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November 27, 2020

Mayor Jesse Arreguín, President
Executive Board, Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

RE: Proposed RHNA Methodology and Subregional Shares – Support for Option 8A & Sonoma County Unincorporated Allocation Adjustment

Dear President Arreguín & ABAG Executive Board,

Generation Housing respectfully encourages the Association of Bay Area Governments (ABAG) to adopt the Proposed Regional Housing Needs Allocation (RHNA) Methodology and adjust the preliminary allocation for unincorporated Sonoma County.

Generation Housing is a nonprofit housing advocacy organization that works to support an increase in the supply, diversity, and affordability of housing in Sonoma County. The proposed methodology is an equitable, ambitious, and well-researched strategy to house our region that recognizes our climate crisis and a legacy of segregation on the basis of race and income in the San Francisco Bay Area.

Generation Housing embraces the overall baseline allocation for Sonoma County made in data-driven consideration of Plan Bay Area 2050. Our county is expected to build 4% of the Bay Area's housing, or just over 17,000 homes. This marks a 108% increase countywide over the 2015-2023 RHNA cycle, but is the same percentage as last cycle and proportional to our population within the San Francisco Bay Area. We are confident that Sonoma County is capable of meeting the challenge of accelerated housing production with transit-oriented infill development that lowers vehicle miles traveled (VMT).

Generation Housing urges ABAG to consider an adjustment to the housing allocation for unincorporated areas serviced by the County of Sonoma. An adjustment to the allocation should consider an intra-county shift that reallocates some of our baseline allocation into cities and towns of Sonoma County. Generation Housing echoes concerns expressed in letters submitted by Greenbelt Alliance and Jane Riley, AICP, Comprehensive Planning Manager with the County of Sonoma.

Rural, unincorporated areas of Sonoma County face substantial challenges to housing production spanning fires, floods, and decentralized infrastructure. A series of wildfires that have reshaped our region since 2017 have disproportionately devastated our communities outside of city limits. A nearly tenfold increase in the housing allocation to unincorporated Sonoma County over the last RHNA cycle heightens our concern for further loss of life and property. Moreover, urban growth boundaries and community separators mandated by voters across our county culminate in a near impossibility of over 5,000 new homes sprawling into the farms and open spaces of unincorporated Sonoma County. We accept the challenge of the higher overall housing numbers for Sonoma County, and Generation Housing is keen to help determine a better way to build 17,000 new homes countywide.

We have been impressed with the ABAG Executive Board, Housing Methodology Committee, and Staff who have faced the challenge of creating nearly half a million homes in our region with innovation and care. The preliminary allocation warrants approval, and requires continued attention.

Respectfully,

Jen Klose



Executive Director, Generation Housing

cc: ABAG Executive Board Director Jake Mackenzie, City of Rohnert Park
ABAG Executive Board Director David Rabbitt, County of Sonoma
Gillian Adams, Principal Planner, Regional Housing Needs Allocation

