

City of Sonoma

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September 17, 2020

Housing Methodology Committee Members
VIA ELECTRONIC MAIL

ASSOCIATION OF BAY AREA GOVERNMENTS
375 Beale Street, Suite 700
San Francisco, CA 94105

Re: City of Sonoma Comments on 6th Cycle RHNA Methodology

Dear Mayor Arreguín, Housing Methodology Committee Members, and ABAG Staff:

The City of Sonoma appreciates your continued and assiduous efforts to develop a methodology for equitably allocating the San Francisco Bay Area's housing needs for the 6th Cycle Housing Element planning period. We know this effort is more challenging than in the past and we recognize the valuable contributions of staff and Housing Methodology Committee (HMC) members and the many hours that have been spent to get to where we are today. The City of Sonoma is fully committed to increasing the supply of housing and expanding the variety of housing types available in our community, including affordable housing. We provide below our initial staff comments to help you understand the dramatic effect upon our City should a significant increase in our assigned RHNA (as currently envisioned and projected using the "Visualization Tool") be adopted by the HMC on September 18th, 2020.

Sonoma has a rich past and was incorporated in 1883. However, it was laid out as a "pueblo" much earlier than that by General Vallejo in 1835 and had its first Town Council in 1844. Without belaboring the fact, Sonoma was and is the birthplace of the California Republic and home of the Bear Flag Rebellion in 1846.

Today, Sonoma has an area of 2.7 square miles and has a population (according to the State Department of Finance, Demographic Research Unit) of 11,050. The City lost population in 2019 of 114 people which translates (with a population per household of 2.10) to 54 households being lost. Of greater note, the City of Sonoma's population in 1970 was 4,112, meaning that its growth over the past 50-year period has been 6,938 people with an annual growth rate average of 139 people. Sonoma is known as a small and slow growing community.

Just as ABAG considers jobs, transit, and high opportunity areas as weighing factors in its model, land supply constraints and other factors also should be considered as outlined below:

1. The City of Sonoma is NOT “Urbanized” according to the US Census.¹

The reason for explaining the aforementioned small rate of growth above, is to articulate and support the fact that the City of Sonoma is not an urbanized city in spite of being lumped together with other cities in Sonoma County (and others in the Bay Area) when it comes determining an appropriate number of units in the forthcoming 6th Cycle RHNA process. As can be seen from the attached 2010 Census map, the City of Sonoma is NOT within an “Urbanized Area” as defined by the US Census in 2010 nor will it be in 2020 and must not be considered and treated as such.

Sonoma is 10.25 miles east of the Santa Rosa Urbanized Area - #79498 “as the crow flies” (near the southerly edge of the City of Cotati and the City of Santa Rosa), but more importantly, 8.5 miles from the Santa Rosa “Urbanized Area” along State Highway 12 corridor where it ends at the small locale of Kenwood in the unincorporated County. The southeasterly limits of the City of Santa Rosa are a total of 11 miles from Sonoma’s northwesterly city limits along that same State Highway 12 corridor.

2. The City of Sonoma is within a defined “Urban Cluster” along with the City of Cloverdale. The rest of the Cities within Sonoma County are within an “Urbanized Area”.

The City of Sonoma is located within an “Urban Cluster - #83008” as defined by the US Census (See attached 2010 Census map) and is the only City within the “Sonoma Valley”. Per the 2010 Census, Sonoma Valley had a total area of 12.43 square miles of which the City’s then and now total area of 2.7 square miles is 22% of the total. Sonoma Valley’s population in that same Census was 32,678 and the City of Sonoma’s was 10,648 – at just below 33% of the total. The Census also reported that the City of Sonoma had 5,544 households or 37.85% of Sonoma Valley’s 14,664 total household units. The City of Sonoma is basically one-third of the Sonoma Valley and has a much lower population per square mile than communities with the Santa Rosa “urbanized area”. As a comparison, Sonoma Valley’s population (which includes unincorporated County areas **and** the City of Sonoma) is 32,678, as compared to the aggregate “Urbanized” population of the Cities of Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol and Windsor for a population of 338,000.

3. The City of Sonoma will receive a higher numerical increase of its RHNA than all 7 other Cities that are within an “Urban Cluster” within ABAG’s territory.

There is a total of 101 cities within ABAG’s territory and 7 of them are within designated “Urban Clusters”. This means that 94% of the Cities are within “Urbanized Areas”. These 7 “Urban Cluster” cities are listed below according to size of population:

¹ The Census Bureau identifies two types of urban areas: “urbanized areas” of 50,000 or more people and “urban clusters” of at least 2,500 and less than 50,000 people. There are 486 “Urbanized Areas” and 3,087 “Urban Clusters” nationwide. ABAG has 101 Cities within its 12 “Urbanized Areas” and 7 cities within its 7 “Urban Clusters”.

	<u>Name of Jurisdiction</u>	<u>County</u>	<u>Population (approx.)</u>	<u>Area in Sq. miles</u>
1.	Yountville	Napa	3,000	1.5
2.	Calistoga	Napa	5,000	2.6
3.	St. Helena	Napa	6,000	5.0
4.	Rio Vista	Solano	10,000	7.0
5.	CITY OF SONOMA	SONOMA	11,000	2.7
6.	Half Moon Bay	San Mateo	12,000	6.2
7.	Dixon	Solano	20,000	7.2

The above Cities need to be assigned a RHNA more in line with their size and the fact that they are designated as communities within an “Urban Cluster”

Based on preliminary calculations identified by ABAG staff in “Appendix 5: Comparison of Allocation Results”, dated September 3, 2020, the 7 “Urban Cluster” cities will be impacted as shown below (in order of numerical increase):

	<u>Name of jurisdiction</u>	<u>5th Cycle RHNA</u>	<u>6th Cycle RHNA</u>	<u>% increase</u>	<u>Num. Diff.</u>
1.	SONOMA	140	480	(243%)	340
2.	Dixon	200	500	(300%)	300
3.	Calistoga	30	280	(833%)	250
4.	Half Moon Bay	240	490	(104%)	250
5.	St. Helena	30	250	(733%)	220
6.	Yountville	20	120	(500%)	100
7.	Rio Vista	300	290	-(3.3%)	-10

As can be seen, the City of Sonoma has the highest numerical increase for the above listed seven small Cities that are within an “Urban Cluster”.

4. The City of Sonoma is not considered “urbanized” by the Census, yet the current HMC methodology assigns LOWER (or equal) 6th Cycle RHNA’s to 13 cities that ARE considered “urbanized” by the Census. This is an illogical outcome. See chart below based on size of population of urbanized Cities that have a projected RHNA of 480 units or less:

	<u>Jurisdiction</u>	<u>Population</u>	<u>5th Cycle (RHNA)</u>	<u>6th- Cycle (RHNA)</u>	<u>% increase</u>
1.	Belvedere	2,000	20	120	(500%)
2.	Colma	2,000	60	300	(400%)
3.	Ross	3,000	20	90	(350%)
4.	Monte Sereno	4,000	60	150	(150%)
5.	Portola Valley	5,000	60	200	(233%)
6.	Woodside	6,000	60	320	(433%)
7.	Atherton	7,000	90	360	(300%)

8. Fairfax	7,000	60	400	(566%)
9. Cotati	8,000	140	330	(135%)
10. Los Altos Hills	8,000	120	430	(258%)
11. Cloverdale	9,000	210	360	(71%)
12. Tiburon	10,000	80	480	(500%)
SONOMA	11,000	140	480	(340%)
13. Healdsburg	12,000	160	450	(181%)

5. The City of Sonoma is NOT a transit or jobs rich community as it is 15 miles (a 25-minute drive) away from the major North Bay travel corridor of US Highway 101 at Petaluma and 25 miles (a 40-minute drive) away from it in Santa Rosa.

Unlike other cities in Sonoma County (with the exception of the City of Cloverdale), the City of Sonoma is located 25 miles to the north from the connection with US Highway 101 in Santa Rosa and 15 miles to the US Highway 101 connection from the south in Petaluma. The City of Sonoma employs 38 people. The City’s largest employer is Sonoma Valley Hospital with 360 employees.

Sonoma County Transit provides bus service between Sonoma, Sonoma Valley, and the US-101 Corridor. A major constraint to increased transit use is geography. Sonoma lies away from the major North Bay travel corridor along Highway 101, making express service to job centers such as Santa Rosa and San Francisco expensive. Sonoma Valley has a dispersed population and low densities that are not conducive to cost-effective transit provision. The data below demonstrates the low daily ridership of transit service to and from the City of Sonoma:

Transit service to and from Sonoma to Santa Rosa (Ridership for 6-month period)
September, 2019 thru February, 2020

Route #	Daily Average Ridership	Notes:
Route #30	251	To Santa Rosa. Operates from 5:50am to 7:30 pm weekdays with <u>90-minute headways</u> with 4 trips on Saturdays and Sundays from 8:15am to 5:00pm.
Route #32	202	Local service, no service on Sunday.
Route #34	15	To Santa Rosa. Commuter service only (one trip per direction). Monday through Friday with 1-4 trips. No service on Saturday or Sunday.
Route #38	7	To San Rafael Transit Center.
Route #40	28	To Petaluma Transit Mall.

Clearly, the City of Sonoma is not located in close proximity to job centers along major transportation routes to justify transit connections with more frequent headways.

The City of Sonoma is committed to adding housing and affordable housing for our community. Over the last few years, the City has allocated \$160,000 in funds from the City's recently established Housing Trust Fund (HTF) to be used for rental and utility payment assistance needs for Very Low Income, Low Income and Moderate Income households due to the declared COVID-19 Pandemic. In 2019 the City adopted non-residential impact fees for affordable housing and since 2003, has had a requirement for new subdivisions to include 20% of its units for households that are in the "low" and "moderate" income categories. Notwithstanding the above, the methodology under development by the HMC is not realistic and does not align with the broader policy goals of placing housing along transit and employment corridors.

The City of Sonoma will continue to search for creative solutions to substantially increase housing production in the future and we urge the HMC to continue to refine its model to include an adjustment or weighing factor for smaller cities that have been acknowledged by ABAG (through its prior forecasts) to have limited growth potential. Our community stands ready to plan for a higher RHNA than we've seen in the past and ask that you give due consideration to the factors listed above that inform local land use decisions.

If you have questions, please contact David Storer, Planning Director, at dstorer@sonomacity.org or 916-502-7341.

Sincerely,

CITY OF SONOMA



Cathy Capriola
City Manager



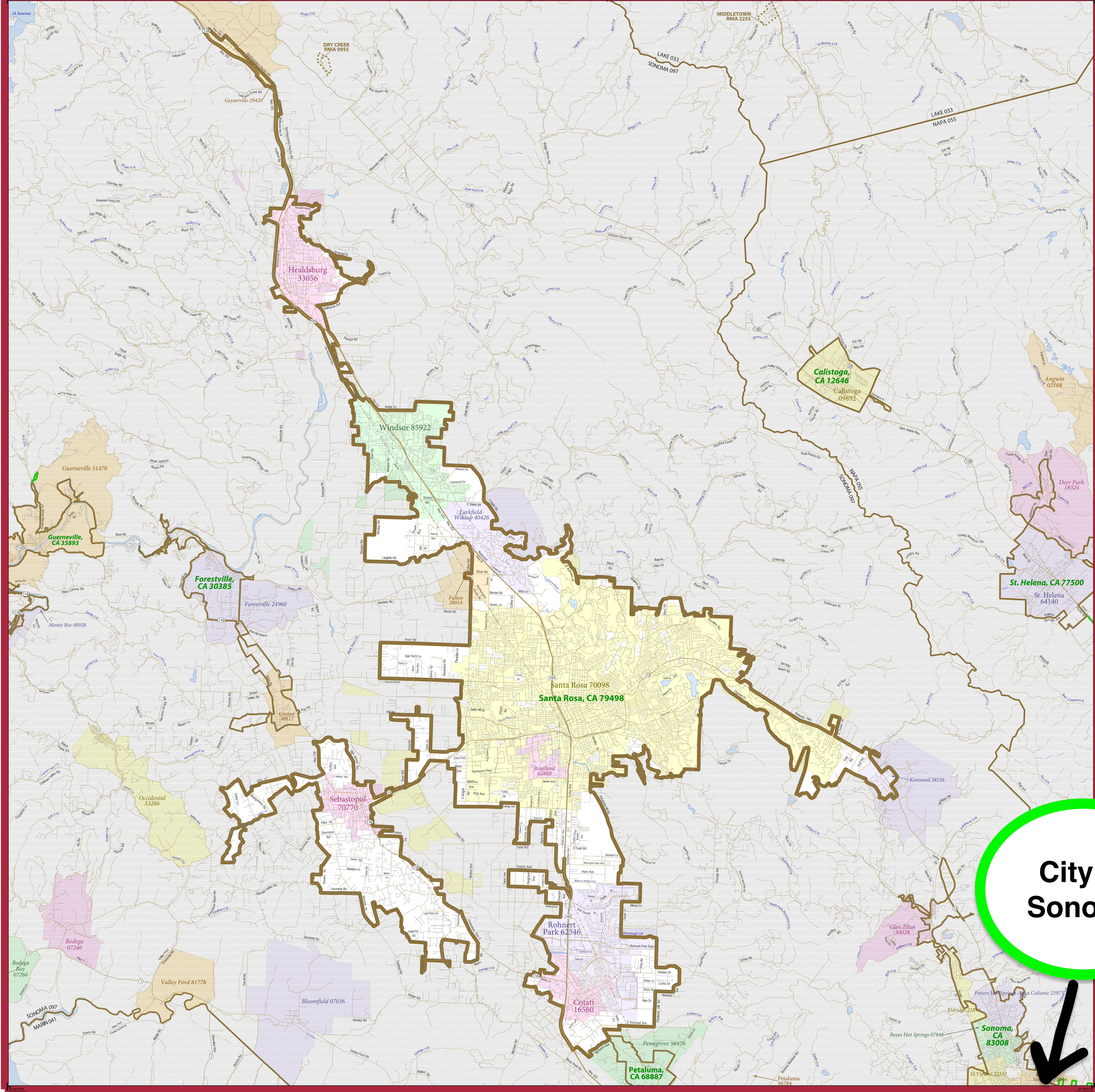
David A. Storer, AICP
Planning and Community
Services Director

Attachments:

- 1) Map – 2010 Census "Urbanized Area Reference Map: Santa Rosa, CA"
- 2) Map – 2010 Census "Urban Cluster Reference Map: Sonoma, CA"
- 3) Map – Administrative boundaries -

CC: City Council
Planning Commission
ABAG Regional Housing Needs Allocation Staff, via RHNA@bayareametro.gov
Dave Vautin, AICP, ABAG Assistant Director, Major Plans via dvautin@bayareametro.gov
Gillian Adams, Principal Planner, RHNA via gadams@bayareametro.gov
Ada Chan, ABAG Regional Planner, via achan@bayareametro.gov
Paul Fassinger, Regional Planning Program, Bay Area Metro, via pfassinger@bayareametro.gov

2010 CENSUS - URBANIZED AREA REFERENCE MAP: Santa Rosa, CA



SYMBOL DESCRIPTION		LEGEND	
International	--- ---	CANADA	
Federal American Indian Reservation	L'ANSE RES 1880	
Off-Reservation Trust Land	T1880	
Urbanized Area	Dover, DE 24580	
Urban Cluster	Toole, VT 88057	
State (or statistically equivalent entity)	--- ---	NEW YORK 36	
County (or statistically equivalent entity)	--- ---	ERIE 029	
Minor Civil Division (MCD) ^{1,2}	--- ---	Bristol town 07485	
Consolidated City	MILFORD 47500	
Incorporated Place ³	Davis 18100	
Census Designated Place (CDP) ³	Incline Village 35100	

DESCRIPTION	SYMBOL	DESCRIPTION	SYMBOL
Interstate	Water Body
U.S. Highway	Military
State Highway	Outside Subject Area
Other Road		
Railroad		
Perennial Stream		
Intermittent Stream		

Where international, state, county, and/or MCD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.

1 A ** following an MCD name denotes a false MCD. A *** following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2 MCD boundaries are shown in the following states in which some or all MCDs function as general-purpose governmental units: Connecticut, Illinois, Indiana, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Dakota, Ohio, Pennsylvania, Rhode Island, South Dakota, Vermont, and Wisconsin. (Note that Illinois and Nebraska have some counties covered by nongovernmental precincts and Missouri has most counties covered by nongovernmental townships.)

3 Place label color corresponds to the place fill color.
Label colors: Davis Davis Davis Davis Davis

SUBJECT AREA COUNTIES ON MAP SHEET
06097 Sonoma

City of Sonoma



All legal boundaries and names are as of January 1, 2010. Urban areas are based on results from the 2010 Decennial Census. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Geographic Vintage: 2010 Census (reference date: January 1, 2010)
Data Source: U.S. Census Bureau's MA/TIGER database (TAB10)
Map Created by Geography Division: March 11, 2012

U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration U.S. Census Bureau

Projection: Albers Equal Area Conic
Datum: NAD83
Spheroid: GRS 80
1st Standard Parallel: 34 06 27
2nd Standard Parallel: -40 25 20
Central Meridian: -119 18 20
Latitude of Projection's Origin: 32 31 43
False Easting: 0
False Northing: 0

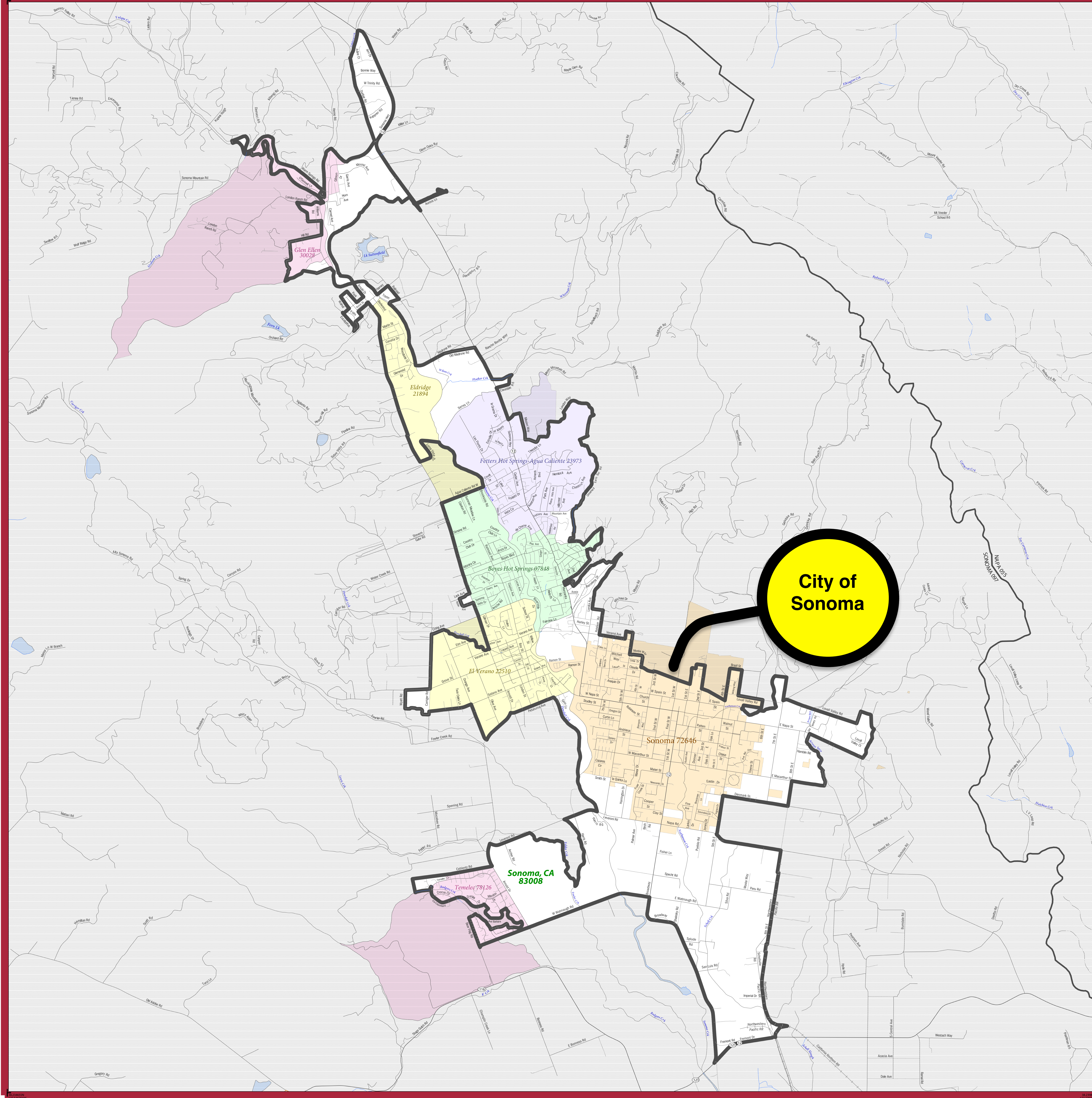
The plotted map scale is 1:62137



PARENT SHEET 1
Total Sheets: 1
Index Sheets: 0
Parent Sheets: 1

UA NAME: Santa Rosa, CA
UA CODE: 79498
ENTITY TYPE: Urbanized Area (UA)
ST: California (06)

2010 CENSUS - URBAN CLUSTER REFERENCE MAP: Sonoma, CA



LEGEND	
SYMBOL DESCRIPTION	LABEL STYLE
International	CANADA
Federal American Indian Reservation	L'ANSE RES 1880
Off-Reservation Trust Land	T1880
Urbanized Area	Dover, DE 24580
Urban Cluster	Toolee, VT 88057
State (or statistically equivalent entity)	NEW YORK 36
County (or statistically equivalent entity)	ERIE 029
Minor Civil Division (MCD) ^{1,2}	Bristol town 07485
Consolidated City	MILFORD 47500
Incorporated Place ³	Davis 18100
Census Designated Place (CDP) ³	Incline Village 35100

DESCRIPTION	SYMBOL	DESCRIPTION	SYMBOL
Interstate		Water Body	
U.S. Highway		Military	
State Highway		Outside Subject Area	
Other Road			
Railroad			
Perennial Stream			
Intermittent Stream			

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Label colors: Davis Davis Davis Davis Davis

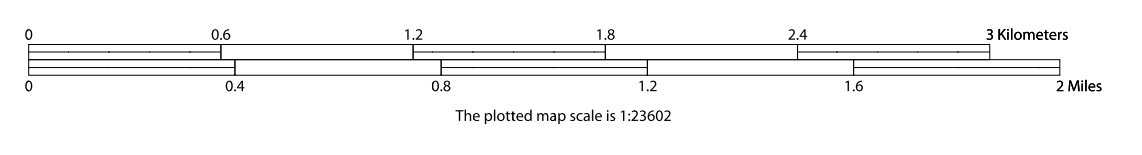
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U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration U.S. Census Bureau

Projection: Albers Equal Area Conic
Datum: NAD 83
Spheroid: GRS 80
1st Standard Parallel: 34 06 27
2nd Standard Parallel: 40 25 20
Central Meridian: -119 18 20
Latitude of Projection's Origin: 32 31 43
False Easting: 0
False Northing: 0



PARENT SHEET 1
Total Sheets: 1
Index Sheets: 0
Parent Sheets: 1

UC NAME: Sonoma, CA
UC CODE: 83008
ENTITY TYPE: Urban Cluster (UC)
ST: California (06)

Sonoma County Administrative Area Boundaries

