



Jesse Arreguin, President  
MTC/ABAG Executive Board  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear President Arreguin:

Today is a monumental day for the entire Bay Area as the MTC/ABAG Executive Board considers and votes to recommend that the State Department of Housing and Community Development (HCD) adopt the Bay Area's 6<sup>th</sup> cycle Regional Housing Needs Allocation (RHNA), allocation methodology. This vote is the culmination of hours of work by staff from the entire Bay Area and we want to express our gratitude to the entire HMC and ABAG/MTC staff and consultants for supporting this comprehensive effort. We recognize their hard work and appreciate the continued and direct assistance to our jurisdictions.

As has been previously stated in multiple comments, the North Bay communities are supportive of the HMC decision to utilize the draft Plan Bay Area (PBA) 2050 Blueprint's projected 2050 household data as the baseline in establishing the 6th cycle RHNA for Bay Area communities, as the Draft Blueprint provides similar guiding principles to those adopted by the HMC. However, this assumes the underlying data and assumptions in the 2050 Blueprint model are accurate and comprehensive. As the North Bay communities have recently been given the opportunity to analyze into the data in a meaningful way, multiple concerning errors have been identified, especially for rural communities such as Cotati unincorporated Sonoma County. These errors have been communicated directly to MTC/ABAG staff however no meaningful responses regarding how the data will be corrected have been provided. As such, if the draft PBA is to form the baseline for the RHNA allocation, the Cotati City Council formally requests that:

- 1) MTC/ABAG create a formalized process allowing direct and meaningful methods to have these identified data errors be communicated and corrected; and
- 2) The finalized data and development assumptions used to predict how land will develop under the PBA 2050 Blueprint, be accurate and account for existing real-world constraints; and
- 3) That the Executive Committee not vote to support a methodology that is based on demonstrably incorrect data without committing to meaningfully address such issues.

As identified in previous comments (attached), significant errors in modeling data appear to be erroneously inflating population growth projections in the North Bay unincorporated counties and some rural cities. It is critical that a process be created to ground-truth this information to ensure proper accounting for our unique community constraints. The impacts of these errors are only compounded by the HMC decision not to formally include natural hazards into the allocation methodology as demonstrated by the tragic and on-going impacts of the Tubbs, Kincade, Shady and Glass fires, which have continued to ravage our communities since 2017.

Ultimately, the goal of the HMC, MTC/ABAG, all Bay Area jurisdictions and the HCD should be to ensure adequate housing is provided to meet the needs of our varied and diverse communities in a manner that meets the statutory objectives of the RHNA. Specifically these objectives are to:

- Increase housing supply & mix of housing types, tenure & affordability in an equitable manner
- Promote infill development & socioeconomic equity, protect environmental & ag resources, & encourage efficient development patterns (the State “planning priorities”)
- Promote improved intraregional jobs-housing relationship including jobs housing fit
- Balance disproportionate household income distributions (more high income RHNA to lower income areas and vice-versa)
- Affirmatively furthering fair housing

The Cotati City Council questions how the MTC/ABAG Executive Board and ultimately HCD could support a methodology that does not include a process to address these errors. Comments provided to date have identified that the North Bay data assumptions appear to push sprawl development into agricultural and environmentally sensitive areas; away from city-centered transit, infrastructure and jobs; and are not distributing a mix of housing types in a way that affirmatively furthers fair housing. The Cotati City Council further wishes to express concern over how the impacts of the current data assumptions may affect individual communities ability to achieve a certified Housing Element under the new 6<sup>th</sup> cycle Housing Element legislative requirements.

In summary, while the choice to use PBA 2050 data as the baseline for RHNA allocations is supported as a sound planning policy, the use of this data must include a correct data errors as they are identified and communicated. Without an effective accounting for constraints and allowance for needed corrections, the resulting growth projections will not meet the statutory objectives of RHNA and may counter-productively preclude some jurisdictions from achieving Housing Element certification. Ultimately, this lack of statutory conformance and reduction in housing grant funding will result in less homes being built overall, and for the homes that are built to perpetuate the discriminatory policies that have created the issues we are now trying to solve. Please take these comments under serious consideration in any decisions made to support the HMC RHNA methodology and to finalize the PBA 2050.

Sincerely,



Wendy Skillman  
Mayor  
City of Cotati

Enclosed:

1. September 29, 2020, SCTA Comment Letter
2. October 15, 2020, City of Cotati Draft Blueprint/Urban Sims Data Comments + Corrections Identification Email-Noah Housh, City of Cotati Community Development Director



Sonoma County Transportation Authority  
Regional Climate Protection Authority

September 29, 2020

Jesse Arreguin, President  
MTC/ABAG Executive Board  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear President Arreguin:

First, we want to express our gratitude to the entire HMC and ABAG/MTC staff and consultants for supporting this monumental effort. Further the Planning and Community Development Directors and SCTA staff wish to specifically acknowledge the dedication of Gillian Adams, Dave Vautin, Paul Fassinger, Ada Chan, Aksel Olsen, Eli Kaplan and all of the other individuals whom have worked so diligently to support the HMC. We recognize their hard work and appreciate their continued and direct assistance to our jurisdictions.

At its September 18, 2020 meeting, the HMC voted to utilize the draft Plan Bay Area 2050 Blueprint's projected 2050 household data as the baseline in establishing the 6<sup>th</sup> cycle Regional Housing Need Allocations (RHNA) for Bay Area communities. Because the Draft Plan Bay Area (PBA) Blueprint provides similar guiding principles (<https://www.planbayarea.org/2050-plan/plan-bay-area-2050-blueprint>) as those adopted by the HMC, this seems a strategic and logical approach that would move the Bay Area toward these guiding principles. However, this assumes the underlying data and assumptions in the 2050 Blueprint model are accurate and comprehensive. In practice, North Bay communities are realizing, ***the implications of using a 30-year projection to establish an 8-year RHNA are significant and may have unintended consequences, especially for our rural communities and areas of unincorporated counties.*** Given this, if the draft PBA is to form the baseline for the RHNA allocation, then it is critical that:

- 1) The data input and development assumptions used to predict how land will develop must be accurate and account for existing real-world constraints; and
- 2) The growth assumptions must account for the two very different time frames (8 years vs. 30 years) and appropriately account for (but not over emphasize), the widespread economic crisis caused by the COVID-19 pandemic.

To ensure proper accounting for these issues, the Sonoma County Community Development Directors, Planning Directors and SCTA planners have repeatedly requested the data and the development assumptions that ABAG/MTC is utilizing for its modeling. Unfortunately, we have yet to receive the development assumptions, and only received the GIS (layer) zoning assumptions on Friday, September 25. Despite the delay in providing the requested data, ABAG staff has requested our communities each report back on any errors in this data by Wednesday, September 30, effectively providing our staff less than 3 working days to examine GIS data that

took years to build and to identify its errors. As identified below, a few hours spent examining this data has already revealed significant errors that appear to be erroneously inflating populations and projections in the unincorporated county and in some rural cities. ***Additional time is needed for the comprehensive data and assumptions used in the draft PBA Blueprint to be provided by ABAG/MTC staff, and to be truth-tested to ensure proper accounting for our unique community constraints. This need for additional time is only compounded by the tragic impacts of the Shady and Glass fires currently ravaging our communities.***

#### **Data errors identified by Sonoma County jurisdictions**

Without having the requested GIS layers from PBA available to check for errors, local staff have resorted to using the static .pdf graphic provided to each jurisdiction by ABAG. These .pdf maps are not interactive and do not provide any wayfinding information such as streets and roads to assist with orienting and ensuring accuracy with the review. Nonetheless, North Bay staff toiled to make side-by-side comparisons with our own GIS maps and have identified several significant errors.

Specifically, high-density housing assumptions are made in the PBA 2050 data in the following areas, either erroneously or in violation of RHNA objectives:

- In graveyards
- In floodways
- On rural recreational lands many miles from any services (at least 20 instances in unincorporated county)
- Adjacent to freeways with high pollution emission rates
- In industrially designated areas adjacent to noxious land uses
- In areas identified and certified as Priority Production Areas by ABAG/MTC
- Increased densities adjacent to high wildfire areas

In several unincorporated areas, the shape files for high-density housing do not have any relationship to parcel boundaries, roads or zoning districts; rather they appear to have been included randomly. There are clearly a large number of mapping errors that need to be corrected based on existing and known constraints (such as those listed above). If such significant errors were found in only a few hours and using information provided in a limited format, it calls into question the accuracy of the growth projections of the entire model.

While ABAG staff did contact local jurisdictions to ask them to review their data a year ago, the data was provided only as a spreadsheet with hundreds or thousands of data entries and no mapping or development assumptions being given. As such, this format did not result in a true “project referral” or productive engagement as the results clearly identify. Now that the maps have been included and staff can visually check for errors, the Directors and SCTA staff ***request a review period of three weeks following receipt of the requested data and development assumptions from ABAG staff, to review and identify errors in mapping and development assumptions. Further, this feedback needs to be meaningfully incorporated into the data and modeling projections before the RHNA baseline is set and growth is allocated.***

## Infrastructure Constraints and Sites Requirements

All Sonoma County jurisdictions are concerned about the assumptions made in the draft PBA related to infrastructure. The resulting development assumptions (which we still have not received) made in the 30-year 2050 PBA timeline do not translate well into the 6<sup>th</sup> cycle RHNA planning period of 8 years. The use of PBA 2050 development assumptions and 25-year growth projections, which do not account for the 8-year RHNA timeline, deliver obscenely high numbers to unincorporated and rural communities which currently lack the infrastructure to serve the projected high-density growth. It is important to note that HCD is legislatively prohibited from allowing jurisdictions to “count” sites that will not be available for development within the 8-year housing element period. The end result is that jurisdictions allocated shockingly high numbers of growth without the means to develop the infrastructure needed to support such growth, will never be able to identify adequate sites to meet the statutory sites criteria and thus will not be able to achieve certification of their housing elements. Because grant funding for housing now requires a certified housing element, the use of the PBA assumptions will preclude these jurisdictions from receiving any funding to support housing development. ***The Directors and SCTA staff request that such areas identified for growth in the draft PBA 2050 Blueprint NOT be included in a jurisdiction’s RHNA allocation for the 6<sup>th</sup> cycle unless infrastructure can be provided within the 8-year timeframe of the planning cycle. Setting these jurisdictions up for Housing Element failure is not good planning policy and will not result in housing being built.***

## Environmental Justice, Climate Change and Covid-19 Related Issues

The chosen allocation methodology must meet the six statutory objectives of RHNA, including affirmatively furthering fair housing. This means that the RHNA allocation must take ***meaningful action to overcome patterns of segregation*** and to ***replace segregated living patterns*** with integrated and balanced communities. Unfortunately, mapping done for the PBA 2020 Blueprint reflects a perpetuation of segregated housing patterns by placing higher-density housing allocations into environmentally inferior areas that are already home to the region’s poorest populations by virtue of having the lowest land costs. This, in turn, causes the RHNA allocation methodology to fail to meet the 5<sup>th</sup> statutory objective of RHNA. ***If the draft PBA 2050 Blueprint is to be used as a baseline for the RHNA allocation, the PBA data and projections must also be corrected to meet the six statutory objectives of RHNA, including to remove assumed high-density housing developments from areas that are environmentally inferior such as in flood zones, in polluted areas, adjacent to freeways, within industrial areas with high emissions and in high wildfire areas.***

Additionally, the specific development assumptions for PBA2050 should be made available for comment by the public, and then discussed by the Regional Planning Committee (RPC), HMC and ABAG Executive Board. For instance, it is our understanding that future sea level rise (e.g. current and future flood plain areas) is included as a development constraint for coastal areas, but neither current nor future FEMA regulatory flood plain areas outside of coastal communities are being included. This is not good planning and is an inconsistent approach to identifying and applying the development constraints of climate change, across all Bay Area communities. This is yet another example of why the underlying data and assumptions must be made available, so that local planners can assist ABAG/MTC staff in identifying and correcting these types of issues using our collective localize

knowledge of the issues we understand as lead agencies. Similarly, the additional adjustments to the development constraints and assumptions resulting from the Covid-19 pandemic (such as telecommuting assumptions) should also be provided to the public for discussion by the RPC, HMC and ABAG Executive Board.

In summary, while the choice to use PBA 2050 data as the baseline for RHNA allocations makes sense and can achieve good planning policy (such as thoughtful planning for development in high hazard areas), the use of this data must include means to separate the 8-year RHNA cycle from the 25-year growth model horizons. Without an effective accounting for constraints and allowance for needed corrections, the resulting growth projections will not meet the statutory objectives of RHNA and will counter-productively preclude jurisdictions from achieving Housing Element certification. Ultimately, this lack of statutory conformance and reduction in housing grant funding will result in less homes being built overall, and for the homes that are built perpetuating the discriminatory policies that have created the issues we are now trying to solve. Please take these comments under serious consideration and utilize the feedback provided to improve the PBA 2050 modeling.

Thank you,

Sonoma County Planning and Community Development Directors

  
Jeff Beiswenger (Sep 30, 2020 12:52 PDT)

Jeffrey Beiswenger  
Planning Manager, City of Rohnert Park



Clare Hartman  
Deputy Director – Planning, City of Santa Rosa

  
Heather Hines (Oct 5, 2020 13:26 PDT)

Heather Hines  
Planning Manager, City of Petaluma

  
Noah Housh (Sep 30, 2020 08:54 PDT)

Noah Housh  
Director of Community Development, City of Cotati



Jessica Jones  
Community Development Director, Town of Windsor

Janet Spilman

Janet Spilman (Oct 5, 2020 14:55 PDT)

Janet Spilman

Director of Planning, Sonoma County Transportation Authority

David Storer, AICP

David Storer, AICP (Sep 30, 2020 11:57 PDT)

David Storer, AICP

Planning and Community Services Director, City of Sonoma

Kari Svanstrom

Kari Svanstrom (Sep 30, 2020 08:19 PDT)

Kari Svanstrom

Planning Director, City of Sebastopol

Kevin Thompson

Kevin Thompson (Sep 30, 2020 11:00 PDT)

Kevin Thompson

Assistant City Manager/Community Development Director, City of Cloverdale

Tennis Wick

Tennis Wick

Director, Permit Sonoma, County of Sonoma

David Woltering, AICP

David Woltering, AICP (Oct 2, 2020 01:28 PDT)

David Woltering, AICP

Interim Community Development Director, City of Healdsburg

cc: Therese McMillan, MTC Executive Director  
Matt Maloney, MTC Director of Regional Planning  
Suzanne Smith, SCTA Executive Director

**From:** [Noah Housh](#)  
**To:** [jcroff@bayareametro.gov](mailto:jcroff@bayareametro.gov)  
**Cc:** [Ada Chan](#); [Jane Riley](#); [Janet Spilman](#); "[Hines, Heather](#)"; [Christopher Barney](#)  
**Subject:** City of Cotati Draft Blueprint/Urban Sims Data Comments + Corrections  
**Date:** Thursday, October 15, 2020 5:46:00 PM

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Hi Joshua,

Following up on the recent discussions ABAG/MTC staff have been having with some of the Sonoma County communities regarding the data inputs to the Urban Sims model and resulting Draft Blueprint 2050, please see the following list of comments and corrections for the City of Cotati data.

1. The spreadsheet data is generally accurate except that our Commercial Industrial Zoning District is identified as appropriate for residential development at 15 d/u per acre. This is inaccurate-this category is essentially a light industrial zoning district and is not appropriate for any residential development. Therefore all of these properties should be removed from the areas available for residential development in the dataset and model and identified as "No Residential Uses Allowed". This specific parcel data is identified as: name\_pba40 902 Commercial Industrial
2. See below for a few specific parcels identified as pink on the PBA50 map but I cannot understand why they are identified for high density residential development. Generally, in these cases they are a single parcel or small groups of parcels in Rural Residential areas, Industrial or Commercial districts that are not significantly different than the surrounding properties, but have been highlighted as appropriate for high density development where the surrounding properties have not.
  - A. APN 046-111-018 is the City's Corporation Yard, and is also in the Commercial Industrial district (mentioned above) and is not appropriate for residential development at all. Parcel ID 1930272 on the PBA50 Map
  - B. APNs 144-230-021 and 144-230-018 are both Rural Residential properties at the edge of the City and are not appropriate for higher density housing. The spreadsheet includes the accurate d/u per acre allowed in this district as does the parcel data, but they are also highlighted pink on the PBA50 Map as appropriate for higher density development. Parcel IDs 2010557 & 2010554
  - C. Five lots in the Low Density District on the edge of town are also pink on the PBA50 map and would not be good locations for higher density homes. These properties are further complicated by being at the end of a dead-end access road and under significant natural hazard risks (APNs 144-420-026; 144-420-017; 144-420-016; 144-420-011 and 144-420-015) Parcel IDs 2011097; 2011090; 2011089; 2011088; 2011085
  - D. Parcel ID 2010222-Industrial property adjacent to HWY 101
  - E. Parcel ID 2010806-Split zoned parcel developed with a gas station-ok with rear half of property being included in residential calculations/projections as 15 d/u per acre but E. Cotati Avenue portion inappropriate.
  - F. Parcel ID 2011566 and 2011398-both of these parcels are Public Bike Paths
3. See below for several parcels in the un-incorporated County surrounding Cotati that are identified as appropriate sites for high density housing (36 d/u per acre) and should definitely not be in my opinion.



- A. APN 046-181-019 is the location of Carl's Body Shop and junk yard and has been occupied as an industrial use for decades-definitely not a good location for residential uses. Parcel ID 1930599
- B. APN 046-182-010 is a rural residential property on well and septic with Cotati Creek running through it, and appearing to provide on-site wetland habitat. This is similarly not a good location for the high density housing identified.
- C. There are 7 parcels on the west side of the HWY 116/Stony Point Rd intersection identified for development at 36 d/u per acre. This location has no sewer or water services, is adjacent to a creek and has limited access to any services. Parcel ID 1930102 is the central parcel.
- D. Parcel ID 1930144-Issolated agricultural/rural property at the end of a dead end road in Tiger Salamander/Wetland Habitat.

Please let me know when the corrections have been implemented and feel free to follow up with any questions.

Thank you!

**Noah Housh**

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