Sorry this is a rough draft as I ran out of time but want to be sure to get this in on time. Thanks so much; please call if you want to discuss.

David Petritz
As a conceptual Framework, the plan list Sonoma county along with Solano and Napa country as an ‘Exurb’ in contrast to suburban definition provided for every county around the Bay. But this designation does not appear to be reflective in regard to the ‘Exurb’ per capita miles traveled per year by the average driver compared to a city designated as a suburb. Specifically, Sonoma County is second lowest in the average per capita number of miles driven at 20.5 miles driven compared to a low of under 10 miles per driver for San Francisco and on the high end of 25 miles for Marin and 30.5 for Solano county. I think this probably reflects that the Santa Rosa metro area is the largest city between San Francisco and Portland and in its own right likely emerging as a major hub with a highly regard State University, one of the largest junior colleges in the state (with campuses both in Santa rosa and Petaluma), a cluster of several major health providers, a thriving wine/tourist industry, a very significant present in the medical tech sector and likely a very booming emerging Cannabis economy. As such, it stand quite apart from a typical exurb such as Solano county.

I am quite shocked that in Figure 1.2-5 Change in Households per Acre through 2040, the analysis project only a very small amount of growth outside the 101 corridor and even in the downtown/surrounding neighborhoods a relatively small amount of growth. This is particularly perplexing given that the SMART train is scheduled to begin service in the next few months from two station in Santa Rosa (and relatively quickly from another station near the Airport north of the City and likely from Windsor as well). In the inventory of transportation resources, no mention is made of the SMART train whereas rather extensive mention is made of the high Speed rail and how it will serve the suburb communities on it path!

I could be mistaken, but I don’t believe any mention was made of the Southeast Greenway which is a project that will involve the conversation of vacant 2 plus mile long corridor bought over half a century ago by CalTrans to a Greenway. Starting at the Farmer’s Lane/Highway 12 intersection, this Greenway will serve as a key Lynch pin for a non motorized bike and walking corridor that will eventually connect the county from the Sonoma coast through Santa Rosa and the Sonoma valley to the historical town of Sonoma.

I suggest this greenway be considered for designation as a Priority Conservation area (PCA). Likewise, I would suggest that the Farmer’s lane Corridor in conjunction with the area immediately adjacent to the triangular area adjacent to the farmer lane/highway 12 intersection be consider for designation as a Priority Development area (PCA). In this regard Farmer lane is the commercial hub of East Santa Rosa and should encompass in the future a mix of higher density housing and the city plan for triangular area at the far west end of the greenway is for medium or higher density mixed use housing.
• PDAs and PCAs The proposed Plan largely reflects the foundation and regional growth pattern established in the original Plan Bay Area. The proposed Plan’s core strategy is “focused growth” in existing communities along the existing transportation network. This strategy helps to achieve key regional economic, environmental and equity goals: it builds upon existing community characteristics, efficiently leverages existing infrastructure, and mitigates impacts on areas with less development. Key to implementing the “Focused Growth” strategy are Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs), which are recommended by local governments and, ultimately, approved by ABAG:

- Priority Development Areas (PDAs) - The proposed Plan focuses growth and development in nearly 188 PDAs. PDAs are specific geographic areas that meet the following criteria: 1) within an existing community; 2) within walking distance of frequent transit service; 3) designated for more housing in a locally adopted plan or identified by a local government for future planning and potential growth; and 4) nominated through a resolution adopted by a City Council or County Board of Supervisors. Staff recommendations are presented to ABAG’s Regional Planning Committee for approval and then to ABAG’s Executive Board for regional adoption.

- Priority Conservation Areas (PCAs) - PCAs are open spaces that provide agricultural, natural resource, scenic, recreational, and/or ecological values and ecosystem functions. These areas are identified through consensus by local jurisdictions and park/open space districts as lands in need of protection due to pressure from urban development or other factors. PCAs are categorized into four designations: Natural Landscapes, Agricultural Lands, Urban Greening and Regional Recreation. There are 165 PCAs identified in the region.

• PCAs and PDAs complement one another by promoting compact development in established communities with high-quality transportation access, while placing less development pressure on the region’s vast and varied open spaces and agricultural lands. TPAs Approval of an adopted SCS by the California Air Resources Board allows for CEQA streamlining benefits for transit priority projects (TPP). Please see Section 1.1.8 for more information regarding CEQA streamlining opportunities. A TPP is defined by statute, based on consistency with the following requirements:
  • consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area in the SCS;
  • located within half a mile of a major transit stop or high-quality transit corridor;
  • comprised of at least 50 percent residential use based on total building square footage, or as little as 26 percent residential use if the project has a floor area ratio of not less than 0.75; and
  • built out with a minimum of 20 dwelling units per acre (PRC § 21155). For the purposes of this EIR, geographic areas eligible to meet the TPP requirements are referred to as Transit Priority Areas (TPAs). Relationship between PDAs, PCAs, and TPAs As discussed above, PCAs and PDAs
complement one another by promoting compact development in established communities with
high-quality transportation access, while placing less development pressure on the region’s vast
and varied open spaces and agricultural lands. The major difference between TPAs and PDAs is
how they are designated. As discussed above, a PDA is identified by a local agency for adoption
by ABAG, while a TPA is defined by statutes based on the series of requirements described
above. Both PDAs and TPAs are similar in that they focus on access to transit service and are
appropriately planned for growth.

- Plan Bay Area 2040  Project Description
- Metropolitan Transportation Commission  Draft EIR v.4.17.17  1.2-19
- Within the Bay Area, TPAs and PDAs cover approximately 175,300 and 114,000 acres,
respectively. Approximately 68,700 acres of land is designated as both a PDA and TPA. Figure
1.2-2 shows designated TPAs, PDAs, and PCAs in the Region. Table 1.2-7 shows county-by-
county total acreage of PDAs and TPAs, and the extent to which they do and do not overlap.