



## Sonoma County Planning Commission **STAFF REPORT**

**FILE:** PLP20-0018  
**DATE:** February 2, 2023  
**TIME:** at or after 1:05 pm  
**STAFF:** Eric Gage, Project Planner  
Ross Markey, Supervising Planner

### **SUMMARY**

<b>Applicant:</b>	County of Sonoma
<b>Supervisory District(s):</b>	All
<b>Description:</b>	Housing Element Update Draft Environmental Impact Report
<b>CEQA Review:</b>	Environmental Impact Report

### **RECOMMENDATION**

Accept public comments on the Draft Environmental Impact Report prepared for the Housing Element update.  
No action is requested.

### **EXECUTIVE SUMMARY**

In December 2021, the Association of Bay Area Governments adopted the Final Regional Housing Needs Allocation (RHNA) Plan for the Bay Area for the 6<sup>th</sup> Housing Element Cycle, 2023-2031. ABAG's Final RHNA Plan allocated 3,881 housing units to unincorporated Sonoma County. Under State law, the County is required to have adequate sites zoned to accommodate its RHNA and meet the housing need in its community.

The Draft Housing Element was published on November 3, 2022 and circulated for public comment, and subsequently submitted to the California Department of Housing and Community Development (HCD) for review and approval.

The Draft Environmental Impact Report (DEIR) for the Housing Element update analyzes the environmental impact of the draft Housing Element update, including the proposed rezoning of up to 59 sites in unincorporated Sonoma County to accommodate the county's RHNA and the policies and programs of the Draft Housing Element. Published on December 28, 2022, the DEIR has a 45-day public review period that includes this public hearing conducted by the Planning Commission to receive comments on the adequacy of the DEIR. After the



public review period closes on February 13, 2023, Permit Sonoma will evaluate the comments on environmental issues, prepare a written response to any significant environmental issues raised in the comments, and prepare a Final EIR for review and recommendation by the Planning Commission. Following HCD approval of the Draft Housing Element, both the Final EIR and the Housing Element will be scheduled for Board certification and adoption, respectively.

### **Background—Housing Element**

California law requires all cities and counties to plan and zone for their projected housing need. Based on a rolling eight-year cycle, the California Department of Housing and Community Development (HCD) determines each region's housing need. In regions represented by councils of government (COGs), COGs assign each jurisdiction in the region a share of the Regional Housing Need Allocation (RHNA). Housing need is established for four different income categories (very low-, low-, moderate-, and above moderate-income). In December 2021, the Association of Bay Area Governments finalized its RHNA Plan to allocate the 441,176 units assigned to the Bay Area for the 6<sup>th</sup> Cycle, including 3,881 units allocated to unincorporated Sonoma County. This represents an increase of over 600% above the County's RHNA at the end of the 5th Cycle (2014-2023). State law requires that each local jurisdiction must have adequate sites zoned to accommodate its RHNA.

Last year, the County and the City of Cloverdale reached an agreement to transfer some RHNA responsibility associated with recent annexations, and the County's RHNA decreased by 57 units. ABAG approved the transfer, and it is now final. The County's updated RHNA is 3,824 units, as shown in Table 1.

**Table 1: Unincorporated Sonoma County Regional Housing Needs Allocation, 2023 - 2031**

Income Level	Very Low < 50% AMI*	Low < 80% AMI	Moderate < 120% AMI	Above Moderate > 120% AMI	Total
RHNA (units)	1,036	596	627	1,622	3,824**

\*AMI = Area Median Income

\*\*Total RHNA as of November 18, 2022 (accounting for transfer of 57 units to the City of Cloverdale).

State law requires each city and county in the state to adopt a housing element as one of the seven mandated elements of the General Plan. Preparation of the Housing Element is required by the California Housing Element (Gov. Code §§ 65580 et seq.). The Housing Element is one of the seven mandated elements of the General Plan, and the only element that must be updated on a set schedule, consistent with the establishment of the RHNA. Housing elements must contain a housing needs assessment, an analysis of constraints to housing development, policies and programs to address constraints and meet the jurisdiction's housing needs, and a site inventory showing that there is sufficient land zoned to accommodate the need. For this cycle, the statutory deadline for the County to adopt a "substantially compliant" Housing Element update was January 31, 2023.

### **Project History—CEQA Review and Draft EIR**

Preparation for the 2023 Housing Element began in 2020 with the Rezoning Sites for Housing project. Permit Sonoma asked the public to nominate sites for housing. County staff evaluated sites for consistency with basic



eligibility criteria, including availability of public utilities, location in relation to nearby Urban Growth Boundaries, community separators, and others. Fifty-nine (59) potential sites were identified to accommodate up to 2,900 units of housing. A draft EIR was prepared to study the environmental effects of the Rezoning Sites for Housing project.

Following circulation of that Draft EIR in May 2021, Permit Sonoma determined that, due to the imminent Housing Element Update, it would not move forward with rezoning the identified 59 sites as a separate project, and instead would incorporate proposed rezoning of these sites as one component of the broader Housing Element update. Accordingly, the Board of Supervisors did not certify the Rezoning Sites for Housing Project Draft EIR. Just as the Housing Element Update is a different project from the Rezoning Sites project, this EIR for the Housing Element Update is a new and distinct document. To that end, this Draft EIR incorporates some information from the Rezoning Sites Draft EIR, as appropriate, but it is a new and distinct document that analyzes the environmental effects of the comprehensive Housing Element Update throughout the County.

Permit Sonoma held an EIR scoping meeting in June 2022, following notice of preparation of the draft EIR for the Housing Element. On December 28, 2022, Permit Sonoma staff published a Notice of Availability of the DEIR (“NOA”). The NOA notified public agencies, interested parties, and members of the public that the DEIR is available for public review and comment for a 45-day public review period (December 28, 2022 through February 13, 2023).

### ***Project Description***

The proposed project would update Sonoma County’s current Housing Element, including goals, objectives, policies, and implementing programs. The Housing Element Update would rezone 59 urban sites located in designated Urban Service Areas throughout unincorporated Sonoma County for by-right, medium-density housing. In addition, 20 additional inventory sites would not be rezoned under implementation of the project. The project would also add these sites to the County’s Housing Element site inventory to comply with new inventory requirements in Housing Element law. All Rezoning Sites near incorporated areas are within or adjacent to voter-approved Urban Growth Boundaries. Current designations of the sites include agricultural, residential, commercial, and industrial uses. The sites include both undeveloped and developed parcels.

The project includes 1) an update to the Sonoma County Housing Element; (2) a General Plan Map amendment as necessary and, where applicable, area plan amendments to change land uses and allowable densities on identified sites; (3) rezoning of sites to match new General Plan land uses or densities, or to add the Workforce Housing (WH) Combining District; and (4) this Program EIR to evaluate the potential environmental impacts of the project. The project is intended to facilitate and encourage housing development that could be developed over an 8-year period, commencing in 2023 and ending in 2031.

### ***Draft Environmental Impact Report***

The Draft Environmental Impact Report (DEIR) analyzes the potential environmental effects of the proposed Housing Element Update, including proposed rezoning of up to 59 sites, in compliance with California Environmental Quality Act (CEQA). The DEIR is a Program EIR, a type of analysis which considers the environmental impact of a series of related actions, rather than a single project. The Draft EIR finds that project implementation could result in significant and unavoidable impacts related to aesthetics, cultural resources, greenhouse gas emissions, hazards, transportation, utilities, and wildfire. All other impacts were found to be less than significant, or reduced to less than significant after mitigation was incorporated. A “significant and

unavoidable” impact is one that cannot be reduced to below the threshold of significance, given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be adopted by the decision-making body before the project may be approved.

The Housing Element Update DEIR was published for public review on December 28, 2022. The Executive Summary is included as Attachment 1, and the complete DEIR and appendices are available for review at the project website, <https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement>.

The purpose of this public hearing is to accept public comments on the DEIR.

### ***Next Steps***

Formal public comments on the DEIR will be accepted at today’s hearing. Comments will also be accepted in writing throughout the public review period. After the review period closes on February 13, 2023, Permit Sonoma will review the comments, prepare written responses to comments that raise significant environmental issues, and prepare a Final EIR. Following HCD approval of the Draft Housing Element, the final Housing Element and and Final EIR will be scheduled for the Planning Commission’s recommendation of approval, and then for Board adoption and approval.

### **RECOMMENDATIONS**

Staff recommends that the Planning Commission receive an informational update from staff on the Draft Environmental Impact Report for the proposed Housing Element Update and hold a workshop to receive public comment on the DEIR

### **ATTACHMENTS**

1. Attachment 1 Draft Program Environmental Impact Report Executive Summary
2. Attachment 2 Timeline