REGIONAL HOUSING NEEDS ALLOCATION

Association of Bay Area Governments

2023-2031 Regional Housing Needs Assessment (RHNA) Appeal Request

Submit appeal requests and supporting documentation via DocuSign by 5:00 pm PST on July 9, 2021.

Late submissions will not be accepted. *Send questions to* ***rhna@bayareametro.gov***

Jurisdiction Whose Allocation is Being Appealed: County of Sonoma

Filing Party: ○ HCD ⊗ Jurisdiction: County of Sonoma

Contact Name: Brian Oh, AICP

Title: Planning Manager

Phone: 707-565-1931

Email: brian.oh@sonoma-county.org

APPEAL AUTHORIZED BY:

Name: Tennis Wick

Signature: DocuSigned by: Tennis Wick AE16B00E5BC047C...

Date: 7/9/2021

PLEASE SELECT BELOW:

- ○ Mayor
- ○ Chair, County Board of Supervisors
- ○ City Manager
- ○ Chief Administrative Officer
- ⊗ Other: Director

IDENTIFY ONE OR MORE BASES FOR APPEAL [Government Code Section 65584.5(b)]

☒ ABAG failed to adequately consider information submitted in the Local Jurisdiction Survey regarding RHNA Factors (Government Code Section 65584.04(e)) and Affirmatively Furthering Fair Housing (See Government Code Section 65584.04(b)(2) and 65584(d)(5)):

- ☐ Existing and projected jobs and housing relationship.
- ☒ Sewer or water infrastructure constraints for additional development due to laws, regulatory actions, or decisions made by a provider other than the local jurisdiction.
- ☒ Availability of land suitable for urban development or for conversion to residential use.
- ☐ Lands protected from urban development under existing federal or state programs.
- ☒ County policies to preserve prime agricultural land.
- ☐ Distribution of household growth assumed for Plan Bay Area 2050.
- ☐ County-city agreements to direct growth toward incorporated areas of county.
- ☐ Loss of units contained in assisted housing developments.
- ☐ Households paying more than 30% or 50% of their income in rent.
- ☐ The rate of overcrowding.
- ☐ Housing needs of farmworkers.
- ☐ Housing needs generated by the presence of a university campus within a jurisdiction.
- ☐ Housing needs of individuals and families experiencing homelessness.
- ☐ Loss of units during a declared state of emergency from January 31, 2015 to February 5, 2020.
- ☐ The region's greenhouse gas emissions targets to be met by Plan Bay Area 2050.
- ☒ Affirmatively furthering fair housing.

☒ ABAG failed to determine the jurisdiction's Draft RHNA Allocation in accordance with the Final RHNA Methodology and in a manner that furthers, and does not undermine the RHNA Objectives (see Government Code Section 65584(d) for the RHNA Objectives).

☒ A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted in the Local Jurisdiction Survey (*appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change occurred*).

Pursuant to Government Code Section 65584.05, appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d). An appeal shall be consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy (Plan Bay Area 2050 Final Blueprint). (Click here)

Number of units requested to be reduced or added to jurisdiction's Draft RHNA Allocation:

⊗ Decrease Number of Units: 1971 ○ Increase Number of Units: _____

Brief description of appeal request and statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d) and how the revision is consistent with, and not to the detriment, of the development pattern in Plan Bay Area 2050. Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

The County of Sonoma contends this revision is necessary to further the intent of the five RHNA objectives listed in Government Code Section 65584(d) on three foundational issues. Each of these basis are supported by data and documentation that is provided in the attached supporting documents.

1. ABAG failed to adequately consider information submitted or readily available pursuant to Government Code § 65584.04(b).

2. ABAG failed to determine the share of the regional housing need in a manner that furthers and does not undermine the intent of the objectives listed in subdivision (d) of Section 65584.

3. A significant unforeseen change in circumstances has occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The revision is consistent with, and not to the detriment, of the development pattern in Plan Bay Area 2050. The County's proposal is necessary to ensure success in planning for and providing housing to meet our significant housing needs while limiting increases in Vehicle Miles Traveled, reducing greenhouse gasses, and affirmatively furthering fair housing – all important goals of the State, the region, the County, and Plan Bay Area 2050.

Denying the County's appeal and moving forward with the most recent draft allocation would ignore the actual real world limitations on the amount and location of urban lands within the unincorporated county. This proposal will further the housing and Plan Bay Area objectives in a more meaningful way by adhering to the adopted RHNA methodology while incorporating actual data and information as well as prioritizing social equity.

List of supporting documentation, by title and number of pages

1. Appeal Cover Letter, 4 pages
2. Appeal Basis and Documentation, 56 pages
3. _____

The maximum file size is 25MB. To submit larger files, please contact rhna@bayareametro.gov.

Click here to attach files

permit SONOMA

County of Sonoma
Permit & Resource Management Department

09 July 2021

Therese McMillan, Executive Director
Association of Bay Area Governments
375 Beale Street
San Francisco, California 94105

By E-Mail and Electronic Submittal
rhna@bayareametro.gov

RE: DRAFT REGIONAL HOUSING NEEDS DETERMINATION APPEAL

Dear Director McMillan:

Sonoma County has demonstrated its commitment to affordable housing. Since 2007, our county has facilitated the construction of 2,579 homes in compliance with state requirements. We have championed density bonuses, innovative environmental projects, and other award winning programs to bring housing equity to our community. In spite of these efforts, the County has received an unacceptable, manifold increase in our next housing allocation. I appeal this determination.

Sonoma County has been a leader in balancing environmental protection with housing. Our voters have approved urban growth boundaries around all of our cities, supported by community separators and an agricultural preservation and open space district that purchases parcels and easements. All ten local governments have adopted general plans focused on city-centered growth, especially transit oriented development around our SMART rail stations.

The County of Sonoma commends the Association of Bay Area Governments (ABAG) for developing a methodology to distribute the State Department of Housing and Community Development's (HCD) Regional Housing Need Determination (RHND) of 441,111 housing units for 2023-2031. The County appreciates the effort citizens, housing advocates, local agency officials, and ABAG/ Metropolitan Transportation Commission (MTC) staff have contributed to the Regional Housing Need Allocation (RHNA) process. I especially thank Gillian Adams, Dave Vautin and Aksel Olsen for their assistance as staff worked through this process. While staff may not agree on all the details in data collection, analysis, and incorporation into the RHNA process, we share the goal of a better Bay Area by vastly increasing housing, especially for those with lower incomes.

I also applaud the work of the Housing Methodology Committee (HMC). Over the course of a year, HMC meetings culminated in a methodology that generally meets the five statutory objectives of RHNA. The County strongly supports regional planning as part of Plan Bay Area. The RHND numbers assigned to ABAG from HCD were based on state Department of Finance (DOF) growth estimates rather than on the more appropriate growth projections from Plan Bay Area. While I would prefer the State adjust these numbers to respond to California's recent population losses and the global pandemic, ABAG does not control the assigned RHND.

The unincorporated County of Sonoma has received a draft RHNA of 3,881 units, a 654% increase over its 5th cycle RHNA of 515 units. As previously indicated, the County has met its existing housing needs; it is ready and willing to do more. Please consider its record of accomplishments.

1. During the 5th cycle, the County adopted four sets of ordinances to remove barriers and increase opportunities for affordable housing by providing for a full range of housing types by-right.

2. For 18 years, the County has authorized multi-family housing projects by right.

3. We have won awards for our generous and well-utilized 100% density bonus program for rental housing, available for 20 years to non-profit and for-profit developers.

4. The County has just completed an EIR for the rezoning of 59 housing sites within our scarce urban areas where sewer is available or planned to be available.

Sonoma County encourages the development of high-density and affordable housing, but it can only be realized in areas with sewer available or planned. **EXPANSION OF SEWER SERVICES OUTSIDE OF THE COUNTY'S DESIGNATED URBAN SERVICE AREAS IS PROHIBITED BY STATE AND LOCAL REGULATIONS AND WOULD REQUIRE A VOTE OF ITS CITIZENS.**

ABAG has long held that a RHNA assignment to unincorporated areas does not dictate housing density or location; the County determines those factors. The County of Sonoma concurs with this approach if it can place housing close to transit and services. Higher density development, especially for lower-income households, must be supported by proximity to the transit, jobs, and services that are found typically within cities. Housing sites zoned for medium and high densities must be located in areas where sewer is available. The County has a limited amount of land with sewer service.

Medium- and high-density housing cannot develop in rural areas without sewer because of poorly-drained soils and other constraints on onsite wastewater treatment systems (OWTS). For example, construction of a 10 one-bedroom unit development on a 1-acre rural parcel with no constraints would require 1.2 acres of land dedicated to an OWTS

under County and State regulations. This fact demonstrates projects relying on OWTS cannot support the type of density necessary to meet the draft RHNA.

I understand that the County general plan and zoning do not factor into either the establishment of the RHNA or this appeal. However, these fundamental land use documents provide a foundation of city-centered growth policies for Sonoma County and each of its cities. Since 1979, the County's general plan has encouraged city-centered growth to protect agricultural land, reduce vehicle travel, and place housing near services it requires. County voters have enacted urban growth boundaries and community separators around all nine cities to protect agricultural and open space lands and to ensure that development only occurs within the cities.

The County has demonstrated its commitment to providing its responsible share of regional housing within the physical constraints of our land. Unfortunately, ABAG's failure to consider urban areas where sewer is available has resulted in the unincorporated county receiving a draft RHNA that is higher than 8 of our 9 incorporated cities, despite the fact that our projected 7% population growth rate is one of the lowest in our sub region and in the entire Bay Area. Please refer to Methodology, pages 28 and 29.

The unincorporated County's actual land area suitable for urban development of any type amounts to 14.5 square miles, similar in size to urban land areas of cities shown below.

Table1: ABAG jurisdictions with similar urban land areas, with draft 6th cycle RHNA allocations

Jurisdiction	Square Miles	Draft RHNA Allocation	Allocation per square mile of urban land
Sonoma County (unincorporated)	14.50	3,881	270.83
Petaluma	14.38	1,910	132.82
Newark	13.87	1,874	135.11
Milpitas	13.59	1,803	132.67
Lafayette	15.22	2,114	138.89
Brentwood	14.79	1,522	102.91
Dublin	14.91	3,719	249.42

As shown in the Table above, the draft RHNA allocation for unincorporated Sonoma County inexplicably exceeds that of the other Bay Area jurisdictions with similarly sized urban areas. Even Dublin, with two BART stations and a population of 544,107 residents, has a lower draft RHNA allocation than unincorporated Sonoma County. This misdistribution directly violates Plan Bay Area objectives, the Blueprint Growth

Geographies, city-centered growth and the statutory objectives of RHNA.

The County's urban land area is just slightly larger than that of the City of Petaluma which has a draft RHNA of 1,910 units. **The County requests that its RHNA allocation be revised downward from 3,881 units to 1,910 units**, similar to the draft allocation for the City of Petaluma which has about the same urban land area. This revised allocation represents a more reasonable 271% increase over the 5th Cycle RHNA, still much higher than the 135% RHNA increase across the Bay Area but much more reflective of the city-centered growth geographies and greenhouse gas reduction targets of the draft Plan Bay Area 2050.

The sheer volume of ABAG's draft RHNA forces the County to zone lands for high-density and to locate affordable housing units into areas of low economic opportunity, exacerbating unfair housing conditions rather than promoting better land uses and opportunities for residents as required by SB 686 (Affirmatively Furthering Fair Housing). Please refer to **Sonoma County | ACS Poverty Status Last 12 Months.**

Sonoma County has demonstrated its commitment to providing a responsible share of regional housing. The County remains committed to increasing housing in the next RHNA cycle. However, the allocation of 3,881 units will result in the zoning of rural land incapable of treating sewage for this density in violation of County and State regulations. The draft RHNA also makes it difficult to reconcile conflicting State mandates - Firesafe, Vehicle Miles Traveled, Fair Housing, and Drought Emergency laudably fostering city centered growth with a 654% draft RHNA increase spawning sprawl, fire risk, water waste, environmental pollution and inequitable housing.

I look forward to ABAG's favorable consideration of this appeal. If you have any questions or concerns, please contact me at Tennis.Wick@Sonoma-County.org or 707-565-1925.

Sincerely,

Tennis Wick

Digitally signed by Tennis Wick
Date: 2021.07.09 12:01:49 -07'00'

Tennis Wick, AICP
Director

cc: Chair Lynda Hopkins and the Board of Supervisors
Sheryl Bratton, Chief Administrative Officer
Scott Orr, Deputy Director, Planning Division
Brian Oh, AICP, Comprehensive Planning Manager

permit SONOMA

County of Sonoma
Permit & Resource Management Department

July 9, 2021

submitted electronically & emailed to

rhna@bayareametro.gov

Sonoma County Appeal of Draft RHNA Allocation for 2023-2031

The County of Sonoma (County) appeals ABAG's Draft Housing Unit Allocation (Draft Allocation) for the Sixth Housing Element Cycle (2023-2031) (the "Sixth Cycle").

I. Introduction

Sonoma County's Draft RHNA for the Sixth Cycle is 3,881 units, which is an increase of 654% over the County's allocation of 515 units in the current (Fifth) Housing Element cycle. By contrast, the increase for the Bay Area as a whole is 135%. While the County continues to demonstrate its commitment to meeting the current and future housing needs of its population and to carrying its fair share of the region's housing need, its draft RHNA allocation demonstrates that ABAG failed to meet the statutory mandate to consider and incorporate into the methodology information submitted about key local planning factors. This failure to obtain, consider and incorporate data about local factors produced a draft RHNA allocation for Sonoma County that fails to meet fair housing goals; as discussed in this appeal, the size of the RHNA allocation will force Sonoma County to concentrate the sites it makes available for lower-income units in areas that are already under-resourced, with populations that are already burdened. Finally, critically important water supply circumstances have changed since February 2020 that necessitate a reduction in the County's draft RHNA allocation.

Sonoma County submitted and referenced this information, which was also available to ABAG in a variety of widely accepted and publicly available documents In particular, the County focused on information to address several of the factors specified in Government Code § 65584.04(e), including: information about availability of urban services such as sewer; legal constraints on extension of urban services infrastructure outside of designated urban service areas; availability of and regulatory constraints on surface water supplies for urban users; and information about the importance of, and limitations on, groundwater supplies in the context of identified Priority Groundwater Basins and geologic constraints. The draft RHNA for Sonoma County is inequitable, inconsistent with increases allocated across other jurisdictions, and wholly incompatible with both the statutory objectives of RHNA and the community-centered growth policies and greenhouse gas reduction targets of Plan Bay Area.

II. Summary of Bases for Appeal and Request for RHNA Revision

In its determination of Sonoma County's draft RHNA, ABAG failed to consider data and information that was submitted, offered, and widely available about key local RHNA factors outlined in Government Code Section 65584.04(e), and affirmatively furthering fair housing pursuant to Government Code Sections 65584.04(b)(2) and 65584(d)(5). The County requests revisions to its Draft RHNA allocation under all three bases specified in Government Code § 65584.05, for the reasons summarized below and discussed in detail in this appeal.

Basis 1 (Gov. Code § 65584.05(b)(1)): ABAG failed to adequately consider information submitted or readily available pursuant to Government Code § 65584.04(b). County contends that ABAG failed to adequately consider the availability of urban services (sewer and water) to the lands within the county such that they might be developed with urban uses, including housing. Specifically, ABAG failed to adequately consider information provided as a part of the survey conducted under 66584.04 related to the availability and adequacy of urban services to allow the urban development of unincorporated land. Additionally, although the GIS layers were repeatedly offered, ABAG failed to consider Urban Service Area boundaries, which are reflective of LAFCO Spheres of Influence (when around incorporated areas) and sewer district boundaries, and designate where urban services exist or are planned to exist. *Changes to district boundaries, such as would be needed to extend sewer services, are under LAFCO's authority and are not within the jurisdiction of the County*.

Basis 2: 65584.05(b)(2): ABAG failed to determine the share of the regional housing need in a manner that furthers and does not undermine the intent of the objectives listed in subdivision (d) of Section 65584, specifically with respect to RHNA Objective 1 (increasing the housing supply in an equitable manner), Objective 2 (promoting socioeconomic equity, protecting environmental resources, and encouraging efficient development patterns that help the region to achieve its greenhouse gas reduction targets); Objective 4 (balancing disproportionate household income distributions by not forcing more low-income units into lower-income areas); and Objective 5 (ABAG's Draft RHNA allocation fails to affirmatively further fair housing by perpetuating existing patterns of segregation and poor socioeconomic outcomes.

Basis 3: 65584.05(b)(3): Significant unforeseen changes in circumstances have occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04. While the drought impacts all of California, Sonoma County and the Russian River watershed are substantially more vulnerable to drought due to the nature of the watershed and surface water supply infrastructure. Due to the severity of local drought conditions, Sonoma and Mendocino counties had the unfortunate distinction of being the first two counties to warrant a gubernatorial declaration of emergency due to the drought. In addition, the State Water Resources Control Board issued an emergency regulation in late June for curtailment of surface water diversions in the Russian River watershed to the minimum necessary to maintain public health and safety, in order to protect remaining reservoir supplies and maintain minimum instream flows for federally protected fish species. In addition, a key source of surface water supplies, the future of the Potter Valley Hydroelectric Project has become even more uncertain.

Overall, the County's requested RHNA revisions are necessary to ensure success in planning for and providing housing to meet our significant housing needs, while also affirmatively furthering fair housing and meeting other key objectives such as limiting increases in Vehicle Miles Traveled and

reducing greenhouse gas emissions--all important goals of the State and of Plan Bay Area 2050. Denying the County's appeal and finalizing its current draft allocation would ignore the real-world limitations on the amount and location of urban lands in unincorporated Sonoma County. The County's proposed revisions further RHNA and Plan Bay Area objectives in a more meaningful way by adhering to the adopted RHNA methodology while incorporating actual data and information and advancing social equity.

When local factors affecting the potential for urban development are appropriately considered--including those factors involving supply constraints and service decisions that are out of the County's control--the available unincorporated urban land area is reduced to approximately 14.5 square miles, an area slightly smaller than that of the City of Petaluma. Petaluma has a draft RHNA of 1,910 units. **Accordingly, the County requests that its draft RHNA allocation be revised downward from 3,881 units to 1,910 units.** This represents a more reasonable 271% increase over the County's Fifth Cycle RHNA and is still much higher than the region-wide average, but still compatible with the city-centered growth geographies and GHG reduction targets in the draft Plan Bay Area 2050.

III. **Discussion**

Background

On September 29, 2020, Sonoma County and its cities provided written comments to ABAG objecting to the inaccuracy and inadequacy of data collected by ABAG on local conditions and the resulting assumptions and highlighting the lack of transparency in ABAG's failure to demonstrate how that local data was incorporated into the RHNA methodology (Attachment 2a). That letter, and all other submissions by the County to ABAG as part of the RHNA process, are incorporated here by reference. ABAG/MTC and Plan Bay Area staff met repeatedly with the County and its cities to review and attempt to correct much of the data that ABAG used in its BASIS model to project household growth for the draft Plan Bay Area 2050. The County greatly appreciates the time spent by you and your staff to discuss the methodology and data used and explain why the methodology resulted in such a large increase in the unincorporated County's RHNA obligation. In summary, and as was stated many times during those meetings, the primary driver for County's huge RHNA increase was existing households in the unincorporated county, which were projected to increase within rural areas without any offset for the physical and regulatory constraints that substantially limit such growth in the unincorporated County. The number of existing households, when used in the Plan Bay Area "projected 2050 households" formula that became the baseline in the adopted RHNA methodology, yielded the County's very high draft RHNA obligation. Although state law requires ABAG to consider and incorporate information about the local factors identified in Gov. Code § 65584.04(e), that information was plainly not incorporated into the methodology if the sole driver of the County's 654% RHNA increase is the number of existing households.

The County recognizes and agrees with the Department of Housing and Community

Development (HCD) and ABAG that many suitable urban lands across the Bay Area and in Sonoma County should be converted to residential use, or to mixed-use areas that can also accommodate 100% residential developments. The County further understands and agrees that ABAG has only assigned RHNA numbers to its jurisdictions, and that it is up to the local jurisdictions to determine *where* the allocated units and higher densities would go. However, as discussed in this appeal, Sonoma County's excessive RHNA allocation will force the County to zone for a disproportionately high concentration of its lower-income population in areas on the outskirts of cities, where poverty rates are highest and socioeconomic outcomes are lowest. A more equitable RHNA allocation would allow the County to continue to affirmatively further fair housing by placing a higher percentage of zoning for its lower-income households in higher opportunity areas, within unincorporated urban service areas where urban services are available or could be made available within the Sixth Cycle planning period.

Appeal Basis 1 (Gov. Code § 65584.05(b)(1)): ABAG failed to adequately consider the information submitted by Sonoma County pursuant to Government Code Section 65584.04(b).

1. ABAG failed to adequately consider information provided as a part of the survey conducted under 66584.04.
2. ABAG failed to consider the availability of land suitable for urban development or for conversion to residential use

The information submitted by Sonoma County, and information widely available to the public and commonly used as part of accepted planning methodologies, was not adequately considered in the development of the RHNA methodology and determination of the County's RHNA allocation. For reference, both the County's responses to ABAG's survey conducted under Gov. Code § 66584.04 and the survey results memoranda that were provided to the Housing Methodology Committee (HMC) and available on the HMC website.

Throughout the data collection period and the Housing Methodology Committee meetings, County staff raised their concerns related to the lack of unincorporated county data being collected and used when planning for growth - including housing growth - in all unincorporated areas of the region, but especially in the rural North Bay areas, where major wildfires have occurred in three out of four years between 2017-2020 and agricultural lands are dominant and protected. HMC members were told by ABAG staff on multiple occasions that data for the North Bay counties (Sonoma, Napa and Solano) was incomplete but that it would be corrected prior to the final Plan Bay Area and the final RHNA Methodology. Indeed, ABAG staff continued to work with local jurisdiction staff long after the initial data collection period to attempt to rectify the more significant errors in its BASIS data. Even during these meetings, however, ABAG staff would not accept or use data that were offered by county staff on multiple occasions, including key data related to FEMA flood areas and adopted Urban Service

Area boundaries, which reflect service district boundaries and delineate areas where urban services are available or planned.

The County understands and respects the difficulty of the effort to design a single, fair methodology to be applied across the nine very different counties that make up the Bay Area. We also understand that every jurisdiction could in some way claim that the adopted methodology should not apply to them, while at the same time housing is a matter of statewide importance that must be put ahead of local interests if we are ever to climb out of our serious and deepening housing crisis. And yet GOV. Code § 65584.04 specifically provides for collection of local jurisdiction-level information and incorporation of that data into the RHNA process. Section 65584.04(e)(2) directs ABAG to collect information about "[t]he opportunities and constraints to development of additional housing in each member jurisdiction." To give meaning to this statutory directive and as provided by Gov. Code § 65584.04(f), ABAG must not only collect the information from the local jurisdictions, but must actually utilize it in the methodology and explain in writing how the information was incorporated into the methodology. ABAG did not meet this statutory obligation.

Sonoma County cities were among the earliest adopters of voter-approved urban growth boundaries, and the County applauds ABAG's inclusion of Urban Growth Boundaries in the modeling efforts; however, UGBs apply only to cities, and unincorporated Sonoma County has small unincorporated communities. There are no UGBs or SOIs around these communities; rather, Urban Service Area boundaries demarcate the areas within LAFCO-approved districts for sewer service. To ignore the County's Urban Service Areas and the related availability and adequacy of urban services to allow the urban development of unincorporated land fails to achieve the statute in 65584.05 and 65584.04.

On November 8, 2016 Measure K, Community Separators Protection, was approved by 81.1% of voters. Measure K extended voter protections to Community Separator lands for 20 years. The ballot measure ***specifically prohibits the extension of urban services into community separators through 2036*** except by vote of the people (Attachment 2b). Community Separators do not appear to have been accounted for in the UrbanSims model that formed the basis for the RHNA, further indication that ABAG should have collected and used this important information about the areas where urban services could be provided.

3. <u>ABAG failed to consider and appropriately apply information about local planning factors related to lack of capacity for sewer or water service and due to supply and distribution decisions not under the County's control that limit the County from providing necessary urban infrastructure to support the additional development during the Sixth Cycle.</u>

Housing developments need public sewer and water. ABAG failed to consider submitted and broadly available information regarding legal and physical constraints on availability of urban water supplies and sewer service in unincorporated Sonoma County. These constraints make the County's draft RHNA unachievable. To the extent that ABAG relied on data prepared for Plan Bay Area 2050 and its Draft EIR, some of that information is dramatically too general or incomplete to support a 654% increase in the County's RHNA.

<u>Water Resources and Supply Constraints</u>

Surface water

Surface water supplies for urban uses in Sonoma County are limited and subject to substantial regulatory constraints. Moreover, the future of surface water supplies is uncertain for the northernmost cities in the County. While the DEIR for Plan Bay Area appears to assume that Sonoma Water is the water supplier for the entire county, this is incorrect. Sonoma Water is a water wholesaler that provides water to Sonoma County's incorporated cities and water districts located south of Healdsburg. It mostly depends on the Russian River for water supply, with groundwater from the Santa Rosa Plain as a secondary source to be used during drought or when the Russian River is otherwise constrained. Sonoma Water is not a department of the County; it is a separate legal entity, created by State law with specific purposes and powers.

As stated in Sonoma Water's 2020 Urban Water Management Plan (draft available 2019), the availability of water in the Russian River is the most prominent potential physical constraint on the delivery of water to Sonoma Water's customers, particularly during high demand periods in the summer months. The UMWP indicates that in single dry years, which are modeled using the driest year on record (1977), model simulations predict supply shortages by 2030. Sonoma Water does not purchase water.

Use of Russian River water is constrained not just by seasonal and climatological availability of water, but also a variety of additional factors, including legal constraints related to the fact that the river is habitat for multiple threatened and endangered fish species. Sonoma Water's facilities and operations in the Russian River are subject to a National Marine Fisheries Service Biological Opinion that requires implementation of a series of actions and programs intended to minimize impacts to listed salmon species. Although the Biological Opinion expires in September 2023, Sonoma Water's UWMP indicates an expectation that similar operational and flow limitations will continue beyond the expiration date.

The cities of Healdsburg and Cloverdale and the unincorporated community of Geyserville receive Eel River water from the Potter Valley Hydroelectric Project (PVP) via the Upper Russian River and Lake Mendocino. The future and stability of this PG&E-owned facility and its water supply is uncertain. PG&E's Federal Energy Regulatory Commission (FERC) license to operate the PVP expires in April 2022, and PG&E is not renewing the license. The facility must either be relicensed or decommissioned, and either option will be a lengthy and contentious process. According to Sonoma Water's UWMP, decommissioning would likely result in termination of transfers to the Russian River watershed.

Groundwater

Sonoma Water and retail water suppliers in Sonoma County—cities and water districts—often rely on municipal groundwater sources as critical components of their overall water supplies. However, groundwater availability is increasingly constrained. The Santa Rosa Plain, Sonoma

Valley, and Petaluma Valley groundwater basins are designated by the state Department of Water Resources as medium and high priority basins subject to the Sustainable Groundwater Management Act (SGMA). Saltwater intrusion is increasingly impacting municipal wells, particularly in the Sonoma Valley.

As noted above, most of the unincorporated County is not served by an urban water provider and relies on individual groundwater wells. Based on geologic conditions, most of the western and northern area of the unincorporated County is classified and mapped as either "marginal groundwater" or "low/highly variable water yield" groundwater areas. (See Sonoma County Groundwater Availability Map.) The intensity of development in these areas is often limited due to physical lack of groundwater on-site.

Constraints on Wastewater Treatment

a. *Limitations on sewer service availability*

State and local law limits or prohibits the expansion of urban services into areas of Sonoma County that are not designated and planned for growth. Statewide, LAFCOs are state-mandated, with jurisdiction over boundary changes for special districts, including sewer districts and water districts. Sonoma LAFCO has jurisdiction over changes in boundary lines within Sonoma County, including changes in sanitation and water district boundaries. Sonoma LAFCO must approve amendments to these boundaries to enable extension of sewer services (Attachment 2c). Similar rules apply statewide; comparable data regarding the geographic availability of urban services is readily available from all jurisdictions and from county LAFCOs.

Before any sewer district boundary can be expanded, and under certain other circumstances, LAFCO requires a municipal service review (MSR). If the MSR does not determine that sufficient water is available to support the expansion, the expansion of services cannot be allowed. It is simply not possible to flush toilets and treat waste without a sufficient water supply, and as outlined above, urban water supplies In Sonoma County are increasingly constrained. Surface water supplies are severely limited by drought (see Basis 3) and are also limited by federal and state protections for listed fish species in the Russian River watershed. Saltwater intrusion is increasingly affecting municipal wells, especially in the Sonoma Valley area. Demand is expected to outpace supply in a single dry year by 2025 (Plan Bay Area 2050 Draft EIR, pages 3.14 -12-13). These facts are clearly set out in the Plan Bay Area 2050's Draft EIR, but were ignored by ABAG as legitimate factors necessitating reduction of the unincorporated County's draft RHNA allocation.

Moreover, the review of sewer treatment capacity in the Plan Bay Area 2050 Draft EIR does not address the situation in unincorporated Sonoma County. Rather, it simply concludes that, for all jurisdictions, "[b]ecause of the dynamic nature of treatment plant planning/upgrading/expansion, it is not practical, at this regional and programmatic level of analysis, to characterize treatment

plant technology, flows, or capacity." (See Plan Bay Area 2050 DEIR, p. 3.14-15.) Moreover, it erroneously states in a list of sewer service providers that Sonoma Water provides sewer service to the Town of Sonoma and surrounding unincorporated areas. (See Plan Bay Area 2050 DEIR, p. 3.14-16.)

The complete lack of data and analysis for sewer availability in the unincorporated areas of Sonoma County, compounded by errors, highlight why the urban service area and district boundary information offered by the County to ABAG should have been considered and incorporated in the methodology, as required by statute. These factors directly impact the suitability of land for urban development and must be considered in the RHNA allocation under §65584.04(e).

b. Incompatibility of Onsite Wastewater Treatment Systems (Septic Systems) with residential development at urban densities

Because of Sonoma County's typical soils and the large land area needed to treat each bedroom, public sewer is required to support medium- to high-density housing. New housing development at urban densities is only feasible in areas where public sewer and water are available. Where sewer service is not available, new development must be served by an Onsite Wastewater Treatment System (OWTS), sometimes called a septic system. The State Water Quality Control Board adopts standards for regulation of OWTS, and local jurisdictions implement the state requirements. The standards and regulations that approved by the State for Sonoma County generally require a certain amount of land for each bedroom within a dwelling, depending on soil type, slope, setbacks to wells and waterways, and other pertinent factors.

For purposes of illustration, and assuming silty clay soil type (the most prevalent soil type in areas of Sonoma County with slopes of less than 30% (see Soil Survey of Sonoma County), the OWTS Manual for Sonoma County provides that the land area required to treat waste from a 1-acre development with 10, 1-bedroom units would be 1.1 acres:

Soil Type	1 bdrm	20 bdrm	50' lines	8' width	L x W = SF	= Acres
Clay, silty clay	300	6000	120	960	48000	1.10

This example assumes that there are no nearby waterways, wells, or structures.

4. The allocation fails to apply the adopted final RHNA methodology for the 6th cycle RHNA, particularly with respect to affirmatively furthering fair housing in unincorporated Sonoma County.

It is the County's position that allocation of the regional housing needs to the unincorporated County was inappropriately determined because ABAG failed to consider, collect and incorporate key data about the suitability of land for increased residential development, as required under Government Code Section 65584. Rather than collect this data as outlined in and required by the statute, the COG relied instead on the robust data set that it had built and refined through the BASIS model and UrbanSim, which were used to forecast projected growth in the draft Plan Bay Area 2050. While UrbanSim purports to take voter-approved Urban Growth Boundaries into account, it does not include the limitations on sewer and water availability in unincorporated Sonoma County. Urban Growth Boundaries occur only around cities; the unincorporated county contains Urban Service Areas unassociated with any city and to dismiss their occurrence and delineation is to ignore that requirements of §65584. The use of the adopted methodology's basis (existing households + projected PBA 2050 households/2) without collection and incorporation of the data outlined in statute fails to meet the requirements of §65584 (Attachment 2d).

The size of the County's draft RHNA, coupled with the constraints identified in the information submitted but disregarded by ABAG, fail to meet the RHNA objective to affirmatively further fair housing. The current draft RHNA allocation will force the County to concentrate zoning for large numbers of high-density affordable units in areas that are already strained: in general, these areas are already under-resourced, have a disproportionate share of affordable housing, are designated as disadvantaged communities, suffer from repetitive losses from wildfires or floods, and achieve the lowest outcomes on HCD's Affirmatively Furthering Fair Housing maps. While the County does have some suitable areas to zone for housing consistent with affirmatively furthering fair housing, those areas cannot support the County's entire draft RHNA for lower-income households.

ABAG failed to take into consideration the existing patterns of segregation and poverty that occur within the County's repetitive loss flood areas along the Russian River and the Laguna de Santa Rosa. Even though both City of Sebastopol and County of Sonoma staff met with ABAG/MTC and Plan Bay Area staff to discuss the inappropriateness of designating areas within FEMA floodways and floodplains for higher-density housing, ABAG/MTC and Plan Bay Area staff indicated that flood zones were not being considered in Plan Bay Area 2050 but instead would be considered in the next regional planning cycle. Because the 6th cycle RHNA is based on the draft Plan Bay Area 2050 data and land use growth scenarios, this is an inherent flaw in the methodology that results in failures to meet both Gov. Code § 65584.04(d)(3) (land suitable for urban development) and § 65584.5 (affirmatively furthering fair housing).

Appeal Basis 2: 65584.05(b)(2): ABAG failed to determine the share of the regional housing need in a manner that furthers and does not undermine the intent of the objectives listed in subdivision (d) of Section 65584

The five Statutory Objectives of RHNA, Per Govt. Code § 65584(d), are as follows:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low-and very low-income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region' s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080
3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low- wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of household s in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
5. Affirmatively furthering fair housing. For purposes of this section, "affirmatively furthering fair housing " means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

As to Objective 1: Increasing the housing supply in an equitable manner. Unincorporated Sonoma County is not a major growth geography in Plan Bay Area. It does not have any major transit facilities (SMART ridership is just under 3,000/day, compared to 63,597/day for Caltrain and 432,000/day for BART), it does not have major job centers, and does not have a high degree of divergence from the regional norms, and yet it has one of the highest percentages of RHNA increase in the entire Bay Area. The RHNA allocation fails this first objective because it does not distribute the growth in housing supply in an equitable manner; in fact, it does not even distribute housing supply in any way that makes sense.

As to Objective 2: Promoting socioeconomic equity, protecting environmental resources, and encouraging efficient development patterns that help the region to achieve its greenhouse gas reduction targets. As noted above, Sonoma County is not a major growth geography, does not have major transit facilities, and is not a major job center. Assigning such a large percentage of the County's projected growth to the unincorporated areas is to ignore city-centered growth objectives and to encourage inefficient development patterns and the inability to reduce VMT so that the State's and region's greenhouse gas reduction targets can be achieved. The assignment of a draft RHNA allocation to the unincorporated County that is larger than any of its cities save for the one largest (Santa Rosa*) fails to protect environmental and agricultural resources and encourages sprawl rather than infill development*. It also fails to promote socioeconomic equality because it forces growth into the less desirable areas on the outskirts of cities rather than into their thriving, vibrant downtown areas (see also Objective 5).

Further, ABAG failed to collect and consider information and data offered by the County related to flooding and repetitive losses, which disproportionately affect households with lower incomes. ABAG also failed to take into consideration the existing patterns of segregation and poverty that occur within the County's repetitive loss flood areas along the Russian River and the Laguna de Santa Rosa. Even though both City of Sebastopol and County of Sonoma staff met with ABAG/MTC and Plan Bay Area staff to discuss the inappropriateness of designating areas within FEMA floodways and floodplains for higher-density housing, ABAG/MTC and Plan Bay Area staff indicated that *existing FEMA flood zones were not being considered in Plan Bay Area 2050* but instead would be considered in the next regional planning cycle. Because the 6th cycle RHNA is based on the draft Plan Bay Area 2050 data and land use growth scenarios, it is inherently flawed on this count and fails under both 65584.04 (d) 3 (land suitable for urban development) and under 65584. 5 (affirmatively furthering fair housing). The proposed revision to the County's draft RHNA allocation will provide better consistency with state laws and Plan Bay Area 2050 by placing more housing in cities near transit, jobs and services thereby reducing Vehicle Miles Traveled (VMT) and associated greenhouse gas emissions. Plan Bay Area 2050 sets a target of reducing GHG emission to 19% below 2020 levels to meet SB 375 requirements; these reductions are focused almost exclusively on automobiles and light-duty truck emissions, meaning everyday traffic. Placing more growth and more housing within cities near transit and services is Plan Bay Area's main strategy to address this requirement. The County's proposed revision furthers both the second objective of RHNA and Plan Bay Area's GHG reduction targets.

As to Objective 4: Balancing disproportionate household income distributions. This objective is thwarted by ABAG's determination of the unincorporated County's regional share because the sheer magnitude of the County's draft RHNA will force a high percentage of the zoning for units affordable to lower-income households to take place in areas that already it forces more low-income units into lower-income areas, as evidenced by HCD's TCAC and AFFH mapping site: https://affh-data-resources-cahcd.hub.arcgis.com/.

As to Objective 5: Affirmatively Furthering Fair Housing. ABAG's Draft RHNA allocation fails to affirmatively further fair housing by perpetuating existing patterns of segregation and poor socioeconomic outcomes. The sheer volume of the County's draft RHNA would force that county to zone for large numbers of high-density affordable units in the limited unincorporated areas with available urban services to support higher density housing:

- directly outside of cities but within adopted Urban Growth Area boundaries, the majority of which are located along south Santa Rosa Avenue and in the Sonoma Valley, which are disadvantaged communities;
- in the Russian River communities, which suffer from repetitive flood losses and the least-positive economic, environmental, and educational outcomes, according to HCD's AFFH maps;

- into the Larkfield/Wikiup area, which suffered devastating losses in the 2017 wildfires and is currently under consideration by CalFire for being re-mapped to increase its fire hazard severity risk zone; and
- Into the Airport Specific Plan Area (pending), which is a newly designated PDA but which is also an industrial area where existing heavy industrial uses render the area low on environmental outcomes according to the AFFH maps.

A more equitable RHNA allocation would affirmatively further fair housing by allowing the County to place a higher percentage of zoning for lower-income households in higher opportunity areas, within vibrant city cores and downtowns rather than in the less resourced outskirts of incorporated cities.

The County does have multiple places within unincorporated urban service areas where sewer and water services are available or could be made available within the Sixth Cycle planning period, where land can be zoned and housing can be located in a manner that affirmatively furthers fair housing and avoids perpetuating existing patterns of segregation and poor socioeconomic outcomes. These areas are not, however, large enough to accommodate the County's current draft allocation of 3,881 units.

As shown in Table 1, the size of all available land areas within LAFCO-designated sewer districts, regardless of general plan or zoning designation, is 21.12 square miles. When areas with statutorily recognized constraints are removed, the resulting area with urban services available is 14.5 square miles, just marginally larger than that of the City of Petaluma, which has a draft RHNA of 1,910 units. The County requests a revision of its draft RHNA allocation to better match the RHNA assigned to other jurisdictions with similar urban land areas.

Table 1: Size of Urban Areas within Sewer Zone and District Boundaries

Abbr.	Label	Acreage	Sq Mile	Water Provider	Notes
ALWSZ	Airport-Larkfield-Wikiup Sanitation Zone	3,147.92	4.92	California American Water	Includes Airport Industrial PDA, Larkfield
GSZ	Geyserville Sanitation Zone	178.36	0.28	Geyserville Waterworks Service	
OCSD	Occidental County Sanitation District	72.28	0.11	Occidental Community Service District	
PSZ	Penngrove Sanitation Zone	441.90	0.69	Penngrove Water Company	

RRCSD	Russian River County Sanitation District	1,141.69	1.78	Sweetwater Springs Water District	Includes FEMA flood areas
SVCSD	Sonoma Valley County Sanitation District	3,770.47	5.89	Valley of the Moon Water District	Includes City, Springs PDA
SPCSD	South Park County Sanitation District	529.21	0.83	City of Santa Rosa / Well	Utilities only if consist. w/City General Plan
Sum Acreage and Sq Mile		***9,281.72***	***14.5***		

Appeal Basis 3 (65584.05(b)(3)): Significant unforeseen changes in circumstances have occurred in the local jurisdiction that merit revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

Since the February 2020 jurisdiction survey was submitted, a significant change in circumstances have occurred that substantially constrain surface water supplies in Sonoma County and the Russian River watershed, and that may in turn cause greater than anticipated impacts on groundwater availability. These changed circumstances necessitate require a reduction in Sonoma County's draft RHNA allocation.

1. Drought Emergency
    a. Surface water supplies

Exceptional drought conditions in the Russian River watershed have caused unprecedented drawdown of water in storage in the two main reservoirs, Lake Mendocino and Lake Sonoma, that supply surface water for human and environmental needs within the watershed. Storage levels in both reservoirs are lower than they were during the 2013/2014 drought (Sonoma Water, 2021). As of July 2, 2021, Lake Mendocino was at 35.8% of its target water supply curve, and Lake Sonoma was at 52.9% of its water supply capacity. For both reservoirs, these storage levels represent the lowest on record for this date.

On April 21, 2021, Governor Gavin Newsom declared a drought state of emergency in Sonoma and Mendocino counties due to severe drought conditions in the Russian River watershed. (See April 2021 Drought Proclamation.) The Governor's emergency proclamation directed the State Water Resources Control Board (SWRCB) to consider the following:

- Modifying requirements for reservoir releases or diversion limitations in that watershed to ensure adequate, minimal water supplies for critical purposes.
- Adopting emergency regulations to curtail water diversions when water is not available at water rights holders' priority of right or to protect releases of stored water.

The Sonoma County Board of Supervisors declared a drought state of emergency on April 27, 2021. (April 27 Proclamation.) Supporting materials cited, among other things, a real threat that Lake Mendocino may go dry by the end of this year. (Summary report.)

On May 10, the Governor expanded the drought emergency proclamation to include counties in other watersheds, and provided additional direction to SWRCB to "consider modifying requirements for reservoir releases or diversion limitations-including where existing requirements were established to implement a water quality control plan-to conserve water upstream later in the year in order to protect cold water pools for salmon and steelhead, improve water quality, protect carry over storage, or ensure minimum health and safety water supplies," in order to "ensure adequate, minimal water supplies for purposes of health, safety, and the environment." (May 2021 Proclamation.)

In response to the Governor's orders, SWRCB took a series of actions to protect basic water supplies and minimum instream flows for special-status fish. As of June 30, 2021, SWRCB enacted an Emergency Regulation for the Russian River watershed that provides for significant curtailments of and other actions to preserve remaining water in storage in Lake Mendocino and Lake Sonoma and maintain minimum instream flows necessary for the survival of special-status anadromous fish.

ATTACHMENT 2a

Sonoma County Transportation Authority
Regional Climate Protection Authority

September 29, 2020

Therese McMillan, Executive Director
Matt Maloney, Director of Regional Planning
MTC/ABAG Regional Planning Committee Members
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Housing Methodology Committee recommendation – comments and concerns

Dear Ms. McMillan, Mr. Maloney and Members of the Regional Planning Committee:

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 6th 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 AGAB/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 6th 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 obscenely 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 6th 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 to 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 5th 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 take utilize the feedback provided to improve the PBA 2050 modeling.

Thank you,

Sonoma County Planning and Community Development Directors

Jeffery Beiswenger
Planning Manager, City of Rohnert Park

Clare Hartman
Deputy Director – Planning, City of Santa Rosa

Heather Hines
Planning Manager, City of Petaluma

Noah Housh
Director of Community Development, City of Cotati

Jessica Jones
Community Development Director, Town of Windsor

Janet Spilman
Director of Planning, Sonoma County Transportation Authority

David Storer
Planning and Community Services Director, City of Sonoma

Kari Svanstrom
Planning Director, City of Sebastopol

Kevin Thompson
Assistant City Manager/Community Development Director, City of Cloverdale

Tennis Wick
Director, Permit Sonoma, County of Sonoma

David Woltering
Interim Community Development Director, City of Healdsburg

ATTACHMENT 2b

County of Sonoma
State of California

THE WITHIN INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE

ATTEST: AUG 0 2 2016

VERONICA A. FERGUSON, Clerk/Secretary

BY: [redacted] DEPUTY CLERK/ASST SECRETARY

Item Number: 9

Date: August 2, 2016

Resolution Number: 16-0282

☐ 4/5 Vote Required

Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California, Calling A Special Election On The Community Separators Protection Ordinance, To Be Consolidated With The November 8, 2016 General Election

Whereas, in November 1996, the voters of Sonoma County approved Ordinance 5003R requiring voter approval of certain revisions of or amendments to the boundaries of or land use regulations applicable to Community Separators created by the 1989 Sonoma County General Plan, and in November 1998, the voters of Sonoma County approved Ordinance 5145R requiring voter approval of any increase in the allowed density or intensity of land uses allowed within the expanded Petaluma/Novato Community Separator, specifying certain highway design criteria, and providing for bicycle lanes; and

Whereas, Ordinance 5003R and its voter approval protections will expire at the end of 2016, and Ordinance 5145R and its voter approval protections will expire at the end of 2018; and

Whereas, Elections Code section 9140 authorizes this Board to submit ordinances to the voters without the prior presentation of an initiative; and

Whereas, in December 2015, this Board approved a Community Separators work plan and directed County staff to prepare a ballot measure for the November 2016 general election to extend the voter approval protections for Community Separators; and

Whereas, in accordance with the provisions of law, the Sonoma County Planning Commission ("the Planning Commission") conducted duly noticed public hearings on the proposed ballot measure ("the Community Separators Protection Ordinance") on June 23, 2016, and June 30, 2016, at which time all interested persons were given an opportunity to be heard on the matter, and the Planning Commission recommended that the Community Separators Protection Ordinance be placed on the November 8, 2016 general election ballot; and

Whereas, in accordance with the provisions of law, this Board conducted a duly noticed public hearing on the Community Separator Protection Ordinance on July 19, 2016, at which time all interested persons were given an opportunity to be heard; and

Whereas, this Board finds that the Community Separators Protection Ordinance is a matter of significant public policy that is appropriate for the voters of Sonoma County to decide;

Now, Therefore, Be It Resolved that the Board of Supervisors of the County of Sonoma hereby finds, declares, determines, and orders as follows:

1. A special election is hereby called for November 8, 2016, on the proposed Community Separators Protection Ordinance, which is attached hereto, marked Exhibit "A," and incorporated herein, and this election is hereby ordered to be consolidated with the general election occurring on that date.

2. The measure shall be submitted to the voters in the following form:

In order to preserve rural open space and agricultural land, maintain community identities, and prevent sprawl, shall the "Community Separators Protection Ordinance" be adopted to amend the Sonoma County General Plan to require voter approval of changes to the General Plan that increase the allowed density or intensity of development within Community Separators until December 31, 2036, and to repeal Ordinance 5145R?	Yes
	No

3. As required by law, the full text of the Community Separators Protection Ordinance shall be printed in the voter information pamphlet distributed to voters. A map(s) showing the locations of the Community Separators in the county shall also be included in the voter information pamphlet distributed to voters.

4. The County Clerk is hereby authorized, instructed, and directed to provide and furnish any and all official ballots, notices, printed matter, and all supplies, equipment, and paraphernalia that may be necessary in order to properly and

lawfully conduct an election.

5. The County Clerk is hereby further directed to take the necessary and appropriate actions to provide the necessary election officers, polling places, and voting precincts.

6. Arguments for and against the measure may be submitted to the Registrar of Voters Office in accordance with the deadlines established for the November 8, 2016 election.

7. In accordance with the provisions of the Elections Code, the County Counsel is authorized to prepare an impartial analysis of the measure.

8. The polls for the election shall be open during the hours required by law and the election, with respect to the foregoing ballot measure, shall be held and conducted as provided by law for the holding of County elections.

9. Notice of time and place of holding the election, together with any other notices required by law, shall be given to the County Clerk.

10. Pursuant to State CEQA Guidelines section 15168(c)(2), a program environmental impact report may be relied upon for CEQA compliance for later activities if the lead agency determines that no new effects will occur or no new mitigation measures would be required as a result of the later activity. The Board of Supervisors finds that, as discussed more fully in the staff report provided to the Board, the activity described herein falls within the scope of the project analyzed in the Program Environmental Impact Report prepared for Sonoma County General Plan 2020 and certified by the Board in June 2008. No new environmental effects could occur and no new mitigation measures would be required as a result of the activity. Therefore, pursuant to State CEQA Guidelines sections 15162 and 15168(c)(2), and Public Resources Code section 21166, no further environmental review is necessary.

Supervisors:

Gorin: Aye Rabbitt: Aye Zane: Aye Gore: Aye Carrillo: Aye

Ayes: 5 Noes: 0 Absent: 0 Abstain: 0

So Ordered.

EXHIBIT "A"

Ordinance No. _____R

An Ordinance Of The County Of Sonoma, State Of California, Amending The Sonoma County General Plan To Require Voter Approval Of Amendments To The Boundaries Of Urban Service Areas Of Unincorporated Communities To Include Lands Within Community Separators, And Amendments To The Boundaries Of Community Separators Or The Land Use Designations Or Densities Of Lands Within Community Separators, Until December 31, 2036, And Repealing Ordinance 5145R.

The People of the County of Sonoma ordain as follows:

Section 1. Title.

This ordinance shall be known and may be cited as the Community Separators Protection Ordinance.

Section 2. Statement of Purpose.

A. Community Separators are rural open space and agricultural land around cities and unincorporated communities in Sonoma County that maintain community identities, prevent sprawl, protect natural resources, and provide visual separation between cities and unincorporated communities. Community Separators are designated on the maps in the Open Space and Resource Conservation Element of the Sonoma County General Plan.

B. Twenty years ago, the voters of Sonoma County approved Ordinance 5003R requiring voter approval of certain revisions of or amendments to the boundaries of or land use regulations applicable to Community Separators. Eighteen years ago, the voters of Sonoma County approved Ordinance 5145R requiring voter approval of any increase in the allowed density or intensity of land uses allowed within the expanded Petaluma/Novato Community Separator, specifying certain highway design criteria, and providing for bicycle lanes. Ordinance 5003R and its voter approval protections will expire at the end of 2016, and Ordinance 5145R and its voter approval protections will expire at the end of 2018. The purpose of this ordinance is to renew and strengthen the voter approval protections of Ordinances 5003R and 5145R, and to apply those protections to all Community Separators designated in the Sonoma County General Plan. This ordinance is intended to continue to give a higher level of assurance that Community Separators designated in the Sonoma County General Plan will be maintained and that their land use designations will not be changed to increase the allowed density or intensity of development. This ordinance is further intended to encourage the County's cities to establish and maintain voter-approved urban growth boundaries that do not encroach into Community Separators.

C. Community Separators implement a long-standing policy of the Sonoma County General Plan that the physical development of the County should be city-centered. The city-centered growth policy further implements several state level policies, including:

(1) Article XIII, section 8 of the California Constitution encouraging the "conservation, preservation and continued existence of open space lands" for "recreation, enjoyment of scenic beauty, use or conservation of natural resources, or production of food or fiber."

(2) Articles XIIIA and XIIIB of the California Constitution limiting local government tax revenues and spending and thereby encouraging the efficient physical development of communities that will reduce expenditures for public safety, streets, utilities, and other publicly financed, operated and maintained improvements.

(3) The Planning and Zoning Law (Government Code section 65562) assuring "that cities and counties recognize that open-space land is a limited and valuable resource which must be conserved wherever possible" and that they will "prepare and carry out open-space plans."

(4) The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code section 56000 et seq.) discouraging annexations and other changes in organization that result in urban sprawl and its implementation in Sonoma County by Resolution No. 2119, dated May 7, 1992, of the Sonoma County Local Agency Formation Commission.

Section 3. Addition of General Plan Policy LU-3e.

This ordinance hereby adds, and adopts until December 31, 2036, Policy LU-3e of the Land Use Element of Sonoma County General Plan 2020 adopted September 23, 2008, as amended through August 2, 2016, as indicated below (text to be added is shown in ***bold italics***):

> ***Policy LU-3e: Until December 31, 2036, the boundaries of Urban Service Areas of unincorporated communities as shown on the Land Use Maps shall not be amended to include lands within Community Separators as shown on the Open Space Maps unless such amendment is approved by the voters of Sonoma County.***
>
> ***For the purposes of this policy, approval by the voters of Sonoma County shall be accomplished when a general plan amendment is placed on the ballot through any procedure provided for in the Elections Code, and a majority of the voters vote in favor of it. The Board of Supervisors may adopt a general plan amendment prior to securing the approval of the voters of Sonoma County; provided, however, that whenever the Board of Supervisors adopts an amendment requiring approval of the voters of Sonoma County pursuant to the provisions of this policy, the Board action shall have no effect until after such a vote is held and a majority of the voters vote in favor of it. The Board of Supervisors shall follow the provisions of the Elections Code in all matters pertaining to such an election.***

Section 4. Amendment of General Plan Policy OSRC-1k.

This ordinance hereby amends, and readopts as amended until December 31, 2036, Policy OSRC-1k of the Open Space and Resource Conservation Element of Sonoma County General Plan 2020 adopted September 23, 2008, as amended through August 2, 2016, as indicated below (text to be added is shown in ***bold italics***, text to be deleted is shown in ~~strikethrough~~):

Policy OSRC-1k: Until ~~the expiration of Ordinance No. 5145R (2018), the General Plan land use regulations for the lands within the Petaluma/Novato Community Separator shall not be changed so as to increase either the allowed intensity or density of development by changing the land use designations in Figure LU-2h of the Land Use Element without the prior approval of the voters of Sonoma County~~ ***December 31, 2036, the boundaries of Community Separators as shown on the Open Space Maps and the land use designations and densities of lands within Community Separators as shown on the Land Use Maps shall not be amended unless such amendment is approved by the voters of Sonoma County, except that the following types of amendments may be approved by the Board of Supervisors pursuant to its usual procedures and without the approval of the voters of Sonoma County:***

(1) An amendment designating additional lands as Community Separator.

(2) An amendment reducing the allowed density or intensity of development within a Community Separator.

(3) An amendment both adding and removing lands from a Community Separator, where there is no net loss in land area within the Community Separator.

(4) An amendment correcting a mapping error, where lands that do not meet the designation criteria for Community Separators have been inadvertently included within a Community Separator.

For the purposes of this policy, approval by the voters of Sonoma County shall be accomplished when a general plan amendment is placed on the ballot through any procedure provided for in the Elections Code, and a majority of the voters vote in favor of it. The Board of Supervisors may adopt a general plan amendment prior to securing the approval of the voters of Sonoma County; provided, however, that whenever the Board of Supervisors adopts an amendment requiring approval of the voters of Sonoma County pursuant to the provisions of this policy, the Board action shall have no effect until after such a vote is held and a majority of the voters vote in favor of it. The Board of Supervisors shall follow the provisions of the Elections Code in all matters pertaining to such an election.

Section 5. Applicability.

The provisions of Sections 3 and 4 of this ordinance shall apply to all Community Separators shown on the Open Space Maps of the Sonoma County General Plan on the effective date of this ordinance, and to any additional lands designated as Community Separator during the term of this ordinance.

Section 6. Implementation.

A. Upon the effective date of this ordinance, the provisions of Section 3 of this ordinance are hereby inserted into the Land Use Element of the Sonoma County General Plan and the provisions of Section 4 of this ordinance are hereby inserted into the Open Space and Resource Conservation Element of the Sonoma County General Plan, as amendments thereto. At such time as these General Plan amendments are inserted in the Sonoma County General Plan, any provisions of the Sonoma County Zoning Ordinance, as reflected in the ordinance itself or in the Sonoma County Zoning Database, that are inconsistent with these General Plan amendments shall not be enforced.

B. The Sonoma County General Plan, including the provisions added or amended and readopted by this ordinance, may be reorganized, and individual provisions may be renumbered or reordered, in the course of ongoing amendments or updates of the Sonoma County General Plan in accordance with the requirements of State law; provided, however, that the substance of Policy LU-3e, as added by this ordinance, and Policy OSRC-1k, as amended and readopted by this ordinance, shall continue to be included in the Sonoma County General Plan until December 31, 2036, unless earlier repealed or amended by the voters of Sonoma County.

C. All County plans, policies, ordinances, rules, and regulations constituting legislative acts shall be amended as necessary as soon as possible and in the time and manner required by any applicable State law to ensure consistency between those policies and the provisions adopted in this ordinance.

D. Upon the date of insertion of the provisions of Sections 3 and 4 of this ordinance into the Sonoma County General Plan, all General Plan amendments, rezonings, specific plans, tentative subdivision maps, parcel maps, conditional use permits, building permits, or other ministerial or discretionary entitlements for use not yet approved or issued shall not be approved or issued unless consistent with the policies and provisions of this ordinance.

Section 7. Severability and Interpretation.

This ordinance shall be interpreted so as to be consistent with all federal and state laws, rules, and regulations. If any section, subsection, paragraph, subparagraph, sentence, clause, phrase, part, or portion of this ordinance is held to be invalid or unconstitutional by a final judgment of a court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. The voters hereby declare that this ordinance, and each section, subsection, paragraph, subparagraph, sentence, clause, phrase, part, or portion thereof

would have been adopted or passed even if one or more sections, subsections, paragraphs, subparagraphs, sentences, clauses, phrases, parts, or portions are declared invalid or unconstitutional. If any provision of this ordinance is held invalid as applied to any person or circumstance, such invalidity shall not affect any application of this ordinance that can be given effect without the invalid application. This ordinance shall be broadly construed in order to achieve the purposes stated in this ordinance. It is the intent of the voters that the provisions of this ordinance shall be interpreted by the County in a manner that facilitates the protection of lands within Community Separators.

Section 8. Amendment or Repeal.

This ordinance may be amended or repealed only by the voters of Sonoma County.

Section 9. Repeal of Ordinance 5145R.

Ordinance 5145R shall be repealed on the effective date of this ordinance.

Section 10. Effective Date.

This ordinance shall be in full force and effect from and after January 1, 2017.

Section 11. Expiration.

This ordinance shall be of no further force or effect after December 31, 2036.

APPROVED BY THE FOLLOWING VOTE OF THE VOTERS OF SONOMA COUNTY AT THE GENERAL ELECTION HELD ON NOVEMBER 8, 2016.

YES _____

NO _____

_____
Chair, Board of Supervisors
County of Sonoma

Attest:
Veronica A. Ferguson,
Clerk of the Board of Supervisors

By: _____
Chief Deputy Clerk of the Board

ATTACHMENT 2c

SONOMA LAFCO

LOCAL AGENCY FORMATION COMMISSION
575 ADMINISTRATION DRIVE, ROOM 104A, SANTA ROSA, CA 95403
(707) 565-2577 FAX (707) 565-3778
www.sonoma-county.org/lafco

Staff Report

Meeting Date: August 5, 2009

Agenda Item No.: Item No. 5.2

Agenda Item Title: Policy: Outside Service Area Agreements for Parcels Within a City's Sphere of Influence and Contiguous to City Boundaries.

Proposal: Review policy regarding the approval of Outside Service Area Agreements for parcels located within a city's sphere of influence and contiguous to the city's boundaries.

Summary of Recommendation: Policy Committee and staff recommend that the Commission adopt the proffered Policy as distributed.

Location: Countywide

Environmental Determination: Not a project under CEQA

Analysis

Background

Since October 2008, the Committee has been reviewing the policy for the extension of services by a city to areas outside of the city boundary but within the city sphere of influence. Previously, the Commission required cities to annex parcels that were outside but contiguous to city boundaries. Parcels that were not contiguous were extended service through Outside Service Area Agreements (OSAA) in anticipation of a later change of organization.

After considerable discussion, the Committee, at its May 6, 2009, meeting, directed staff to revise the policy to allow OSAAs, with restrictions, for parcels within the sphere of influence of a city and contiguous to city boundaries. The Committee believes the OSAA is a valuable tool to allow extension of services for sewer or water in emergencies while controlling untimely development and the potential for growth.

The City of Cotati, participated extensively in the development of the policy and has endorsed the revised Policy.

The Committee established prerequisites for OSAAs under these circumstances, to include the following:

1. There is a documented existing or potential threat to public health or safety.
2. The property owner and city have entered into a recordable agreement that runs with the land limiting development to existing levels.
3. A covenant is recorded against the property prohibiting the current and future property owners from protesting annexation to the City.
4. The existing use has been determined to be either legal or legally non-conforming by the Sonoma County Planning and Resource Management Department.

This proposed policy is stricter than current state law. Regarding territory within a city's sphere of influence, Government Code §56133 states, in part:

> b. The Commission may authorize a city or district to provide new or extended services outside its jurisdictional boundaries but within its sphere of influence in anticipation of a later change of organization.

The statute does not place restrictions on or requirements for LAFCO approval of an OSAA within a sphere, does not differentiate between contiguous and non-contiguous territory nor does it require documentation of a threat to public health or safety.

Sonoma LAFCO has several policies that are more restrictive than the state law, which according to legal counsel is permissible.

RECOMMENDATION

The Policy Committee recommends that the Commission, by minute order, adopt revised policy and direct staff to forward the Policy to all Cities.

ALTERNATIVE TO THE RECOMMENDATION

The Commission refers the Policy back to the Committee for further review based on comments by the full Commission.

ATTACHMENTS

1. Draft Policy

POLICY: Outside Service Area Agreements for Parcels Within a City's Sphere of Influence and Contiguous to City Boundaries

Policy

The Commission encourages urban development in cities rather than in unincorporated territory. Additionally, the Commission believes that there are efficiencies of scale and opportunities to encourage well-planned and phased development by permitting interim Outside Service Area Agreements, rather than requiring immediate annexation, when a documented threat to the public health or safety exists.

Where existing urban development is within a city's sphere of influence, and public services, such as water or sewer, are required to respond to an existing or impending threat to the public health or safety of the residents of the affected territory, the Commission will consider approval of an Outside Service Area Agreement (OSAA).

The Commission, or by direction, the Executive Officer, will consider authorization of an OSAA for territory within a city's sphere of influence and contiguous to city boundaries under the following conditions only:

1. There is a documented existing or potential threat to public health or safety;
2. The property owner and city have entered into a recordable agreement that runs with the land limiting development to existing levels;
3. A covenant is recorded against the property prohibiting the current and future property owners from protesting annexation to the City; and
4. The existing use has been determined to be either legal or legally non-conforming by the Sonoma County Planning and Resource Management Department.

Legal Authority

The Government Code §56133 states in part:

> (a) A city or district may provide new or extended services by contract or agreement outside its jurisdictional boundaries only if it first requests and receives written approval from the Commission in the affected county.
>
> (b) The Commission may authorize a city or district to provide new or extended services outside its jurisdictional boundaries but within its sphere of influence in anticipation of a later change of organization.

The Government Code authorizes a city to extend its services beyond its boundaries but clearly indicates that such action would be taken in anticipation of a later change of organization (i.e., annexation).

Background and Discussion

The Commission recognizes that cities are the logical service providers for municipal-level services. In those instances where a property has a failed or failing septic or water system, the Commission will permit an OSAA, provided that there is adequate assurance that the extension of services is not for new development. The Commission expects the property to be eventually annexed into the city and the use of an OSAA is an intermediate step towards annexation.

From a LAFCO perspective, an OSAA can:

- Protect the public from impending threats to health and safety;
- Impose restrictions that limit development to existing intensities,
- Permit a city to plan for future development in an orderly manner though the use of traditional zoning or specific plans, and
- Discourage premature development of fringe properties.

The Commission acknowledges that the annexation of individual parcels within a city sphere and contiguous to city boundaries may be premature and require more resources than a larger annexation of multiple parcels. In these instances, the use of an OSAA would provide services to meet the immediate needs of the property owners while allowing the city sufficient time to develop a more comprehensive and beneficial plan of annexation for the entire territory.

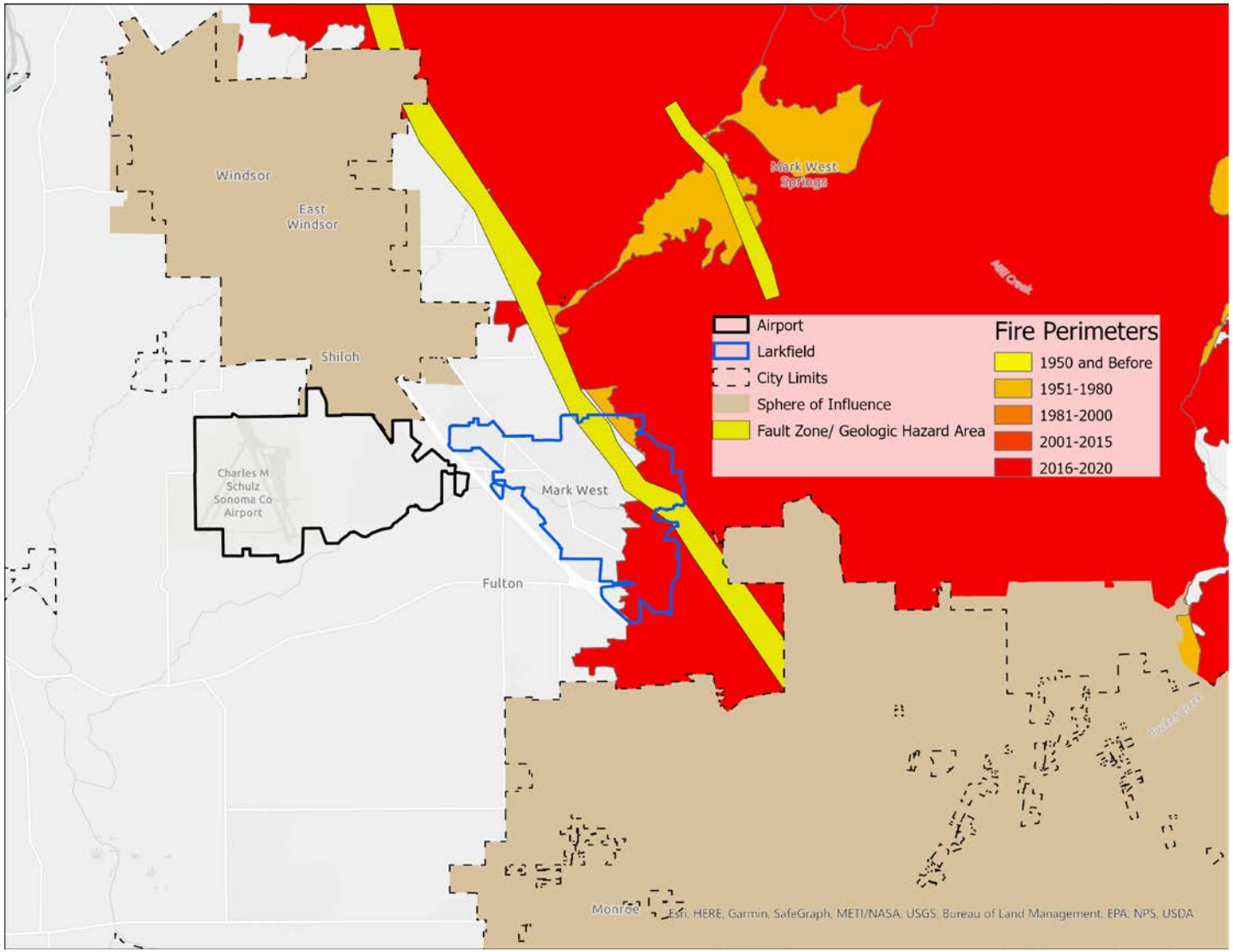
Adoption Date:

ATTACHMENT 2d

Constraints and Challenges in Sonoma County Urban Service Areas

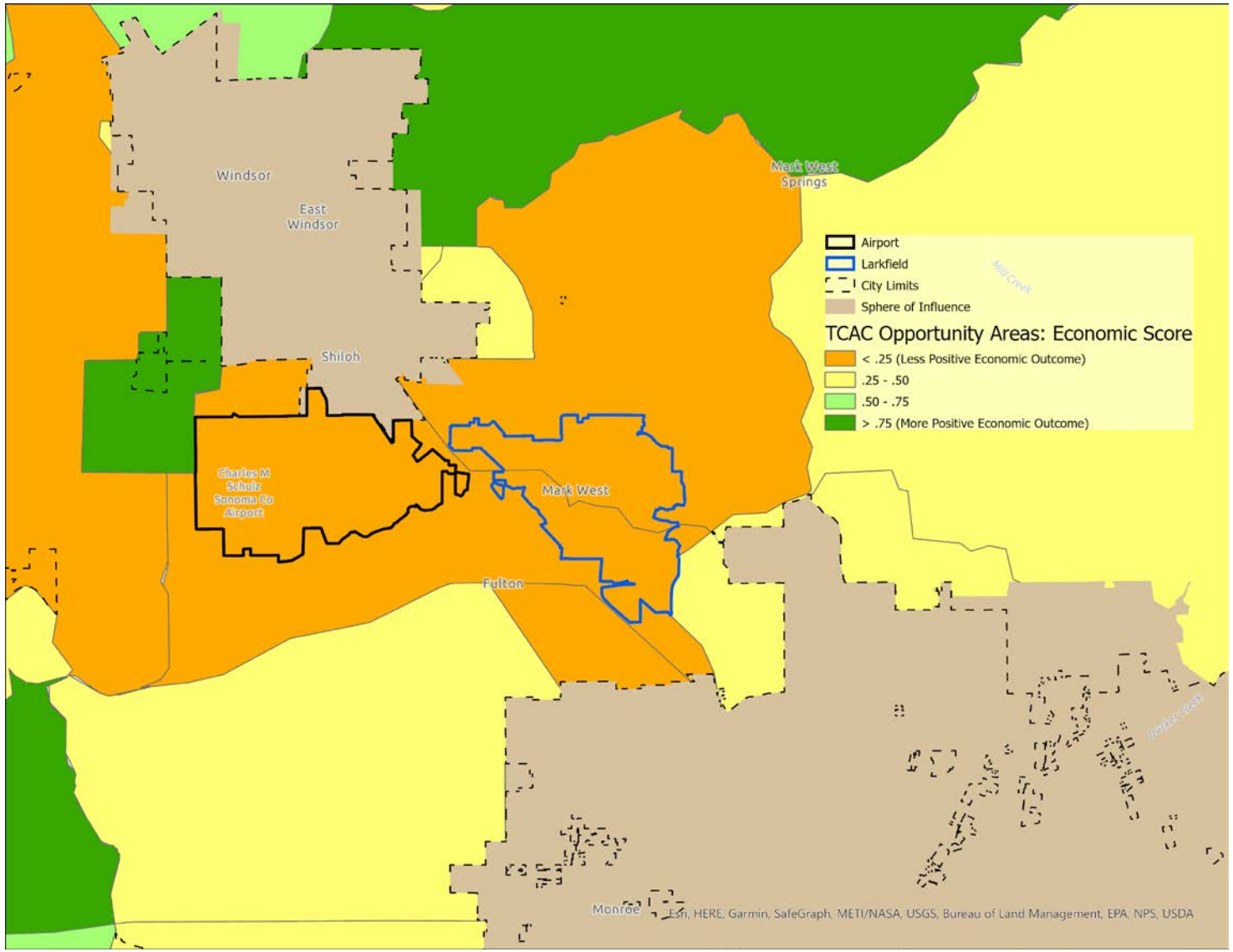
Airport and Larkfield Urban Service Area

Airport and Larkfield USA: Environmental Constraints



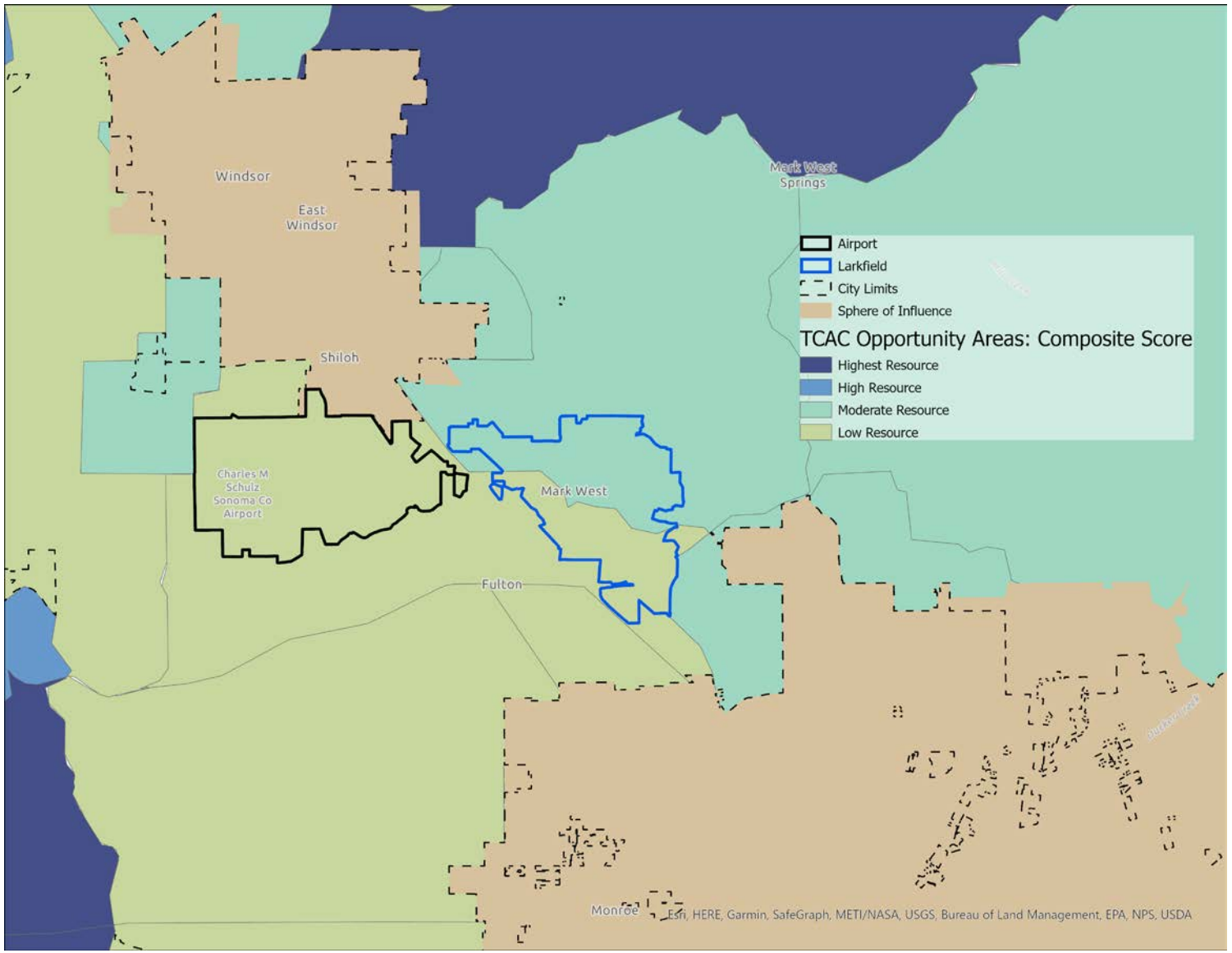
The Larkfield Areas suffers from intense fire activity and is on a fault zone

Airport and Larkfield USA: AFFH



Both Airport and Larkfield have lowest economic outcome scores

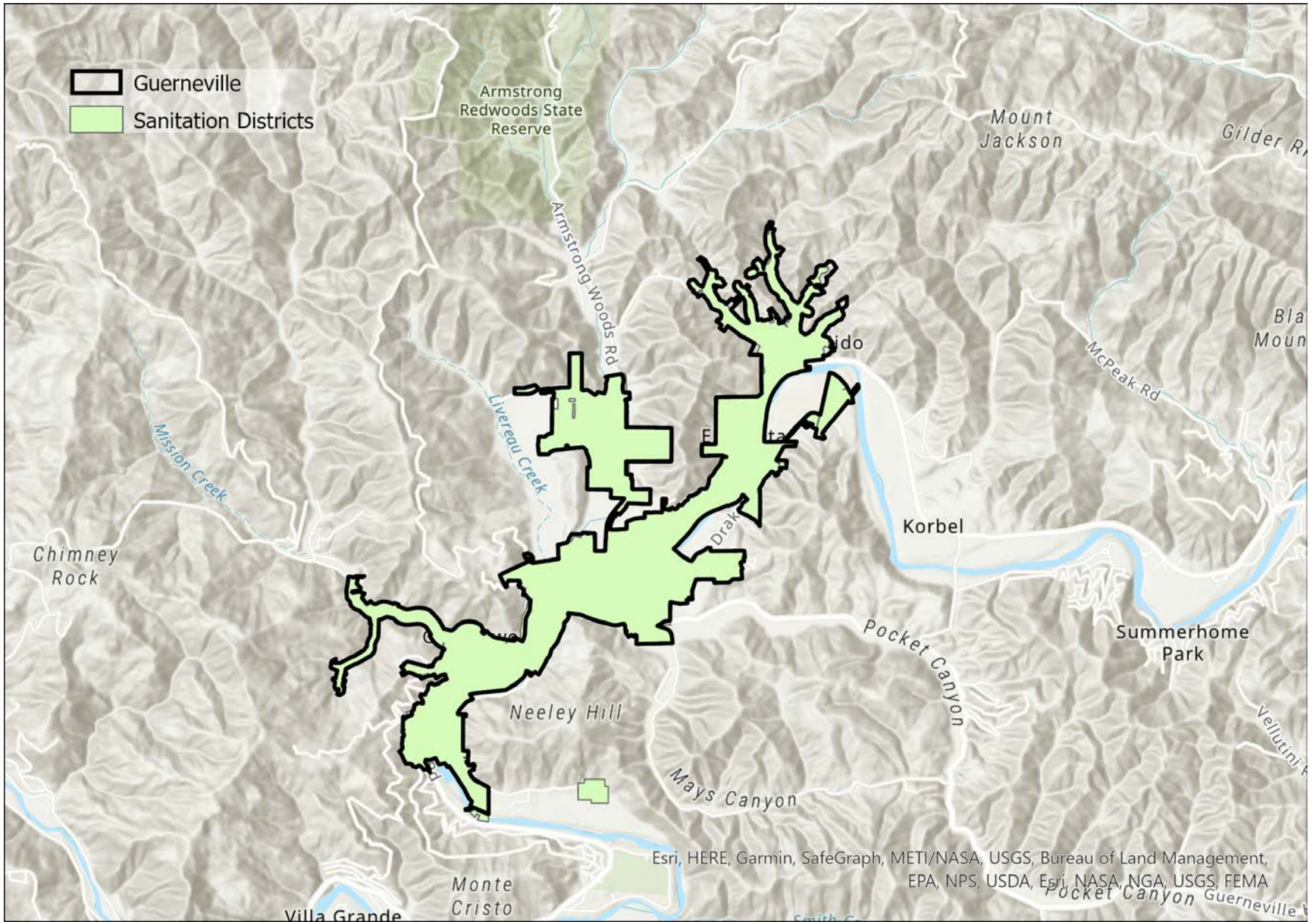
Airport and Larkfield USA: Affirmatively Furthering Fair Housing



Airport USA is a Low Resource Area

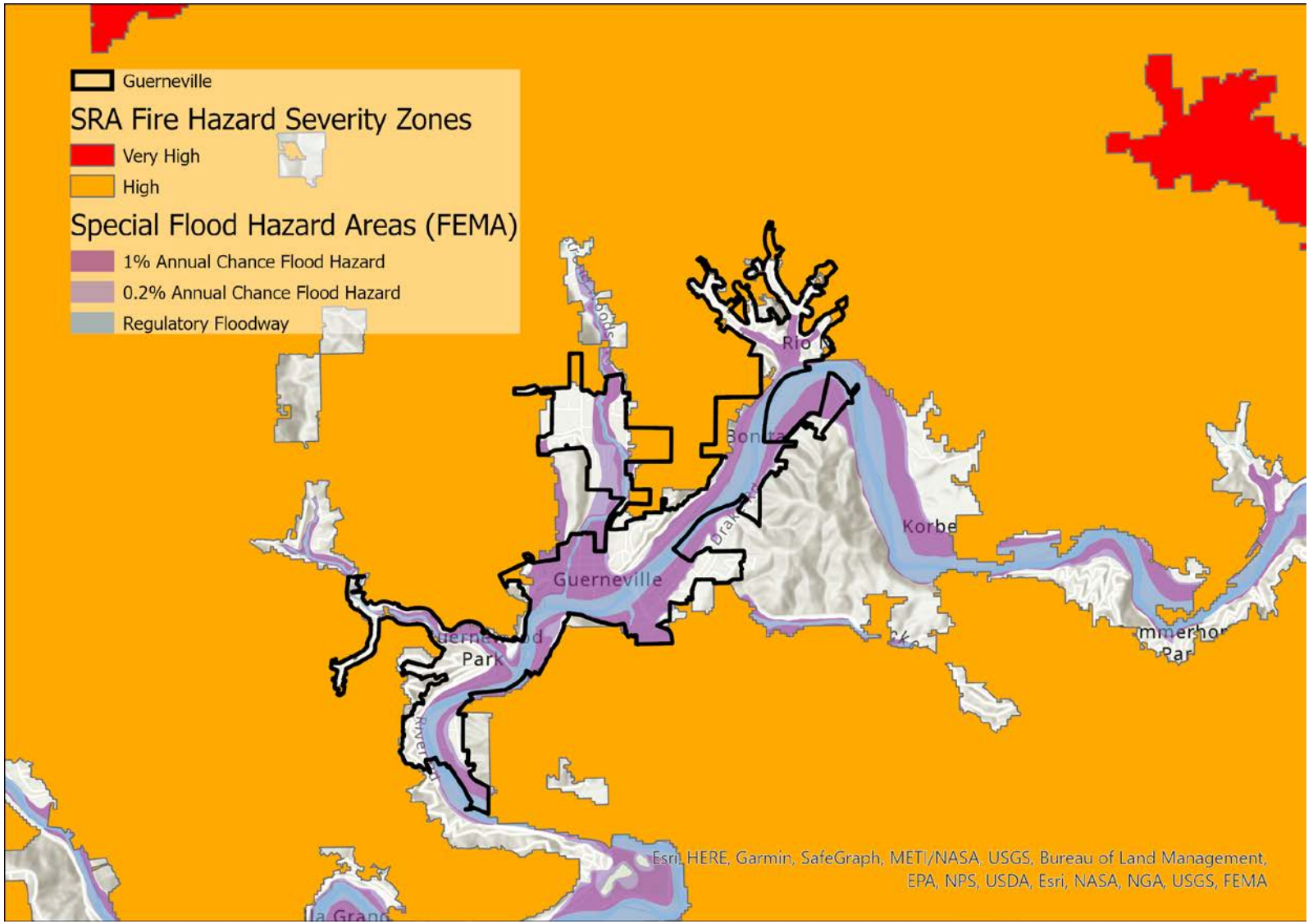
Guerneville
Urban Service Area

Guerneville USA: Infrastructure



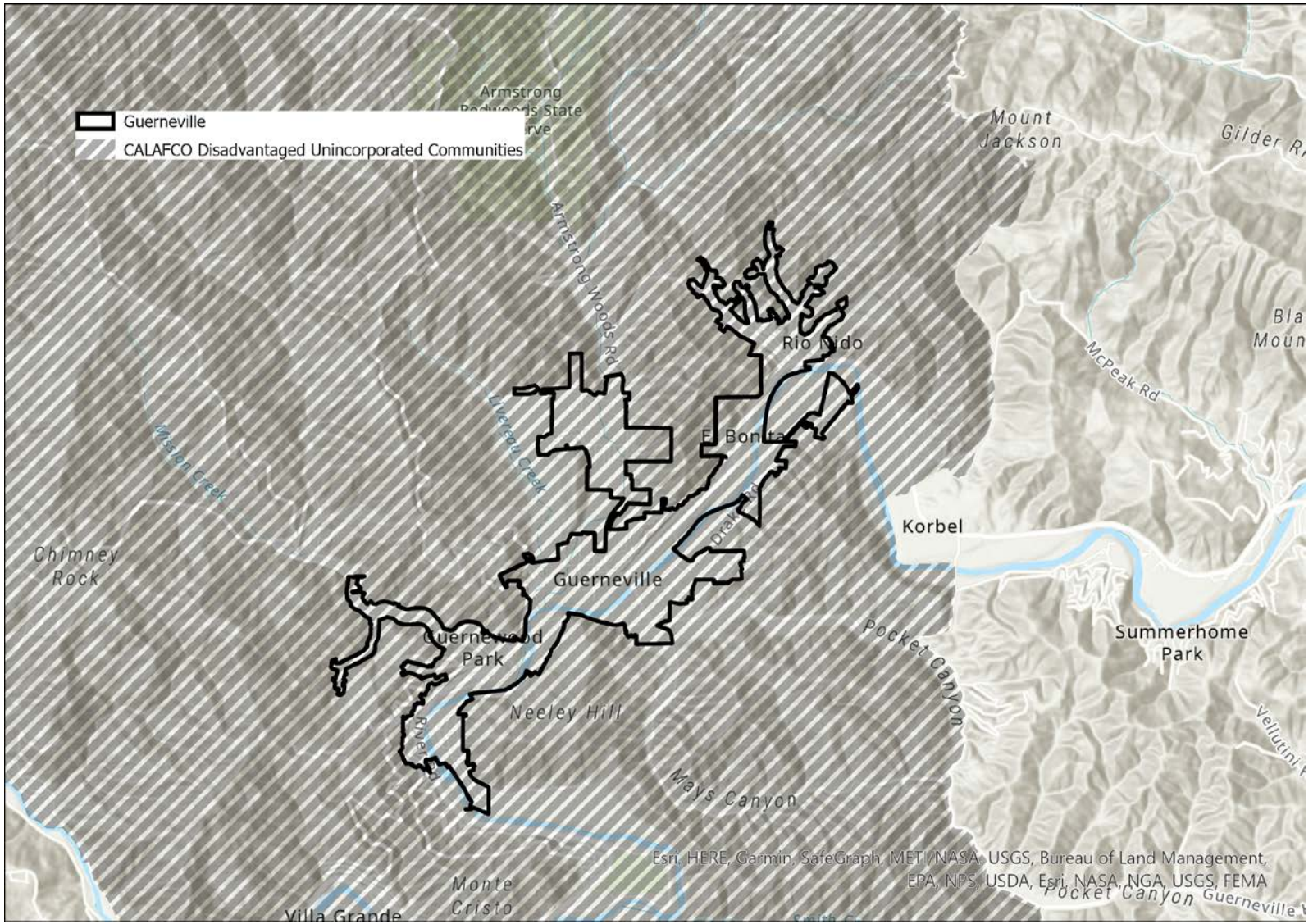
Guerneville has a sanitation district but is very steep and hilly with poor access

Guerneville USA: Environmental Constraints



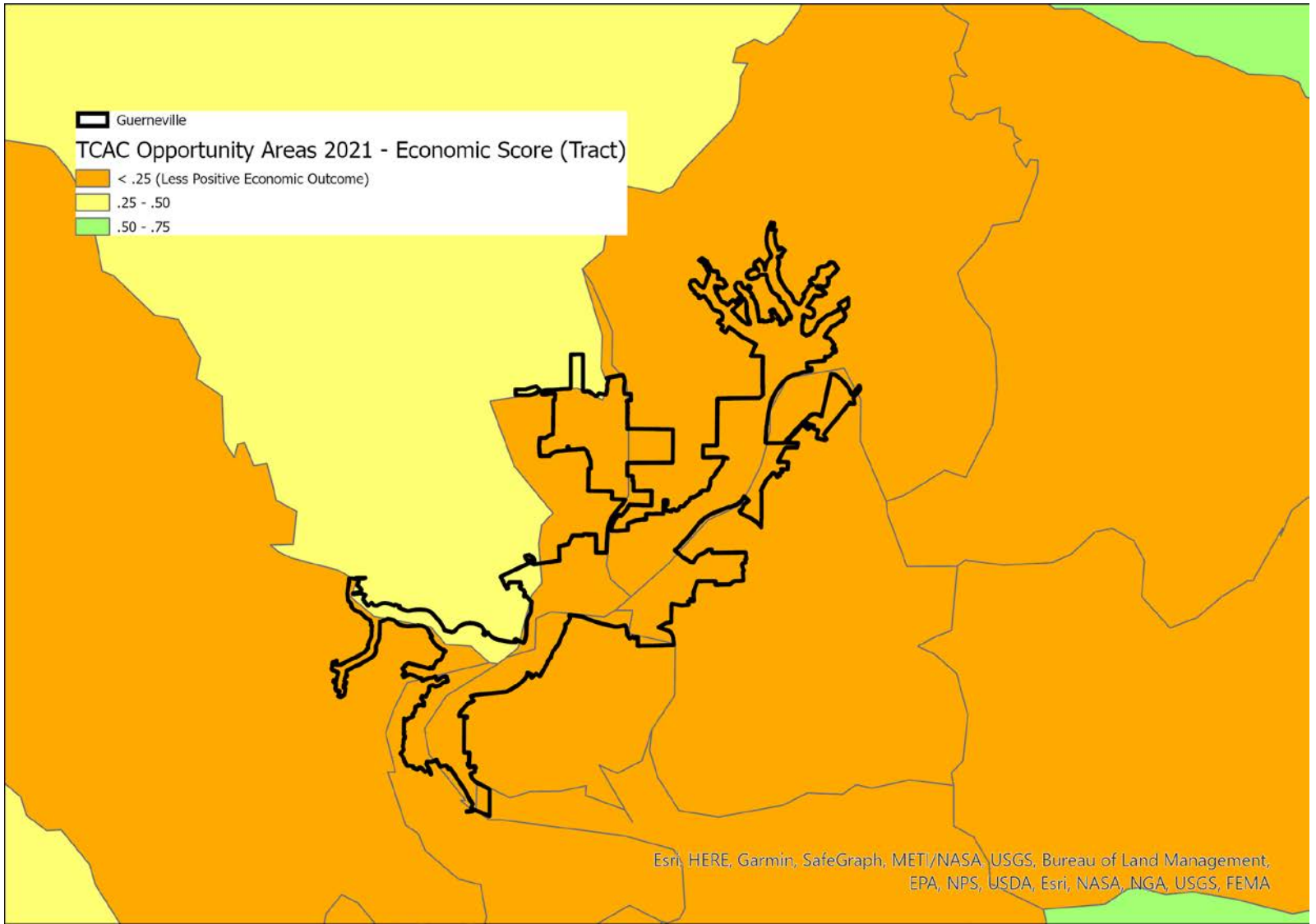
Guerneville has one of the highest repetitive flood loss rates in the entire nation

Guerneville: Disadvantaged Communities, Priority Development Areas, and Demographics



The entire Guerneville USA is a Disadvantaged Unincorporated Community

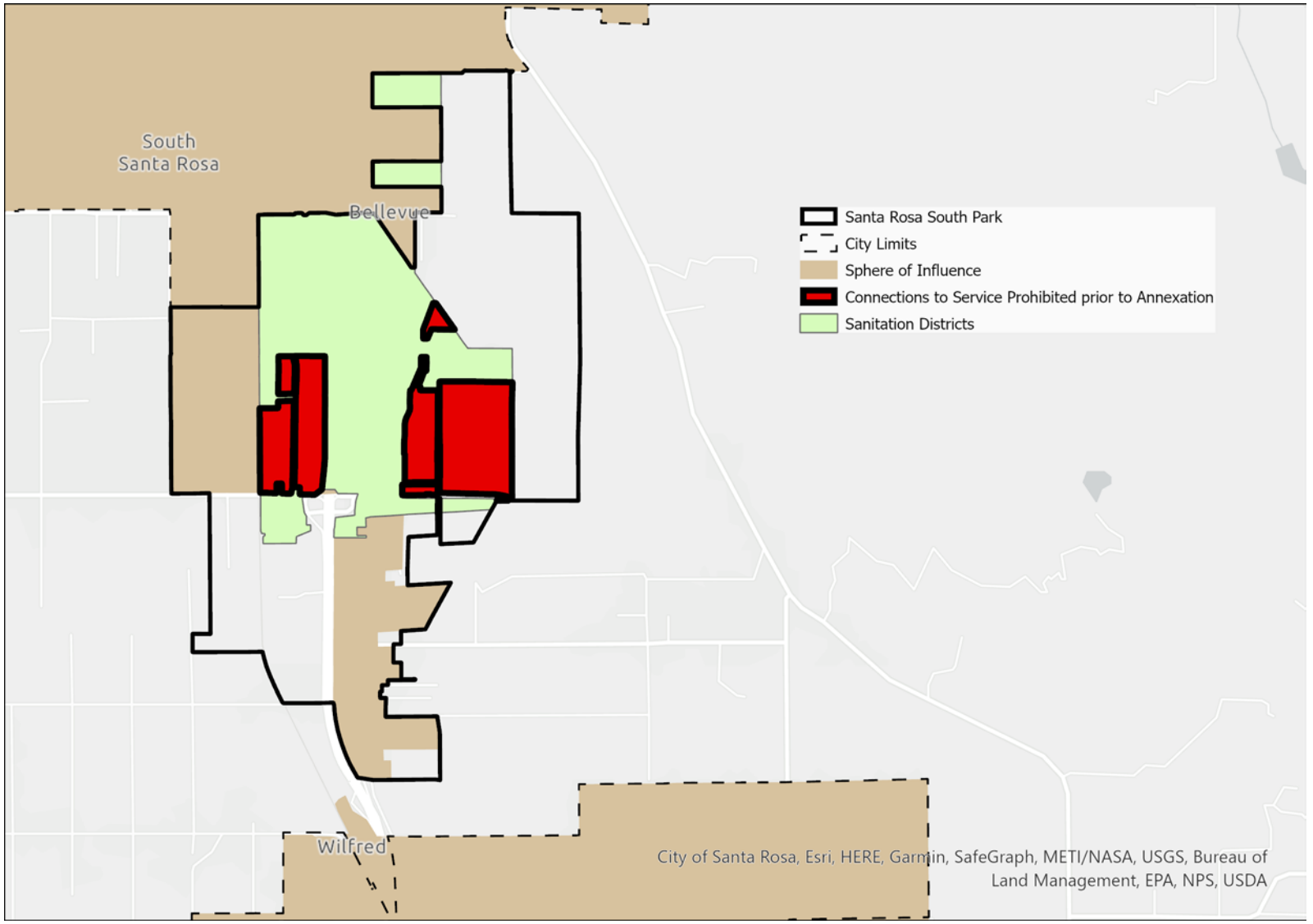
Guerneville USA: AFFH



Guerneville scores lowest on economic outcomes

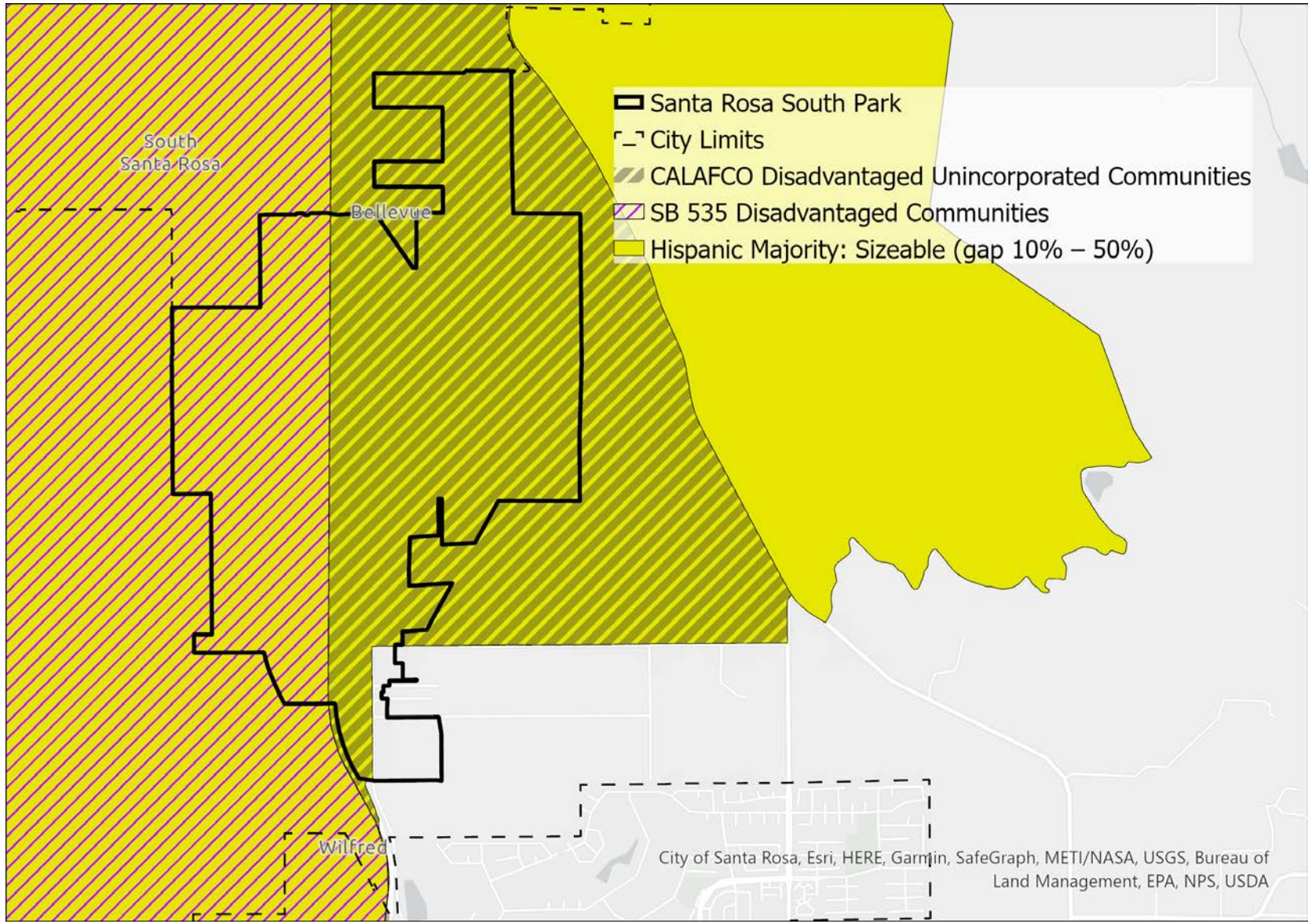
Santa Rosa South Park Urban Service Area

Santa Rosa South Park USA: Infrastructure



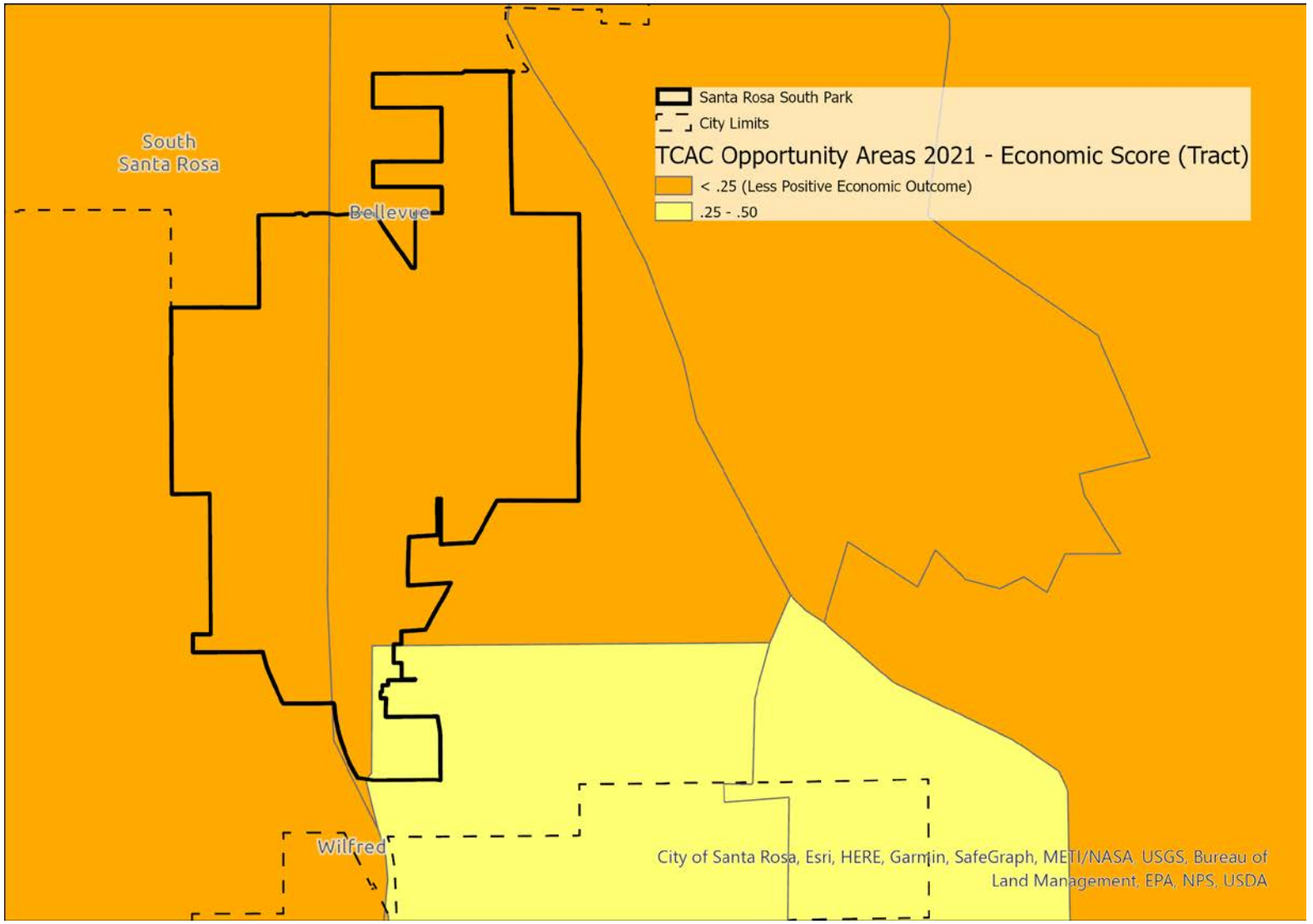
Some areas in South Park allow sewer connections if consistent with CITY General Plan

South Park: Disadvantaged Communities & Demographics



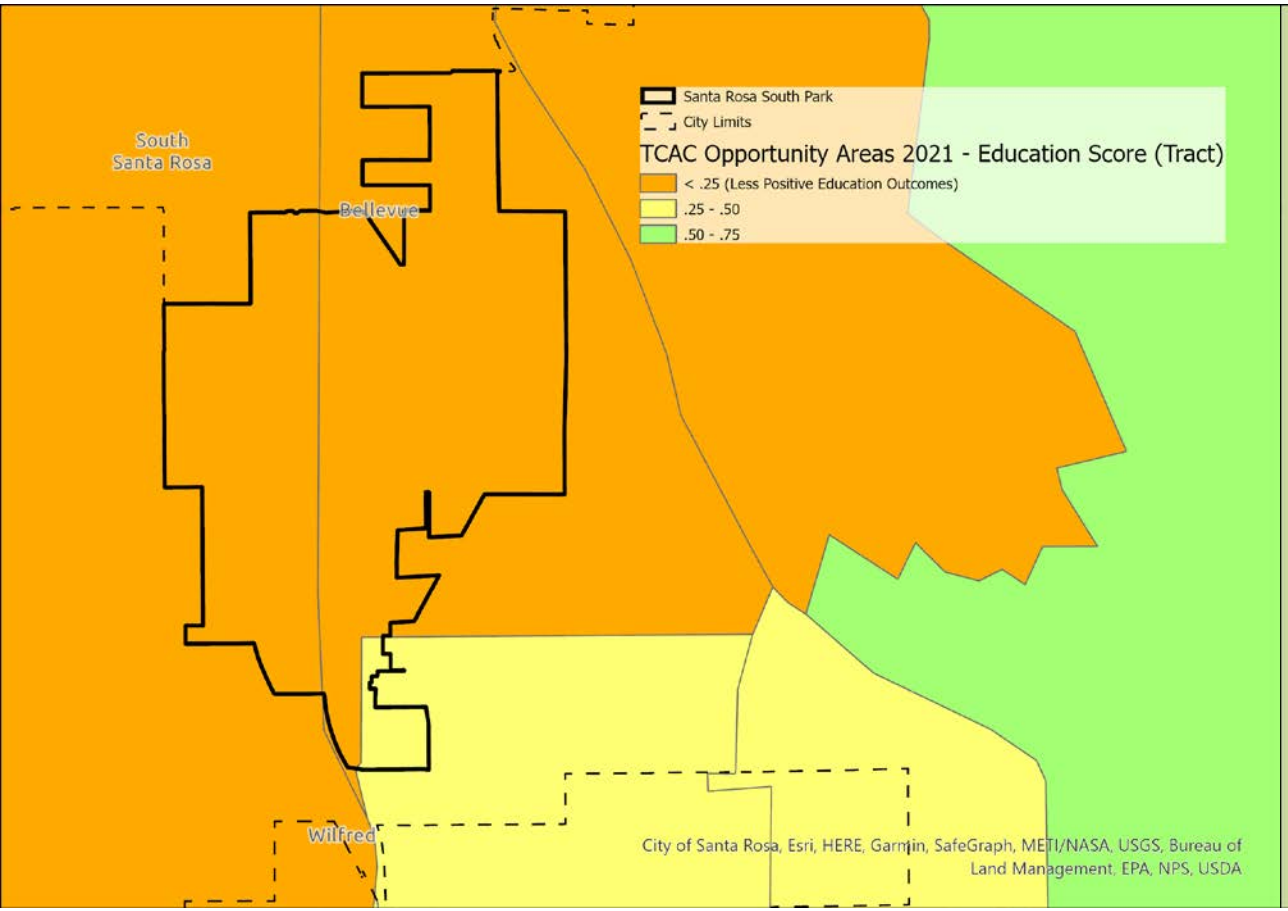
South Park is an area of existing racial and economic segregation. It is both a Disadvantaged Unincorporated Community and an SB 535 Disadvantaged Community.

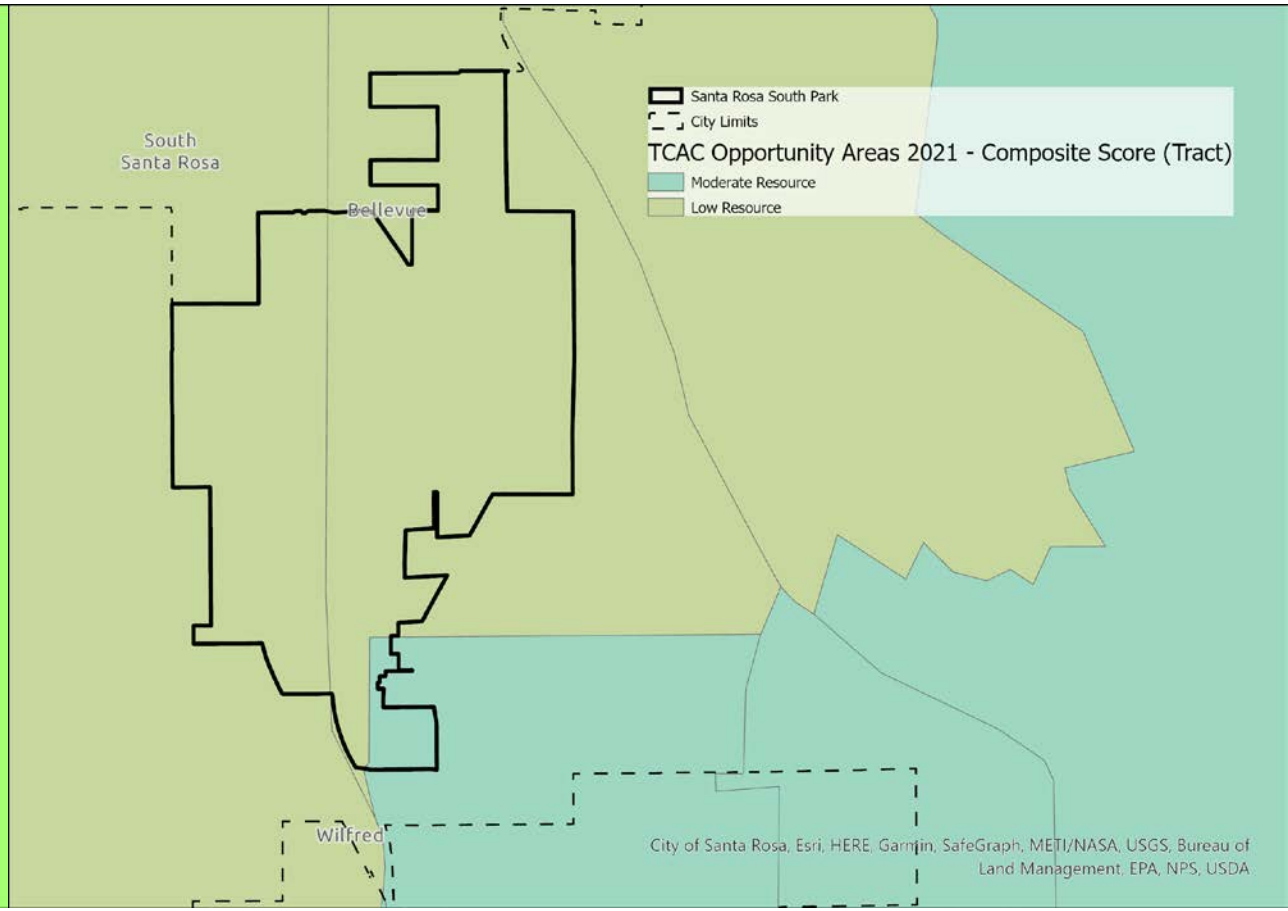
Santa Rosa South Park USA: AFFH



South Park has the least positive economic opportunities

Santa Rosa South Park USA: AFFH

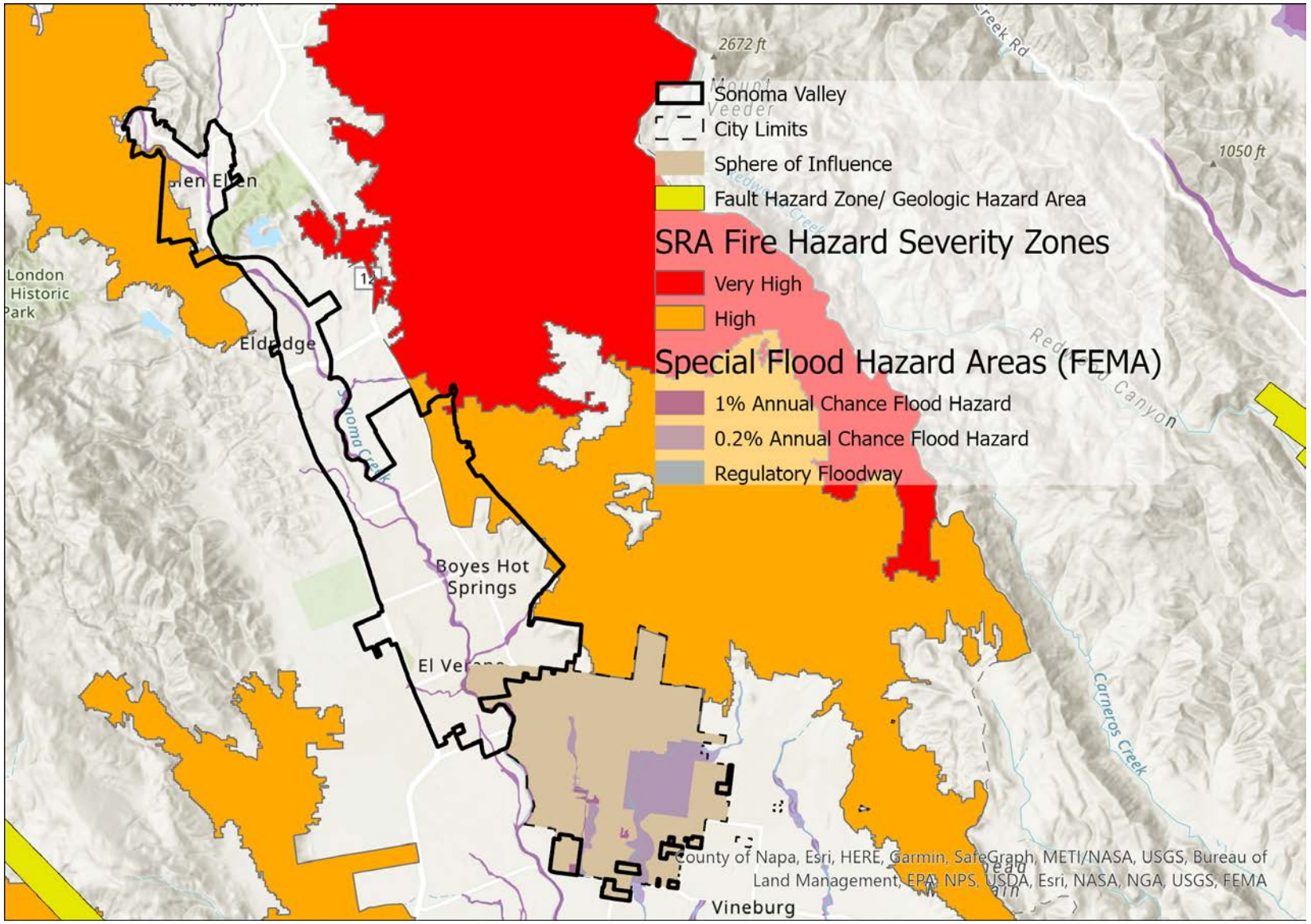




South Park is a low educational opportunity area and a TCAC low resource area

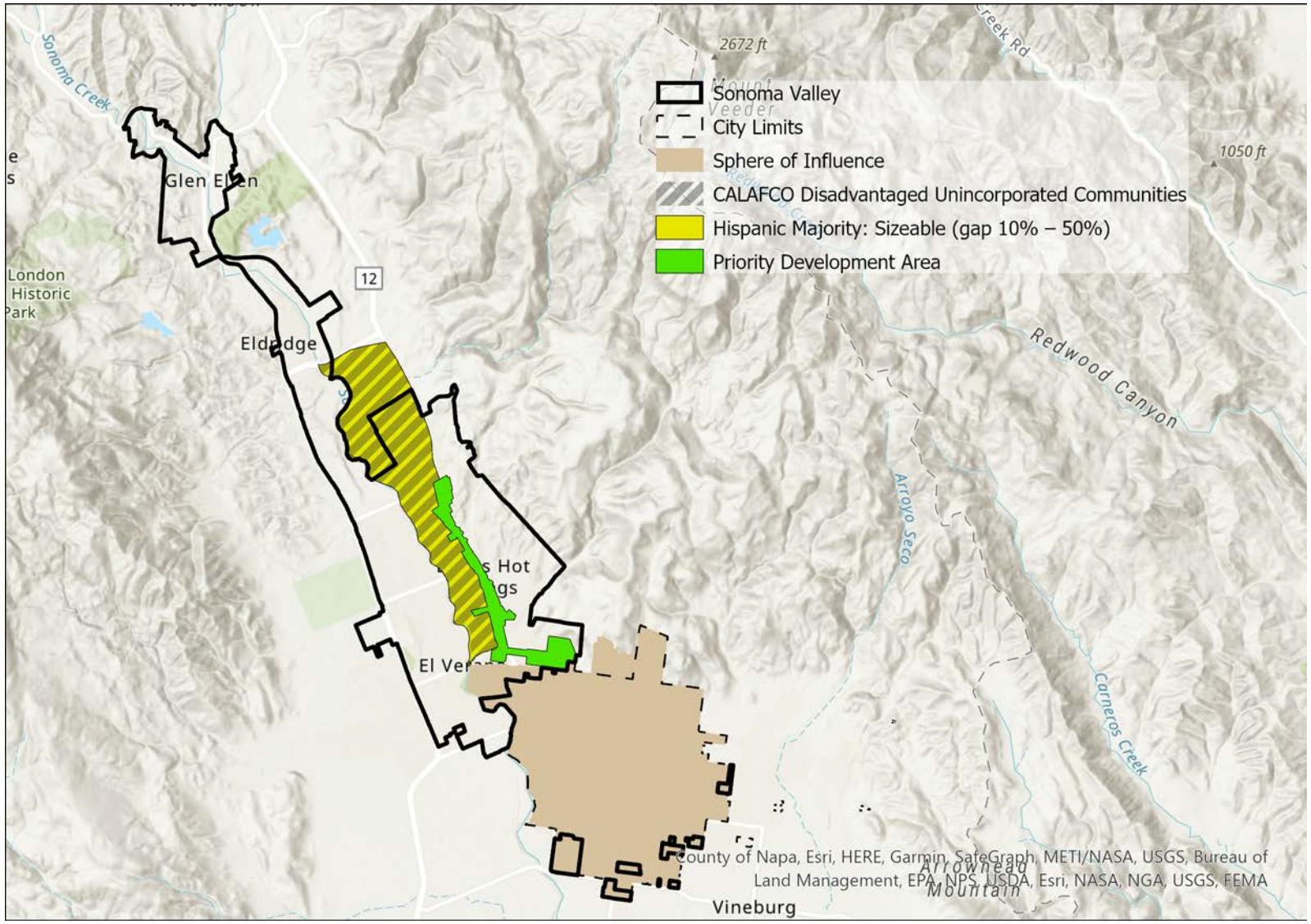
Sonoma Valley Urban Service Area

Sonoma Valley : Environmental Constraints



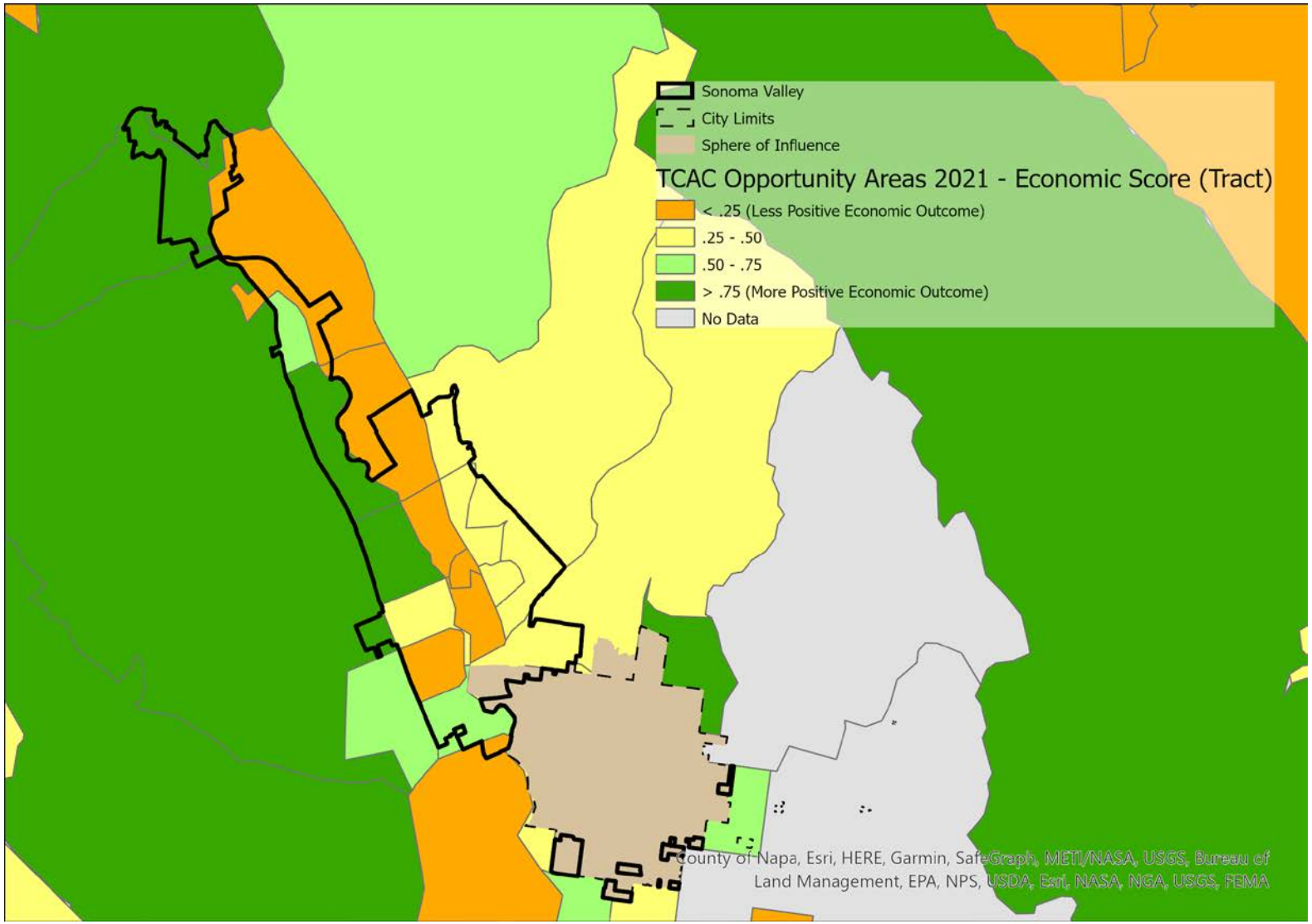
Sonoma Valley is prone to wildfires

Sonoma Valley : Disadvantaged Communities, Priority Development Areas, and Demographics



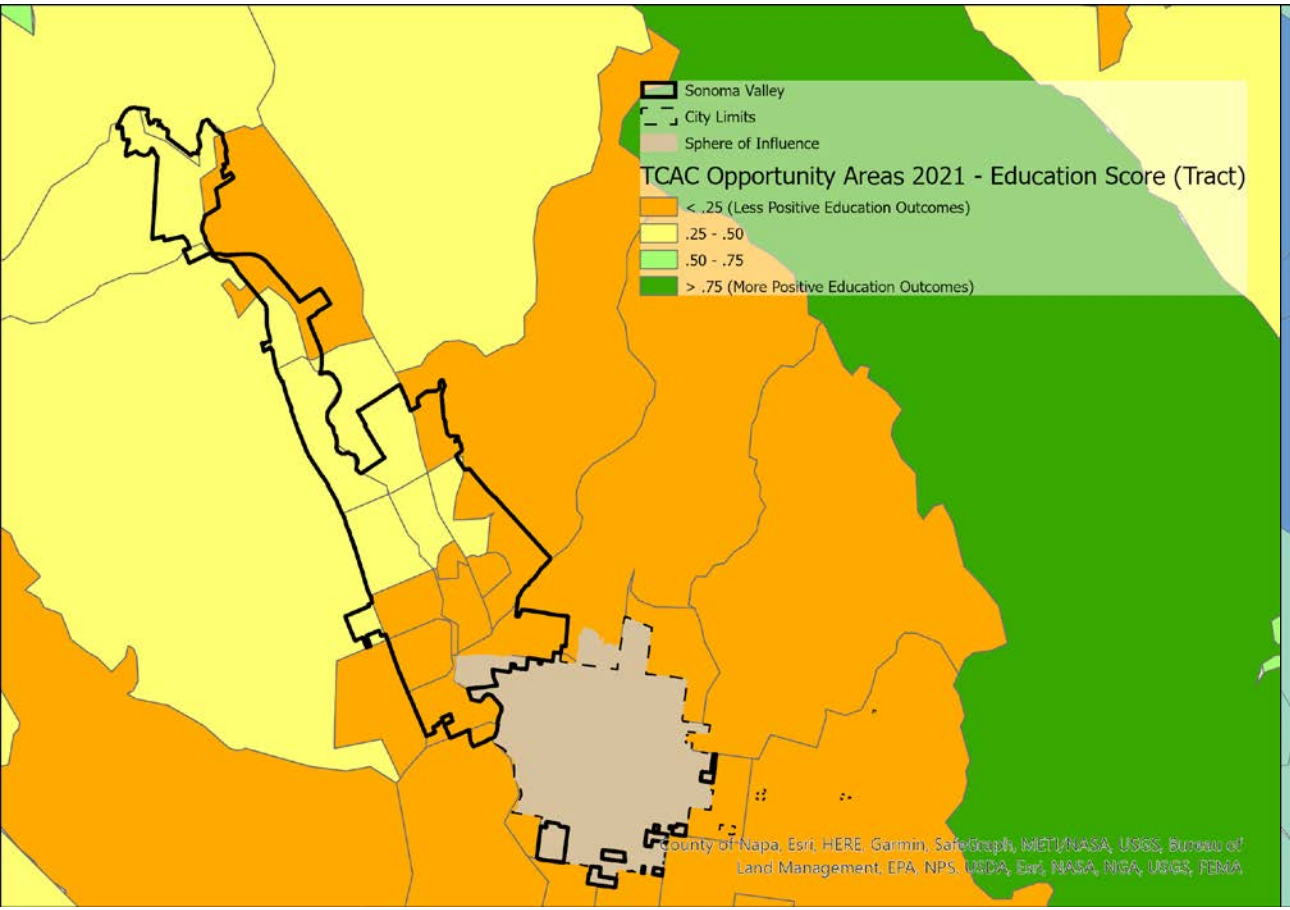
Sonoma Valley (Springs) is an existing area of racial and economic segregation, and is a Disadvantaged Unincorporated Community

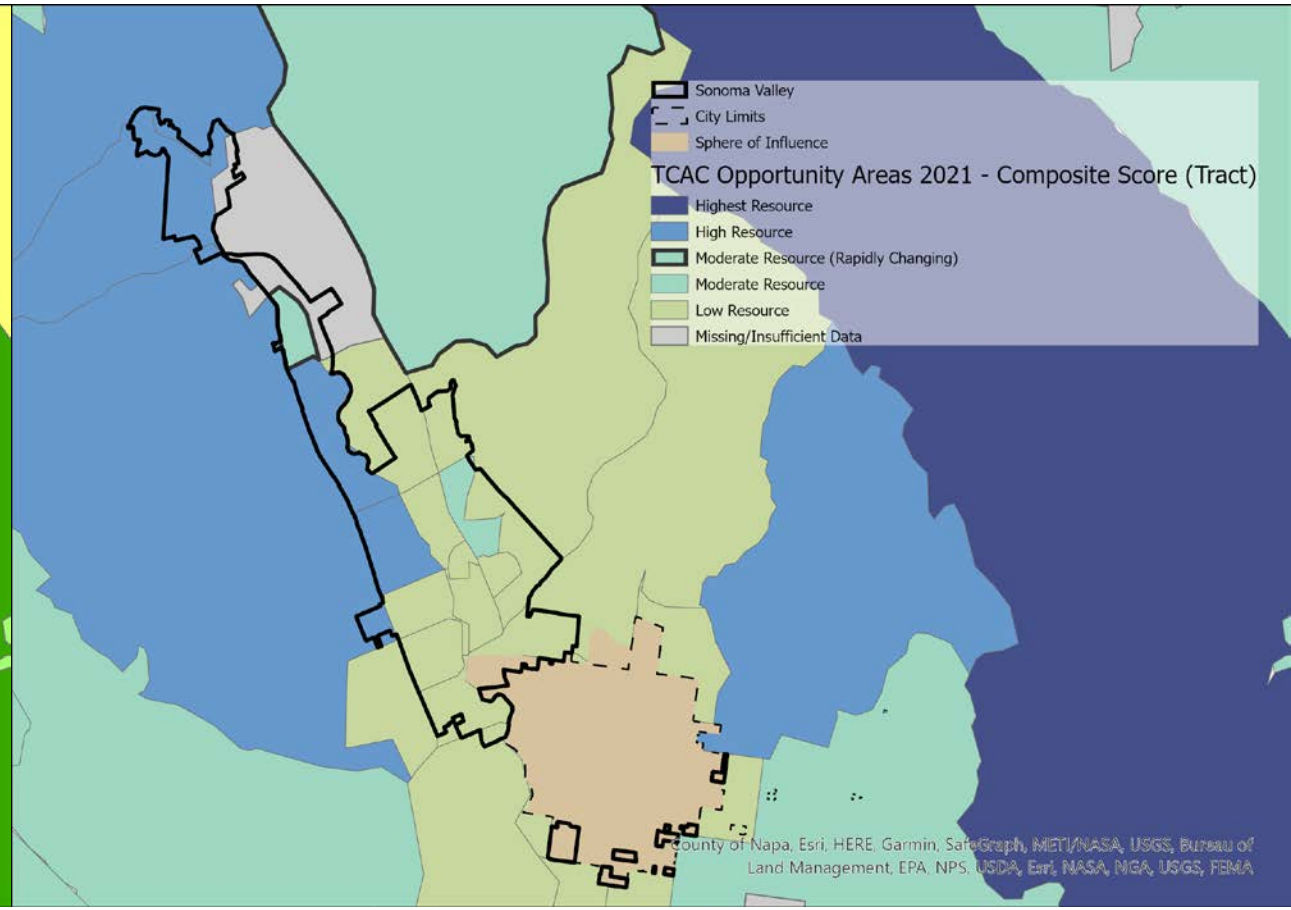
Sonoma/Sonoma Valley: AFFH



The Springs area has less positive economic opportunities

Sonoma/Sonoma Valley: AFFH





The Sonoma Valley/Springs area has low educational opportunities and is a TCAC low resource area