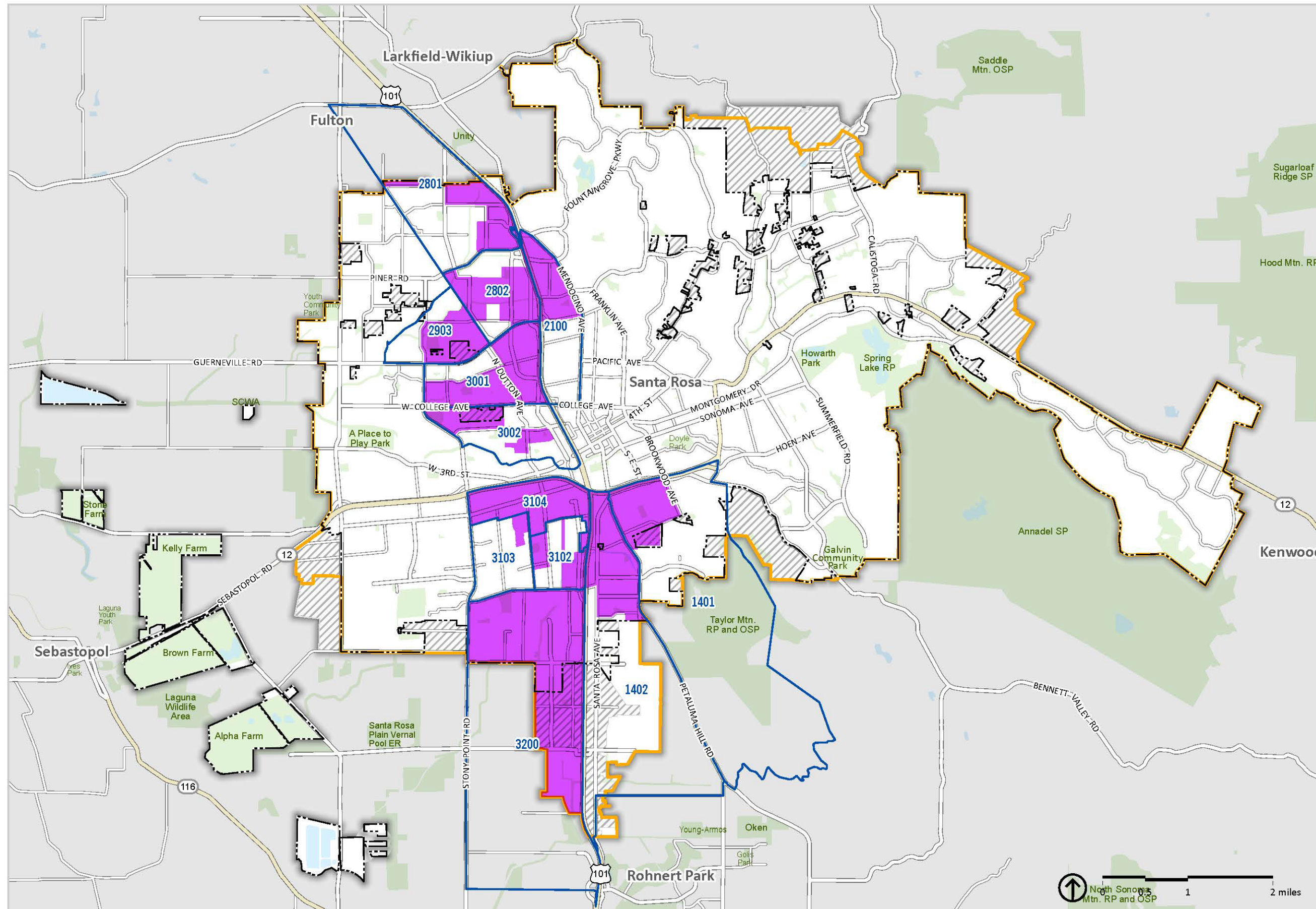


Figure 2-4  
Equity Priority Areas

- City Limits
- City Sphere of Influence
- Urban Growth Boundary
- Planning Area
- Equity Priority Areas
- Census Tracts Containing Equity Priority Areas

Source: City of Santa Rosa 2023





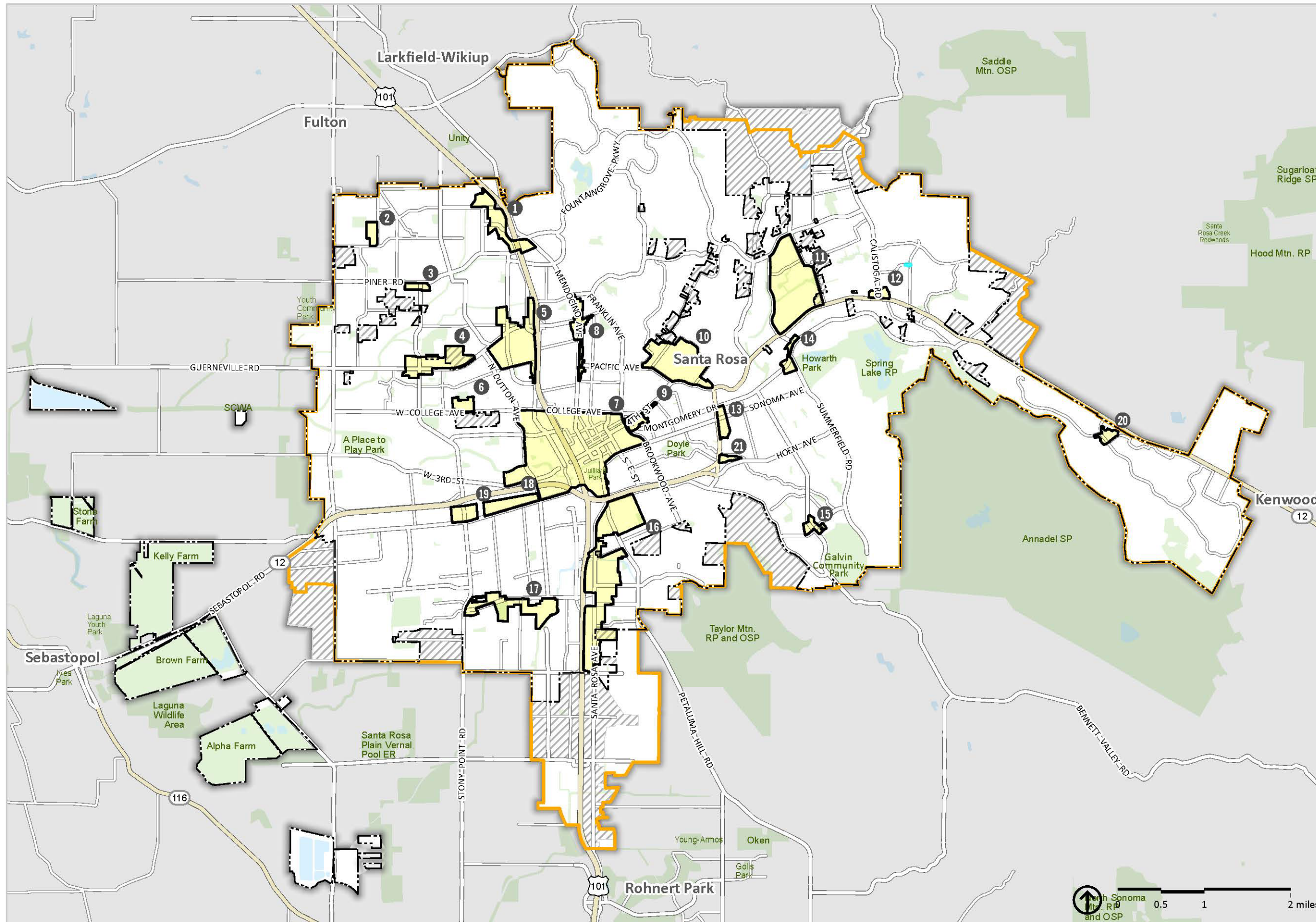


Figure 2-5  
Areas of Change

- City Limits
  - City Sphere of Influence
  - Urban Growth Boundary
  - Planning Area
  - Areas of Change
- 1 Fountain Grove/Mendocino Interchange
  - 2 Francisco Avenue
  - 3 Rosewood Village
  - 4 Marlow Center and Lance Drive Annexation
  - 5 Coddington
  - 6 West College Neighborhood Center
  - 7 Downtown Station Area
  - 8 Mendocino Corridor
  - 9 4th Street Corridor
  - 10 Flamingo Center
  - 11 Montecito
  - 12 St. Francis Shopping Center
  - 13 Montgomery Village
  - 14 Howarth Commercial
  - 15 Bennett Valley
  - 16 Santa Rosa Marketplace/South Park
  - 17 Hearn Corridor
  - 18 Roseland
  - 19 Stony Point Circle
  - 20 Oakmont
  - 21 Southeast Greenway

Source: City of Santa Rosa 2023



# Land Use

## General Plan Land Use

The citywide land use classifications, shown on **Figure 2-6** and described in this section, represent adopted City policy intended to achieve the community's vision. They are meant to be broad enough to give the city flexibility in implementation, and clear enough to provide sufficient direction to carry out the General Plan. The City's Zoning Code has more detailed provisions and standards. More than one zoning district may be consistent with a single General Plan land use classification. **Table 2-1** shows the allowed density and intensity of each land use classification and the zoning districts that correspond to each General Plan designation. Density and intensity in the Core Mixed Use, Station Mixed Use, Maker Mixed Use, and Neighborhood Mixed Use Areas are controlled by floor-area ratio (FAR), as shown on **Figure 2-7**, except for when density maximums are established in the Core Mixed Use land use designation, as shown in **Table 2-1**.

## Residential

Seven residential land use classifications provide for development of a full range of housing types. Densities are stated in housing units per gross acre of developable land, and at least one housing unit may be built on each existing legal parcel designated for residential use. Gross acreage includes the entire site (as opposed to net acreage, which excludes unbuildable areas). Development must fall within the density range stipulated in the classification.

Some residential use classifications include descriptions of housing types that are permitted. Mobile home developments, if within the stipulated density range of a residential classification, are permitted in all residential

categories. In addition to housing type and density standards in this chapter, the Zoning Code establishes development standards, parking, allowed uses, and other requirements.

Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) are allowed in addition to densities otherwise permitted, in accordance with State regulations. Density bonuses may be approved for projects with affordable housing and housing for elderly residents with specific amenities designated for residents, provided the design and development standards are in conformance with those specified in the Zoning Code. The City also encourages the development of Missing Middle Housing per California Senate Bill 9, which generally allows any lot larger than 2,400 square feet to be divided into two lots if both can meet City standards. In Santa Rosa, Missing Middle Housing is compatible in medium intensity residential zones (R-2, R 3, TV), mixed use zones, and some planned development areas.<sup>1</sup>

**Missing Middle Housing** refers to house-scale buildings with multiple units in walkable neighborhoods. Missing Middle Housing adds what is often referred to as “gentle density” because it adds dwelling units without altering the character of neighborhoods. Buildings are generally not more than two and a half stories in height; have multiple units within one building; have amenities such as porches that contribute to the street scape; have limited off-street parking, generally at the rear of the structure, reached by a narrow (single-lane) driveway; and have some shared open space, often in the form of a courtyard or rear or side yard.

<sup>1</sup> Missing Middle Housing Initiative, Task 1 Analysis, Opticos Design, Inc., October 2021



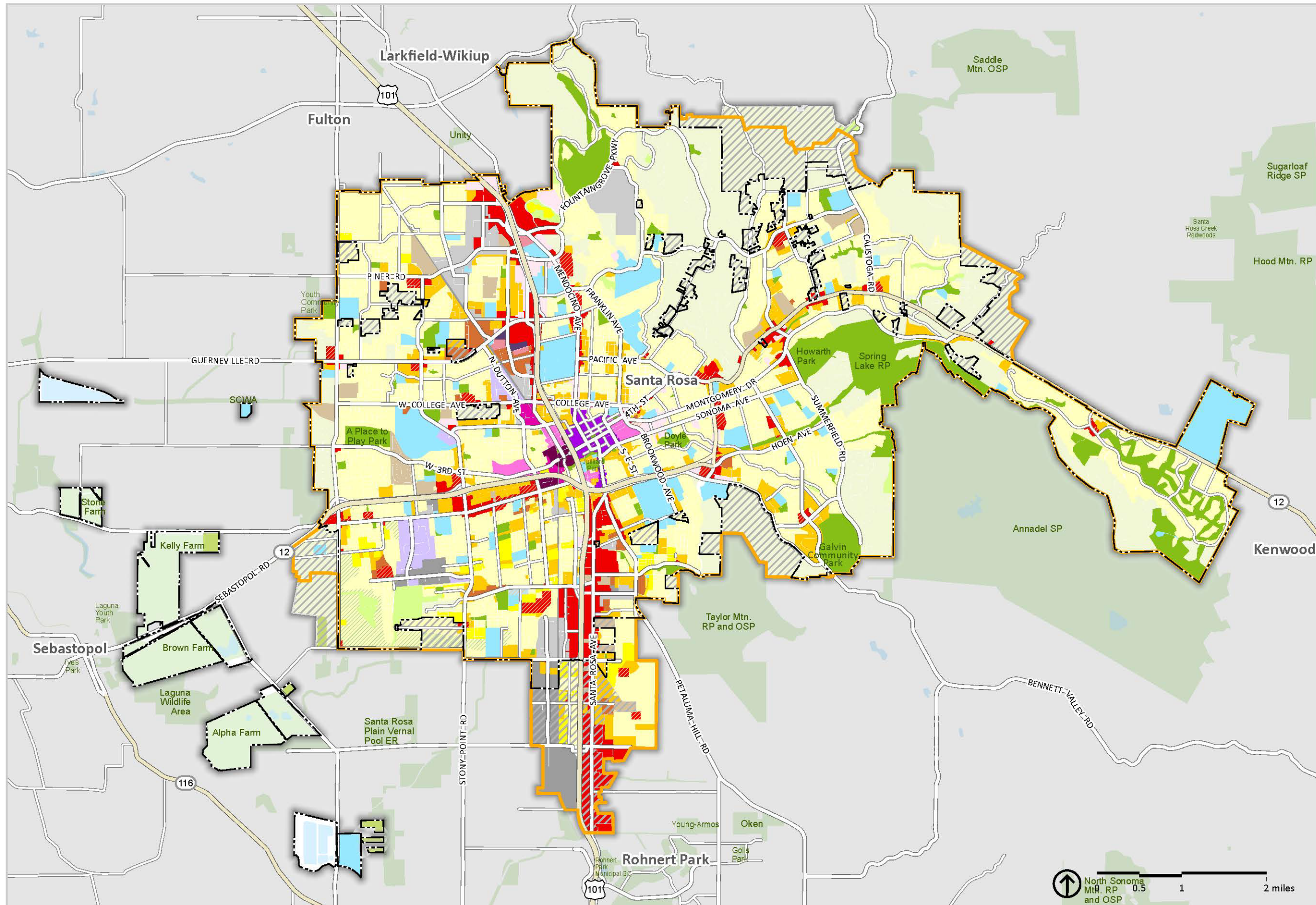
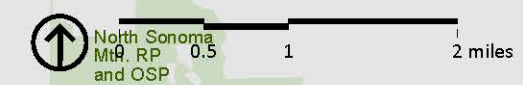


Figure 2-6  
General Plan  
Land Use

- City Limits
- Urban Growth Boundary
- City Sphere of Influence
- Planning Area
- Land Use Designation
  - Country Residential
  - Very Low Density Residential
  - Low Density/Open Space
  - Low Density Residential
  - Medium Low Density Res
  - Medium Density Residential
  - Medium High Density Res
  - Mobile Homes
  - Retail and Business Services
  - Retail/Medium Res Mixed Use
  - Office/High Res Mixed Use
  - Office/Med Residential
  - PubInst/Med Residential
  - Office
  - Transit Village Mixed Use
  - Transit Village Medium
  - Station Mixed Use
  - Core Mixed Use
  - Neighborhood Mixed Use
  - Maker Mixed Use
  - Business Park
  - Light Industry
  - General Industry
  - Public/Institutional
  - Parks and Recreation
  - Open Space
  - Agriculture



Source: City of Santa Rosa 2023



**Table 2-1**  
Permitted Densities/Intensities Under the General Plan

Land Use	Corresponding Zoning Districts	Residential Density (housing units/gross acre)	Residential Density Midpoint (housing units/gross acre)	Square Feet per Employee
<b>Residential</b>				
Very Low Density	Rural Residential (RR)	0.2–2.0	1.0	–
Low Density/Open Space	Single-Family Residential (R-1)	2.0–8.0	4.0	–
Low Density	R-1	2.0–8.0	5.0	–
Medium Low Density	R-1	8.0–13.0	10.0	–
Medium Density	Medium Density Multifamily Residential (R-2)	8.0–18.0	13.0	–
Medium High Density	Multifamily Residential (R-3)	18.0–30.0	24.0	–
Mobile Home Parks	Mobile Home Park (MH)	4.0–18.0	10.0	–
Neighborhood Mixed Use	Neighborhood Mixed Use (NMU)	25.0–40.0	–	–
<b>Transit Village Medium</b>	Transit Village-Residential (TV-R)	40.0 minimum	–	300
<b>Transit Village Mixed Use</b>	Transit Village-Mixed (TV-M)	No maximum	–	300
<b>Core Mixed Use</b>	Core Mixed Use (CMU)	–	–	–
<b>Station Mixed Use</b>	Station Mixed Use (SMU)	–	–	–
<b>Maker Mixed Use</b>	Maker Mixed Use (MMU)	–	–	–
<b>Commercial</b>		–	–	
Retail and Business Services	General Commercial (CG)	–	–	300
<b>Office</b>	Office Commercial (OC)	–	–	250
<b>Business Park</b>	Business Park (BP)	–	–	350
<b>Industrial</b>		–	–	
Light Industry	Light Industrial (IL)	–	–	400
General Industry	General Industrial (IG)	–	–	400
<b>Public/Institutional</b>	Public/Institutional (PI)	25.0–40.0	–	300
<b>Parks and Recreation</b>	OSC, OSR	–	–	–
<b>Open Space</b>	OSC, OSR	–	–	–
<b>Notes:</b> Density bonuses granted for provision of affordable housing or public amenities, up to 25 percent greater than maximum.				

In addition to the primary residential uses described in each land use, below, compatible accessory uses are also allowed, as identified by the City's Zoning Code. Some of these may require discretionary review by the City, and some are allowed by right. Such uses include, but are not limited to, certain recreation, education, and public assembly uses; certain medical, community care, and daycare facilities; supportive and transitional housing; and certain neighborhood-serving retail uses.

### *Very Low Density*

Residential development from 0.2 to 2 units per acre (i.e., 0.5 to 5 acres per unit) accommodates rural and hillside developments within the urban growth boundary (UGB) and is intended for single-family detached units, but clustered single-family attached and multifamily may be permitted.

### *Low Density/Open Space*

This single-family residential development is at a density of 2 to 8 units per acre and assumed at only 80 percent of each site due to wetlands and similar constraints. The classification is mainly intended for detached single-family dwellings but attached single-family and multiple-family units may be permitted.

### *Low Density*

Single-family residential development has a density of 2 to 8 units per acre. The classification is mainly intended for detached single-family dwellings but attached single-family and multiple-family units may be permitted.

### *Medium Low Density*

Housing has densities from 8 to 13 units per acre. The classification is intended for attached single-family residential development (such as townhomes), but single-family detached housing and multifamily development may be permitted. Development at the midpoint of the density range is encouraged but not required.

### *Medium Density*

Housing densities are from 8 to 18 units per acre. This designation permits a range of housing types, including single-family attached and multifamily developments and is intended for specific areas where higher density is appropriate. Missing Middle Housing types, including Duplex-Triplex, Fourplex, and Cottage Court, are also compatible within this zone. New single-family detached housing is not permitted except in historic preservation districts and historic neighborhoods where single-family detached units are allowed.

### *Medium High Density*

Residential development has densities ranging from 18 to 30 units per acre. This designation permits a range of housing types, including single-family attached and multifamily developments, and is intended for specific areas where higher density is appropriate. Missing Middle Housing types, including Multiplex (small and large), Courtyard buildings, Townhouses, and Live-Work units are also compatible within this zone. Single-family detached housing is not permitted.

### *Mobile Home Parks*

Residential mobile-home development of two or more mobile home units, and densities range from 4 to 18 units per acre. Mobile homes and manufactured homes are the only allowed housing type.

## **Mixed Use**

Mixed-use development is planned downtown and in specific neighborhood and community shopping centers. Transit Village Medium and Transit Village Mixed Use apply to areas around existing and proposed rail as well as bus transfer sites. Transit Village Medium is more residential in nature, but ground-floor retail is desirable. Several areas designated for multiple land uses are distinguished by a striped pattern on the Land Use Diagram. Single or multiple uses are

allowed in these areas, consistent with land use designations. Missing Middle Housing is also compatible within these areas.

The Downtown Station Area Specific Plan (DSASP), adopted in 2020, regulates FAR without establishing height and density standards (mixed-use development outside downtown is not subject to FAR, but instead is regulated by the combination of setbacks, height limits, and maximum lot coverage standards). FAR is a widely used planning tool that divides total building square footage by lot area. **Figure 2-7** offers examples of FAR and how it is calculated. **Figure 2-8**, from the 2020 DSASP, shows the maximum FAR allowable for DSASP sites. The allowed maximum FAR excludes parking areas, outdoor recreation spaces, and areas of any historic structure to be preserved on-site to maximize the building square footage that can be devoted to housing, employment, cultural, and entertainment uses. These downtown sites are the only areas of the city where FAR is applied; elsewhere, the amount of square footage allowed on a property is regulated by the combination of setbacks, height limits, and landscaping and lot coverage standards.

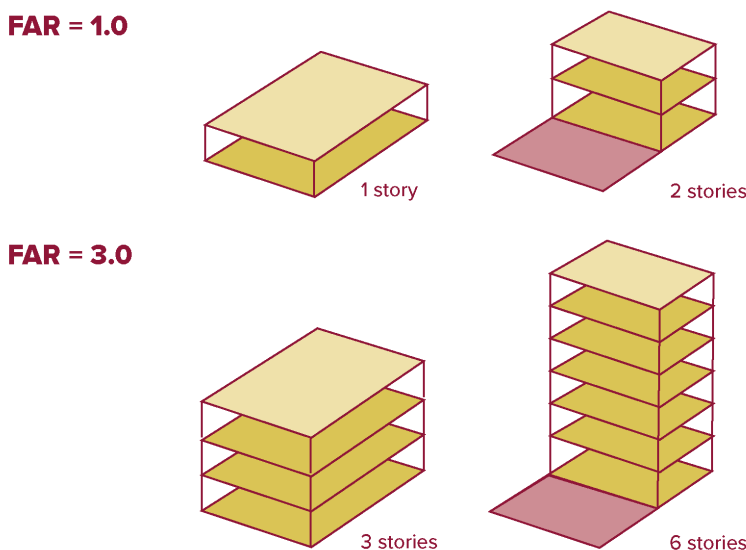
**Transit Village Medium**

This classification is intended to accommodate mixed-use development within approximately one-half mile of a transit facility. Development should transition from less intense uses at the outlying edges to higher-intensity uses near the transit facility. Residential uses are required, and ground-floor neighborhood-serving retail and Missing Middle Housing types are encouraged, including Live-Work uses. Housing densities range from 25 to 40 units per acre.

**Transit Village Mixed Use**

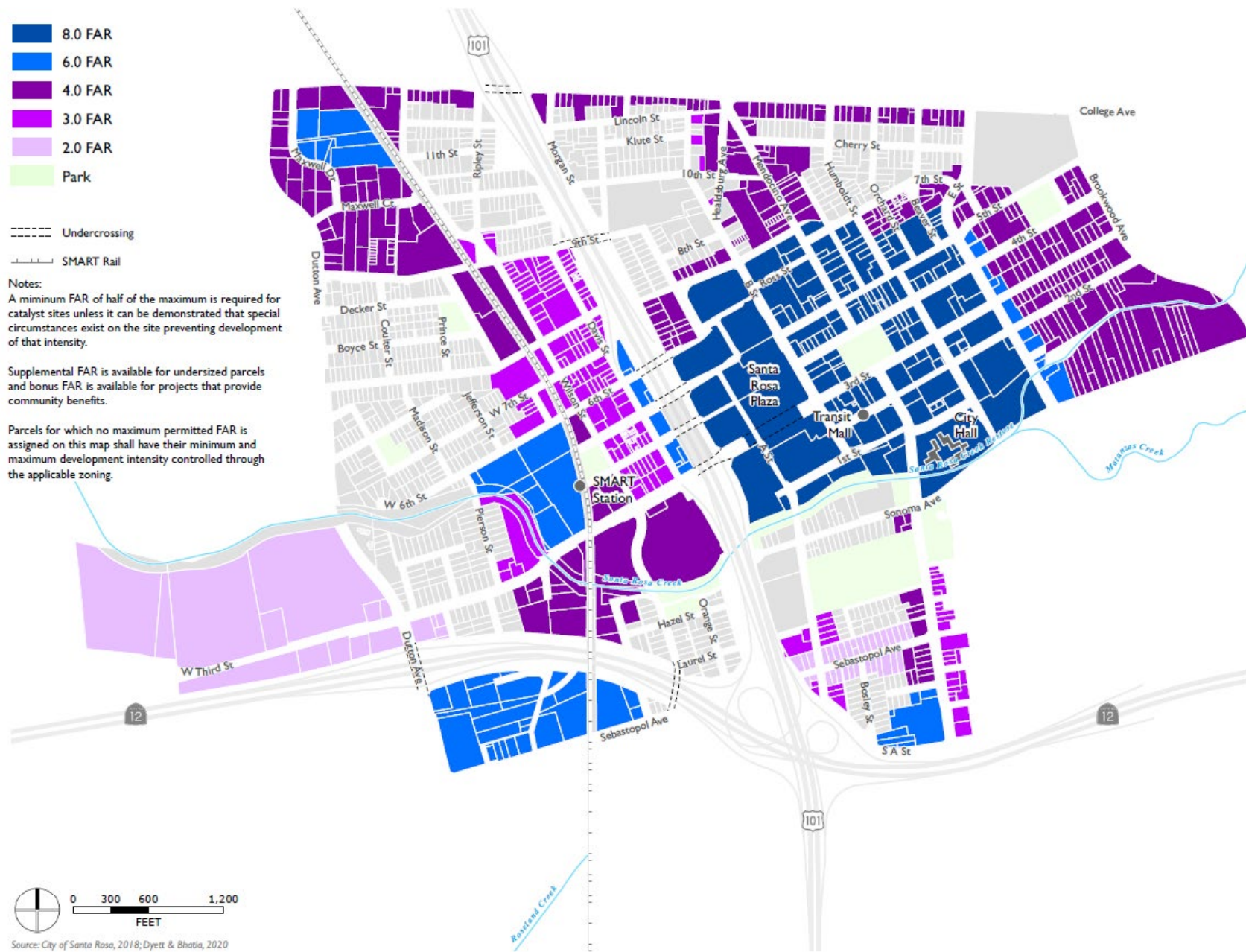
This classification is intended to accommodate a well-integrated mix of higher-intensity residential, including Missing Middle Housing, such as Multiplex (small and large), Courtyard buildings, Townhouses and Live-Work units, office, and commercial uses within one-quarter mile of a transit facility. Development is designed and oriented to create a central node of activity at or near the transit facility. The minimum housing density is 40 units per acre; there is no maximum density requirement.

**Figure 2-7: Examples of FAR**



*Floor Area Ratio (FAR) does not directly limit the height or number of stories of a building*

Figure 2-8: Downtown Maximum FAR





### *Core Mixed Use*

This classification is intended to foster a vital mix of residential, retail, office, governmental, entertainment, cultural, educational, and hotel uses to activate the greater Courthouse Square area and key transit corridors. The principal objectives of the CMU designation are to strengthen the role of this area as a business, governmental, retail, and entertainment hub for the region, and accommodate significant new residential development that will extend the hours of activity and create a built-in market for retail, service, and entertainment uses. High-rise development in all-residential or mixed-use buildings is envisioned in a walkable, bikeable environment with civic spaces such as plazas, courtyards, or parks and easy access to public transit. The Core Mixed Use designation has a maximum FAR range of 3.0 to 8.0 except for 12 contributor properties on B, 7th, and 10th Streets, to which height and density maximums apply.

### *Station Mixed Use*

This classification is intended to provide for a range of visitor-serving uses, including retail, restaurants, entertainment, cultural amenities, and hotels in proximity to the Downtown SMART station. Though commercial uses are emphasized, new multifamily housing will also be allowed to support daytime and evening vitality in the Downtown Station Area. New development will be required to respect the historic character of the Railroad Square area, adding to the mix of uses and enhancing the walkable, pedestrian-oriented streets and public spaces that attract community members, SMART train riders, and visitors from the wider region. The Station Mixed Use designation has a maximum FAR range of 3.0 to 6.0.

**Complete Streets** are streets designed and operated to enable safe use and support mobility for all users. Those include people of all ages and abilities, regardless of whether they are travelling as drivers, pedestrians, bicyclists, or public transportation riders.

*Source: U.S. Department of Transportation*

### *Community Shopping Center*

The vision for Community Shopping Centers is a complex of retail services and enterprises anchored by a large grocery store and serving a community clientele. Typical uses include restaurants and shops offering convenience goods. These sites are in areas surrounded by residential development and are intended to be walkable areas with a mix of uses that meet the shopping needs for surrounding neighborhoods and provide housing integrated with commercial development.

Residential uses shall be incorporated into the overall design but may be provided over time as part of a phased development. Existing community shopping centers are not required to include residential uses for minor alterations or re-occupancy but are required to evaluate and demonstrate through site planning that future residential would not be precluded when significant additions or reconstruction are proposed.

### *Neighborhood Shopping Center*

These are small groups of retail and service enterprises providing shopping and services to satisfy the day-to-day needs of local neighborhoods and workplaces. Typical neighborhood center uses include small grocery stores, restaurants, barber or beauty shops, cleaners, shoe repair, and shops offering convenience goods. Residential development is encouraged but not required. New neighborhood centers are allowed in any land use designation where they can be supported.

## Commercial

### *Retail and Business Services*

This designation allows retail and service enterprises, offices, and restaurants. It includes regional centers, which are large complexes of retail and service enterprises anchored by one or more full line department stores, and destination centers, which are retail centers anchored by discount or warehouse stores. Large grocery stores are expressly permitted in Community Shopping Centers and downtown only, and they may be considered through a Conditional Use Permit process on other commercial sites.

### *Office*

Sites for administrative, financial, business, professional, medical, and public offices are allowed under this designation.

### *Business Park*

This category accommodates holistically planned, visually attractive centers for businesses that do not generate nuisances (noise, clutter, noxious emissions, etc.), in campus-like environments for corporate headquarters, research and development facilities, offices, light manufacturing and assembly, industrial processing, general service, incubator facilities, testing, repairing, packaging, and publishing and printing. Warehousing and distribution facilities, retail, hotels, and residential uses are permissible on an ancillary basis. Restaurants and other related services are permitted as accessory uses. Outdoor storage is not permitted.

## Industrial

### *Light Industry*

This designation supports light industrial, warehousing, and some heavier commercial uses. Uses appropriate to this land use category include auto repair, bulk or warehoused goods, general warehousing, manufacturing/assembly,

home improvement and landscape materials retail, freight or bus terminals, research oriented industrial, accessory offices, employee-serving commercial uses, and services with large space needs, such as health clubs. Professional office buildings are not permitted.

### *General Industry*

This category provides areas for manufacturing and distribution activities with potential for creating nuisances, along with accessory offices and retailing. Unrelated retail and service commercial uses (which can be appropriately located elsewhere in the city) are not permitted. Uses may generate truck traffic and operate 24 hours a day.

## Public/Institutional

These lands are set aside for governmental or semi-public facilities, such as hospitals, utilities, and government office centers; however, such facilities may also be allowed in areas with other land use designations, provided they comply with applicable zoning code standards.

## Parks and Recreation

The City's park system consists of neighborhood, community, trail and open space parks, special purpose parks and recreational facilities, and civic spaces. Existing parks are identified on Figure 2-6, General Plan Land Use Map. In 1978, the City established the parkland service standard of 6 acres per 1,000 residents. This standard and City Parks are discussed in more detail in Chapter 6.

### *Community Parks*

Community parks are the largest areas in the Santa Rosa Park system and are intended to offer a variety of passive and active recreational opportunities that attract users of all ages, especially from within 1 mile or a 20-minute walk that is uninterrupted by barriers to access like highways, waterways, and railways. These parks are at least 10 acres (20 acres or more preferable)

and often include athletic fields and courts for organized sports; support programming with community-wide participation, such as summer camps and special events; and are venues for cultural and social gatherings such as concerts and farmers markets. Community parks also include areas for children’s play and group picnicking. Access to nature and wildlife viewing, walking pathways, exercise equipment, bike and skate parks, off-leash dog areas, and other unique features that often require more space and attract larger segments of the community may also be included.

Community parks often accommodate stays of four or more hours, with amenities including parking, restrooms, and lighting for recreation and parking areas and pathways. Community parks also must consider bicycle and pedestrian access for nearby neighbors, and public transit access and links to local and regional trail systems for community members living farther away. Community parks contribute to the city parkland standard of 6 acres per 1,000 residents.

### ***Neighborhood Parks***

Neighborhood parks are the fundamental unit of the park system and should be equitably distributed across the city. They serve the daily recreational and social needs of people within a half mile or 10-minute walk by facilitating informal recreation, encouraging social interaction among neighbors, reflecting neighborhood identity, and improving the overall quality of life for community members. Neighborhood parks provide a mix of amenities such as picnic areas, community gardens, exercise equipment, and children’s play areas. They generally have one signature amenity, such as a water play feature, a skate spot, sports court, or single athletic field.

Neighborhood parks generally support stays of one hour or less, usually with no restrooms (due to the intended proximity of the park to the neighborhood), lighting limited to security lights,

and often with no off-street parking because of limited space and to promote walkable communities. Neighborhood parks contribute to the city parkland standard of 6 acres per 1,000 residents.

### ***Special Purpose Parks and Recreation Facilities***

These facilities typically serve a single purpose or a specific user group and generally fall into one of three categories:

- Golf courses.
- Recreation facilities such as gymnasiums, aquatic centers, sports field complexes, community centers, or senior centers.
- Historic, cultural, or social sites such as museums, botanical gardens, amphitheaters, performing arts centers, and cemeteries.

### ***Trail and Open Space Parks***

These areas of varying size support both active and passive recreation, including walking, biking, hiking, jogging, and wildlife viewing and can also be used as a safe, active transportation network that connects people and places locally and regionally. Trail and Open Space parklands provide a variety of benefits, including visual enjoyment, natural resource conservation (e.g., plant and wildlife habitats, creek corridors, hillsides, and soils), water quality protection, recreational use, flood control, fire management, and transportation corridors.

Trail and Open Space parklands may contribute to the parkland standard of 6 acres per 1,000 residents if they provide multipurpose, ADA-compliant paved pathways and benches, trash and recycling receptacles, wayfinding and interpretive signage, and lighting.

### ***Southeast Greenway***

The Southeast Greenway is a continuous linear space in southeast Santa Rosa between Farmers Lane to the west and Spring Lake Regional Park

to the east. The majority of the Greenway is designated for Parks and Recreation, with smaller areas designated for Medium Density Residential and a mix of Retail and Business Services. Future plans for the Greenway include separated bicycle and pedestrian paths as well as bicycle and pedestrian connections to surrounding neighborhoods.

## Civic Spaces

Civic spaces are urban parks that provide flexible, publicly accessible space for a range of cultural and recreational activities, often in places without enough land for a neighborhood or community park. Civic spaces may be privately owned but must be publicly accessible year-round, at least during daylight hours; contain vegetation; be large enough for people to stop and stay; contain places to sit; be subject to a deed restriction to ensure the property is maintained; and contribute to an interconnected system of public spaces that meet the needs of the surrounding neighborhood.

Civic spaces are generally less than two acres and include multipurpose plazas for community gathering, events, or recreation; rooftop green spaces; pocket parks; paseos, pedestrian paths, stairs, or other connections; off-leash dog runs; or children's play areas.

## Open Space

These areas feature special environmental conditions or significance; may be subject to wildfire, flood, or geologic hazards; or contain watershed lands or important wildlife or biotic habitat. Where otherwise not excluded by noise, aircraft safety, or other environmental standards, residential development is generally permitted at a density of 1 unit per 40 acres.

## Growth and New Development Considerations

Santa Rosa is a well-established community with many unique assets to be maintained, though there is room for improvement to enhance equity and quality of life, particularly in areas that still have vacant land and/or have historically not received as much investment as other areas of the city. New development within the city limits will follow this General Plan and other applicable City codes and guides to ensure it complements and enhances the existing community. Growth and change in the city will be tailored to support maintenance and development of complete neighborhoods, particularly in Areas of Change. Development in the UGB beyond the city limits will need to demonstrate that it will not have a negative impact on the city's environmental resources or fiscal health to be eligible for annexation and development.

**Complete Neighborhoods** are areas with convenient, equitable access to goods and services needed to support daily life, such as grocery stores, recreation opportunities, community gathering places, active transportation infrastructure, and transit. The specific attributes of a complete neighborhood will vary, depending on the unique needs of the local community.

## Plan Bay Area and Priority Development Areas

Plan Bay Area is an integrated long-range transportation and land-use/housing plan for the San Francisco Bay Area, prepared by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). It includes the Bay Area's Sustainable Communities Strategy (SCS), in accordance with the California Sustainable Communities and Climate Protection Act of 2008 (SB 375), which

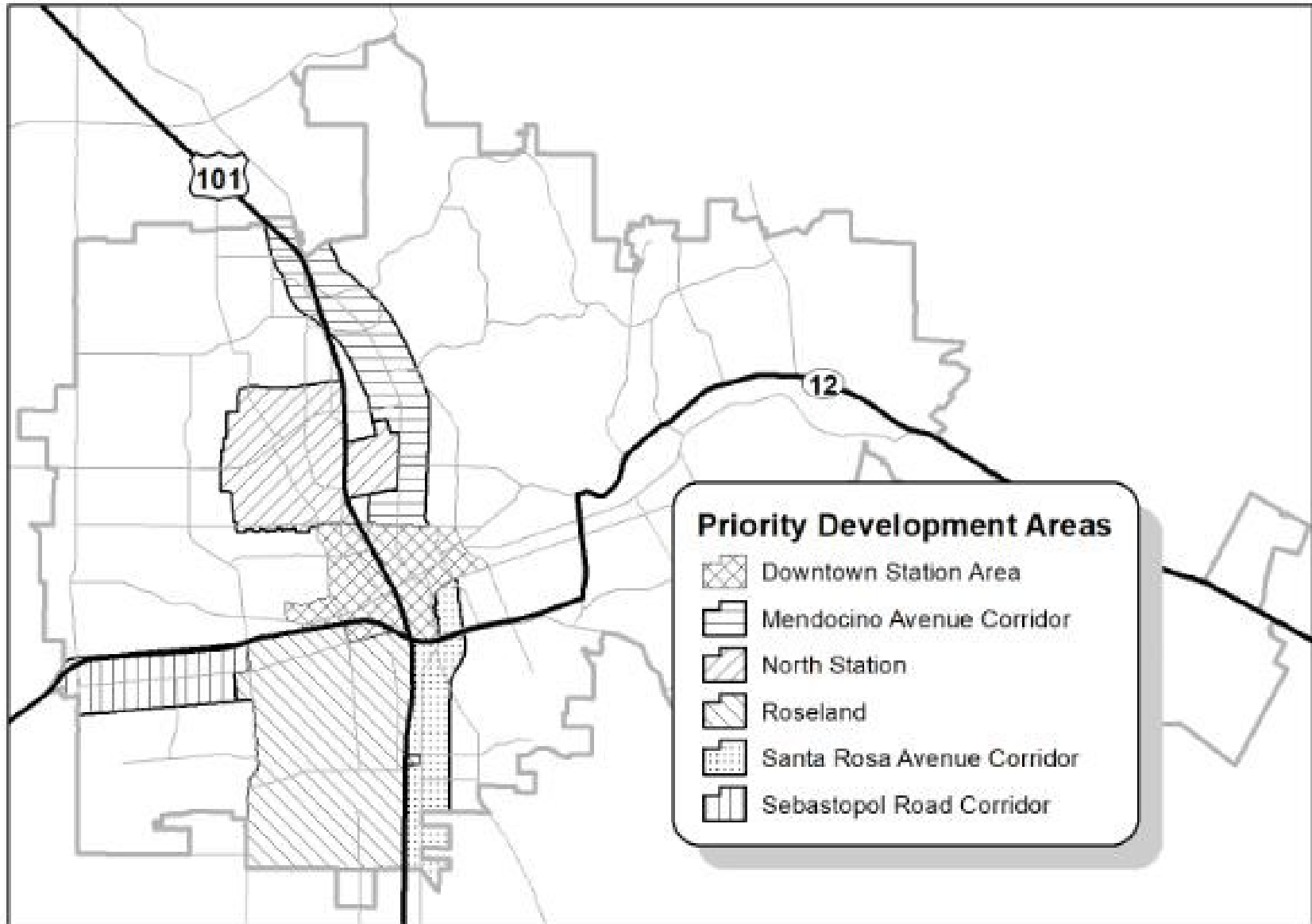
requires each of the state's metropolitan areas to prepare an SCS or similar plan to reduce GHG emissions from cars and light trucks.

The SCS provides for the coordination of land use, housing, and transportation to reduce GHG emissions for cars and light-duty trucks. Plan Bay Area directs the majority of housing growth to designated Priority Development Areas (PDA), with the aim of making more future development walkable, bikeable, and close to public transit, jobs, schools, shopping, parks, recreation, and other amenities. There are five PDAs in the Santa Rosa Planning Area, listed below and shown on **Figure 2-9**.

1. **Downtown Station Area PDA**, in central Santa Rosa, primarily north of Highway 12 and extending east and west of Highway 101.
2. **North Santa Rosa Station PDA**, in northwest Santa Rosa.
3. **Roseland Area PDA** in southwest Santa Rosa.
4. **Sebastopol Road Corridor PDA** in southwest Santa Rosa.
5. **Mendocino Avenue/Santa Rosa Avenue PDA**, extending north and south along Highway 101.

PDAs are eligible for technical assistance from MTC and ABAG to help further the goals of Plan Bay Area.

Figure 2-9: Santa Rosa Priority Development Areas



## Specific Plans

Santa Rosa has adopted specific plans for three of the PDAs that establish unique zoning and development regulations:

- The **Downtown Station Area Specific Plan** guides future transit-supportive development around the Downtown SMART station. The plan intensifies uses within walking distance to SMART and invests in infrastructure and other public improvements. The plan establishes regulations for land use, development standards, densities, infrastructure improvements, implementation measures, and incentives to promote a diverse mix of uses. The land use designations of the Downtown Station Area Specific Plan establish seven subareas with unique characteristics that supplement the City's Zoning Code and design guidelines.
- The **North Santa Rosa Station Area Specific Plan** supports rail service transit at the North Santa Rosa SMART station by improving pedestrian, bicycle, transit, and auto connections; increasing residential density; promoting economic development; and enhancing aesthetics and quality of life within a half mile of the station.
- The **Roseland Area/Sebastopol Road Specific Plan** supports a unified, vital, and livable Roseland community with a focus on healthy and equitable development. The plan aims to improve connectivity, concentrate areas of activity, and enhance the physical environment.

## Disadvantaged Unincorporated Communities

Senate Bill 244 requires that general plans address the needs of disadvantaged unincorporated communities (DUC), which are areas of Sonoma County with an annual median household income less than 80 percent of the statewide annual median household income and: within the City's Sphere of Influence; an island within an incorporated jurisdiction's boundary; or geographically isolated and has existed for at least 50 years. DUCs often lack adequate infrastructure to sustain public health and safety, which can foster economic, social, and educational inequality. Therefore, the law requires that cities and counties identify their DUCs, analyze infrastructure and fire service needs and deficiencies, and assess potential funding mechanisms for expansions of services and facilities. With each update of its Housing Element, the City identifies DUCs, evaluates their infrastructure and service deficiencies, and assesses potential funding mechanisms to address those deficiencies. As required by State law, this chapter includes policies and actions to address infrastructure deficiencies in the DUCs, which are mapped on **Figure 2-10**.



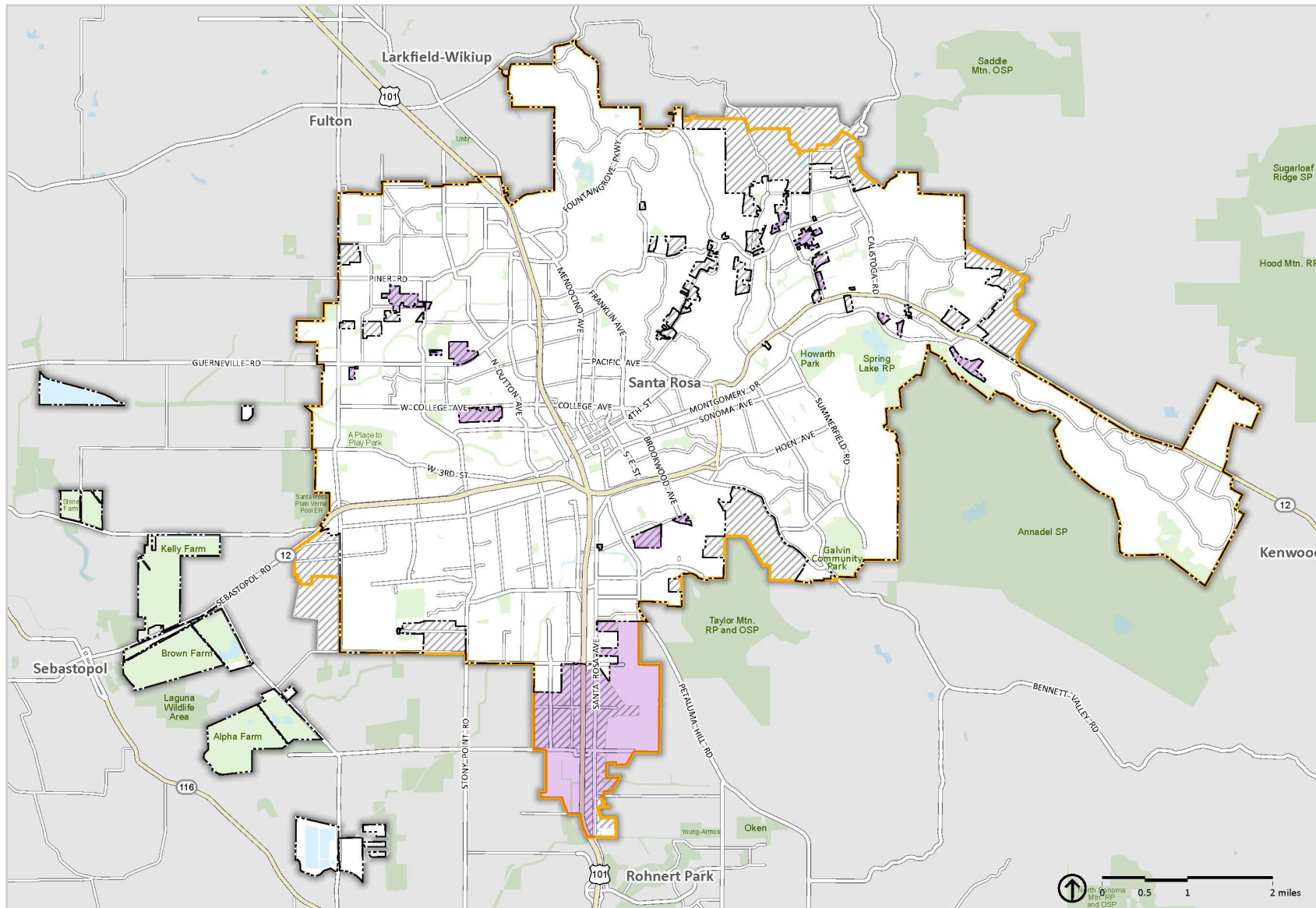


Figure 2-10  
Disadvantaged  
Unincorporated  
Communities

- City Limits
- City Sphere of Influence
- Urban Growth Boundary
- Planning Area
- Disadvantaged Unincorporated Communities

Source: City of Santa Rosa 2023



## Goals, Policies, and Actions

**Goal 2-1:** Ensure that growth and change serve community needs, protect the environment, improve fiscal stability, and enhance quality of life for all members of the community.

**Policy 2-1.1:** Encourage development that supports community health and quality of life and fosters complete neighborhoods in both established and emerging neighborhoods.

**Action 2-1.1:** Implement and update the following Specific Plans, as necessary to address changing economic and market conditions and/or changing community visions for these areas:

- Downtown Station Area Specific Plan
- North Santa Rosa Specific Plan
- Roseland Specific Plan

**Action 2-1.2:** Update the Zoning Code to require industrial development adjacent to residential areas to provide buffers, landscaping, and screening to minimize noise, light, glare, and other impacts.

**Action 2-1.3:** Require residential developments within 500 feet of U.S. Route 101 and California Route 12 to include construction measures that mitigate future resident exposures to ozone, particulate matter, and other toxic air contaminants (TAC) identified by CARB.

**Action 2-1.4:** Address the need for gathering places by providing amenities such as parks, community centers,

and cultural facilities for community members in all neighborhoods, prioritizing EPAs and Areas of Change.

**Action 2-1.5:** Address the need for access to outdoor activity/recreation in urban core areas by encouraging the creative integration of such spaces or uses in public and private development.

**Action 2-1.6:** Encourage retail and housing development in mixed-use developments along regional transportation routes and in areas that serve community members, with a focus on Areas of Change.

**Action 2-1.7:** Amend the Zoning Code regulations related to community care facilities, including updating the definition of community care facility; address neighborhood compatibility in the context of residential neighborhoods; and explore opportunities for streamlining.

**Action 2-1.8:** Address the infrastructure and service needs of disadvantaged unincorporated communities.

**Policy 2-1.2:** Facilitate future annexations with a thoughtfully designed and transparent strategy that ensures the City's ongoing fiscal health and supports a high quality of life for community members.

**Action 2-1.9:** Prepare a specific plan prior to annexation of land in south Santa Rosa, south from the current City boundary to the UGB, to identify and accommodate needs related to City services, such as Fire and Police, water, wastewater, stormwater, transportation, and parks.

How realistic is it to count on updates? Build flexibility into the document!

What? Streamlining what? Address compatibility, how?

WOW! how do you think this will work? You realize that all residential construction along the SMART line would in all likelihood be near transit corridors.

Urban 3 data analytics should be applied to all policy decisions! Not even mentioned as an economic tool anywhere in this GP

*Action 2-1.10: Require a fiscal impact analysis for proposed annexations that exceed 10 acres to ensure a full accounting of infrastructure and public service costs and confirm whether revenue enhancement mechanisms are necessary to ensure net fiscal balance.*

*Action 2-1.11: Only allow annexations of City utility connections if they are consistent with the General Plan and do not adversely impact the City's fiscal viability, environmental resources, infrastructure and services, and quality of life.*

*Action 2-1.12: Limit annexations to land in the UGB with adequate services available, including unincorporated islands within the city limits.*

*Action 2-1.13: Work with LAFCO to require all proposed annexations within a County island to prepare a sentiment survey of all properties within the island to determine the ability of annexing the full County island.*

*Action 2-1.14: Prioritize the processing of proposed annexations when applicants provide funding for dedicated staff time.*

**Policy 2-1.3: Promote and participate in cooperative planning efforts with surrounding jurisdictions and the County, especially related to Countywide and subregional issues such as transportation, waste management, and affordable housing.**

*Action 2-1.15: Conduct regular meetings with County of Sonoma staff to*

*coordinate land use issues of mutual concern within the UGB.*

**Policy 2-1.4: Ensure that City policy, codes, programming, and practices support a range of viable land uses that are consistent with the General Plan.**

*Action 2-1.16: Maintain an inventory of industrial lands and sites zoned appropriately for the retention and expansion of key manufacturing and industrial businesses/employers.*

*Action 2-1.17: Maintain sufficient land in areas zoned for industrial uses to accommodate a wide range of production, distribution, and repair-oriented light industrial uses, including research and development, manufacturing, and food processing.*

*Action 2-1.18: Consider updating the Zoning Code to allow for compatible residential and commercial uses in office parks, light industrial areas, and other similar areas. Such compatible uses could include Live-Work units, artisan studios/shops, brew pubs, coffee shops, tasting rooms, and event spaces.*

*Action 2-1.19: Identify necessary policy changes to enable the retention or conversion of sites with light industrial/light manufacturing uses located in appropriate areas, and implement changes as feasible and appropriate.*

*Action 2-1.20: Update the UGB so that it is coterminous with the city's Sphere of Influence.*

*Action 2-1.21: Update the Zoning Code to:*

why not everywhere? Wouldn't this also help mitigate food desert problems?

1. Rezone parcels to ensure consistency with the General Plan.
2. Create development standards for Missing-Middle Housing types.
3. Rezone Planned Development communities into appropriate zoning districts consistent with General Plan Land Use.

*back of parcels, with retail and office activities fronting the regional/arterial street. Site design with residential uses at the rear is intended to reduce potential for housing units to exceed maximum noise levels along a regional/arterial street.*

**Action 2-2.3:** *Work with Sonoma County and potential developers to redevelop sites in the unincorporated stretch of Santa Rosa Avenue with mixed-use, limiting and discouraging the expansion of existing single-use, auto-oriented commercial establishments.*

**Action 2-2.4:** *Allow for regional and neighborhood shopping centers to integrate amenities, events, and programming that enhance the destination and its attractiveness as a shopping location and community gathering space.*

**Action 2-2.5:** *Allow farmers markets by right in shopping centers.*

**Action 2-2.6:** *Allow temporary, community-oriented / community-amenity uses on sites slated for redevelopment that activate those spaces prior to entitlement/construction.*

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

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

**Action 2-2.8:** *For all private development, capital improvement projects, and*

**Goal 2-2:** Promote city-centered growth and investment with a neighborhood-focused approach to create complete and connected communities that provide community members' daily needs within easy walking or biking distance.

**Policy 2-2.1:** **Support development of complete neighborhoods in all Areas of Change, ensuring they offer convenient, equitable access to goods and services needed to support daily life, such as grocery stores, recreation opportunities, community gathering places, active transportation infrastructure, and transit.**

I understand why this is targeted but why? This should be available everywhere in the city.

Love this! Just make sure it doesn't become a bureaucratic nightmare to implement

**Action 2-2.1:** *Consider development incentives and update the Zoning Code to require new developments in Areas of Change to include on-site and proximal access to goods and services that support daily life, including, but not limited to, fresh-food stores, recreation, community gathering, and infrastructure that supports active transportation and transit.*

**Action 2-2.2:** *Require design of mixed-use projects to focus residential uses in the upper stories or toward the*

too restrictive and actually antithetical to some good residential options

eliminate parking covenant requirement for shared resources

preparation of detailed area plans, require close land use/transportation relationships to promote use of alternative transportation modes and discourage travel by automobile.

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

Policy 2-2.3: Ensure mixed use developments along regional/arterial streets are designed to reduce impacts to community members; encourage redevelopment with mixed use in areas that do not meet the community's vision.

Action 2-2.10: Maintain Priority Development Area designations in accordance with Plan Bay Area to maintain consistency with regional planning efforts.

Goal 2-3: Promote livability by creating a variety of housing types near transit to reduce greenhouse gas emissions.

Policy 2-3.1: Ensure that residential developments, including subdivisions and neighborhoods, are designed to foster livability and maintain a diversity of neighborhoods and varied housing stock to satisfy a wide range of needs and retain local character.

why not have some criteria by which financial impacts to the city are ACTUALLY analyzed? Urban 3 Data Analytics

Action 2-3.1: Evaluate new development through the development review process to ensure neighborhood identities are maintained.

Action 2-3.2: Update the Zoning Code to allow residential and mixed-use development in the Retail and

How would the city enforce this? For instance there are already parking regs that eliminate min parking requirements (in some districts) that would already promote this...stop feeling like every desired outcome needs to be regulated.

Business Services and Office land use designations. Good

Action 2-3.3: Identify barriers and/or incentives to redevelopment with mixed use in areas that do not meet the community's vision, and mitigate/implement these, as feasible.

Action 2-3.4: Work with Sonoma County and potential developers to redevelop sites in the unincorporated stretch of Santa Rosa Avenue with mixed use, limiting and discouraging the expansion of existing single-use, auto-oriented commercial establishments.

without a specific plan this sounds like an unmitigated disaster

without a specific plan this sounds like an unmitigated disaster

Policy 2-3.2: Ensure that residential developments achieve the density potential of the project site and include a variety of housing types with a full range of affordability.

Action 2-3.5: Require development at the midpoint or higher of the density range in the Medium and Medium High Density Residential land use designations, unless topography, parcel configuration, heritage trees, historic preservation, or utility constraints make the midpoint impossible to achieve.

Policy 2-3.3: Ensure that mixed use developments along regional/arterial streets are designed to reduce impacts to future residents.

Action 2-3.6: Require design of mixed-use projects to focus residential uses in the upper stories or toward the back of parcels, with retail and office activities fronting the regional/arterial street. Site design with residential uses at the rear is intended to reduce potential for

Huh!??

*housing units to exceed maximum noise levels along a regional/arterial street.*

## Economic Development

### Existing Conditions and Market Outlook

#### Today’s Market

Santa Rosa is the fifth largest city in the San Francisco Bay Area and is home to roughly one-third of Sonoma County residents and businesses. The city is the North Bay’s largest concentration of office, industrial and retail space, making Santa Rosa the economic center of the region, the primary employment center, and the default destination for healthcare and government services. The city is also the region’s primary retail destination, outperforming comparable sites throughout the county and serving both residents and visitors.

#### Economic Growth Potential

Over the next three decades, job growth and related demand for office, industrial, and retail space will be determined by the rate of local population growth and regional demand. The General Plan accommodates up to 24,000 new homes to house approximately 66,000 additional residents. Combined with regional demand factors, this additional population would support up to:

- 2 million square feet of new office development and 5,500 new office jobs.
- 1 million square feet of new industrial development and 1,500 new industrial jobs.
- 650,000 square feet of new community-serving retail space and 1,500 new retail jobs.

very skeptical

Long-term job growth opportunities are anticipated to be strongest in health care, advanced research and development, and dining and food/beverage businesses. Government and other office-based industry sectors are likely to grow at a moderate pace, and retail jobs may grow slowly or even decline with the rise of online shopping.

### Goals, Policies, and Actions

**Goal 2-4:** Ensure that new growth and development are resilient to economic cycles and forces.

**Policy 2-4.1:** Maintain a positive business climate in the community and encourage diverse job types in Santa Rosa.

**Action 2-4.1:** *Ensure the City’s actions and communications convey an organizational culture and climate that support global business values (e.g., productivity, speed-to-market, flexibility, innovation), and that the City recognizes the value business brings to the city.*

**Action 2-4.2:** *Institute new policies and leverage partnerships to address the primary drivers of an inclusive and resilient economy, highlighting urgent economic challenges and improved livability across Santa Rosa.*

**Action 2-4.3:** *Maintain an economic development strategic plan to guide the City’s economic development initiatives, periodically reviewing and funding updates to and special reports in support of the plan to keep current with market conditions and economic trends.*



**Policy 2-4.2: Develop and strengthen locational assets and business assistance programs that support innovation and create an entrepreneurial business climate attractive to technology and entrepreneurial businesses.**

*Action 2-4.4: Continue to promote Santa Rosa as the North Bay's premier location for clean/green technologies and entrepreneurial businesses that create new products and business models that will attract national and international interest.*

*Action 2-4.5: Develop and foster City-business connections and maintain a Business Visitation Program for a cross-section of City staff and officials to ensure that industry trends and opportunities are identified early, and City services are meeting the needs of business.*

*Action 2-4.6: Identify necessary policy changes and new program options to allow and support micro-entrepreneurialism and neighborhood-centered businesses/jobs creation and implement, as feasible and appropriate.*

**Policy 2-4.3: Develop strategies and work cross-departmentally on programs and initiatives to retain existing businesses; enable business expansion; and attract new employers that contribute to the city's economic vitality, use the area's existing labor pool, and leverage or expand upon the region's existing industry clusters.**

*Action 2-4.7: Monitor land use and development trends in the city to*

*ensure an adequate supply of land that offers diverse use designations and development intensities in support of anticipated demand for commercial and industrial growth; employ regulatory mechanisms and incentives to maintain sites and buildings in suitable locations to attract major employers.*

*Action 2-4.8: Identify sites suitable for flexible uses and micro-entrepreneurial opportunities in downtown, commercial districts, and neighborhood centers, and promote and market small business opportunities in these areas.*

**Policy 2-4.4: Leverage City and community-partner technical assistance and funding to support key-sector business development and growth.**

*Action 2-4.9: Conduct periodic, industry-specific cluster analyses to identify targets for retention, expansion, and innovation, with a focus on increasing business-to-business commerce in Santa Rosa*

*Action 2-4.10: Work with property owners to encourage development projects that generate local jobs and that further inclusive economic development objectives.*

*Action 2-4.11: Consider public/private technology infrastructure projects that support business and municipal efficiency.*

*Action 2-4.12: Work with Santa Rosa Junior College, Sonoma State University, and private educators to provide job training that matches local job opportunities, including housing construction.*

**Better worded: Remove zoning barriers for property owners and businesses to expand within the city. In other words increase By-Right property rights. Even Zoning Clearances are becoming complicated.**

*Action 2-4.13: Work to attract professional, vocational, and technical institutions and engage employers in the development of education and training systems that equip residents with the skills and knowledge needed to succeed in an advanced economy.*

**Policy 2-4.5: Seek innovative ways to reduce the cost burden of infrastructure for industrial and commercial development, without transferring the burden to the residential sector.**

*Action 2-4.14: Use funds from the statewide Community Infrastructure Program and other tax increment and/or assessment-based financing tools to support local improvements.*

*Action 2-4.15: Identify opportunities to support innovation and growth by fostering business incubators, accelerators, shared working spaces, and networking organizations.*

*Action 2-4.16: Attract infill developers that build the facilities attractive to employers with new or alternative workplace needs.*

**Policy 2-4.6: Focus business attraction efforts on filling vacancies in commercial and industrial structures.**

*Action 2-4.17: Encourage occupancy of new businesses in vacant commercial and industrial buildings through efforts such as low-cost loans for tenant improvements, façade improvements, and new business incubation.*

**Policy 2-4.7: Maintain vibrant, convenient, and attractive commercial centers that provide a range of**

**goods and services that satisfy the needs of community members.**

*Action 2-4.18: Identify and mitigate barriers to locate new local-serving retail in Plan Areas of Change.*

*Action 2-4.19: Locate any new region-serving, high-volume retail outlets within one-half mile of Highway 101 to minimize regional traffic on city streets.*

*Action 2-4.20: Work with business park owners to encourage new distribution and research uses in addition to office uses.*

**Goal 2-5:** Foster sustained, inclusive growth that generates long-term, shared value in the community and creates economic opportunities for all residents.

**Policy 2-5.1: Encourage retention and anti-displacement strategies aimed at retaining local businesses and residents.**

*Action 2-5.1: Continue to maintain and disseminate resources directing existing smaller businesses to training, financial assistance, and other supportive services.*

*Action 2-5.2: Identify and target economic development resources to businesses in areas undergoing rapid increases in commercial or industrial rents and property sales prices.*

*Action 2-5.3: Study potential adoption of policies and programs that would help prevent future displacement of Santa Rosa's longstanding smaller businesses.*

How does this work. These seem like empty promises with no real path to success. Eliminate entitlement barriers to new and existing businesses and allow flexibility in approval of innovative new uses

So...limiting access to community benefits in the places that people actually live. Wouldn't this be a VMT benefit as well

**Policy 2-5.2: Support opportunities to expand economic opportunity to all segments of the community.**

*Action 2-5.4: Establish public-private partnerships and philanthropic initiatives to provide work opportunities for high-risk youth and young adults in Santa Rosa.*

*Action 2-5.5: Work with Santa Rosa City Schools, Sonoma County Office of Education, Santa Rosa Junior College, Sonoma State University, other educators, and the Workforce Investment Board to provide job training opportunities for all segments of the population, including high-risk youth and young adults and Equity Priority Populations.*

**Policy 2-5.3: Invest in neighborhood entrepreneurship.**

or any property, why limit access

*Action 2-5.6: Update the Zoning Code to allow temporary or alternative incubator spaces on vacant or underutilized properties to facilitate trial uses that may be unique to the city.*

**Policy 2-5.4: Establish free citywide internet access at a speed appropriate for all types of businesses.**

*Action 2-5.7: Study the gaps in broadband access and create a plan to expand access where appropriate.*

**Policy 2-5.5: Encourage home businesses to support workforce participation, decrease worker vehicle miles traveled, and increase the provision of goods and services at the neighborhood scale.**

*Action 2-5.8: Allow and encourage home-occupancy businesses in most residential zones, especially EPAs, including for uses such as family childcare and microenterprise home kitchen operations.*

*Action 2-5.9: Update the Zoning Code to allow mobile food and crafts vendors, farmers markets, art and artisan pop-ups, and community gathering events in all nonresidential zoning districts.*

*Action 2-5.10: Update the Zoning Code to allow for micro-entrepreneurial uses in residential zones, as appropriate.*

YES!

**Policy 2-5.6: Expand economic opportunity in industrial zones.**

*Action 2-5.11: Update the zoning code to allow for more maker mixed-use, such as clothing producers and 3D printing in all industrial areas.*

*Action 2-5.12: Evaluate the public procurement process with an eye to stimulating small business development, targeting minority-/women-/veteran-owned businesses; foster more equitable procurement practices.*

**Goal 2-6: Maintain vibrant, convenient, and attractive commercial centers.**

**Policy 2-6.1: Provide a range of commercial services that are easily accessible and attractive, satisfy the needs of people who live and work in Santa Rosa, and attract a regional clientele.**

*Action 2-6.1: Encourage region-serving, high-volume retail outlets to locate near freeway access (generally within one-half mile of Highway 101) to minimize traffic on city streets. Do not allow regional-serving uses in residential neighborhoods.*

*Action 2-6.2: Allow neighborhood centers that include small grocery stores, cleaners, and similar*

this is good!



*establishments where they can be supported within walking and biking access of residential uses. Ensure that neighborhood centers do not create unacceptable traffic or nuisances for residents due to the hours and nature of their operation. Encourage residential developments that are not within walking distance of convenience shopping to provide small centers on-site.*

~~**Action 2-6.3:** *Require buildings in neighborhood centers and commercial corridors to actively engage and enhance the public realm through such techniques as location of parking, ground-floor transparency, building orientation, and build-to and setback lines.*~~

**Action 2-6.4:** *Allow large grocery stores on sites citywide and in the downtown. On sites outside of the downtown, proposed large grocery stores must demonstrate that the store will not impact the viability of a similar use on a downtown site.*

**Policy 2-6.2: Maintain the economic vitality of business parks and offices and Santa Rosa's role as a regional employment center.**

**Action 2-6.5:** *Require new commercial and industrial developments to maintain space in business parks for distribution and research uses, not primarily office uses. Avoid the intrusion of office uses that could diminish the economic vitality of business parks.*

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

**Policy 2-6.3: Protect industrial land supply and ensure compatibility between industrial development and surrounding neighborhoods.**

**Action 2-6.7:** *Require industrial development adjacent to residential areas to provide buffers, and institute setback, landscaping, and screening requirements intended to minimize noise, light, glare, and other impacts.*

**Action 2-6.8:** *Update the Zoning Code to require outdoor storage areas to be screened from any public right-of-way.*

**Action 2-6.9:** *Require any proposal to change industrial-designated land to an alternate land use to provide a market analysis that supports such a change. The market analysis should include documentation of the need for such a change, the potential impacts to the City's industrial land inventory citywide, and potential mitigation.*

**Action 2-6.10:** *Preserve current industrial and business park employment centers by supporting the integrity of industrial zoning and/or allowing consideration of new manufacturing.*

**Action 2-6.11:** *Update the Zoning Code to create the allowance for creative mixes of land uses that accommodate non-noxious manufacturing and maker-type spaces.*

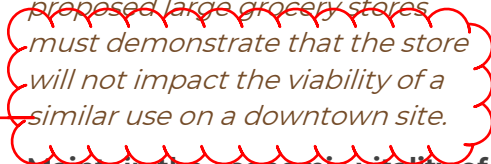
This...



..will kill this

There is no discussion anywhere in this document to emphasize the productive value of financially conceived land use decisions which would inform policy that in turn would create more economic viability and less ongoing costs for the city. For instance, the value per acre of different types of development and the long term financial obligations that the city would take on for each of these development types. While on the PC, I never saw a development staff report that didn't state: "financial impact to the City: None". **Every** development has a financial impact to the city and some are better than others. Land Use and economic policy should follow that model. With limited develop-able land left in the City, every piece of land becomes increasingly more important.

How would you suggest they do that? Micro managing economic viability is only a recipe for competitive pushback from existing businesses



### III. Tribal Comments

Lytton Rancheria comments on Chapter 4. Urban Design, Historic Preservation, and Art and Culture

**Action 4-1.5:** *Where feasible and prioritizing EPAs and Areas of Change, provide planting strips with large canopy trees between the road and sidewalk to buffer pedestrians from traffic and help define the street space along commercial streets, and install pedestrian amenities such as:*

- Street lighting
- Seating
- Bus stop shelters
- Bicycle racks
- Mailboxes

**Action 4-1.6:** *Update the Zoning Code to require screening of development along Highway 101 with dense landscape.*

**Policy 4-1.4:** **Avoid strip patterns of commercial development and improve the appearance and operation of existing commercial strip corridors, especially in Areas of Change.**

**Action 4-1.7:** *Work with property owners to restructure existing strip developments to cluster commercial uses in neighborhood nodes, with higher-density housing included where possible and lower-density residential, office, or institutional uses that generate less traffic located between the nodes.*

**Policy 4-1.5:** **Create public/civic spaces at the neighborhood, city, and regional scale to serve residents of all areas of the city, prioritizing EPAs.**

**Action 4-1.8:** *Provide for new open space opportunities throughout the city, especially in neighborhoods that*

*have less access to open spaces, including creek corridors, bicycle and pedestrian connections, civic spaces, and publicly accessible conservation areas.*

**Action 4-1.9:** *Enhance pedestrian activity and safety by requiring that streets, buildings, pathways, and trails have lighting and wayfinding signage, and provide a visual connection with public spaces, such as parks and Santa Rosa Creek, where possible.*

## Historic Preservation

### Native American Heritage

Native American habitation in the Santa Rosa region began about 7,000 years ago, and the city contains almost 200 recorded Native American resources, according to the California Historical Resources Information System. Remnants of Native American civilization have been discovered along Santa Rosa Creek and its tributaries; in the adjacent alluvial valleys, surrounding plains, hills, the Trione-Annadel State Park area, and the Laguna de Santa Rosa. The Santa Rosa Basin encompasses the Planning Area and includes six major drainages (Santa Rosa, Matanzas, Piner, Rincon, Austin, and Brush Creeks), each of which may contain additional, undiscovered Native American archaeological sites.

Trione-Annadel State Park in the southeast corner of the Santa Rosa Planning Area was an important obsidian source for Native American tools. Resources there include chert and obsidian flakes, projectile points, mortars, pestles, shell and bone debris, and human remains. The remains of entire settlements, including three former villages, have been found in northern Santa Rosa. Given the archaeologically rich nature of the Santa Rosa area, and the fact that about half of the Planning

Area has not been surveyed for archaeological resources, there is a high potential for finding more Native American sites in Santa Rosa.

## Historic Resources

Historic resources include sites, structures, districts, landmarks, or other physical evidence of past human activity generally more than 50 years old. Santa Rosa has a rich architectural heritage spanning many periods—Mexican adobes, nineteenth-century Gothic structures, Greek Revival and Italianate houses, turn of the century Stick/Eastlake homes, early 20th-century Craftsman and California bungalows, 1920s Spanish Revival houses, and 1930s Art Deco buildings.

Numerous well-preserved structures represent the eclectic styles and periods that contribute to the city’s character and identity. Some of the more notable historic resources are the Luther Burbank Home and Gardens, Rosenberg Department Store, Flamingo Resort Sign Tower, DeTurk Round Barn, Church of the One Tree, Carrillo Adobe, Fountaingrove Winery (the Fountaingrove Round Barn was lost in the 2017 Tubbs Fire), and Santa Rosa Rural Cemetery. Recognizing the value of Santa Rosa’s historic resources, the City Council adopted a preservation ordinance in 1988 and created the Cultural Heritage Board to:

- Undertake and update historic inventories or surveys.
- Recommend designation of landmarks and preservation districts.
- Review proposed alterations to historic buildings.
- Promote public awareness of preservation issues.

With Cultural Heritage Board guidance, the City has prepared inventories to document historical buildings and neighborhoods. The resulting Cultural Heritage Survey is not just a list but also

a narrative and pictorial summary of the city's past that documents the architectural style of each structure and historical features by neighborhood. The Cultural Heritage Board has designated especially significant structures and sites that have a specific historical, archaeological, cultural, or architectural value as Landmarks, and key historic neighborhoods as Preservation Districts. The districts designation officially recognizes these places as key components of the city’s heritage. Santa Rosa has 21 Landmarks and 8 designated historic Preservation Districts, which are Burbank Gardens, Cherry Street, McDonald, Olive Park, Railroad Square, Ridgway, Saint Rose, and West End.

## Goals, Policies, and Actions

**Goal 4-2:** Protect the historic and cultural resources of Santa Rosa and enrich the sense of place and understanding of the city’s history and prehistory.

**Policy 4-2.1:** Protect Native American heritage and honor the early stewards of this land.

**Action 4-2.1:** *Continue to review proposed developments in conjunction with the California Historical Resources Information System, Northwest Information Center, at Sonoma State University to determine whether project areas contain known archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or have the potential for such resources.*

**Action 4-2.2:** *Work in good faith with interested communities to evaluate proposed development sites for the presence of subsurface historic, archaeological, and tribal cultural resources. These efforts may include:*

- Consideration of existing reports and studies.

- Requirements for new surveys or studies where necessary
- Consultation with Native American tribes as required by State law.
- Appropriate site-specific investigative actions.
- Onsite monitoring during excavation if appropriate.

**Action 4-2.3:** *Continue to require that project areas found to contain significant archaeological resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation.*

**Action 4-2.4:** *Continue consultation with the appropriate Native American tribes on projects containing tribal cultural resources, landscapes or sacred sites.*

**Action 4-2.4:** *If cultural resources are encountered during development, halt work to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative (if appropriate) have evaluated the situation and recorded identified cultural resources—which may include animals, structures, landscapes, or plants—and determined suitable mitigation measures.*



**Policy 4-2.2:** Treat Native American human remains with sensitivity and dignity and ensure compliance with the California Health and Safety Code and the California Public Resources Code. Collaborate with the most likely descendants, as identified by the Native American Heritage Commission.

**Action 4-2.5:** *If human remains are encountered, prevent further disturbance of the area until the Coroner has made the necessary findings. Remains shall be left in place until final determinations regarding treatment and disposition are made.*

**Action 4-2.6:** *Where the Coroner has determined the remains are Native American, the City shall contact the Native American Heritage Commission within 24 hours and follow the appropriate laws to consult with the most-likely descendant(s).*

**Policy 4-2.3:** Preserve Santa Rosa's historic structures and neighborhoods.

**Action 4-2.5:** *Establish priorities for and pursue designating new landmarks and historic preservation districts, following study by the Cultural Heritage Board.*

**Action 4-2.6:** *Follow the Secretary of the Interior Standards for Preservation, Rehabilitation, Restoration, and Reconstruction for the treatment of historic properties.*

**Action 4-2.7:** *Integrate the common goals of the City's green ordinances and historic preservation objectives when reviewing proposals related to historic structures or places.*

**Action 4-2.8:** *Provide building owners of older and historic structures clear and cost-effective options to measurably enhance energy efficiency while maintaining the structure's historic integrity to the greatest degree possible.*

**Action 4-2.9:** *Pursue designation as a Certified Local Government Program by the National Parks Service to assist in funding local historic preservation.*

**Action 4-2.10:** *Seek funding and establish mechanisms, such as periodic flyers, to educate property owners in preservation districts about the steps required for changes to historic properties.*

**Action 4-2.11:** *Consider removing or simplifying obstacles for owners of historic properties to support preservation, including guides for repurposing facilities and concurrent review of entitlement and building permit applications.*

**Action 4-2.12:** *Update the building code to require the preservation of materials, such as historic*

## IV. External Technical Advisory Comments



August 13, 2023

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

Dear Amy,

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

### **Components We Applaud**

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

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

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

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

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

## Significant Concerns

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

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

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

## Detailed Feedback

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

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

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

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

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

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



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

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

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

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

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

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



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

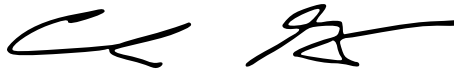
Should you have any questions about the above comments, please contact us at [bikeablesr@gmail.com](mailto:bikeablesr@gmail.com). We would also welcome the opportunity to meet with you to further discuss our feedback and collaboratively develop ideas to further enhance the Plan.

Thank you for your time and consideration.

Sincerely,



**Alexa Forrester**  
Co-Lead, Bikeable Santa Rosa



**Chris Guenther**  
Co-Lead, Bikeable Santa Rosa



**Memo**

To: Amy Lyle, Shari Meads and Beatriz Guerrero Auna  
From: Downtown Action Organization  
Date: October 2, 2023  
Re: Recommendations regarding City of Santa Rosa's General Plan 2050

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On August 30, the Downtown Action Organization's Design & Improvement Committee met to review the City of Santa Rosa's Draft General Plan 2050 to provide feedback to City staff on behalf of the Downtown District. The Committee shared their recommendations with the DAO Board at their meeting on September 20, 2023. The DAO Board approved the recommendations below on behalf of the Downtown businesses and property owners that the organization represents.

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It is recommended that the following overall changes be made to the document so that it will be more concise and user friendly and make it easier to find specific policies and actions applicable to various projects:

1. Limit use of the word "require" throughout the document and use only when absolutely necessary to allow for maximum flexibility and implementation. Use of the word encourage would create greater opportunities.
2. Remove any actions that are already required by law and add a blanket statement to the preamble stating that the General Plan will comply with existing law. many of these proposed actions restate procedures and standard mitigation measures included in the environmental review process mandated by the California Environmental Quality Act (CEQA) and required of all proposed development and other proposed actions defined as "projects" under CEQA. Restating these actions in the General Plan not only makes the document more lengthy and cumbersome, but also creates the opportunity for inconsistencies between the General Plan and other actions required by law which may change in the future.
3. Consider inclusion of the fact that existing uses of the following properties are likely to change and future uses should remain as flexible as possible: City Hall Campus, State Building, Federal Building, Post Office, White House Site, 3<sup>rd</sup> Street Cinemas and Santa Rosa Plaza.

It is recommended that specific changes be made to the following items:

Action 2-6.4 Allow large grocery stores on sites citywide and in the downtown. On sites outside of the downtown, proposed large grocery stores must demonstrate that the store will not impact the viability of a similar use on a downtown site.

*Action as written could make future neighborhood stores infeasible. Text should be edited to: Encourage grocery stores in downtown.*

Action 3-1.10 Require developers of sites within a quarter mile of transit corridors to integrate transit-supportive components, such as unlimited pass programs, transit-serving pedestrian infrastructure, and/or transit subsidies, as appropriate.

*Action as written does not provide enough specificity and could render such projects infeasible or overly cumbersome. Text should be edited to: "Encourage developers of sites..."*

Action 3-5.2 Eliminate the use of fossil fuels as an energy source in all new building construction.

*Action as written does not account for the use of back-up power sources. Text should allow for use of fossil fuels for emergency power generators, or back-up power sources*

Action 3-5.3 Reduce the use of fossil fuels as an energy source in the existing building stock at the time of building alteration through requirements for all-electric appliances.

*Action as written might make it infeasible for existing stock to be altered and redeveloped. Text should be edited to reduce the significant barrier this creates.*

Policy 6-8.2 Ensure adequate funding for parks and recreation facility improvements and maintenance.

*Policy as written suggests this is a requirement or guarantee. Recommend language shift that reflects this, such as "Work to provide" rather than "Ensure".*

Action 6-8.12 Annually evaluate the park development impact fees allowed under the Quimby Act to ensure sufficient funds to acquire, develop, and maintain parks, consistent with General Plan targets for park service.

*Action as written incorrectly implies that the Quimby Act can fund maintenance; text should be edited to reflect that correction. It is recommended that this item be edited to be consistent with language already approved through the Downtown Station Area Specific Plan and include the following: Require that all park impact fees collected Downtown are used for park and recreational space facilities in the Downtown Station Area*

The committee reviewed and discussed the City provided survey and provided the following feedback to questions 1-14, which asked for positions from Strongly Oppose to Strongly Support. Significant discussion occurred around Question 13, which the DAO Board would like further clarification on.

1. NEUTRAL: Require construction measures that make exposure to air pollution less severe for development within 500 ft of Highways 101 and 12 (Action 2-1.3).
2. NEUTRAL: Support micro-entrepreneurialism, neighborhood-centered businesses and job creation, home-based businesses, mobile food and craft vendors, and community gathering events in all nonresidential zoning districts (Actions 2-4.6, 2-5.8, and 2-5.9).
3. SUPPORT: Prioritize transportation investments that support walking, biking, transit, carpools, and rideshares, especially in Equity Priority Areas (Actions 3-1.7 and 3-1.14), or areas that have been underinvested.
4. NEUTRAL: Continue to reduce parking requirements (Action 3-1.9).
5. NEUTRAL: Prohibit new drive-throughs (retail and services) and provide incentives to discontinue existing ones (Action 3-4.34).
6. NEUTRAL: Provide planting strips with large canopy trees between the road and sidewalk along commercial streets to support safety and placemaking (Action 4-1.5).
7. SUPPORT: Remove obstacles for owners of historic properties to support preservation (Action 4-2.11).
8. NEUTRAL: Create opportunities to proactively relocate existing development from high fire risk areas (Action 5-3.11).
9. NEUTRAL: Explore options to prohibit increased density of residential and non-residential uses in fire-prone areas (Action 5-3.12).

10. SUPPORT: Ensure that every decision made by the City of Santa Rosa promotes community health, sustainability, equity, and environmental justice (Actions 6-1.3, 6-1.4, 6-1.11, and 6-1.12).
11. NEUTRAL: Restrict tobacco and alcohol sales where there is already a high concentration of retailers and near sensitive populations, such as near schools and senior facilities (Action 6-2.14).
12. NEUTRAL: Require convenience stores, supermarkets, liquor stores, and neighborhood markets to carry fresh produce (Action 6-6.2).
13. OPPOSE: Require extra review for new chain restaurants and at least 300 feet between fast-food chains (Actions 6-6.7 and 6-6.8).
14. NEUTRAL: Allow all forms of urban agriculture (including rooftop, indoor, and other gardens) by right citywide and allow on-site produce exchanges and sales (Action 6-6.13).

The DAO appreciates the time and dedication that you have put into creating this document. Thank you for giving the community the opportunity to provide feedback.

Cadance Hinkle Allinson  
Executive Director, Downtown District

cc: City Manager Smith, Assistant City Manager Dunston, Assistant City Manager Nutt,  
Interim Director Osburn, Deputy Director Jones



**SANTA ROSA  
YIMBY**

September 13, 2023

Santa Rosa Planning Commission  
Council Chambers, City Hall  
100 Santa Rosa Avenue  
Santa Rosa, CA

Re: General Plan Update

Dear Chair Weeks and Commissioners,

Santa Rosa YIMBY is an all-volunteer association of Santa Rosa residents dedicated to saying “Yes-in-my-backyard” to new housing to ensure Santa Rosa grows into a vibrant, sustainable, and affordable city. Good housing policy is impossible without good transportation and land use policy.

The Circulation, Open Space, Conservation, and Greenhouse Gas Reduction Element begins with a laudable goal to support the “mobility needs of everyone in Santa Rosa to reduce dependence on single-occupant vehicles and fossil fuels.” Unfortunately, the Element’s estimated impact is imperiled by a lack of commitment to specific goals and objectives.

Santa Rosa’s Climate Action Plan estimates the transportation sector emits 684,280 metric tons of CO<sub>2</sub>e annually within the city, 51% of all emissions and more than twice the volume of the next largest-emitting sector (Figure 4). The “Greenhouse Gas Reduction Element” is the city’s central planning document for reducing these emissions. Yet while the Element repeatedly states its goal is to reduce VMTs, it offers few specific goals and objectives for achieving it beyond vague, and at times contradictory, value statements.

- The Plan offers to “continue to reduce or eliminate vehicle parking requirements” without specifying where and when these harmful requirements may be addressed;
- The Plan pledges to increase “bicycle parking to prioritize a car-free environment in high density areas” when the biggest obstacle to mode-shifting towards bicycles and other wheeled transport isn’t parking but the lack of Class IV protected lanes on which the Element is mostly silent (Action 3-1.9);
- The element makes no mention whatsoever of the unique opportunity of e-bikes, perhaps the most promising VMT-reducing technology of the past generation, or their unique charging and security needs;
- The Plan makes no mention of the need to restore sidewalk widths downtown to their pre-street-parking origins;
- Policies to Continue to support SMART rail service (3-2.4) fail to mention increasing service or improving the existing clumsy connection with the Larkspur Ferry Terminal;

- References to the Bicycle and Pedestrian Master Plan should be changed to the Active Transportation Plan.
- Policy 3-1.4 to “Reduce traffic volumes and speeds in neighborhoods” does include important actions to reduce vehicle speeds through neighborhoods, but is undermined by Action 3-1.29 to improve (i.e. increase) traffic flow on arterial and collector streets;
- Action 3-1.19 is explicitly about increasing VMTs on Farmers Lane and East-West Corridors such as Mendocino and the inclusion of language about “remaining cognizant” of multimodal needs is weak, noncommittal, and obviously intended to soften the Action’s inconsistency with the Plan’s stated objective of reducing VMTs.
- Nowhere is it mentioned that Santa Rosa’s parking surplus amounts to the equivalent of 19% of the surface area of downtown going unused virtually every single day of the year.
- Perhaps for these reasons, the Plan estimates it will result in only a 6.3% reduction in Santa Rosa Service Population VMTs and just a 2% reduction in the Countywide Service Population VMT (Figure 3-2). No estimate in GhG impacts is given.

Elsewhere, the Plan includes specific, important, and actionable improvements for which we’re grateful and proud to support. These include the proposed five road diet projects and 12 pedestrian/bicycle connections improvements (Figure 3-4); the widespread expansion of Class I shared use paths (Figure 3-5); the promotion of street design practices that reduce VMT and dependence on single occupancy vehicle trips (Policy 3-1.2); using the Urban Streets Design Guide and the Urban Bikeways Design Guide to plan roadway improvements and new development (Action 3-1.8); and continuing to reduce or eliminate vehicle parking requirements and increase bicycle parking to prioritize a car-free environment in high density areas (Action 3-1.9).

In summary, the Circulation Element lacks the commitments necessary to meet its ambitious objectives. We respectfully urge city planners to (1) propose eliminating all parking minimums citywide; (2) commit to building at least 25 miles of connected low stress bike lanes to address the primary obstacle of mode shifting away from single-occupancy vehicles; (3) address the unique security and charging needs of e-bikes; (4) incorporate specific improvement areas for sidewalk restoration; (5) reject any policies that will induce additional single-passenger car demand; (6) strengthen city support for SMART train to include greater service and better connections with Larkspur Ferry; and (7) estimate total GhG impacts.

### **Land Use and Economic Development**

Like the Mobility Element, the Land Use and Economic Development Element mostly contains beneficial goals and policy recommendations. We like and support the Plan’s blending of the “Downtown” and “Corridor” alternatives put forward in the community engagement process, and the encouragement of compact rather than scattered development patterns (Policy 2-2). However, some of the actions to support these goals and policy recommendations should be strengthened.

- **Action 2-2.9: Encourage the creation of shared parking areas and shared driveways / vehicle access points in private development.**  
This action is extremely important and warrants further emphasis. Parking currently occupies 25% of the surface area of the Downtown Station Area. According to the 2022 Parking Study commissioned by the city, 74% of all parking spots go unused on a typical busy day. The amount of space wasted by unused surplus parking (approximately 19% of downtown) is wholly incompatible with the vision outlined in the



General Plan and represents perhaps the lowest hanging fruit towards achieving the Plans goals.

- **Goal 2-3: Promote livability by creating a variety of housing types near transit to reduce greenhouse gas emissions.**  
It's unclear what "variety" means in this context. Greenhouse gas emissions are reduced by *dense* housing types near transit. If "variety" means low-density, then this characterizing this goal as a greenhouse gas reduction measure is misleading.
- **Policy 2-3.1: Ensure that residential developments, including subdivisions and neighborhoods, are designed to foster livability and maintain a diversity of neighborhoods and varied housing stock to satisfy a wide range of needs and retain local character.**  
It's unclear what "livability" and "local character" mean in this context. If they mean preserving existing buildings or status quo density, then the policy will contribute to sustained single passenger car dependency, undermine the Plan's VMT reduction goals, contribute to decreasing affordability and displacement.
- **Action 2-3.1: Evaluate new development through the development review process to ensure neighborhood identities are maintained.**  
It's unclear what "neighborhood identities" means in this context. If it means preserving existing buildings and architecture at the expense of meeting housing needs, the neighborhoods will gentrify and its residents will be displaced, changing the neighborhood identity. The Plan should clarify that maintaining neighborhood identities doesn't preclude building needed housing.
- **Action 2-4.19: Locate any new region-serving, high-volume retail outlets within one-half mile of Highway 101 to minimize regional traffic on city streets.**  
These outlets should also be located within one-quarter mile of a SMART station and include adequate bike and pedestrian connections with surrounding neighborhoods to reduce car dependency and the pollution, noise, inefficient land use, and heat island impacts it causes.

Thank you for your leadership and for considering our views.

Sincerely,



Adrian Covert  
Co-Lead, Santa Rosa YIMBY



Lauren Fuhry  
Co-Lead, Santa Rosa YIMBY

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

Overarching recommendations:

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

## 2. Land Use and Economic Development

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

Increase the density and diversity of land uses across jurisdiction.

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

Build community capacity/knowledge around issues of climate adaptation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Capture more carbon in soils and plants

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

Conduct Carbon Sequestration farming pilot projects and research

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

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

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

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

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

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

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

Ensure urban forestry plans focus resources on vulnerable communities.

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

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

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

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

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

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

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

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

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

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

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

Support state and regional funding strategies.

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

Protect neighborhoods from multiple climate threats.

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

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

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

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

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

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

**6. Health, Equity, and Environmental Justice**

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

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

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

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

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

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

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

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

Ensure housing and protections for housing during climate hazard events.

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

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

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

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

## **Additional Goals Environmental Justice Goals, Strategies, and Actions**

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

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

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

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

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

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

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

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

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



# General Plan 2050

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

### Historical Society of Santa Rosa’s Suggested edits:

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

### Other comments:

#### Suggested new actions:

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

#### Review consistency of terminology:

- “Historic” vs “Historical”

## **SCBC COMMENTS ON DRAFT GENERAL PLAN**

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

#### **HIGHLY APPROVE**

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

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

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

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

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

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

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

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

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

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

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

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

**PROBLEMS**

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

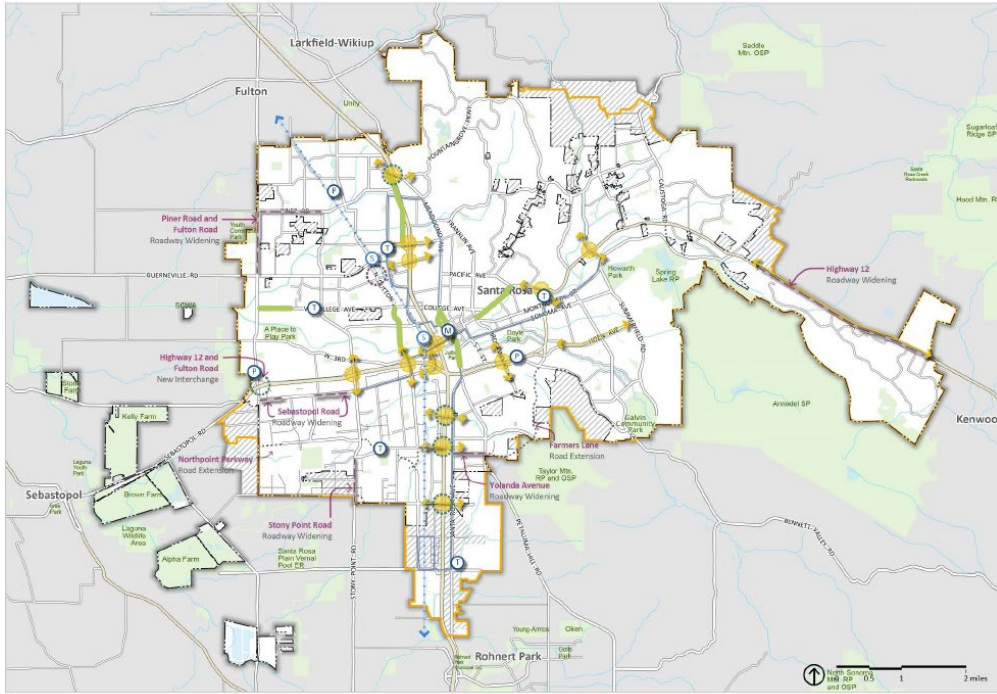


Figure 3-4  
Planned Transportation Network Improvements

City of Santa Rosa  
SANTA ROSA GENERAL PLAN 2040

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

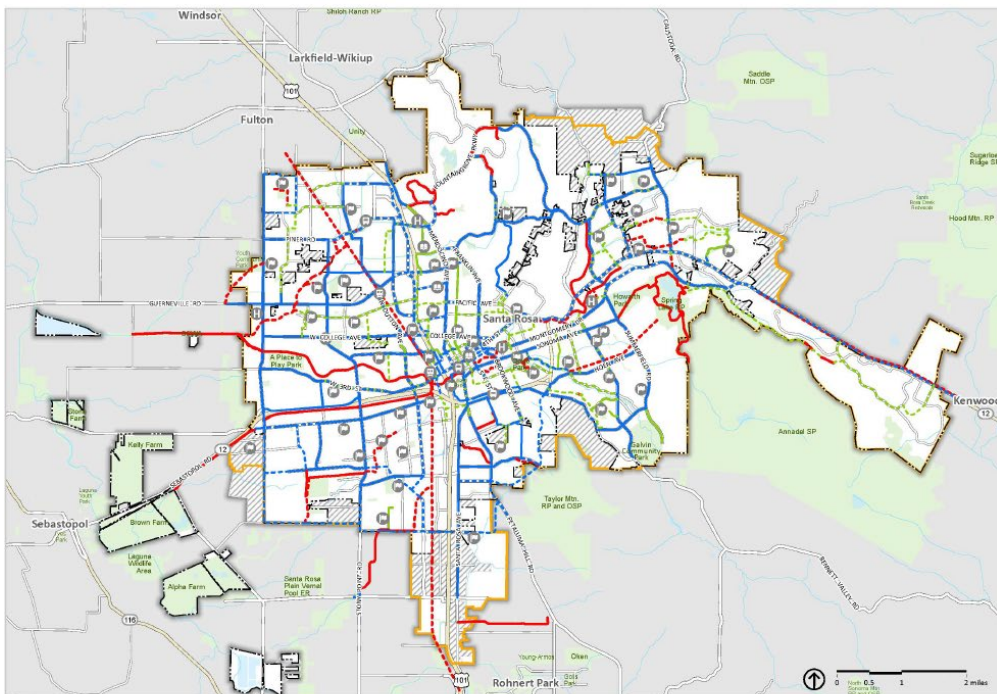


Figure 3-6  
Existing and Planned Bicycle Network

City of Santa Rosa  
SANTA ROSA GENERAL PLAN 2040

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

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

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

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

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

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

## **SECTION 2: LAND USE AND ECONOMIC DEVELOPMENT**

### **APPROVE**

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

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

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

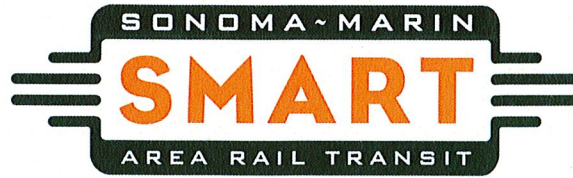
*Comment: I live in a mixed-use development in which parking is shared between commercial employees during the day and residents at night. It has worked well for almost 20 years but is getting more challenging as more of the residents are retired and thus home more of the day.*

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

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

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





**Eric Lucan, Chair**  
Marin County Board of Supervisors

**Melanie Bagby, Vice Chair**  
Sonoma County Mayors' and  
Councilmembers Association

**Kate Colin**  
Transportation Authority of Marin

**Chris Coursey**  
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September 20, 2023

Shari Meads, Senior Planner  
Planning & Economic Development  
City of Santa Rosa  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404

Dear Shari Meads,

SMART appreciates the opportunity to submit comments on the Draft Santa Rosa General Plan 2050, known as Santa Rosa Forward. SMART supports the Vision of the General Plan, which acknowledges the importance of having high-quality, reliable, and safe transit service, bicycle and pedestrian facilities, and other forms of mobility to support healthy lifestyles, clean air, equity, and resilience.

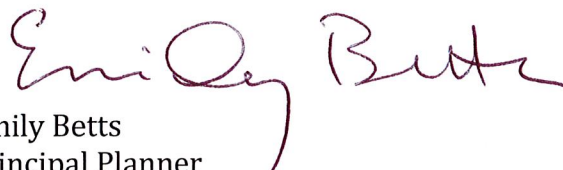
SMART currently sees over 13,000 boardings per month in Santa Rosa, providing access to jobs and other destinations. With the opening of the Windsor SMART Station in 2025, we anticipate an increase in train ridership to the north as well. SMART is also making strides towards completing and connecting the pathway in Santa Rosa. Building on the 3.75 miles of existing pathway in the city, SMART has over 10 miles of pathway funded for construction that, once complete, will provide a contiguous, protected, multi-use path that spans more than 18 miles between Cotati, Rohnert Park, Santa Rosa, and Windsor.

To ensure continued regional support and funding for development around SMART stations, as well as the construction of the rail line to the north, SMART recommends that the City consider the MTC's Transit-Oriented Communities (TOC) Policy (MTC Resolution No. 4530) in the development of station area plans. To ensure eligibility for OBAG 4 funding and any other discretionary funding that may be linked to TOC Policy compliance, the City will be required to demonstrate compliance prior to adoption of OBAG 4, expected in 2026. Compliance with the TOC Policy is voluntary for jurisdictions that want to advance the goals of Plan Bay Area 2050 or to be eligible for some MTC discretionary funding.

SMART acknowledges the inclusion in this Draft General Plan and other planning documents of a proposed SMART station in the Bellevue neighborhood of Santa Rosa. This station is not in the SMART Environmental Impact Report (EIR), Strategic Plan, nor any regional transportation plans. SMART's line operates on a single-track system with sidings to allow for our current service frequencies. Adding a previously unplanned station would negatively impact our service frequency and lengthen the time it would take to travel on our system, making SMART's regional rail service less competitive with automobile travel and less attractive to riders, potentially resulting in higher regional transportation emissions.

Thank you for the opportunity to review the Draft General Plan and participate in the Technical Advisory Committee. We look forward to working with the City throughout the Santa Rosa Forward planning process.

Sincerely,

  
Emily Betts  
Principal Planner



September 29, 2023

Beatriz Guerrero Auna, Health and Equity Planner  
Planning Division of the Community Development Department  
100 Santa Rosa Avenue, Suite 3  
Santa Rosa, CA 95404

Dear Ms. Guerrero Auna,

Sonoma Land Trust would like to thank you for all the hard work you and the team have put into ensuring an equitable process for the public's review of the Draft City of Santa Rosa General Plan Update. The incorporation of concerns from, and vision for the community, ensure we are taking steps toward a more equitable future for all residents and community members.

We support many components of the draft general plan, especially regarding open space, parks, and active transportation. Yet there are a few areas that we feel have been overlooked or not considered, and we would like to recommend some additions to the Plan's policies and actions. Areas of particular interest and concern to Sonoma Land Trust include the preservation of biodiversity and equitable access to nature.

### **Chapter 3. Circulation, Open Space, Conservation, And Greenhouse Gas Reduction**

#### **Goal 3-2: Provide a safe and accessible active and public transportation network that reduces dependence on single occupancy vehicles, prioritizing Equity Priority Areas and Areas of Change.**

Regarding equitable access to nature, we would like to ensure that all community members are able to safely access not only local neighborhood parks but larger parks and open space preserves. An interconnected network of trails, bicycle, and pedestrian pathways are essential to meeting this goal. In particular, we applaud the efforts to expand access through the Southeast Greenway and the planned connecting trail to the north end of Taylor Mountain. We are concerned that the stretch of Farmer's Lane from Hoen Avenue to Bennett Valley Road is not pedestrian or bicycle friendly and could be a significant barrier to active transportation along this connecting route between parks. We would like to see this area included as a priority area for active transportation-friendly redesign. Under goal 3-2, policy 3-2.1, please add an action: **Prioritize bicycle and pedestrian pathways in areas that connect regional trails, such as on Farmer's Lane between Hoen Avenue and Bennett Valley Road.**

#### **Goal 3-3: Ensure that traffic-related impacts of proposed land uses are evaluated and mitigated.**

An important aspect of preserving biodiversity concerns the ability of wildlife to move through the environment—or permeability of the landscape. Roads create barriers to safe passage of wildlife if not



designed with permeability as a priority. Areas where current or future roads pose a threat to wildlife safety include the proposed Farmers Lane Extension (mountain lions) and proposed roads in and around the Santa Rosa Air Center. We strongly recommend the prioritization of wildlife movement in road design and construction in these areas and other areas such as creek crossings and places where there are no alternative pathways across roads. Under Goal 3-3, Policy 3-3.1, please add an Action: **Prioritize wildlife passage in road design in areas near parks, open spaces, creeks, and other undeveloped lands.** Please also add an Action: **Consider alternatives to building roads in areas near parks and open space that are most likely to impair wildlife movement.**

**Policy 3-4.3: Conserve creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways**

While the plan is very strong on policies regarding creeks (Goal 3-4, Policy 3-4.3), outside of the waterways and wetlands we don't see prioritization of biodiversity and protection of federally or state-listed species. In particular, the general plan 2035 specifically listed a goal (LIL-U) to "**Preserve, as permanent open space, areas which contain State or federally listed rare and endangered species.**" We would like to see that goal included as an action under Goal 3-4, Policy 3-4.3.

As an area of particular concern, the Santa Rosa Air Center is the last remaining area within the City where the endangered Sonoma County California Tiger Salamander (CTS) is known to be actively breeding in the vernal pools. Any contiguous upland area surrounding the vernal pools up to a distance of 1/2 mile is considered active habitat for this endangered species. The CTS requires extensive upland habitat to maintain a viable population, and while there are existing preserves in that area, they are not large enough to meet the habitat needs without additional protected, undeveloped land around them.

Under Goal 3-4, Policy 3-4.3, please add an Action: **Collaborate with and support land conservation organizations in the creation of a California Tiger Salamander open space preserve on the lands of the former Santa Rosa Air Center.** Sonoma Land Trust is interested in working with the City, conservation partners and willing-seller private landowners to protect and restore these remaining undeveloped lands as habitat to support a healthy CTS population, as part of a larger regional strategy to connect remnant active CTS habitat.

Thank you for your consideration of these key components needed to ensure that Sonoma County's largest city will thrive and grow to be a nature-friendly environment that is inclusive and equitable in its health benefits and connections to nature.

Sincerely,



John McCaull  
Land Acquisition Director



Neal Ramus  
Community Engagement and Education Director