



June 18, 2021

Permit Sonoma  
Attention: Nina Bellucci  
2550 Ventura Avenue  
Santa Rosa, CA 95403

**RE: Comment on Rezoning Sites for Housing**

We respectfully submit this letter to inform the County's initiative to rezone sites for housing. We support adding new housing within cities' urban growth boundaries, in priority development areas, and within unincorporated urban service areas. We understand that the initiative intends to add sites to the County's Housing Element site inventory to comply with State law, with an emphasis on identifying potential developable urban sites near jobs and transit.

The following comments focus on offering an initial framework and set of principles by which the County may evaluate individual sites analyzed in the Draft EIR for possible rezoning or inclusion in the upcoming Housing Element update.

- 1. Sites must be within Urban Growth Boundaries, Priority Development Areas, or Urban Service Areas.** Urban growth boundaries and urban service areas represent Sonoma County's urban footprint and the most appropriate siting for new housing development. Given that urban growth boundaries are largely within the purview of a city or town's jurisdiction, urban service areas with water and sewer connections, therefore, offer the best opportunity to add new housing.
- 2. Prioritize vacant sites.** The County has identified several sites, some of which may be vacant or underutilized. We encourage the County to prioritize vacant sites for rezoning, as they offer the highest likelihood for new housing. As the California Department of Housing and Community Development has indicated, the realistic development capacity for non-vacant and underutilized sites is much lower than vacant ones. History shows that these sites are harder to redevelop and transform for new additional housing. As such, vacant sites provide the most realistic development capacity for new housing and should be prioritized.
- 3. Balance low-wage jobs and affordable housing in unincorporated Sonoma County.** We encourage the County to identify sites that enable new housing to be added in urban service areas where there is a demonstrated imbalance between jobs and housing. In

particular, we emphasize focusing on improving the ratio of low-wage jobs and affordable housing for lower-income residents. This criterion is also reflected in the County's May 2021 response to ABAG's survey about RHNA regarding factors for inclusion in the methodology, in which low-wage jobs and affordable housing were listed as being imbalanced. Such a criterion could foster opportunities for new housing that allows workers to live closer to their jobs in unincorporated areas of the county.

4. **Prioritize sites that are located within high-resource neighborhoods.** The State's passage of AB 686 in 2018 staked out its intention to advance equity in our neighborhoods by affirmatively furthering fair housing. One way to advance fair housing is to leverage the Tax Credit Allocation Committee's (TCAC) Opportunity Maps that identify high-resource neighborhoods. The county's unincorporated areas have a significant share of Sonoma County's total number of high-resource communities. To the extent that a housing site does not conflict with any of the other criteria mentioned herein, we encourage the County to prioritize sites that are within these high-opportunity areas, which align with the State's fair housing goals.
5. **Remove sites that are located in very high fire hazard severity zones (VHFHSZ).** Sites located within VHFHSZ could pose a serious risk to the people who may inhabit those homes and nearby structures and assets. We encourage the County to remove from consideration sites in the VHFHSZ that place future households and their neighbors at greater risk.

Thank you for your leadership and initiative in taking proactive steps that will create opportunities for affordable housing throughout the county. As organizations striving to advance housing affordability, we look forward to working with you to achieve that goal.

Sincerely,

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