

*Tag: Proposed RHNA Methodology and Subregional Shares*

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To: ABAG-MTC Public Information Office  
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Comments due 11/27

**Public comment on 6<sup>th</sup> Cycle Proposed RHNA Methodology and Draft Subregional Shares of Regional Housing Need.**

**Abstract:** For the 6<sup>th</sup> RHNA cycle, I strongly suggest keeping the Sonoma County total Option 8A number of 17,543 for whatever scenario. The County needs to buck up on housing. I suggest shifting a large portion or all of Sonoma County's Option 8A unincorporated allocation of 5,257 back onto County cities. Shift the approximately 230 City of Sonoma growth management ordinance units in its southern sphere of influence from the County to the City's RHNA Option 8A allocation. With Sonoma's existing Option 8A allocation of 330 plus 230 from its sphere, this shift would total of 560 for a revised City Option 8A number. A \$25,000 City housing study resulted in an informed citizen's 6<sup>th</sup> cycle recommendation of 725 units with 52% being deed restricted; there is local backing for higher numbers.

Dear ABAG Regional Planning Committee,

I see the RHNA process as caught between conflicting priorities. The clear need to address Bay Area segregation and gentrification negatives runs up against widely accepted "smart growth" theory. Smart growth memes, along with LAFCO law, artificially tight spheres of influence, UGBs, green separators, wildland urban interface arguments, and in-city protective zoning all serve to rigidly limit chances to integrate Bay Area municipalities. All the great HCD, ABAG, and RHNA social equity goals run up against the latter intentional blockades plus local, in-city protectionism and character NIMBYism. In aggregate, social equity in housing runs up against Sonoma's Green Checkmate.

Option 8A reduced the City of Sonoma's RHNA allocation from approximately 480 to 330, but it also gave Sonoma County as a whole an allocation of 17,543. I'm writing now encourage you to keep the 17,543 number and **shift a large portion or all of Sonoma County's Option 8A, 5,257 unincorporated allocation back onto County cities.**

I wrote a public comment in support of the pre-Option 8A RHNA methodology that had given the City of Sonoma the 480 number. I cited multiple policy and data-driven social equity supporting documents and local studies showing the extent of local segregation in Sonoma Valley, where the Springs area stands out like a sore thumb of poverty amidst an island of Sonoma's wealth.

Tax Credit Opportunity Area maps (2020 and 2021) are frankly not granular and accurate enough to show the actual wealth disparities in Sonoma Valley. The maps show a High Opportunity area (Buena Vista/ Lovall Valley Rd area) that can't possibly be developed for any housing equity because of UGB and SOI limitations, even though McMansions are going in this area on city water. Do wealthy foothill areas just get to skate on equity? Who pays their equity debt?

The upward wealth trend here in Sonoma and surrounding unincorporated foothill areas has vastly increased Sonoma's predominantly white property owners home values, drawn in Silicon Valley speculators. Incentives for local protectionism have increased. This while local municipal fragmentation between the City and Springs keeps the Springs on the other side of the tracks in a plantation kind of arrangement.

Smaller cities in Sonoma County have all the reasons why to not take on an aggressive integration program, and these reasons center on anti-growth character and property value protection. These are the exact same reasons that has led to some of the worst segregation in the country in the Bay Area. All the green protection, NIMBYism, and smart growth adds up to the liberal's rationale for segregation.

The facts of segregation are plain to see on the ground in Sonoma Valley. From 2000-2020, the City of Sonoma underbuilt moderate, low and very low units by 236 and overbuilt above moderate by 293, these numbers are verbatim from RHNA website data. This while nearly half of the 15,000 person unincorporated Springs population lives in Census-demonstrable poverty. The vastly disproportional Covid-19 impact on local Latino population "essential workers" is a clear indicator of the inequity here, and why the City of Sonoma needs to pay its past RHNA debt and take more of its fair share of the local housing burden going forward.

In the city's own \$25,000 Housing Our Community series, the public recommended 725 new units for the next RHNA cycle with 52% being deed-restricted affordable.

It's time to eat into some of the very ample green space in Sonoma County. There is enough open space to sacrifice some city sphere of influence areas by annexing them into cities. Nothing but half measures will happen if ABAG and the state does not force a more aggressive race and class integration program.

**For the 6<sup>th</sup> RHNA cycle, I strongly suggest keeping the total Option 8A number of 17,543 for Sonoma County.** Let the County shift a lot or all of its unincorporated allocation to its cities. Make cities deal with annexations into their spheres of influence. Infrastructure extensions are reasonable; cities have to figure out how to pay for it; otherwise we are all condemned to an apparently reasonable world of suburban apartheid. Open the castle gates here! We are not talking "growth" and "sprawl"; we are talking re-accounting for the displaced working class, and excluded brown-skinned people. Higher RHNA numbers means Sonoma is paying societal debts that need to be paid.

The Option 8A unincorporated Sonoma County number of 5,257 will put tremendous pressure on unincorporated urban service areas like the Springs if they're asked to build that much housing. The Springs area has 166 affordable units in process now that will likely be permitted before the current RHNA is certified. The Springs is also smack dab up against the wildland urban interface. This area is already cost burdened and limited geographically.

It would be fairer if cities like Sonoma took on the burden they have heretofore avoided. It would be sensible if future development here went out onto the valley floor, away from overt mountain front fire danger, and on a clear connective axis with the local county Sanitation District infrastructure. Without aggressive rezoning, and in-city affordable housing development by right with concomitant CEQA streamlining to neutralize NIMBY protectionism, the only clear pragmatic path to meet higher RHNA numbers is through high density sphere of influence annexations.

**I suggest shifting the approximately 230 City of Sonoma growth management ordinance units in its southern sphere of influence, from the County to the City's Option 8A 330 allocation, for a total of 560 for the city's revised Option 8A number. 560 is 165 units less than the 725 units an engaged public here already recommended.**