



Sonoma County Planning Commission **STAFF REPORT**

FILE: PLP20-0018
DATE: November 17, 2022
TIME: at or after 1:05 pm
STAFF: Eric Gage, Project Planner
Ross Markey, Supervising Planner
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SUMMARY

Applicant:	County of Sonoma
Supervisorial District(s):	All
Description:	Public Draft Housing Element Workshop
CEQA Review:	Environmental Impact Report (pending)

RECOMMENDATION

The Permit Resource and Management Department (Permit Sonoma) recommends that the Planning Commission receive an informational update on the published Draft Housing Element; hold a workshop to receive information, comments from the public; and provide comments to staff and consultants on the Draft Housing Element.

This item is an informational public workshop, and no formal action or decision is required.

EXECUTIVE SUMMARY

In October 2021, staff selected Civic Edge Consulting and Rincon Consultants to support the County's 6th Cycle Housing Element update project to develop a Housing Element that incorporates new state requirements and creates a policy framework and implementation plan to address inequities in providing safe and affordable housing for Sonoma County. Local housing issues and needs have been identified through data collection and analysis, interviews with stakeholders and focus groups, community opinion surveys, and input from the Housing Advisory Committee (HAC).

In the current 5th Regional Housing Need Allocation (RHNA) cycle, the County of Sonoma was assigned an adjusted allocation of a total of 515 dwelling units of varying income categories. At the end of 2021, the County



had completed 87% of the 5th cycle allocation. In December 2021, the Association of Bay Area Governments assigned a RHNA for the 6th cycle that included an allocation of 3,881 units for unincorporated Sonoma County. Each Bay Area jurisdiction must adopt their Housing Element updates by January 31, 2023.

Following extensive public outreach and draft development, the draft Housing Element was published on November 3, 2022, beginning the 30-day public comment period. Staff is holding several workshops during the comment period to facilitate public comment on the draft Housing Element. Staff will continue to collect public comment during the comment period and submit the updated housing element to the California Department of Housing and Community Development (HCD) for their review.

The Draft Environmental Impact Report (EIR) is scheduled for publication in early December. Staff will circulate the draft EIR and collect feedback during the 45-day public comment period. After incorporating HCD feedback, staff will return to the Planning Commission with a recommendation for the Board of Supervisors to adopt the updated Housing Element and certify the EIR.

PROJECT DESCRIPTION

The preparation of the Housing Element is required by California State Law, Chapter 10.6 and 10.7 of the Government Code. 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 Regional Housing Needs Allocations (RHNA). The County is required to update its 2014 Housing Element to cover the planning period between 2023 – 2031. The 2023 Housing Element will retain many of the existing goals, policies, and programs of the existing 2014 Housing Element; programs that have been completed will be removed, and those that were not successfully implemented will be reviewed and either eliminated or revised and continued. New policies and programs will be added where needed to address new legislative requirements, to address the County’s particular housing needs and trends, and to affirmatively further fair housing.

Project History

During the current (5th Cycle) housing element period, the County has been a leader in incentivizing and encouraging housing and has adopted a multitude of new programs and ordinances to implement its housing agenda. While the County has done a lot to promote housing development, the housing crisis remains. More is needed.

The table below summarizes key project milestones and events:

Table 1: Housing Element Update Project Milestones and Events

Date	Project Event/Milestone
12/30/2021	Housing Element Kick-Off Workshop at Planning Agency
11/02/2021	Tribal Consultation invited under SB 18 (General Plan Amendments)
Dec. 2021 to Jan. 2022	Stakeholder Interviews
12/15/2021	1 st HAC meeting
01/11/2022	1 st community survey released
02/01/2022	2 nd HAC meeting



02/12/22 and 02/15/22	Housing Element Public Workshops
03/08/2022	3 rd HAC meeting
03/10/2022	2 nd community survey released
04/21/2022	1 st Planning Commission Workshop
07/06/2022	3 rd community survey released
08/09/2022	Board of Supervisors Workshop
10/03/2022	Publication of Draft Housing Element
10/15/2022	District 5 workshop
10/16/2022	District 4 workshop

Housing Sites Analysis

Preparation for the 2023 housing element began with the Rezoning Sites for Housing project in 2018, with asking the public to nominate sites for housing. Once this nomination period closed in April 2019, County staff evaluated sites for basic eligibility criteria from the General Plan, including availability of public utilities, location in relation to nearby Urban Growth Boundaries, and proximity to jobs, transit, services, and schools. 59 housing sites were identified to accommodate up to 2,900 units of housing.

The impact analysis prepared for the Rezoning Sites for Housing project will be incorporated in the EIR for the Draft Housing Element so that the Housing Element policies can also be included and analyzed in the environmental document.

Table 2: Rezoning Sites for Housing Project Milestones and Events

Date	Project Event/Milestone
Dec 2018 to April 2019	Public Nomination of Sites
03/11/2020	Notice of Preparation for EIR
03/25/2020	Tribal Consultation invited under AB 52 (CEQA)
05/06/2020	Scoping Meeting
11/17/2020	Tribal Consultation Completed
04/19/2021	Draft EIR Publication, Start of Public Comment Period
06/18/2021	Close of Public Comment Period
10/01/2021	Project on hold pending completion of Housing Element Draft

Public Participation Update

Community input has been collected through a series of virtual meetings with the Housing Advisory Committee (HAC), focus groups representing special needs populations, a regional Equity Working Group, stakeholder interviews, and community surveys. A report of public outreach is included as part of Attachment 3 to this staff report.



Rather than just meet the requirements of Housing Element law, Permit Sonoma’s outreach has centered the lived experience of Equity Priority Communities. Working with a Housing Advisory Committee and community benefit organizations presented an opportunity to engage residents in defining housing issues, and in creating solutions that both meet the needs of the community and the requirements of State law.

RHNA Background

State law requires that Housing Elements demonstrate each local agency’s ability to meet its Regional Housing Needs Allocation (RHNA). Each jurisdiction’s RHNA is set through a process that is meant to identify and address housing needs for the projected State population and household growth, to improve the jobs - housing balance in communities, and to ensure the availability of housing affordable to all income groups. For the 2023-2031 Housing Element Update period, the County of Sonoma overall (county and cities) has a combined RHNA of 14,562 units. The unincorporated County’s assigned share of that RHNA is 3,881 units, which represents an increase of almost 654% above the current 5th Cycle RHNA of 515 units. The current population of unincorporated Sonoma County is 138,460 people.

County staff are currently working with the City of Cloverdale to transfer 57 of the County’s 3,881 units to bring the County’s assigned RHNA share to 3,824 units.

Table 1 below illustrates how the County’s regional housing need is allocated across income levels:

Table 3: 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

**Government Code (GC) Section 65583(a)(1) State law further divides the very low-income category into extremely low and very low categories with 50% in each category. Sonoma County’s extremely low-income unit allocation will be 518 units.

***Total RHNA assuming transfer of 57 units to the City of Cloverdale.

Housing Element Update Requirements

California’s Housing Element law requires that the Housing Element include the following discussion and analysis:

- Provide achievable goals, policies, quantified objectives, and scheduled programs to preserve, improve and develop housing opportunities.
- Identify and analyze household characteristics, including housing costs compared to residents’ ability to pay and housing characteristics, including the extent of overcrowding and an estimate of housing stock conditions.
- Identify and analyze governmental and non-governmental constraints on the maintenance, improvement, and development of housing for all income levels. These constraints may include land use and density controls, building codes and their enforcement, site improvements, fees required of developers, local



processing and permit procedures, the availability of financing, the price of land, the cost of construction, and community opposition.

- Identify the special housing needs of the community including housing for homeless, senior, and female-headed households, farmworkers, and persons with disabilities.
- Identify sites that are suitable for all types of residential development, including multifamily and manufactured homes, during the eight-year housing cycle to meet the County’s fair share of regional housing needs, or Regional Housing Needs Allocation (RHNA), at all income levels.
- Identify opportunities for energy conservation with respect to residential development.

Housing Elements must be reviewed and certified (approved) by the State Department of Housing & Community Development (HCD) in order to satisfy State law.

New State Expectations and Requirements

HCD has dramatically increased expectations for Housing Element sites and programs in order to comply with the complex new State laws and to obtain certification, including the following State expectations and requirements:

- The County will need to demonstrate appropriate zoning to accommodate its share of the regional housing need for lower-income households. State law provides a default minimum density of 20 units per acre. If the County plans to accommodate their RHNA for low-income households on sites that allow less than 20 units per acre, an analysis is required based on statutory factors including market conditions and the County’s experience in developing affordable housing at lower densities.
- Regardless of RHNA, all local governments must include zoning for a variety of housing types, including multifamily, transitional, and permanent supportive housing, low barrier homeless navigation centers, SROs (Single Room Occupancy), homeless shelters, mobile homes, and employee and farmworker housing.
- HCD will likely require programs to remove zoning barriers and increase housing choices so that housing units are not out of reach to less affluent community members. These actions would be required regardless of how the County accommodates the RHNA.
- AB 686 requires HCD to also look at how the sites zoned at high enough densities for low-income housing are integrated throughout the community. As the County contains both low and moderate resource areas (as defined by the State’s Opportunity Area maps), it will be important to ensure housing sites are not concentrated in low resource areas.

Local Housing Issues and Needs

One of the many requirements for the Housing Element is the collection of data to help determine housing needs. This includes quantification of residents overpaying for housing, overcrowded units, the costs of developing housing, and demographic information and trends. The bulk of the required housing and demographic data has been provided by the Association of Bay Area Governments (ABAG) and is contained in Attachment 3. As required by statute, this data has been supplemented by local data and knowledge including an assessment of the County’s success in implementing its 5th Cycle Housing Element.

To ensure that the County’s Housing Element is more than just a set of policies to meet statutory requirements and a list of sites for review and approval by HCD, staff and consultants collected local data in real time. Efforts to collect community input that supplements the data on housing needs was robust as described above.

Identified Housing Issues, Needs and Trends Based on Data, Analysis and Community Input



Senior Housing. Sonoma County’s population is rapidly aging, and additional housing units for seniors will be needed over the next 8 year planning period.

Farmworker Housing. Over the last decade, the number of permanent farmworkers in the County has increased, while the number of seasonal farmworkers has decreased. Community input has identified a need for additional farmworker housing, with a preference for more housing opportunities within the unincorporated County areas that are not employer owned. Farmworkers prefer housing located off-site because if the housing is tied to the job and they lose the job, they have also lost their housing.

Extremely Low-Income Households. 11% of unincorporated Sonoma County households are considered extremely low income, earning 30% or less of the area median income (AMI). 75% of these households are extremely cost burdened (spend 50%+ of income on housing). Because the County does not have sufficient housing units to meet this need, programs to increase the number of units affordable to extremely low-income households will be required.

Large Rental Units. Around 19% of the unincorporated County’s households are considered large households, with 4 or more occupants. Of these households, 40% are rental households. The Housing Element must consider the needs of these households and if a gap exists in the supply of rental units for large families, a program will be required to address the gap.

Young Families and First Time Homebuyers. Over the last two decades, there has been a decrease in all population groups under age 55. Most younger residents are renters: 69% of those ages 25-34, and 59% of those ages 35-44. This data along with community input indicates that there is a lack of opportunities for young families and first-time homebuyers.

In addition to these issues and needs, the following common concerns have been identified through analysis of public input:

- Affordability: high housing prices, high rents, sizable proportion of the population overpaying rent
- Development costs: cost of land, development requirements and fees (ie septic costs, impact fees not related to unit size)
- Conversion of housing to non-residential use (i.e. vacation rentals)
- Lack of suitable land for housing (sewer availability, wildfire prone areas, evacuation access)
- Natural disasters, including wildfires and flooding
- Community opposition to affordable and high-density housing
- Development Requirements & Fees (ie septic requirements, burdensome permitting processes, development fees)
- Fair housing and environmental justice issues including discrimination against housing vouchers

Fair Housing Assessment

Affirmatively Furthering Fair Housing (AFFH) means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” In the context of a community’s housing



needs, AFFH is not just about the number of housing units needed, but also about where the units are located and who has access to them.

Housing Element law now requires the County to prepare an Assessment of Fair Housing (AFH; see Attachment 2, Technical Background Report Section 4.5 – 4.5.5), identify factors that contribute to local fair housing issues, and include programs to address these findings as they relate to housing. The AFH prepared for the County identified the contributing factors listed below as obstacles to affirmatively furthering fair housing. The 6th Cycle Housing Element Programs include 20 programs and subprograms that address contributing factors:

- Displacement of residents due to economic pressures (Programs 5, 5b, 5c, 5d, 7)
- Lack of affordable, accessible housing, in a range of unit sizes (Programs 12, 15d, 15e, 15h, 18, 25f, 25g)
- Lack of public investments in specific neighborhoods (Programs 5c, 31)
- Lack of regional cooperation (Programs 6, 20, 25d, 27)
- Lack of affected populations on boards and committees (Program 31)
- Lack of funding for local fair housing outreach and enforcement (Programs 1d, 29, 32, 32a)
- Community opposition (15e, 15h, 32d)

The County must report implementation progress of these Housing Element programs to HCD on an annual basis.

RECOMMENDATIONS

Staff recommends that the Planning Commission receive an informational update on the 2023 Housing Element Update; hold a workshop to receive feedback and suggestions from the public; and provide comments to staff.

ATTACHMENTS

1. Draft Housing Element
2. Housing Element Technical Background
3. Housing Element Appendices

