

From: [Eli Kaplan](#)
To: [Fred Castro](#)
Subject: FW: public comment to RHNA Methodology Committee and ABAG Executive Board
Date: Monday, December 14, 2020 5:25:13 PM
Attachments: [Sonoma"s RHNA debt.docx](#)

Hi Fred,

I just noticed this public comment submitted to the RHNA email yesterday. Can this be included in the public comment (email plus the attachment) for Thursday's Executive Board meeting? Thanks for your help!

Eli

From: Fred Allebach [REDACTED]
Sent: Sunday, December 13, 2020 3:30 PM
To: Regional Housing Need Allocation <rhna@bayareametro.gov>
Cc: David Rabbitt <david.rabbitt@sonoma-county.org>; Jane Riley <Jane.Riley@sonoma-county.org>; Tennis Wick <tennis.wick@sonoma-county.org>
Subject: public comment to RHNA Methodology Committee and ABAG Executive Board

External Email

Hello,

My name is Fred Allebach and I am a member of the Sonoma Valley Housing Group. I recently heard that the city of Sonoma and perhaps other ABAG cities were interested in counting excess 5th Cycle RHNA to the 6th Cycle. I also recently heard a possible city appeal of its current RHNA allocation of 330.

I'd like to point out that Sonoma has a RHNA deficit from 2000-2020 of 236 units from the very low, low and moderate categories and a surplus of 296 above moderate units. The attached data is from the ABAG RHNA website. This is hardly the kind of performance that furthers fair housing. I strongly suggest that the entire 2000-2020 Sonoma RHNA deficit be made up before any credit for Sonoma good behavior be given in any future RHNA cycles.

I'd also like to bring to your attention that the City of Sonoma held a Housing Our Community series in 2019 where the public recommended 735 new units over the next RHNA cycle with 52% being deed-restricted. There is plenty of public will here for more affordable housing.

I'm appalled that the City of Sonoma appears to not have the spine to lean into the kind and scale of housing needed to mitigate and address that it is the 18th most segregated city in the ABAG region.

https://belonging.berkeley.edu/most-segregated-and-integrated-cities-sf-bay-area?mc_cid=c604e3aa57&mc_eid=2e4bc583f0

I hope the RHNA Methodology Committee and the ABAG Executive Board will take my comments into account, and that you will consider shifting much of Sonoma County's unincorporated 6th Cycle RHNA allocation to County cities. Sonoma can take a 6th Cycle allocation of 500 at least, if not more. Low-density zoned, white suburbia has to be integrated; it's your job to hold feet to the fire.

best regards,
Fred Allebach



Fred Allebach
9/22/20

Analysis of Sonoma's RHNA Affordable Housing deficit.
from ABAG RHNA website data

There is a clear pattern in all the past RHNA progress reports from Sonoma, Sonoma County, and Bay Area, of way overbuilding market rate and way underbuilding, very low, low, and moderate income category housing. From 1999–2020, Sonoma has RHNA deficits of:
53 units for the very low category,
40 for the low category
143 for the moderate category,
and a surplus of 293 for the above moderate category.

Note, state Redevelopment money ended in 2012. RHNA staff confirmed that “permitted” is not equal to being built. The above deficits include the city's 48 SAHA units on Broadway.

1999-2006 Sonoma RHNA performance

very low: allocation 146/ permits issues 111, 76%; 24% underperformed by 35 units
low: allocation 90/ permits issued 68, 76%; 24% underperformed by 22 units
moderate: allocation 188, permits issued 66, 35%, 65% underperformed by 122 units
above moderate: allocation 260/ 587 permitted, 226%, 126% overperformed by 327 units
total allocation: 684
total permits issued: 832

2007-2014 City of Sonoma RHNA performance

very low: allocation 73/ permits issued 40, 55%; 45% underperformed by 33
low: allocation 55/ permits issued 32, 58%; 42% underperformed by 23
moderate: allocation 69, permits issued 29, 42%, 58% underperformed by 40
above moderate: allocation 156/ 84 permitted, 54%, 46% underperformed by 72
total allocation: 353
total permits issued: 185
RHNA performance avg: 52%

2015-23 RHNA city of Sonoma (75% of cycle)

very low, allocation 24, permitted 38, 158%, overperformed by 15
low, allocation 23, permitted 18, 78%, underperformed by 5
moderate 27, 46 permitted, 170%, overperformed by 19
above moderate, allocation 63, 101 permitted, 160% overperformed by 38
total allocation 137
deed-restricted 2, non-deed-restricted 37
total permitted 37
RHNA performance 27%