

DEPARTMENT OF RESOURCE MANAGEMENT

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Planning Services Division

November 10, 2020

Therese McMillan
Executive Director
ABAG & MTC
375 Beale St., Ste. 800
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

Dear Ms. McMillan:

Solano County would like to take this opportunity to provide comments on the proposed RHNA Methodology and Subregional Shares initially approved by your Executive Board on October 15, 2020.

Proposed RHNA Methodology

The proposed draft RHNA methodology was approved for public review and comment on October 15, 2020. It utilizes the draft 2050 Bay Area Blueprint (total households) as its baseline. Solano County has a concern with the application of the 2050 Blueprint as the baseline, as it has inherent flaws in its assumptions for unincorporated housing growth in Solano County. The Blueprint assumes that the County will be developing lands within the cities' Spheres of Influence (SOI) to significant density while still in the County (before annexation) and, as such, more housing development is attributed to the unincorporated County than should be for reasons further articulated below.

The County understands that the Blueprint is intended to project long term growth patterns on a regional scale and is not intended to analyze development at the local scale. However, when the Blueprint data becomes an input into the RHNA process, it must accurately reflect local city and county development strategies because RHNA itself is a local planning issue.

Solano County is rural and agricultural in nature, and its General Plan has and continues to contain strong policies encouraging city centered growth. The Orderly Growth Initiatives (1984, 1994, 2008) (extended by Measure T) is a voter approved initiative that prevents the conversion of agricultural lands to residential or commercial without voter approval at a general election.

The October 15, 2020 draft methodology assigns Solano County 1,016 units that need to be incorporated into its Housing Element. This is an extremely high number and virtually impossible to accommodate for a predominantly rural and agricultural county without the benefit of significant urban services (sewer/water). This flaw is not the fault of the methodology factors and weighting but from using the 2050 Blueprint as the baseline.

Without incorporating the recommended factors and weights of the methodology, the Blueprint baseline assumes that the County will have a RHNA requirement of 1,850 housing units for the upcoming RHNA timeframe. Of these units, 1,080 are anticipated to be built within the LAFCO approved Spheres of

Influence of several cities within the County. This is fundamentally problematic for Solano County. The County does not provide urban services, and services cannot be extended to these areas without annexation to the city.

While Solano County has formed a subregion for re-allocating its countywide allocation to the County and each of its cities, the County does not want to be in a position to correct an assumption about housing that at the regional level was fundamentally incorrect. An adjustment should be made to either the 2050 Blueprint model and assumptions or to the RHNA allocation assigning development of lands within cities' Spheres of Influence to the cities and not the County. This adjustment will not impact the total subregional allocation and will more accurately and realistically reflect anticipated development patterns in future years.

Both ABAG staff and HCD staff have pointed out that RHNA units can be re-allocated to cities when land is annexed. However, current law will require the County to develop a certified Housing Element that will accommodate its RHNA allocation. The County will be expected to identify where and how it plans to locate or rezone for these units and plan for supporting infrastructure in a city sphere of influence, prior to annexation, in order to get its Housing Element certified. As such, transferring this RHNA responsibility at annexation provides no benefit to the County as it attempts to draft a certified Housing Element. Should the County fail to obtain certification of its Housing Element by HCD, there is risk of lawsuits, and it will not be eligible for many forms of funding and grants specifically earmarked to assist with the development of housing.

Solano County appreciates the opportunity to provide comments on the proposed RHNA methodology. Should you have any questions or comments regarding the content of this letter, please feel free to contact Matt Walsh at (707) 784-6765 or by email at mwalsh@solanocounty.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terry Schmidtbauer".

Terry Schmidtbauer, Interim Director
Solano County Department of Resource Management

Cc
Birgitta Corsello, CAO
Solano County Board of Supervisors