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## City of Sebastopol Planning Commission Staff Report

Meeting Date: October 13, 2020  
Agenda Item: 6A  
To: Planning Commission  
From: Kari Svanstrom, Planning Director  
Subject: Regional Housing Need Allocation Update  
Recommendation: Receive report

### **Introduction:**

California state law recognizes that local governments play a vital role in developing affordable housing. In 1969, the state mandated that all California cities, towns and counties must plan for the housing needs of its residents. This state mandate is implemented through each community's General Plan Housing Element, and through the Regional Housing Needs Allocation (RHNA).

As part of the RHNA process, the California Department of Housing and Community Development (HCD), determines the total number of new homes the 9-County Bay Area needs to build—and how affordable those homes need to be—in order to meet the housing needs of people at all income levels. For the 8 year period covering 2023-2031, HCD has determined that the Bay Area's RHNA is 441,176 housing units, about half of which must be affordable. By contrast, the Bay Area's RHNA for the current 8 year period ending in 2022, was 187,990 units. This represents an increase of almost 135%, which is reflective of our state's dire housing crisis and is consistent with the increases seen in other parts of the state.

The Association of Bay Area Governments (ABAG), works through the Housing Methodology Committee (HMC) to distribute a share of the region's housing need to each city, town and county in the nine-county Bay Area. One methodology must be chosen to allocate all of the Bay Area's growth to each of the counties and cities, regardless of their vast differences. Each local government must then update their Housing Element to demonstrate that there are sufficient sites for this to be built, and that the necessary policies and strategies to meet the community's housing needs are in place. Each local government must zone enough of its land to ensure that sufficient housing can be built to accommodate their housing need, based on their RHNA numbers. If a community does not have adequate suitable land to zone for high-density housing, then will not receive state certification of its Housing Element. Most state funding programs for housing and community benefits require a state-certified Housing Element, so this is critically important.

## Housing Methodology Committee

The ABAG Housing Methodology Committee (HMC) began meeting in October 2019 to consider and select a methodology that would allocate the total 441,176 housing units that the state determined the Bay Area region would need to build. These units would be allocated to each local government in the Bay Area, within the following affordability categories:

- very low income (up to 50% area median income),
- low income (up to 80% area median income),
- moderate income (up to 120% area median income) and,
- above-moderate (regular market-rate housing.)

Each county in the region had at least two representatives on the HMC: one planning staff and one elected. Some larger counties had more representatives. Sonoma County's planning representative was Jane Riley, Comprehensive Planning Manager, Permit Sonoma, and Noah Housh, Director of Community Development, City of Cotati served as an alternate. Sonoma County's elected representative was Councilmember Susan Adams with the City of Rohnert Park. Councilmember Adams also sits on the ABAG Regional Planning Committee. The group of Sonoma County's planning directors have met throughout the process to receive updates and discuss input for the HMC with our representatives.

In its earlier meetings, the HMC set its general goals for the process to ensure that the majority of housing units were located near jobs and transit, and that areas with the best opportunities (deemed "high resource areas") were assigned a fair share of affordable units in order to increase equity. At its June 2020 meeting, the HMC came to consensus around several Guiding Principles to guide the development of the RHNA methodology, including:

1. More housing should go to jurisdictions with more jobs than housing and to communities exhibiting racial and economic exclusion
2. The methodology should focus on:
  - Equity, as represented by High Opportunity Areas
  - Relationship between housing and jobs; however, no consensus on specific factor
3. Equity factors need to be part of total allocation, not just income allocation
4. Do not limit allocations based on past RHNA
5. Housing in high hazard areas is a concern, but RHNA may not be the best tool to address

As methodologies were being considered, ABAG staff strongly advocated using the draft Plan Bay Area 2050's projected population model as the "baseline" data in the RHNA methodology, with little discussion of the negative implications of such a choice. Plan Bay Area 2050 makes assumptions about appropriate sites for high-density housing and unfortunately has included several inappropriate locations such as, flood plains, rural recreational land, industrial land and land in areas at high risk of wildfires in their modeling.

Using this data in the HMC methodology has resulted in the rural and agricultural parts of the North Bay receiving high projected RHNA allocations that push growth outside of city limits and into areas without utilities or other services. In Sonoma County, all local governments have voter-approved Urban Growth Boundaries intended to focus housing growth within city limits while preventing sprawl in the unincorporated county. The local Urban Growth Boundaries ensure that jurisdictions comply with the State's Climate Action goals, which includes lowering Vehicle Miles Traveled (VMT) and prioritizing transit oriented in-fill development. Table 1 below

summarizes the increased growth in rural Bay Area communities using the HMC-recommended methodology. While the 2023-2031 RHNA allocation to the entire ABAG region will be increasing 135% over the current cycle’s allocation, the RHNA increase to unincorporated North Bay counties are projected to have far greater percentages of the growth.

**TABLE 1: UNINCORPORATED RURAL COMMUNITIES PROJECTED RHNA – 2023-2031**

Jurisdiction	RHNA 2015-2023	Projected 2023-2031	% Increase
Uninc. Marin	185	3830	1970%
Uninc. Napa	180	790	339%
Uninc. Solano	103	1020	890%
Uninc. Sonoma	515	5250	919%
<b>Total ABAG Allocation</b>	<b>187990</b>	<b>441,176</b>	<b>135%</b>

On September 18, 2020, the HMC selected and voted on a draft methodology (“Option 8A”) for recommendation to the ABAG Regional Planning Committee and Executive Board. This option uses Plan Bay Area 2050 baseline population data with a focus on placing housing near jobs and high opportunity areas. Table 2 below shows the total RHNA numbers by jurisdiction in Sonoma County for the current RHNA cycle (2015-2023) and the projected numbers, based on the recommended methodology, for the upcoming RHNA cycle (2023-2031.)

**TABLE 2: SONOMA COUNTY PROJECTED RHNA – 2023-2031**

Jurisdiction	RHNA 2015-2023	Projected 2023-2031	% Increase
Cloverdale	211	300	42%
Cotati	137	270	97%
Healdsburg	157	350	123%
Petaluma	745	2100	182%
Rohnert Park	899	1260	40%
Santa Rosa	5083	6530	28%
Sebastopol	120	420	250%
Sonoma	137	330	141%
Uninc. Sonoma	515	5250	919%
Windsor	440	710	61%
<b>SONOMA TOTAL</b>	<b>8444</b>	<b>17520</b>	<b>107%</b>

Sonoma County Transportation Agency (SCTA) hosts a monthly Housing Ad Hoc Committee with the County’s planning directors and/or housing staff from each jurisdiction in the County. This group nominated and selected the staff representative and alternate to represent Sonoma County on the HMC, and has been debriefing and discussing the progress of the HMC at their monthly meetings. Staff have also attended many of the HMC meetings throughout the past year. This group recently collaborated on a letter to the ABAG Regional Planning Committee ahead of its October 1, 2020, meeting, expressing concerns about the inaccuracies in the Plan Bay Area Blueprint 2050 data and requesting additional time to review this data and provide input to ABAG (see attachment). The letter also requests that areas that have been identified for growth in the draft Plan Bay Area 2050 Blueprint but that are not suitable for high-density housing, be excluded from a jurisdiction’s RHNA allocation for the 6th cycle unless infrastructure can be provided within the 8-year RHNA cycle.

## **Next Steps**

On October 1, 2020, the ABAG Regional Planning Committee will consider the HMC's recommended methodology and make a recommendation to the ABAG Executive Board. The Executive Board will vote on a final recommended methodology on October 15, 2020. (Both the Regional Planning Committee and Executive Board include elected representatives from each County). After this, the recommended methodology will be submitted to the State HCD for review. In Summer 2021, individual jurisdictions may appeal their draft RHNA numbers to HCD. By the end of 2021, HCD will publish the final approved RHNA numbers by jurisdiction. After receiving the final RHNA numbers, each jurisdiction will work on their Housing Elements, which are due to the state in January 2023.

## **How to Get Involved**

Anyone who wishes to weigh in on the ABAG Executive Board's decision on October 15<sup>th</sup> can contact the Executive Board President and/or submit public comment via email or Zoom during the meeting. Executive Board President, Jesse Arreguin, can be contacted at [mayor@cityofberkeley.info](mailto:mayor@cityofberkeley.info); and be sure to copy ABAG Secretary Fred Castro, [fcastro@bayareametro.gov](mailto:fcastro@bayareametro.gov).

Once posted, meeting details for the October 15<sup>th</sup> meeting can be found [here](#). Sonoma County's ABAG Executive Board representatives can also be contacted ahead of this meeting: County Supervisor David Rabbitt ([David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)) and Rohnert Park Councilmember Jake MacKenzie ([jmackenzie@rpcity.org](mailto:jmackenzie@rpcity.org)).

## **Public Comment:**

No public comments have been received as of the writing of this staff report.

## **Attachments:**

Joint letter regarding RHNA from Sonoma County planning /community development directors and SCTA staff  
RHNA timeline as of October 1, 2020

*For more information about RHNA, visit [ABAG's website](#) or the [State HCD's website](#).*

ABAG 2023-2031 RHNA and Plan Bay Area 2050 Key Milestones	Proposed Deadline
Housing Methodology Committee kick-off	October 2019
Subregions form <sup>1</sup>	February 2020
Plan Bay Area 2050 Regional Growth Forecast	April 2020
HCD Regional Housing Need Determination <sup>2</sup>	Summer 2020
Plan Bay Area 2050 Draft Blueprint	July 2020
Proposed RHNA methodology, <sup>3</sup> draft subregion shares	Fall 2020
Plan Bay Area 2050 Final Blueprint	December 2020
Final subregion shares <sup>4</sup>	December 2020
Draft RHNA methodology to HCD for review <sup>5</sup>	Winter 2021
Final RHNA methodology, <sup>6</sup> draft allocation <sup>7</sup>	Spring 2021
RHNA appeals <sup>8</sup>	Summer 2021
Final Plan Bay Area 2050	September 2021
Final RHNA allocation <sup>9</sup>	End of 2021
Housing Element due date <sup>10</sup>	January 2023

*Dates are tentative and subject to change.*

To learn more, visit the [ABAG RHNA website](#) or [Plan Bay Area 2050 website](#).

## Glossary of Acronyms

ABAG – Association of Bay Area Governments

HCD – California Department of Housing and Community Development

RHNA – Regional Housing Needs Allocation

<sup>1</sup> GC §65584.03(a).

<sup>2</sup> GC §65584.01(b)(1).

<sup>3</sup> GC §65584.04. ABAG/Subregion must conduct at least one public hearing prior to releasing draft methodology.

<sup>4</sup> GC §65584.03(c).

<sup>5</sup> GC §65584.04(h).

<sup>6</sup> GC §65584.04(i). HCD has up to 90 days to review final methodology.

<sup>7</sup> GC §65584.05(a).

<sup>8</sup> GC §65584.05.

<sup>9</sup> GC §65584.05(g).

<sup>10</sup> GC §65588(e)(3)(A). Housing Element Due Date is 18 months after adoption of the RTP/SCS.