

August 30, 2021

Associated Bay Area Governments
RHNA@bayareametro.gov

RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma

To Whom It May Concern,

I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

I urge you to deny the appeals. I am a resident of Mill Valley. The cycle of exclusion and funding neighborhood schools and attracting more wealth continues. I started a Community Land Trust and support Golden Gate Village in Marin City. When the city of Mill Valley proposes a project, I am there alongside our Chamber of Commerce and other citizens who are fighting for diversity and equity.

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – such as through recent ordinances, including just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies. These are all positive actions.

However, I am concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends a negative signal by promoting exclusion and reinforcing the segregation of low- income, disabled, and BIPOC communities.

I understand that the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.

I support the equity adjustment because previous RHNAs have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

The equity adjustment is critical to address racial segregation in the Bay Area, including in Marin and Sonoma counties. Since the Fair Housing Act of 1968 barred exclusion on the basis of race, wealthier and largely white municipalities throughout California, including in these two counties, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are major barriers to developing affordable housing. It's because of this that Marin and Sonoma counties are dramatically more segregated today than four decades ago. **We need the RHNA allocations to address the impacts of our historical inequitable land use policies.**

I understand the concerns expressed about fire safety, drought, and lack of developable land. Despite these concerns, large expensive condominiums and houses are squeezed into what land is left. Zoning remains exclusionary and only amplifies the need for diversity within Mill Valley.

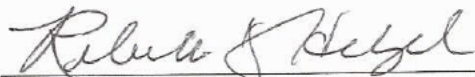
When we exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in overcrowded homes. Many lower-income communities of color are now facing displacement yet again as suburban expenses quickly outstrip their incomes. The equity adjustment helps increase affordability, ensuring that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on historic patterns of segregation.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

I urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, for hard working BIPOC that make our lifestyles possible, and deny their appeals.

Thank you for your consideration.

Sincerely,



Signature
Rebekah Helzel

Advocate for Affordable Housing
I Show up for Racial Justice

Doug Loudon · [REDACTED]

Administrative Committee
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105
Re: Sonoma County RHNA Appeal

By E-mail and Electronic Submittal
rhna@bayareametro.gov

Dear Administrative Committee members:

Sonoma County has been a leader in balancing environmental protection with housing. Our voters have approved urban growth boundaries around all of our cities, supported by community separators and an agricultural preservation and open space district that purchases parcels and easements. All ten local governments have adopted general plans focused on city-centered growth, especially transit oriented development around our SMART rail stations.

From an environmental perspective, Sonoma County's draft Cycle 6 RHNA is problematic. By not considering constraints such as utilities, the draft allocation will have an impact on a number of heightened issues such as groundwater, local endangered species, and most notable, an increase in greenhouse gases. A more appropriate allocation would account for these issues and ensure a sustainable growth pattern for the region.

We look forward to your committee's consideration of the County's appeal. If you have any questions or concerns, please contact me at [REDACTED]

Sincerely,



Doug Loudon

From: [Padi Selwyn](#)
To: [Regional Housing Need Allocation](#)
Subject: RHNA Draft Cycle 6 Comments
Date: Friday, September 24, 2021 11:02:57 AM

External Email



Administrative Committee
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105
Re: Sonoma County RHNA Appeal

Dear Administrative Committee members:

Our organization represents 3,000 concerned Sonoma County residents and we are reaching out to you because over 80% of this county's voters approved urban growth boundaries around all of our cities, supported by community separators and an agricultural preservation and open space district that purchases parcels and easements. All ten of our local governments have adopted general plans focused on city-centered growth, especially transit oriented development around our SMART rail stations.

Sonoma County's draft Cycle 6 RHNA is flawed from an environmental perspective. Wells are going dry in our county during this unprecedented drought, wildfires have been the new normal, and the county's infrastructure (roads, emergency services) is already compromised. By not considering constraints such as utilities, the draft allocation could negatively impact numerous critical issues such as groundwater, local endangered species, and most notable, an increase in greenhouse gases. A more appropriate allocation would account for these issues and ensure a sustainable growth pattern for the region.

Thank you for your committee's consideration of the County's appeal.

Sincerely,

Padi Selwyn, co-chair



PRESERVE RURAL SONOMA COUNTY

Visit our website at - <http://www.preserveruralsonomacounty.org>

Like us on Facebook - <https://www.facebook.com/preserveruralsonomacountyg>



Petaluma River Council
1327 I Street
Petaluma, CA 94952
(707) 763-9336



October 1, 2021

Administrative Committee
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105

By E-mail and Electronic Submittal
rhna@bayareametro.gov

Re: Support Sonoma County RHNA Appeal

Dear Administrative Committee members:

The Sonoma County environmental, agricultural and community organizations signed on to this letter support Sonoma County's REGIONAL HOUSING NEEDS DETERMINATION APPEAL to reduce the allocation of housing units for the sixth RHNA cycle.

We represent thousands of residents and voters who care deeply about balancing environmental protection with equitable housing. Our voters have overwhelmingly approved urban growth boundaries around all of our cities that are enhanced by community separators and an agricultural preservation and open space district that purchases parcels and easements. All ten local governments have adopted general plans focused on city-centered growth, especially transit-oriented development around our SMART rail stations.

Implementing the draft RHNA allocation of 3,881 new units, a 654% increase over the 5th cycle RHNA of 515 units, to unincorporated County of Sonoma will undermine decades of climate-smart planning. The County has met its existing state mandated housing need. The cities are willing and able to provide more housing inside Urban Growth Boundaries.

By not considering key constraints such as utilities, as well as water and wildfire hazards, the draft allocation will negatively impact groundwater, endangered species, open space and parks access and protection, agricultural preservation, city-centered growth, environmental justice, fire-safe roads, and most notably, will lead to an increase in greenhouse gases resulting from increased Vehicle Miles Traveled (VMT). A more appropriate allocation would account for these issues and ensure a sustainable growth pattern for the region.

We look forward to your committee's consideration of the County's appeal.

- **Community Alliance with Family Farmers – Sonoma County**
- **EcoRing**
- **Greenbelt Alliance**
- **Petaluma River Council**
- **Preserve Rural Sonoma County**
- **Protect San Antonio Valley**
- **Sonoma County Conservation Action**
- **Sonoma Mountain Preservation**
- **Wine and Water Watch**



October 4, 2021

To: Administrative Committee
Association of Bay Area Governments

cc: Sonoma County Supervisors
Supervisors Lynda Hopkins, Chair; Susan Gorin, David Rabbitt, Chris Coursey, James Gore

Permit Sonoma
Tennis Wick, AICP Director

Re: Sonoma County Regional Needs Housing Allocation (RHNA) Appeal

Dear Administrative Committee members,

The Sonoma County Chapter of Community Alliance with Family Farmers (CAFF) is writing to express support for Permit Sonoma's appeal of the Draft Regional Housing Needs Determination, which allocates 3,881 units to our county's unincorporated area. CAFF is a statewide organization that has been advocating for family farmers and sustainable agriculture since 1978; our mission is to build sustainable food and farming systems through policy advocacy and on-the-ground programs that create more resilient family farms, communities and ecosystems.

Regarding future housing development, our Chapter recognizes the need in particular for affordable housing, on behalf of our farmworker constituents and others; however, we also hold that this development needs to be implemented sustainably. Permit Sonoma's appeal letter documents several reasons why Sonoma County's unincorporated areas cannot and should not provide so many new units. Additionally, we note that our county's projected population growth rate is comparatively low at 7% (and we question whether this reflects the most recent census data, which indicates an even lower rate). We support prioritizing infill development and sustainable infrastructure, walkable cities that reduce vehicle miles travelled (VMTs) and locating housing next to major transit hubs such as train or bus stations. Water availability is also a critical factor to consider, as evidenced by the current drought conditions and soon-to-be-implemented management plans such as required by the Sustainable Groundwater Management Act (SGMA). In addition, rural development—while potentially proximate to farm work sites—is often not affordable or accessible to farmworkers.

Our Chapter has long been a local advocate for the protection of agricultural lands from development, both commercial and residential. The current proposed RHNA allocations would be in direct conflict with protections our county has put in place and could result in the permanent loss of productive farmland we have worked for decades to prevent. Agriculture is tied to regional food security and is also a critical part of Sonoma County's heritage, rural character, and economy, via both sales and tourism. Our small farms are leaders in environmental sustainability, and many of their livelihoods are already very tenuous after recent wildfires, the pandemic, and current drought. Land access and the cost of land,



which likely would be impacted by development, are major factors in the business viability of these farms.

Farmland protection is also important in meeting the state's climate goals. Giving local governing and permitting bodies a voice in how the RHNA process unfolds in our county is important in mitigating conflicts between state-mandated housing and climate goals. Executive Order N-82-20ⁱ directs the California Air Resources Board (CARB) to set a target in the next Scoping Plan for natural and working lands to support overall carbon neutrality². The order states: "To support the global effort to combat the biodiversity and climate crises, it is the goal of the State to conserve at least 30 percent of California's land and coastal waters by 2030." The California Natural Resources Agency and other relevant state agencies, in consultation with the Collaborative, are directed to develop and report strategies to the Governor no later than February 1, 2022 to achieve this goal in a manner that safeguards our State's economic sustainability and food security; enables enduring conservation measures on a broad range of landscapes, including natural areas and working lands, in partnership with land managers and natural resource user groups; and builds climate resilience, reduces risk from extreme climate events and contributes to the State's effort to combat climate change (Section 2).ⁱ

Thus, we urge you to recognize the importance of regional planning in the RHNA determination process so that potentially conflicting goals such as housing, farmland protection, water availability, and carbon neutrality can be addressed. We also urge you to recognize that our unincorporated areas do not have the infrastructure to sustain the proposed development allocations, but, instead, can help by playing a role in meeting the goals of Executive Order N-82-20; while the development of housing is best suited to our infill areas, which were designated as such in the Sonoma County General Plan.

We extend our deepest appreciation for your time and attention to this critical matter.

Sincerely,

Wendy Krupnick, Vice President, CAFF Sonoma County

rhna@bayareametro.gov

Administrative Committee
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105
Re: Sonoma County RHNA Appeal

Dear Administrative Committee members:

From an environmental and safety perspective, the draft Cycle 6 RHNA for Sonoma County is not logical or healthy. We need to build housing where infrastructure exists, including public transportation, within the voter-approved urban boundaries.

Most of our rural areas have high fire risk; many have suffered catastrophic wildfires and unfortunately this will continue. Having lost our rural home last year, I can attest that this is not where we should be adding new housing including ADUs. Safe evacuation on narrow rural roads is already problematic in many areas. Water is also a major issue, as these unincorporated areas rely on groundwater, and our water tables are declining. Many wells are even going dry now in the current drought.

Sonoma County has been a leader in balancing environmental protection with housing. We have approved urban growth boundaries around all of our cities, supported by community separators. All ten local governments have adopted general plans focused on city-centered growth, especially transit oriented development around our SMART rail stations.

A more appropriate allocation for increased new housing within urban boundaries and away from fire-prone unincorporated regions would ensure a sustainable growth pattern for Sonoma County.

I look forward to your committee's consideration of the County's appeal.

Sincerely,

Deborah A Eppstein, PhD

[REDACTED]

[REDACTED]

From: [christine hoex](#)
To: [Regional Housing Need Allocation](#)
Cc: planner@sonoma-county.org
Subject: RHNA Appeals Day 6, County of Sonoma
Date: Monday, October 4, 2021 1:17:41 PM

External Email



Steering
Committee

Dena Allen
Sunny Galbraith
Christine Hoex
Anna Jacopetti
Laura Neish

Administrative Committee
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105
Re: Sonoma County RHNA Appeal

Dear Administrative Committee members:

Sonoma County has been a leader in balancing environmental protection with housing. Our voters have approved urban growth boundaries around all of our cities, supported by community separators and an agricultural preservation and open space district that purchases parcels and easements. All ten local governments have adopted general plans focused on city-centered growth, especially transit oriented development around our SMART rail stations.

From an environmental perspective, Sonoma County's draft Cycle 6 RHNA is problematic. By not considering constraints such as utilities, the draft allocation will have an impact on a number of heightened issues such as groundwater, local endangered species, and most notable, an increase in greenhouse gases. A more appropriate allocation would account for these issues and ensure a sustainable growth pattern for the region.

350 Sonoma as a climate action group supports Sonoma County's appeal and its intention to respond to the needs of people and our rural environs.

We look forward to your committee's consideration of the County's appeal. If you have any questions or concerns, please contact me at [REDACTED].

Sincerely, Christine Hoex for the Steering Committee of 350
Sonoma 350Sonoma.org
350SonomaCounty@gmail.com



SONOMA GROUP

P.O. Box 466, Santa Rosa, CA 95402-0466
(707) 744-7651 email: songrp@sonic.net
www.sierraclub.org/redwood/sonoma

Administrative Committee
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105
Re: Sonoma County RHNA Appeal

By E-mail and Electronic Submittal
rhna@bayareametro.gov

RE: Support for Sonoma County's REGIONAL HOUSING NEEDS DETERMINATION APPEAL

Dear Administrative Committee members:

We are writing this letter of support for Sonoma County's REGIONAL HOUSING NEEDS DETERMINATION APPEAL to reduce the allocation of housing units for the sixth RHNA cycle.

Why would Sierra Club request a reduction in a RHNA allocation when in 2018 we issued an aggressively pro-housing policy report?¹ Because we believe that these housing units should be reallocated inside the cities and their respective Urban Growth Boundaries. The cities in Sonoma County have the infrastructure, the tax base, and the governance institutions to support all the additional new housing units ABAG seeks in our region. The unincorporated County does not.

We urge you to take a deeper look into our County, and correct this evidently inadvertent error by upholding Sonoma County's Appeal.

Sierra Club believes that if we begin to rebuild our existing neighborhoods and regional infrastructure around properly tailored Smart Growth design, instead of continuing to build new sprawling development, we can save vast amounts of land. We can also dramatically cut our climate emissions while creating more convenient and equitable neighborhoods and regions. In addition to better environmental and social outcomes this strategy can also better serve the economic needs of our society.

The Sierra Club recently released a guidance document² on our Urban Infill Policy which takes some bold stands: Every neighborhood should be walkable. Every neighborhood should be inclusive. Housing is a human right. Economic development should create more middle wage jobs. These are the types of promises around which a powerful multi-sector climate justice movement can be organized. The Sierra Club infill policy is designed to support this goal.

Sierra Club has consistently endorsed, and voters throughout Sonoma County have overwhelmingly approved Urban Growth Boundaries (UGBs) around all of our cities. These UGBs are enhanced by community separators, and together these zoning tools work to concentrate new housing and commercial development inside the UGBs and existing utility service areas.

¹ Sierra Club California Housing Policy: Meeting Our Housing Needs and Protecting the Environment (Aug. 2018)
<https://www.sierraclub.org/california/housing-land-use>

² Guidance For Smart Growth And The Urban Infill Policy (Aug. 2021)
<https://www.sierraclub.org/smart-growth-urban-infill-guidance>

All ten of our County's local jurisdictions have adopted General Plans focused on city-centered growth, including transit oriented development around our network of SMART rail stations.

Requiring the unincorporated County of Sonoma to implement the draft RHNA allocation of 3,881 new units (a 654% increase over the 5th cycle RHNA of 515 units) would undermine decades of climate-smart planning. During the 5th cycle, Sonoma County met its existing state mandated housing need. Most of our cities are able to provide more housing inside their Urban Growth Boundaries.

We urge ABAG to take into consideration the key constraints that exist in unincorporated Sonoma County, most notably inadequate utilities and transportation infrastructure, insufficient water and sewer capacities, severe wildfire hazards, and increasingly limited access to insurance.

In addition to increasing greenhouse gases resulting from increased Vehicle Miles Traveled (VMT), the proposed draft allocation will negatively impact groundwater, endangered species, open space and parks access and protection, agricultural preservation, city-centered growth, environmental justice, and fire-safe roads.

A reallocation of these excess housing units to the incorporated cities would directly address these issues and enable a less destructive growth pattern throughout the entire region.

We look forward to your committee's reconsideration of the draft allocation and a decision to uphold the County's appeal. Thank you for your time, consideration, and action to address these important concerns we have raised.

Respectfully Yours,

Sierra Club, Sonoma Group Executive Committee

Richard Sachen (Chair), Tom Conlon, Suzanne Doyle, Shirley Johnson, Dan Mayhew and Theresa Ryan

Cc:

Supervisor Chris Coursey

Supervisor James Gore

Supervisor Susan Gorin

Supervisor Linda Hopkins

Supervisor David Rabbitt

Planning Director Tennis Wick

Jim Sweeney, The Press Democrat

Association of Bay Area Governments, Administrative Committee
Subject: RHNA Appeals
October 15, 2021

Via Email: rhna@bayareametro.gov

Dear Committee Members:

I am a professional planner and a life-long housing advocate. I serve as the Director of Housing Policy for 4LEAF, Inc. where I assist cities around the state in preparing their 6th cycle housing elements. Prior to accepting my position at 4LEAF, I served as Sonoma County's Housing Planner and then as their Comprehensive Planning Manager. I also served on ABAG's Housing Methodology Committee (HMC) for the 6th cycle RHNA allocation. As coordinator of the Napa-Sonoma Housing Collaborative, I provide technical assistance on housing matters to the 16 jurisdictions within those counties. I have worked on Housing Elements for multiple jurisdictions in the ABAG region since the 2nd RHNA cycle. I provide this background to demonstrate my knowledge and experience around housing policy, comprehensive planning, and the RHNA process.

I am writing today to support the appeals of ABAG's unincorporated jurisdictions. While each county's situation and appeal are unique, there is one underlying rule that applies across ABAG jurisdiction and across the State: ***boundary changes, including the extension of sewer needed to serve new development, are under the authority of the Local Agency Formation Commissions (LAFCOs), and NOT under the authority of individual counties.*** This includes city limit lines, Spheres of Influence (SOI), and special district boundaries including sewer districts. During previous RHNA cycles this fact was recognized,¹ and the RHNA responsibility for lands that lie outside of cities but within the SOI was assigned to the respective cities unless there was an agreement otherwise. This is because only cities may annex and develop those lands. Counties do not have the ability to annex land, nor to extend services to build housing on them. Only cities can annex land; counties can only lose it. This is a fundamental planning reality that has been overlooked by ABAG for this 6th cycle RHNA allocation. This is not the fault of the HMC; the decision to allocate responsibility for areas within city SOI to the unincorporated counties had already been made by ABAG staff when the HMC began its work in 2019.

LAFCO rules

The State legislature delegates the responsibility for orderly growth and development to the LAFCOs, finding that orderly growth is essential to the social, fiscal, and economic well-being of the state, as well as to providing housing for persons and families of all incomes. For these reasons, the State grants the authority to determine urban boundaries and the extension of urban services, such as the sewer necessary to build at higher densities, to the LAFCOs. (Government Code §56001) Counties lack the authority to make such extensions of sewer, even

¹ From the 2015-2023 RHNA Plan: Sphere of Influence Adjustments.

"Spheres of Influence (SOI) must be considered in the RHNA methodology if there is projected growth within a city's SOI. Most SOI in the Bay Area are anticipated to experience growth. Every city in the Bay Area has a SOI which can be either contiguous with or go beyond the city's boundary. The SOI is considered the probable future boundary of a city ***and that city is responsible for planning within its SOI.*** The SOI boundary is designated by the county's Local Area Formation Commission (LAFCO)." (emphasis added)

to serve badly-needed housing. The Administrative Committee will find additional information about this in the letters that it has received from several LAFCOs within the ABAG region.

In addition to granting LAFCOs the authority in matters of boundaries, statutes (§56133) provide that LAFCOs must restrict the extension of services outside of boundaries, unless needed to serve an existing public health hazard; extensions to serve new housing developments are not allowed. Sonoma LAFCO, for example, has adopted a policy that restricts the extension of sewer services outside of existing city limits prior to annexation by the City, unless to serve an existing public health hazard. If lands must be annexed into cities to be provided with sewer and developed, then why are unincorporated counties being made responsible for the RHNA associated with those lands? ***This can be remedied, and the HMC's RHNA Methodology left intact, by assigning the RHNA associated with lands in city SOI to the cities, and not to the unincorporated counties.***

Environmental Justice, Equity, and Fair Housing

By ignoring the above LAFCO rules and instead making unincorporated counties responsible for the RHNA associated with lands immediate outside of city limits, ABAG leaves unincorporated counties with no choice but to upzone lands for affordable housing on city fringes. Historically, these are areas that are already low income and that lack the best schools, parks, and urban amenities. Many of these lands are classified as "Disadvantaged Unincorporated Communities" by the State; cities have avoided annexing them because of their problems and the expense of providing services to them. This is not only an equity issue, but an environmental justice issue as well. Upzoning these fringe lands outside of cities at high enough densities to support affordable housing would conflict with AB 686, Affirmatively Furthering Fair Housing, which requires local jurisdictions to ensure that they zone lands for higher-density housing in high opportunity areas - those with the best neighborhoods and schools and parks - and avoid putting it in areas that are already predominantly low-income. Those high opportunity areas are in the cities themselves, and not on their forgotten fringes. ***Assigning the RHNA responsibility for lands within city SOI to those cities will relieve the pressure on unincorporated counties to zone more land in fringe areas for low-income housing.***

Unsustainable Growth Pattern

By assigning large RHNAs to unincorporated counties, ABAG violates its own Plan Bay Area objectives by putting growth outside of cities, far from transit, jobs, and the daily needs of residents. This results in an increase, not a decrease, of vehicle miles traveled (VMT) and the resultant Greenhouse Gas Emissions (GHG).

One reason that the RHNAs for unincorporated areas are so high in the 6th cycle is because of the baseline established by the HMC, which used existing housing units and projected 2050 households to provide the required consistency with Plan Bay Area. This is a serious flaw in the RHNA Methodology, but that methodology has been approved. The other reason that the unincorporated areas have such a high RHNA this cycle is because the RHNA responsibility for unincorporated lands was assigned to unincorporated counties, rather than to the cities who oversee planning for those areas. ***Assigning the RHNA responsibility for lands within city SOI to the cities will move at least some of the projected growth into cities where it belongs.***

Thank you for considering the facts in this letter as you consider the appeals of the Bay Area's unincorporated counties. The requested change to assign the RHNA responsibility for lands within SOI to the cities will better meet the objectives of Plan Bay Area, VMT and GHG reduction objectives, and fair housing and equity goals. I regret that I am traveling out of the country at this time and unable to participate personally in the hearing process, but trust that this letter and those from LAFCOs around the region will suffice to inform.

Sincerely,

Jane Riley

Jane Riley, AICP
Director of Housing Policy

From: [Laura Morgan](#)
To: [Regional Housing Need Allocation](#)
Subject: Unincorporated Sonoma County can't absorb 3881
Date: Wednesday, October 6, 2021 11:55:14 AM

External Email

Administrative Committee
Submittal

By E-mail and Electronic

Association of Bay Area
Governments

rhna@bayareametro.gov

375 Beale Street

San Francisco, California 94105

Re: Sonoma County RHNA Appeal

Dear Administrative Committee members:

We are 50-year residents of unincorporated Sonoma County writing to request an appeal to the plan to house 3881 more residents in our area.

Every year, we lose more homes and natural resources to climate change. Fires and drought are the norm for us. We don't have room, resources or services to absorb this much construction or new residents.

Sonoma County has been a leader in balancing environmental protection with housing. Our voters have approved urban growth boundaries around all of our cities, supported by community separators and an agricultural preservation and open space district that purchases parcels and easements. All ten local governments have adopted general plans focused on city-centered growth, especially transit oriented development around our SMART rail stations.

From an environmental perspective, Sonoma County's draft Cycle 6 RHNA is problematic. By not considering constraints such as utilities, the draft allocation will have an impact on a number of heightened issues such as groundwater, local endangered species, and most notable, an increase in greenhouse gases. A more appropriate allocation would account for these issues and ensure a sustainable growth pattern for the region.

We look forward to your committee's consideration of the County's appeal. If you have any questions or concerns, please contact us at [REDACTED] or by return email.

Sincerely,

Laura Morgan and James Seward, MDs



NORTH COAST BUILDERS EXCHANGE

1030 APOLLO WAY • PO BOX 8070 • SANTA ROSA, CALIFORNIA 95407
(707) 542-9502 • FAX (707) 542-2027 • WWW.NCBEONLINE.COM

October 25th, 2021

Therese McMillan

Executive Director, Association of Bay Area Governments

RHNA@bayareametro.gov

RE: County of Sonoma request for a reduction in its RHNA Allocation

As background to this correspondence, the North Coast Builders Exchange is a non-profit contractors association with over 1000 members located primarily in Sonoma, Lake, Mendocino, and Napa Counties. We are deeply involved in housing issues in the North Bay and – because of the severe shortage of housing locally - we recognize the need to dramatically increase housing production in the decades ahead.

We have become aware that the County of Sonoma has filed a RHNA Allocation Appeal requesting that its allocation for 2023-31 be reduced from 3,881 units to 1,910 units. The leaders of our organization have reviewed the County's official Appeal Request and would like to make the following two points:

1) After careful review, we believe the County's Appeal Request has merit and should be granted by ABAG. Without reciting all of the points made in the County's Appeal, we particularly agree that despite Sonoma's large land area – approximately 1600 square miles – the urban land area that could readily accommodate new housing is relatively small at only 14.5 square miles. We have concluded that the 1,910 housing units they are proposing is a more realistic number.

2) There is a caveat, however, to our support of the County's Appeal. Since we do acknowledge – as stated above – that our area has a severe shortage of housing, our support of the County's Appeal is contingent on the 1,971 housing units that would be reduced in the County's allocation be assigned in some manner to the nine incorporated cities in Sonoma County that are better-equipped with infrastructure to accommodate these additional units.

In summary, we have no objection to ABAG's goal of 441,000 new housing units that are being assigned to jurisdictions in the nine-county Bay Area and, in fact, we strongly support that number based on our region's needs. But we do feel the current allocation to Sonoma County should be revisited.

We welcome any comments or questions.

Sincerely,

Mike Behler,

2021-22 President

North Coast Builders Exchange

Mike@behlerconstruction.com

Keith Woods,

Chief Executive Officer

North Coast Builders Exchange

Keith@ncbeonline.com



SONOMA COUNTY FARM BUREAU

Affiliated with California Farm Bureau and American Farm Bureau Federation

October 25, 2021

Therese McMillan

Executive Director, Association of Bay Area Governments

RHNA@bayareametro.gov

RE: County of Sonoma request for a reduction in its RHNA Allocation

Dear Ms. McMillan,

Sonoma County Farm Bureau, a general farm organization representing nearly 2,000 family farmers, ranchers, rural landowners, and agricultural businesses in Sonoma County, works to promote and protect policies that provide a prosperous local economy while preserving natural resources and a longstanding county agricultural heritage. We write today to respectfully urge your support for a reduction in the RHNA Allocation in the County of Sonoma.

Studies indicate that by the year 2050, the world is going to have to produce 70% more food to feed the population. As important as housing is to our community, the need to keep our unincorporated rural areas in crop and livestock cultivation is vital. We are not suggesting that less housing be mandated, but that additional housing be inside the urban growth barriers where water, sewer and amenities are easily accessible and less costly. Please keep our working lands working and minimize the amount of housing mandates put on these unincorporated parcels managed by the County of Sonoma.

After careful review, we believe the County's Appeal Request is justified and should be granted by ABAG. We particularly agree that despite Sonoma County's large land area of approximately 1,600 square miles, the land area that could readily accommodate new housing is relatively small. We agree that the 1,910 housing units they are proposing is more realistic for the local infrastructure.

We acknowledge that our area has a severe shortage of housing and as such our support of the County's Appeal is contingent on the proposed reduced housing numbers being reallocated to the nine incorporated cities in Sonoma County that are better equipped with infrastructure to accommodate these additional units.

In summary, we have no objection to ABAG's goal of 441,000 new housing units assigned to jurisdictions in the nine-county Bay Area and we strongly support that number based on our region's needs.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Beretta".

Jennifer Beretta

President