



Sonoma County Transportation Authority
Regional Climate Protection Authority

October 14, 2020

ABAG Executive Committee
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: RHNA base data – comments and concerns

Dear Members of the ABAG Executive Committee:

Sonoma County and all of the nine cities are very committed to increasing housing opportunities – particularly stock in the low and very low categories. With a long history of directed growth supported by Urban Growth Boundaries in all jurisdictions, and engagement in MTC’s Regional Growth Framework to identify 17 Priority Growth Areas, the jurisdictions in Sonoma County are motivated to facilitate the production of housing.

The SCTA convenes Planning Directors and planning staff in Sonoma County as the Planning Advisory Committee (PAC) and, when needed, facilitates an ad hoc staff committee to discuss pressing housing issues. At the October 12, SCTA Board of Directors meeting staff provided a report (attached) regarding the process of the current Regional Housing Needs Allocation (RHNA), along with a letter (attached) signed by all Planning Directors in the County describing their concerns in detail.

The SCTA Board understands and appreciates that the State is responding to housing shortages in all regions and has determined that the Bay Area Region should plan for an additional 441,176 additional housing units, a 135% increase from the last in the last RHNA Cycle. This is a heavy lift for our communities, however we do support the chosen methodology proposed by the Housing Methodology Committee (HMC).

Our issue of concern is the underlying data used to develop the Plan Bay Area 2050 Draft Blueprint, which determines the capacity for future housing growth. Errors in the land use development tool, UrbanSIM, which are used to estimate housing capacity/potential and growth, and particularly where housing can be built, how much can be built, and where housing development should be prohibited, has led to errors in housing forecasts and thereby errors in future housing allocations. The Draft Blueprint/UrbanSim forecast has led to an allocation of nearly 6,000 new units in the unincorporated County, a 919% increase over last cycle and the equivalent of building a new small city in the service-poor unincorporated area. The unincorporated County is largely rural/agricultural and should not see substantial growth, especially outside of urban service areas and spheres of influence. Several small cities have also received substantial increases. Sebastopol, for example is assigned a 250% increase, while Santa Rosa at 28% and Rohnert Park at 40% are relatively low. These increases are not consistent

with the focus on city-centered growth in Sonoma County and are not consistent with many of the planning practices espoused by MTC including the focus on higher density growth near transit service.

Since the September 29 letter was sent, SCTA has received housing potential data and other model inputs used to develop the Draft Blueprint. Regional staff spent time working with local planners to develop these inputs as part of the BASIS data outreach process in 2019, but it appears that inputs used to develop the Draft Blueprint may not be completely consistent with what was submitted as part of the BASIS review process. Local planners are reviewing the materials provided by ABAG to identify potential issues that could influence inaccuracies and issues with housing forecasts in Sonoma County.

The SCTA Board of Directors supports the Planning Directors request that you allow an additional three weeks to review and update the data used to develop regional forecasts that are being used as part of the RHNA allocation process.

We appreciate the attention of ABAG to this matter. Our goal is consistent with the region's - to plan for our share of housing. Please consider granting our planners the opportunity to correct data to more accurately reflect growth in Sonoma County.

Sincerely,



[Susan Gorin \(Oct 14, 2020 16:47 PDT\)](#)

Susan Gorin
Chair, SCTA/RCPA

Cc: Therese McMillan, MTC/ABAG Executive Director
Matt Maloney, MTC/ABAG Director of Regional Planning
SCTA Planning Advisory Committee






RHNA base Letter

Final Audit Report

2020-10-14

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