



ASSOCIATION  
OF BAY AREA  
GOVERNMENTS

Bay Area Metro Center  
375 Beale Street, Suite 700  
San Francisco, CA 94105  
415.820.7900  
www.abag.ca.gov

February 3, 2025

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Councilmember,  
City of East Palo Alto

Attention: Jessica Jones, Deputy Director of Planning, City of Santa Rosa  
Scott Orr, Assistant Director, Permit Sonoma, County of Sonoma

**\*\* SENT VIA EMAIL \*\***

**RE: Deadline Extension Request for RHNA Transfer from the County of Sonoma to the City of Santa Rosa Related to Annexation of Six Parcels (APNs 036-111-009, -010, -011, -016, -002, and 036-091-061)**

Dear Ms. Jones and Mr. Orr:

I am writing in response to your request, submitted on December 18, 2024, for an extension of the deadline to submit a request for a transfer of Regional Housing Needs Allocation (RHNA) units related to the annexation of six parcels (APNs 036-111-009, -010, -011, -016, -002, and 036-091-061) by the City of Santa Rosa that was finalized on September 25, 2024.

Pursuant to Government Code §65584.07(d), if an annexation of unincorporated land to a city occurs after ABAG has made its final RHNA allocation, a portion of the County's RHNA allocation may be transferred to the city. According to Government Code §65584.07(d)(2)(A), a mutually acceptable transfer agreement between the city and county or a written request for a transfer must be submitted to ABAG within 90 days after the date of annexation. ABAG may extend the 90-day deadline if it determines an extension is consistent with the RHNA objectives identified in Government Code §65584(d).

ABAG has reviewed the deadline extension request from the County of Sonoma and the City of Santa Rosa, which was timely submitted (see Attachment) and finds that such an extension is consistent with the RHNA objectives set forth in Government Code §65584(d). With the granting of this extension, the new deadline for submitting the transfer agreement or request for a transfer is March 24, 2025.

If the two parties are not able to reach an agreement and the County submits a transfer

request, we will make a recommendation to the ABAG Executive Board consistent with the provisions of Government Code §65584.07.

We wish the County and the City success in your efforts to achieve a mutually acceptable RHNA transfer agreement.

Sincerely,

A handwritten signature in black ink that reads "Matt Maloney". The signature is written in a cursive, flowing style.

Matt Maloney  
Deputy Executive Director for  
Metro Planning & Policy

MM:GA

Attachment: *RHNA Transfer Extension SOCO SR Dec 2024 with supplement.pdf*

CC: Maraskeshia Smith, City of Santa Rosa, City Manager  
Gabe Osburn, City of Santa Rosa, Director of Planning & Economic Development  
Christina Rivera, County Executive  
Tennis Wick, Permit Sonoma, Director  
Ross Markey, Permit Sonoma, Comprehensive Planning Manager



December 18, 2024

SENT VIA EMAIL

Bella Ramos  
Association of Bay Area Governments  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105

**RE: Request for Time Extension Per Gov. Code § 65584.07(d)(2)(A)**

Dear President Ramos:

Pursuant to Government Code Section 65584.07(d)(2)(A), the City of Santa Rosa and County of Sonoma jointly request an extension of the 90-day deadline to submit a mutually acceptable RHNA transfer agreement after an annexation. On September 25, 2024, Sonoma LAFCO completed an annexation of approximately 41.55 acres in northwest Santa Rosa; the deadline to submit a mutually acceptable RHNA transfer agreement is December 24, 2024, unless extended by ABAG. City and County staff have identified a preliminary agreement which requires approval by the Santa Rosa City Council. A 90-day extension is requested to allow sufficient time for the item to be placed on the earliest available City Council meeting agenda.

Government Code Section 65584.07(d)(2)(A) provides that ABAG may extend the deadline to submit a mutually acceptable RHNA transfer agreement "if it determines an extension is consistent with the objectives of this article." The referenced objectives for the regional housing needs allocation plan are provided in Government Code Section 65584(d)(1)-(5). The 90-day extension requested by the City and County is consistent with the referenced objectives, with the most relevant being subsections (d)(1), (d)(2), and (d)(5), as outlined below.

**65584(d)(1):** *Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

The requested extension is necessary to enable the City of Santa Rosa and the County of Sonoma to finalize a mutually acceptable RHNA transfer agreement

following annexation of unincorporated land to the City. The preliminary agreement reached by City and County staff proposes transfer of a total of 641 units, including 34 units affordable to very low-income households and 607 above moderate-income units. The very low-income RHNA reflects the units and affordability level of the housing development project recently approved by the City for the annexed area.

**65584(d)(2):** *Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to [Section 65080](#).*

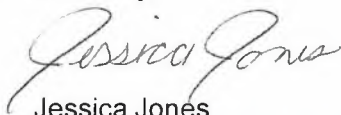
As stated above, an extension is requested to enable the City of Santa Rosa and the County of Sonoma to finalize a mutually acceptable RHNA transfer agreement for an annexation of unincorporated land to the City. The annexed area was an unincorporated island surrounded by incorporated territory of the City, and is located within approximately one-half mile of the North Santa Rosa SMART station. Annexation enables the site to be developed at higher densities due to the availability of City water and sewer services. The contemplated RHNA transfer is consistent with the actual units recently approved by the City for the project site.

**65584(d)(5):** *Affirmatively furthering fair housing.*

The extension would enable a transfer of RHNA units in an amount that tracks the number of units, by income level, recently approved by the City for the annexation area. The 34 very low-income units proposed for transfer are proposed on a 1:1 basis with the number contemplated in project approvals, and the significant majority of units are above moderate-income units. The annexed area is in a CTCAC lower-resource area, and the income mix of the contemplated transfer is consistent with both the City's and County's AFFH obligations.

If you have any questions, please contact Jessica Jones, Santa Rosa Deputy Director of Planning at 707-543-3253 or [jjones@srcity.org](mailto:jjones@srcity.org) or Scott Orr, Permit Sonoma Assistant Director at 707-565-1754 or [scott.orr@sonoma-county.org](mailto:scott.orr@sonoma-county.org).

Sincerely,



Jessica Jones  
Deputy Director of Planning, City of Santa Rosa



Scott Orr  
Assistant Director, Permit Sonoma

EC:

Maraskeshia Smith, City of Santa Rosa, City Manager [cmoffice@srcity.org](mailto:cmoffice@srcity.org)

Gabe Osburn, City of Santa Rosa, Director of Planning & Economic Development [gosburn@srcity.org](mailto:gosburn@srcity.org)

Christina Rivera, County Executive [christina.rivera@sonoma-county.org](mailto:christina.rivera@sonoma-county.org)

Tennis Wick, Permit Sonoma, Director [tennis.wick@sonoma-county.org](mailto:tennis.wick@sonoma-county.org)

Ross Markey, Permit Sonoma, Comprehensive Planning Manager [ross.markey@sonoma-county.org](mailto:ross.markey@sonoma-county.org)

## Gillian Adams

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**From:** Jones, Jessica <jjones@srcity.org>  
**Sent:** Friday, January 17, 2025 9:08 AM  
**To:** Gillian Adams; Scott Orr  
**Cc:** Christa Shaw; Tennis Wick; GOsburn; Crocker, Ashle; Basinger, Megan  
**Subject:** RE: [EXTERNAL] RE: Request for Time Extension - Santa Rosa and Sonoma County  
**Attachments:** RHNA Transfer Extension SOCO SR Dec 2024.pdf

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### \*External Email\*

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Hi Gillian,

Below are our responses to Government Code Sections 65584(d)(3) and (4). I have also attached the original letter for quick reference.

**Government Code Section 65584(d)(3):** Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

The requested extension is necessary to enable the City of Santa Rosa and the County of Sonoma to finalize a mutually acceptable RHNA transfer agreement following annexation of unincorporated land to the City. The annexed land includes a mix of both residential and retail General Plan land use, as designated by the City. On November 14, 2024, the Santa Rosa Planning Commission approved a Tentative Map and Conditional Use Permit, and on December 4, 2024 the Santa Rosa Zoning Administrator approved an associated Design Review application, for a project that includes a mix of single-family, multi-family and neighborhood serving retail. The project, which is located within less than one-half mile radius of the northern Santa Rosa SMART station, and a regional shopping center, will improve the balance of low-wage jobs and affordable housing units in the area. Approving the extension of time for the City and County to complete its mutually acceptable RHNA transfer will allow the time necessary to complete the agreed upon transfer and allow the approved project to proceed.

**Government Code Section 65584(d)(4):** Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

As stated above, an extension is requested to enable the City of Santa Rosa and the County of Sonoma to finalize a mutually acceptable RHNA transfer agreement for an annexation of unincorporated land to the City. The preliminary agreement reached by City and County staff proposes transfer of a total of 641 units, including 34 units affordable to very low-income households and 607 above moderate-income units. The very low-income RHNA reflects the units and affordability level of the housing development project recently approved by the City for the annexed area. Approving an extension of time to complete the mutually acceptable transfer will allow the City and the County to ensure that both jurisdictions are allocating units at each income category with equal distribution.

Please let us know if you need anything further.

Thanks,  
Jessica

**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)



**From:** Jones, Jessica

**Sent:** Thursday, January 16, 2025 12:03 PM

**To:** Gillian Adams <[gadams@bayareametro.gov](mailto:gadams@bayareametro.gov)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>

**Cc:** Christa Shaw <[Christa.Shaw@sonoma-county.org](mailto:Christa.Shaw@sonoma-county.org)>; Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Osburn, Gabe <[GOsburn@srcity.org](mailto:GOsburn@srcity.org)>; Crocker, Ashle <[acrocker@srcity.org](mailto:acrocker@srcity.org)>; Basinger, Megan <[MBasinger@srcity.org](mailto:MBasinger@srcity.org)>

**Subject:** RE: [EXTERNAL] RE: Request for Time Extension - Santa Rosa and Sonoma County

Thanks Gillian. I will work with the County on this and get it over to you as soon as possible.

Jessica

**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)



**From:** Gillian Adams <[gadams@bayareametro.gov](mailto:gadams@bayareametro.gov)>

**Sent:** Thursday, January 16, 2025 11:43 AM

**To:** Jones, Jessica <[jjones@srcity.org](mailto:jjones@srcity.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>

**Cc:** Christa Shaw <[Christa.Shaw@sonoma-county.org](mailto:Christa.Shaw@sonoma-county.org)>; Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Osburn, Gabe <[GOsburn@srcity.org](mailto:GOsburn@srcity.org)>; Crocker, Ashle <[acrocker@srcity.org](mailto:acrocker@srcity.org)>; Basinger, Megan <[MBasinger@srcity.org](mailto:MBasinger@srcity.org)>

**Subject:** RE: [EXTERNAL] RE: Request for Time Extension - Santa Rosa and Sonoma County

Hi Jessica,

Thank you for following up and I appreciate your patience. After reviewing the deadline extension request, we ask that you provide additional information that addresses the two RHNA objectives that were not included in your letter. Providing an explanation for how the extension request addresses the objectives identified in Government Code Section 65584(d)(3) and 65584(d)(4) will aid ABAG in determining whether the extension is consistent with the RHNA objectives, as required by Government Code Section 65584.07(d)(2)(A). The City and County do not need to submit a new letter, we would just include this new information as a supplement to what you have already submitted.

Thanks,  
Gillian

Gillian Adams  
Principal Planner