



February 13, 2023

**California Department of Housing and Community Development**

C/O Land Use and Planning Unit

2020 West El Camino Ave, Suite 500

Sacramento, CA 95833

Submitted via email: HousingElements@hcd.ca.gov

**Subject: City of Sonoma 6<sup>th</sup> Cycle Housing Element Update – Adopted**

Dear Mr. Herrera and HCD Staff,

The **City of Sonoma** is pleased to submit its adopted 6<sup>th</sup> Cycle Housing Element to the Department of Housing and Community Development (HCD) for review. The City is committed to ensuring that decent, safe, and attainable housing is available to current and future resident and appreciates the important role that its Housing Element plays in charting the path forward to achieve these objectives. The 6<sup>th</sup> Housing Element has been prepared consistent with the requirements of state Housing Element law pertaining to housing elements.

The adopted 6<sup>th</sup> Cycle Housing Element includes revisions made in response to HCD's input during its review of the Draft 6<sup>th</sup> Cycle Housing Element and addresses each of the findings in HCD's letter dated January 24, 2023. Please see the enclosed matrix for an explanation of how each of HCD's findings has been addressed.

The City is committed to working with HCD to continue to implement the Housing Element and to ensure that the Housing Element remains in substantial compliance with State law.

We have greatly appreciated HCD's assistance throughout this process. Please do not hesitate to contact the City of Sonoma's Interim Planning and Community Services Director ([LSimpson@sonomacity.org](mailto:LSimpson@sonomacity.org) | (707) 933-2201) or me ([bthompson@denovoplanning.com](mailto:bthompson@denovoplanning.com) | (916) 812-7927) if you have any questions or would like additional information. We are available by phone, video call, or email and will make ourselves available as needed during the review period.

Cordially,

Beth Thompson

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**CITY OF SONOMA**

**6TH CYCLE HOUSING ELEMENT**

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# Housing Plan Background Report

Adopted on January 31, 2023

**Prepared For:**

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**City of Sonoma**

**6th Cycle Housing Element**

# **HOUSING PLAN**

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January 2023

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# PART 1 - HOUSING PLAN

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## A. INTRODUCTION

This Housing Plan reflects: 1) community input; 2) Sonoma's housing needs; 3) land availability and constraints; and 4) experience gained during the past eight years (as summarized in the Housing Element Background Report). The Housing Plan sets forth the goals, policies, and programs to address the identified housing needs and issues for the 2023-2031 planning period and focuses on the following:

- \* **Ensuring housing diversity:** Providing a variety of housing types affordable to all income levels, allowing those who work in Sonoma to also live here.
- \* **Improving housing affordability:** Encouraging a range of affordable housing options for both renters and homeowners.
- \* **Preserving housing assets:** Maintaining the condition and affordability of existing housing and ensuring development is consistent with Sonoma's town and neighborhood context.
- \* **Reducing governmental constraints:** Minimizing governmental constraints under the City's control while facilitating the provision of housing and encouraging innovation in design, ownership, and living arrangements.
- \* **Promoting equal housing opportunities:** Ensuring residents can reside in the housing of their choice, including Sonoma's special needs populations.
- \* **Environmental sustainability:** Ensuring Sonoma grows in a responsible manner, in line with resource limitations such as water availability.

## B. GOALS AND POLICIES

The goals and policies that guide the City's housing programs and activities are as follows:

### HOUSING DIVERSITY

**Goal H-1:** Provide a range of housing types affordable to all income levels, allowing those who work in Sonoma to also live in the community.

**Policy H-1.1:** Encourage diversity in the type, density, size, affordability, and tenure of residential development in Sonoma, while maintaining quality of life goals for the community.

**Policy H-1.2:** Facilitate the development of affordable housing through regulatory incentives and concessions, and available financial assistance. Proactively seek out new models and approaches in the provision of affordable housing, including accessory dwelling units (ADUs) and cottage housing.

**Policy H-1.3:** Ensure the Growth Management Ordinance provides sufficient annual unit allocations to meet Sonoma's regional housing needs allocation (RHNA).

**Policy H-1.4:** Encourage the sustainable use of land and promote affordability by encouraging development at the higher end of the density range within the Medium Density, High Density, Housing Opportunity, and Mixed Use land use designations.

**Policy H-1.5:** Continue to provide opportunities for the integration of housing in commercial districts and the adaptive reuse of non-residential structures.

**Policy H-1.6:** Use inclusionary zoning as a tool to integrate affordable units within market rate developments, and increase access to resources, amenities, and affordable housing opportunities throughout the community.

**Policy H-1.7:** Support collaborative partnerships with non-profit organizations to facilitate greater access to affordable housing funds.

## **HOUSING AFFORDABILITY**

**Goal H-2:** Improve housing affordability for both renters and homeowners in Sonoma.

**Policy H-2.1:** Support the acquisition of existing market rate apartment units by non-profit housing developers, and conversion to long-term affordable housing for very low and low-income renters.

**Policy H-2.2:** Support the provision of rental assistance by the Sonoma County Housing Authority to extremely low and very low-income households.

**Policy H-2.3:** Advocate for the provision of financial assistance to low and moderate-income first-time homebuyers through County and State programs.

**Policy H-2.4:** Promote the availability of early mortgage counseling for homeowners at risk of foreclosure.

## **HOUSING AND NEIGHBORHOOD PRESERVATION**

**Goal H-3:** Maintain and enhance the existing housing stock, preserve the affordable housing stock, and ensure that new residential development is consistent with Sonoma's town character and neighborhood quality.

**Policy H-3.1:** Maintain sustainable neighborhoods with quality housing, infrastructure, and open space that fosters neighborhood character and the health of residents.

**Policy H-3.2:** Encourage property owners to maintain rental and ownership units in sound condition through code enforcement and housing rehabilitation programs.

**Policy H-3.3:** Support efforts to identify and preserve important examples of historical or architecturally significant residences.

**Policy H-3.4:** Require the rehabilitation or remodeling of older cottages and bungalows to conform to the scale of the immediate neighborhood and retain the architectural character and integrity of the original structure.

**Policy H-3.5:** Regulate the conversion of existing apartment complexes to condominium ownership, and only permit when the citywide vacancy rate for rental units warrants.

**Policy H-3.6:** Support the preservation of mobile home parks as an important source of affordable housing.

**Policy H-3.7:** Ensure the continued availability and affordability of income-restricted housing for low and moderate-income households.

## REDUCING GOVERNMENTAL CONSTRAINTS

**Goal H-4:** Reduce governmental constraints under the City's control on the maintenance, improvement, and development of housing while maintaining community character.

**Policy H-4.1:** Provide regulatory incentives and concessions to offset the costs of affordable housing development while protecting quality of life goals.

**Policy H-4.2:** Incentivize the development of affordable housing through growth management prioritization.

**Policy H-4.3:** Implement provisions for transitional housing, supportive housing, emergency shelters, and community care facilities.

**Policy H-4.4:** Support flexibility and variety in site planning, housing design, ownership, and living arrangements, including co-housing, shared housing, and live/work housing through the Development Code.

**Policy H-4.5:** Provide for the infill of modestly priced rental housing by encouraging ADUs on single-family zoned lots.

**Policy H-4.6:** Provide fee waivers to facilitate production of affordable housing.

**Policy H-4.7:** Provide reduced parking standards for affordable and special needs housing.

## EQUAL HOUSING OPPORTUNITIES

**Goal H-5:** Promote equal housing opportunities for all residents, including Sonoma's special needs populations and all classes protected under Federal and State fair housing laws, so that safe and decent housing is available to all persons and all income levels throughout the community and residents can reside in the housing of their choice.

**Policy H-5.1:** Ensure access to fair housing opportunities to the entire community and support the provision of fair housing services and tenant/landlord mediation to Sonoma residents.

**Policy H-5.2:** Support development and maintenance of affordable senior rental and ownership housing and supportive services to facilitate maximum independence and the ability of seniors to remain in their homes or within the greater Sonoma community.

**Policy H-5.3:** Continue to address the special needs of persons with disabilities, including developmental disabilities, through provision of supportive housing, accessibility grants, zoning for group housing, universal design, and procedures for reasonable accommodation.

**Policy H-5.4:** Work cooperatively with the County and other applicable organizations to address valley-wide special housing needs, such as housing for agricultural workers and the homeless, and including transitional housing and emergency shelters.

## ENVIRONMENTAL SUSTAINABILITY

**Goal H-6:** Promote environmental sustainability through support of existing and new development that minimizes reliance on natural resources.



**Policy H-6.1:** Preserve open space, watersheds, environmental habitats and agricultural lands, while accommodating new growth in compact forms in a manner that de-emphasizes the automobile.

**Policy H-6.2:** Implement Sonoma's Green Building Ordinance to ensure new development is energy and water efficient, and consider establishing additional incentives to achieve energy and water conservation efficiencies higher than those required by the Ordinance. Revise and/or revisit the ordinance as necessary to reflect the introduction of a State-wide green building code.

**Policy H-6.3:** Promote the use of sustainable construction techniques and environmentally sensitive design for all housing to include best practices in water conservation, low-impact drainage, and greenhouse gas reduction.

**Policy H-6.4:** Promote the use of alternative energy sources such as solar energy, cogeneration, and non-fossil fuels.

**Policy H-6.5:** Incorporate transportation alternatives such as walking, bicycling and, where possible, transit, into the design of new development.

**Policy H-6.6:** Ensure sufficient water resources to serve existing and future residents provided for under Sonoma's 2020 General Plan: 1) take proactive steps to improve water conservation; 2) upgrade water supply infrastructure; 3) increase the local supply of water through new wells, groundwater banking, and the increased use of recycled water; 4) protect the quality and sustainability of groundwater resources; and 5) investigate alternative water supply options.

## **C. HOUSING PROGRAMS**

The following programs are the implementing actions the City will take to address its housing goals. Each program identifies the objectives, timeframe for implementation, City department or agency primarily responsible for implementation, and the likely funding source.

### **1. HOUSING DIVERSITY**

Providing a variety of housing types affordable to all income levels, allowing those who work in Sonoma to also live here.

#### **PROGRAM 1: INCLUSIONARY HOUSING**

The purpose of Sonoma's inclusionary housing ordinance is to ensure that a component of affordable housing is provided as part of residential development. The City's inclusionary housing requirements apply to projects with five or more units, and require:

- Rental projects to have at least 25 percent of the total parcels and/or units to be rental units that are affordable to households in the extremely low, very low, and low-income categories; and
- Ownership projects to have at least 25 percent of the total parcels and/or units to be ownership units that are affordable to households in the low, moderate, and middle-income categories.

An in-lieu fee may be paid instead of providing affordable units in a residential project of four or fewer units. Additionally, if the number of affordable units results in a fractional unit below 0.50, an in-lieu fee may be paid instead of providing an affordable unit.

Sonoma's Inclusionary Housing Program continues to be the City's primary tool to provide affordable housing throughout the community, ensuring equitable access to areas of opportunity, amenities, and housing available to a range of income levels. As a means of further enhancing the effectiveness of local inclusionary requirements, the City will reevaluate its current ordinance to ensure that the provisions remain appropriate and do not impede the development of housing and are effective in providing an affordable component to new development.

Responsible Department/Agency: Planning Department

Funding Sources:	General Fund
2023-2031 Objectives:	<p>Reevaluate the City’s inclusionary housing provisions to ensure that they remain appropriate and do not impede the development of housing and are effective in providing an affordable component to new development.</p> <p><a href="#">By December 2023, adopt an in-lieu fee that is supported by a study to ensure the fee does not make residential projects economically infeasible.</a></p> <p>By July 1, 2024, revise the City’s inclusionary housing provisions to require that inclusionary units remain affordable in perpetuity <del>and adopt an in-lieu fee that is supported by a study to ensure the fee does not make residential projects economically infeasible.</del></p>
Timeframe:	Review the inclusionary housing requirements and amend the Development Code, if necessary, by <del>2026</del> <a href="#">2024</a> .

**PROGRAM 2: PARTNERSHIPS WITH AFFORDABLE HOUSING DEVELOPERS**

In today’s housing market, creative approaches are required to finance, build, and rehabilitate affordable and special needs housing. Sonoma has partnered with several different non-profit developers in the provision of affordable ownership and rental housing. Nonprofits active in the Sonoma area include: Burbank Housing Corporation; Community Housing Sonoma County; Affordable Housing Associates; Habitat for Humanity; Community Land Trust of Sonoma County; [4](#), and Eden Housing, among others. The City participates in the Sonoma County Housing Coalition, providing an ongoing opportunity for coordination with local housing nonprofits.

To specifically address the housing needs of farmworkers, the City will coordinate with the County’s farmworker housing program, as well as nonprofits such as Burbank Housing Development Corporation, California Human Development Corporation, [Housing Land Trust of Sonoma County](#), and Sonoma County Housing Coalition, to promote the construction of farmworker housing. The City will assist by partnering with the County and/or other organizations to support applications for funding to the State’s Joe Serna Jr. Farmworker Housing Grant Program (FWHG).

Responsible Department/Agency:	Planning Department
Funding Sources:	General Fund
2023-2031 Objectives:	<p>Provide information annually via email and host an <del>annual</del><a href="#">quarterly</a> meeting with affordable housing developers and non-profits to identify housing opportunities and to identify City programs, including the Housing Trust Fund, and incentives that support affordable housing development, rehabilitation, and conversion of market-rate housing or non-residential development to affordable housing through provision of land write-downs, regulatory incentives, and/or direct assistance.</p> <p>Identify developer interest in at least 2 affordable projects (<a href="#">1 project by 2024 and another by 2026</a>), including at least 42 extremely low, 41 low, and 48 low income units, <del>by 2026</del></p> <p>Annually meet with County representatives to discuss farmworker housing needs and to identify opportunities and potential applications for funding. Identify at least one</p>

project, locally or regionally, to provide at least 20 units of farmworker housing by 2026

Timeframe: Annual mailing of information to housing developers and annual meeting with affordable housing developers.

Ongoing implementation.

### **PROGRAM 3: ADAPTIVE REUSE**

The conversion of outmoded buildings, including non-residential development and market-rate housing, can provide an opportunity for new residential uses and new affordable and special needs housing within a community. As a housing strategy, adaptive reuse can restore buildings to a useful purpose, and potentially provide higher density housing at a reasonable cost. Sonoma encourages the adaptive reuse of historic structures, permitting uses not otherwise allowed through the base zone as well as allowing for increased residential densities. Successful examples of conversion of commercial structures to residential use in Sonoma include the old Boys and Girls Club, and the Olde Bowl Center. Additional opportunities for adaptive reuse may include conversion of upper-story office and other uses in non-residential buildings to housing units.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Develop innovative strategies for the adaptive reuse of commercial structures and market-rate housing with potential to convert to affordable housing beyond only officially designated historic structures to provide for a range of housing types and residential uses.

Timeframe: Amend the Development Code to broaden the applicability of adaptive reuse by 2026.

Identify at least four sites with adaptive reuse potential, including underutilized commercial sites or underutilized residential sites, by 2026 and reach out to property owners of sites informing them of the City's methods of promoting adaptive reuse in 2027.

### **PROGRAM 4: ALTERNATIVE HOUSING MODELS**

Sonoma recognizes the changing housing needs of its population, including a growing number of non-family households, aging seniors in need of supportive services, and single-parent families in need of childcare and other services. To address such needs, the City can support the provision of non-traditional and innovative housing types to meet the unique needs of residents, such as co-housing, shared housing, and assisted living for seniors, among others.

Cottage housing developments are groupings of small, attached or detached single family dwelling units, often oriented around a common open space (courtyard) area, and with a shared area for parking. Cottage housing is typically built as infill development in established residential zones and can provide increased density and a more affordable alternative to traditional single-family housing. Similarly, duplexes, triplexes, and fourplexes offer an alternative to traditional single family housing and expand housing choices. Rather than codifying all parameters of expanded alternatives to single family and multifamily development, a more flexible approach of design guidelines and design review may be appropriate.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Establish design and development standards and a streamlined review process that supports a greater variety of housing types, including duplex, triplex, and fourplex units and cottage/courtyard housing.

Increase access to census tracts that have low racial or economic diversity and to census tracts in areas of higher opportunity by allowing a greater variety of housing types in order to promote greater racial and economic diversity

Permit 40 units of duplex, triplex, and fourplex units and cottage/courtyard housing census tracts that have low racial or economic diversity and to census tracts in areas of higher opportunity

Timeframe: Amend the Development Code to include design and development standards and a streamlined review process for at least duplex, triplex, fourplex, and cottage/courtyard housing by 2026.

**PROGRAM 5: ACCESSORY DWELLING UNITS AND JUNIOR ACCESSORY DWELLING UNITS**

An accessory dwelling unit (ADU) is a self-contained living unit with cooking, eating, sleeping, and full sanitation facilities, either attached to or detached from the primary residential unit on a single lot. A junior accessory dwelling unit (JADU) is a unit that is no more than 500 square feet in size and contained entirely within a single-family residence with separate or shared sanitation facilities. ADUs and JADUs offer several benefits. First, they often are affordable to very low and low-income households and can provide options for seniors, single persons, and even small families. Second, the primary homeowner receives supplementary income by renting out the ADU, which can help many modest income and elderly homeowners afford to remain in their homes. ADUs offer an important opportunity to help Sonoma address its regional housing needs while maintaining the community’s small-town character.

The City will continue to apply Municipal Code regulations that allow ADUs and JADUs by right on properties with existing or planned single-family and multifamily uses.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Update the ADU/JADU requirements to comply with State law; pursue funding for ADU construction; provide financial assistance to build ADUs; provide technical resources; conduct outreach and education on ADUs; conduct a mid-cycle review of ADU assumptions; and achieve at least 64 ADUs

Timeframe:

- Update the City’s current ADU/JADU requirements (SMC Section 19.50.090) to comply with State law by December 2023.
- Pursue State funding available to assist lower- and moderate-income homeowners in the construction of ADUs.

- Provide financial assistance to qualified property owners to build ADUs using State funds (such as CalHOME funds).
- Provide technical resources online in 2024 to assist with ADU/JADU development, including an ADU factsheet with a summary of requirements for ADUs/JADUs and permit fees required for ADUs/JADUs, and information regarding CalHFA grants.
- Conduct outreach and education on ADU options and requirements to homeowners and Homeowners' Associations in 2025.
- 32 permitted ADUs by January 31, 2027 and 32 additional permitted ADUs by January 31, 2031
- Conduct a mid-cycle review no later than January 31, 2027 of ADU assumptions included in the Housing Resources chapter of the Background Report. If the review finds that production is not consistent with the projections in the Housing Resources chapter, modify this program within one year to further incentivize ADU production so that the City's projections can be realized.

**PROGRAM 6: SECOND HOMES**

As shown in Tables 26 and 27 of the Background Report, the City has an overall vacancy rate of approximately 11%. Of the vacant units, the majority are for seasonal, recreational, or occasional use (69%). These seasonal, recreational, or occasional use units do not provide permanent housing opportunities and reduce the availability of housing in Sonoma for permanent use. While new vacation rentals are prohibited in the residential, mixed use, and commercial zones, the City will further disincentivize second homes uses through economic tools that can be used to fund affordable and workforce housing.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Develop tools to disincentivize second homes and reduce the number of seasonal, recreational, or occasional use units by 5-10% during the planning period

Timeframe:

- In 2024/2025, evaluate programs that disincentivize second units, such as the property tax used by the City of Oakland or a real-estate transfer tax
- In 2026, pursue implementation of approaches to reduce second homes and capture a portion of the cost of second homes have on the need for permanent housing, including affordable and workforce

**2. HOUSING AFFORDABILITY**

Encouraging a range of affordable housing options for both renters and homeowners.

**PROGRAM 7: AFFORDABLE HOUSING FUNDING SOURCES**

Successful implementation of Sonoma's programs for development of affordable and special needs housing will depend on the leverage of local funds with a variety of federal, State, County, and private sources. The Financial Resources section of the Housing Element identifies the primary affordable housing funding programs available to Sonoma. In addition to applying for those funds

directly available to municipalities, the City plays an important role in supporting developers to secure outside funds. City involvement may include review of financial pro-forma analyses; provision of demographic, market, and land use information; review and comment on funding applications; and City Council actions in support of the project and application. Many “third-party” grants may also require some form of local financial commitment.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Actively pursue federal, State, County and private funding sources for affordable housing as a means of leveraging local funds and maximizing assistance. Support developers in securing outside funding sources.

Funds will be used to support the City’s housing goals, policies, and programs including providing ADUs, alternative housing types, integration of housing into commercial areas, adaptive reuse of non-residential structures, rehabilitation and preservation of housing, including subsidized housing and mobile home parks, incentivizing affordable housing, infill housing, and furthering access to housing opportunities throughout Sonoma.

In 2023, pursue a Prohousing Designation from HCD in order to reflect the City’s significant housing achievements and to increase the City’s competitiveness for State grant and loan program applications

[In 2024, request to join the Renewal Enterprise District \(a Joint Powers Authority between the County of Sonoma and the City of Santa Rosa\) to assist housing providers with access to opportunities to pool and leverage financing tools and funding sources](#)

Work with developers and housing providers to identify at least 2 affordable new development projects, including at least 42 extremely low, 41 low, and 48 low income units, and 1 rehabilitation or conversion project that would assist at least 10 very low and 10 low income households [\(1 project identified by 2024 and 1 by 2026\)](#)

Submit, or support developer submission of, at least 3 affordable housing funding applications, such as development, preservation, maintenance/rehabilitation, and/or homebuyer assistance, to assist the above-referenced projects as well as other opportunities identified during the planning period

[Work with non-profits and philanthropy groups to identify opportunities to purchase larger lots or to purchase contiguous smaller lots, with an emphasis on opportunities in the east side, that can be made available at low or now cost to non-profit developers to provide affordable, workforce, and special needs housing.](#)

Timeframe: Ongoing review of potential funding sources and application submittals on or before July 1<sup>st</sup> of 2025, 2027, and 2029. .

**PROGRAM 8: AFFORDABLE HOUSING IMPACT FEES**

Sonoma faces a shortage of affordable housing opportunities for the local workforce, resulting in the vast majority of persons who work in the community commuting in from outside the City. Residential development further increases the demand for affordable housing, based on the growth in employment generated by residential households' increased demand for goods and services. While Sonoma's Inclusionary Housing Ordinance specifies affordable housing requirements for development of five or more residential units, the Ordinance does not currently apply to construction of individual single-family homes, or 2-4 unit projects.

To ensure individual single family homes and small projects address affordable housing needs, the City will evaluate the contribution towards affordable housing demand from such development. Pursuant to AB 1600, a nexus study will be prepared to demonstrate the linkage between smaller units and the demand for affordable units, and to establish the maximum supportable impact fee. To ensure that the impact fee is equitable, it shall be assessed on a per square foot basis.

To ensure that non-residential development addresses the demand it generates for workforce housing, the City will evaluate the Affordable Housing Fees for Nonresidential Development established by Resolution 12-2020 to ensure that the fees adequately address the demand for very low and extremely low income housing associated with development of commercial, recreational, visitor-serving, industrial, and other non-residential uses and prepare a nexus study to address the linkage between non-residential development and the demand for affordable housing.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: [By December 2023, a](#)Adopt an impact fee to address the demand for affordable housing generated by new single family units and smaller residential projects.

[By December 2025, expand the application of the commercial linkage fee](#)~~Adopt an impact fee~~ to address the demand for affordable, including extremely low, very low, low, and moderate income, workforce housing generated by non-residential development.

Timeframe: Complete [residential nexus study and adopt fee by 2023; complete non-residential nexus studies](#) by 2024 and adopt fees by 2025. ;

**PROGRAM 9: HOUSING CHOICE VOUCHER RENTAL ASSISTANCE**

The Federal Housing Choice Voucher (HCV) Rental Assistance Program extends rental subsidies to extremely low and very low-income households, including families, seniors, and persons with disabilities. The Housing Choice Voucher Program offers a voucher that pays the difference between the current fair market rent (FMR) and what a tenant can afford to pay (i.e., 30% of household income). The voucher allows a tenant to choose housing that costs above the payment standard, provided the tenant pays the extra cost. Given the significant gap between market rents and what extremely low and very low-income households can afford to pay for housing, the Housing Choice Voucher Program plays a critical role in allowing such households to remain in the community, and is a key program to address the needs of extremely low and very low-income households.

Responsible Department/Agency: Planning Department, Sonoma County Housing Authority

Funding Sources: U.S. Department of Housing and Urban Development (HUD) Housing Choice Vouchers

- 2023-2031 Objectives:
- Cooperate with the Sonoma County Housing Authority to continue to make Housing Choice Vouchers available in Sonoma.
  - Make information regarding the HCV program available on the City website and in an annual direct mailing to all residents and property owners, identifying available housing resources.
  - Provide referrals to the Sonoma County Housing Authority to households seeking rental assistance.
  - To increase housing mobility and opportunities in the City's highest resource areas, provide annual outreach to property owners citywide encouraging owners of rental property to register with the Sonoma County Housing Authority to increase housing stock accessible to very low and extremely low-income households.
  - Perform additional outreach, with a minimum of three (3) presentations per year, to Homeowners' Associations and Neighborhood Associations in the areas with the highest opportunity scores in the City, to provide education about the benefits of the HCV program and to encourage increased landlord participation.

Timeframe: Ongoing implementation and annual reporting throughout the planning period.

**3. HOUSING AND NEIGHBORHOOD PRESERVATION**

Maintaining the condition and affordability of existing housing and ensuring development is consistent with Sonoma's town and neighborhood context.

**PROGRAM 10: HOUSING REHABILITATION PROGRAM**

Since the City of Sonoma participates in the County's Community Development Block Grant (CDBG) program, Sonoma residents are eligible to participate in the Sonoma County Community Development Commission's Housing Rehabilitation Loan Program. This program offers below market rate loans to low-income owner-occupants of single-family homes or mobile homes, and owners of rental properties where at least half of the tenants are low-income households, to make necessary repairs to their dwellings.

During the 6<sup>th</sup> Cycle, the City will work to identify any areas of the City with concentrations of housing in need of repair, including dilapidated units, as well as individual multi-family developments that are in need of significant repair or rehabilitation and will coordinate connecting owners of such housing with federal, State, and regional resources for housing rehabilitation. Ensure that Code Enforcement staff provides information regarding available financial resources for housing rehabilitation, weatherization, and emergency repair to any owners of housing in need of repair.

Responsible Department/Agency: Planning Department, Sonoma County Community Development Commission (SCCDC)

Funding Sources: CDBG

2023-2031 Objectives: Promote the availability of the Housing Rehabilitation Program on the City's website, through social media, and by way of handouts available at the City Hall public counter and Sonoma Community Center as well as through the local real estate community. Continue to work with the SCCDC to ensure that funding remains available for



housing rehabilitation activities. Seek to assist a total of 20 lower income households during the planning period.

Identify concentrations of housing in need of repair and multifamily developments in need of significant repair and connect property owners with resources for rehabilitation.

Timeframe: Ongoing implementation and annual reporting throughout the planning period. Identification of multifamily developments in need of significant repair by December 2024 and coordinate with property owners in 2025.

**PROGRAM 11: TENANT AND RESIDENT PROTECTIONS**

Rental units, including mobile homes, represent important sources of housing affordable to lower income households, the workforce, and persons with fixed incomes. The City has enacted protections since 1993 to preserve the affordability of its mobile home parks – which are primarily occupied by senior citizens. Residents of mobile home parks receive rent stabilization and other protections under Chapter 9.92 of the Municipal Code. Tenants living in apartment projects and mobile home parks that are proposed for conversion to condominium ownership are subject to Sonoma’s condominium conversion regulations (Section 19.65.030 of the Development Code). To build upon these tenant and resident protections, the City will consider methods to protect tenants from excessive rent increases and unjust evictions.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Continue to enforce the mobile home park rent stabilization and conversion ordinances to preserve the affordability and long-term use of mobile home parks in Sonoma.

Update the Chapter 9.92 of the Municipal Code by December 2023<sup>4</sup> to reflect the requirements of State law, including AB 2782 changes to Civil Code Section 798.17 (rental agreement requirements), Civil Code Section 798.56 (tenancy termination standards), and Government Code Sections 65863.7 and 66427.4 provisions regarding conversion or closure of a mobile home park.

Continue to provide tenant protections through implementation of the City’s condominium conversion regulations. Utilize State provisions under SB 510 to ensure that mobile home park residents are afforded all protections specified by law pertaining to park conversions to resident ownership.

Adoption of additional tenant protection requirements to reduce displacement

Timeframe: Ongoing implementation of Chapter 9.92 and Section 19.65.030 to address mobile home park conversions and condominium conversions, respectively

[Update Municipal Code by December 2024 to address above requirements](#)

In [2023/2024](#), review rent stabilization and just cause eviction policies including reasonable protections for small-time, good-behavior landlords

In [20245](#), adopt tenant protection requirements

## **PROGRAM 12: PRESERVATION OF ASSISTED RENTAL HOUSING**

As of 2022, Sonoma has a total of 146 assisted multifamily rent-restricted units in four developments (see Table 39 of the Background Report), with an additional 293 affordable inclusionary and density bonus rental units integrated within 40 market rate and ownership projects. While all of the affordable multifamily properties are not at risk of converting to market rate for at least ten years (assisted multifamily projects within Sonoma are not anticipated to be eligible to convert to market rate until after 2050), the City has identified 104 of its inclusionary units, including 73 rental and 30 ownership, that are at-risk of converting during the planning period.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Facilitate long-term preservation of Sonoma's rent-restricted housing through the following actions:

### **Rental Units – preserve 100% of at-risk rental units**

- **Monitor At-Risk Units:** Contact property owners at least 18 months and again within one year prior to the affordability expiration date to discuss City's desire to preserve as affordable housing.
- **Work with Potential Priority Purchasers:** Solicit participation of agencies interested in purchasing and/or managing units at risk. Provide funding assistance, which can be leveraged with outside funding sources from nonprofits to either transfer ownership or provide rent subsidies to maintain affordability.
- **Tenant Education:** Based on State law, property owners are required to give a nine month notice of their intent to opt out of low-income use restrictions. The City will work with tenants, and as necessary contract with specialists like the California Housing Partnership and other nonprofits, to provide education regarding tenant rights and conversion procedures.

### **Ownership Units – preserve all at-risk ownership units where the City has an option to purchase**

- **Monitor At-Risk Units:** Contact property owners at least 18 months and again within one year prior to the affordability expiration date to discuss City's desire to preserve as affordable housing.
- **Exercise Option Agreement:** Where the City has the option to purchase the agreement, the City either exercise the option agreement or partner with agencies or organizations interested in purchasing and/or managing units at risk in order to maintain the affordability of the unit.

Timeframe: Ongoing implementation.

**PROGRAM 13: HOUSING ELEMENT MONITORING/ANNUAL REPORTING**

Sonoma’s Planning Department is responsible for the regular monitoring of the Housing Element to ensure that the City continues to assess its affordable housing programs, progress towards the RHNA, including maintenance of adequate sites, and the preservation of affordable housing units. The Planning Department will prepare the Annual Progress Report for review by the public, City decision-makers, and submittal to the Department of Housing and Community Development (HCD). Completion of the Annual Progress Report is required for the City to maintain access to State housing funds.

The Annual Progress Report will document:

- Sonoma’s annual residential building activity, including identification of any deed-restricted affordable units and assignment of market rate units to an appropriate affordability category;
- Progress towards the Regional Housing Needs Allocation since the start of the planning period; and
- Implementation status of the Housing Element programs.

As part of Housing Element implementation monitoring, the City will monitor individual projects and its inventory of sites suitable for residential development and ensure no net loss of housing sites pursuant to Government Code Section 65863.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Review the Housing Element annually and provide opportunities for public participation, in conjunction with the submission of the City’s Annual Progress Report to the State Department of Housing and Community Development by April 1st of each year.

By 2025, develop a registry of rental units, accessory dwelling units, and SB 9 units to monitor the affordability of such units, to collect data to inform decisions, and to assist the City in monitoring the efficacy of its programs directed at tenant protections, promoting housing opportunities through ADUs and SB 9 units, and addressing the maintenance and preservation of housing.

Timeframe: Ongoing implementation and annual reporting throughout the planning period.

Registry of rental units, ADUs, and SB 9 units by 2025.

Ongoing monitoring of inventory of residential sites, with replacement sites identified within 6 months of any shortfall.

**PROGRAM 14: DESIGN GUIDELINES AND DESIGN REVIEW**

Sonoma uses design review to ensure development embodies excellence in architectural design and complements the scale, character, and rich history of the community. The Development Code establishes design guidelines for each of the City’s planning areas, addressing site plan elements, building types, and materials, and provides the foundation for all design reviews in Sonoma. The design guidelines work in concert with the Code’s development standards, although unlike development standards, which are mandatory, design guidelines are applied with flexibility to foster creativity and strict adherence is not required for project approval. Sonoma’s Design Review and Historic Preservation Commission (DRHPC) reviews all residential projects, except for single-family homes and duplexes located outside the Historic zone. Typically, only one to two meetings are necessary to receive approval.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Update the City's Development Code and design guidelines to expand the City's objective multifamily design standards to also address mixed use and multi-unit (two or more units on a single parcel) projects and to provide a streamlined ministerial review process consistent with relevant provisions of State law as discussed under Program 15.

Continue to implement design review in accordance with State law, focusing on increasing housing opportunities in the City while ensuring maintenance of Sonoma's architectural character and quality of the built environment as the City continues to grow.

Timeframe: Update the City's zoning and design requirements to provide objective design and development standards consistent with State requirements, including SB 330 and SB 9, by December 2023; ongoing implementation.

#### 4. REMOVING GOVERNMENTAL CONSTRAINTS

Minimizing governmental constraints under the City's control while facilitating the provision of housing and encouraging innovation in design, ownership, and living arrangements.

##### PROGRAM 15: DEVELOPMENT CODE AMENDMENTS – HOUSING CONSTRAINTS

Amendments to the Development Code are needed to address various recent changes to State law and create consistency with the Housing Element. The amendments shall address the following:

- A. **Low Barrier Navigation Centers:** The Development Code will be updated to define and permit low barrier navigation centers consistent with the requirements of Government Code Sections 65660 through 65668, including treating low barrier navigation centers as a by-right use in areas zoned for mixed-use and nonresidential zones permitting multifamily uses.
- B. **Transitional and Supportive Housing:** The Development Code will be revised to ensure that transitional and supportive housing are allowed in residential and mixed-use zones subject to the same standards as a residence of the same type in the same zone consistent with Government Code Section 65583(c)(3), and to allow eligible supportive housing as a by-right use in zones where multifamily and mixed uses are permitted pursuant to Government Code Sections 65650 through 65656.
- C. **Residential Care Facilities:** The Development Code will be amended to fully address small and large residential care facilities consistent with State law. Specifically, the City will amend the Development Code (1) to allow residential care facilities for six or fewer persons to be allowed in the same manner as a residential use of the same type in all residential zoning districts, and (2) to allow residential care facilities that serve seven or more people in all zones that allow residential uses, in the same manner as a residential use of the same type, and to ensure all conditions of approval are objective and do not create barriers for housing for seniors, persons with disabilities, or other special needs populations, and to clarify that this type of facility is intended to serve as a residence for individuals in need of assistance with daily living activities.

- D. **Streamlined and Ministerial Review for Eligible Affordable Housing Projects:** The Development Code will be updated to ensure that eligible multifamily, mixed use, and multi-unit projects are provided streamlined ministerial (by-right) review and are only subject to objective design and development standards consistent with relevant provisions of State law, including [AB 2011](#), [SB 330](#), [SB 35](#), and SB 9, as provided by applicable sections of the Government Code, including but not limited to Sections 65905.5, [65912.100 through 65912.131](#), 65913.4, 65940, 65941.1, 65950, and 66300. State law defines objective design standards as those that “involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant and public official prior to submittal.” [The City will also prepare application materials and written procedures for projects processed under State requirements for ministerial or streamlined projects, including SB 330, SB 35, AB 2011, and SB 9.](#)
- E. **Employee Housing and Agricultural Employee Housing:** The Development Code will be amended to [1\) define “employee housing” and to clarify that employee housing serving six or fewer employees shall be deemed a single-family structure and shall be subject to the same standards for a single-family residence in the same zone in accordance with the requirements of Health and Safety Code \(HSC\) Section 17021.5, and 2\) to permit agricultural \(farmworker\) employee housing in accordance with HSC Sections 17021.6 through 17021.8.](#)
- F. **Single-Room Occupancy (SRO):** The Development Code will be updated to define single-room occupancy units and to establish objective standards for SROs.
- G. **Emergency Shelters Parking:** The Development Code will be updated to [allow emergency shelters with up to 30 beds as a permitted \(ministerial, by-right\) use in the P zone and to](#) require sufficient parking to accommodate all staff working in an emergency shelter, provided that the standards will not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with AB 139.
- H. **Design Standards:** The City will review and modify the Design Review criteria to address potentially subjective terminology in order to provide objectivity in the design review process.
- I. **Affordability in Perpetuity:** The City will review its conversion provisions for market-rate to affordable housing and for non-residential uses to affordable housing to ensure that affordable units that are required by the City are provided in perpetuity.
- J. **Use Permits:** [The Development Code will be updated to revise the findings for use permits to ensure that subjective language for the findings associated with residential uses, including mixed use, commercial, and other projects with a residential component, is either defined or replaced with objective language and that the findings do not constrain accommodating a variety of housing types or otherwise constrain residential development.](#)
- K. **Building Heights and Setbacks:** [The Development Code will be updated to allow a maximum building height of 36 feet for projects that: 1\) exceed the maximum permitted density and include at least 20% of units for special needs households or affordable to lower income households, or 2\) demonstrate that a 36-foot height is necessary to accommodate features unique to the site, such as protection of on-site riparian features, historic structures, or open space. As part of this effort the City will review the feasibility of increasing heights to 4 stories and reducing setbacks along Highway 12.](#)
- J.L. **Chapter 19.42:** [The City will review its guidelines and requirements related to historic preservation and infill development in the historic zone to clarify in regards to residential development whether the guidelines are a requirement or are optional for a project to implement and, if the guidelines are required, to ensure that subjective language is removed or](#)

[clarified and to ensure that projects can be implemented consistently in a predictable manner.](#)

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Ensure that the City’s Development Code is consistent with State law and update the Development Code as needed to comply with future changes. Review development standards in all residential districts every three years to identify if standards have constrained potential development and revise standards when necessary to remove constraints to multifamily residential developments, including mixed use development.

Timeframe: Identified Development Code Amendments adopted by December 2023. Periodic review of development standards every three years.

**PROGRAM 16: MONITOR CHANGES IN FEDERAL AND STATE HOUSING, PLANNING, AND ZONING LAWS**

The City will continue to monitor federal and state legislation that could impact housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as support new legislation when appropriate. Furthermore, while Program 15 addresses specific constraints identified in this Housing Element, the City will continue to, at least annually, monitor its development processes and zoning regulations to identify and remove any housing constraints and endeavor to minimize governmental constraints to the development, improvement, and maintenance of housing.

Recent laws that may require Municipal Code revisions to implement include Assembly Bill (AB) 2011 and Senate Bill (SB) 6. AB 2011 creates a CEQA-exempt, ministerial approval process for eligible housing developments, including 100% affordable projects and mixed-income projects located on “commercial corridors”, on sites where office, retail, or parking are the principally permitted use. SB 6 allows eligible residential and mixed use projects in zones where office, retail, or parking are the principally permitted use to invoke SB 35 and the Housing Accountability Act approval processes.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Monitor federal and state legislation as well as City development processes and zoning regulations to identify and remove constraints to housing.

Timeframe:

By December 2023, update the Municipal Code and the City’s project application documents to incorporate the requirements of AB 2011 and SB 6.

Annual monitoring of relevant legislation and ongoing implementation to address any revisions needed to the Municipal Code or other City standards based on annual monitoring of relevant legislation.

**PROGRAM 17: GROWTH MANAGEMENT ORDINANCE**

Sonoma’s Growth Management Ordinance (GMO) was adopted by City Council in 1980 to manage increases in service and infrastructure demand from development consistent with available water supplies and sewer treatment capacities. The GMO currently limits development within the City to an average of 65 units per year, a level determined after extensive study of infrastructure capacities. City staff is not implementing the GMO due to the potential for it to conflict with the California’s Housing Crisis Act (SB 330). —Furthermore, should the GMO begin to be implemented, the 65-unit per year GMO limit is sufficient to accommodate Sonoma’s regional housing needs, defined as 311 units for the 2023-2031 planning period, or an average of 39 units per year.

The GMO exempts the following types of development from the allocation process in that a qualifying development may apply for a building permit or planning approval, as applicable, at any time:

- Small projects, although the number of small projects approved in any one development year are deducted from the 65-unit allocation of the following year;
- Condominium conversions where no additional dwelling units are created;
- Accessory dwelling units and junior accessory dwelling units;
- Density bonus units;
- Inclusionary units provided at the low-income level (except within projects located in the Sonoma residential zone) or at the very low-income level;
- Inclusionary units provided in numbers in excess of the normal requirement; and
- As determined by the City Council on a case-by-case basis, applications in which at least 60 percent of the proposed units qualify as affordable housing, and which involve City participation in planning, financing, or development.

The GMO is adopted by ordinance and thus the City Council is not subject to the limitations of a voter approved initiative in making appropriate changes to the ordinance.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Should the GMO be reinstated or reactivated, [the City will:](#)

- [Review the GMO to ensure that it does not conflict with SB 330 or other provisions of State law, and](#)
- [Annually review the Growth Management Ordinance in conjunction with the monitoring of affordable housing produced \(refer to Program 13\), and modify as necessary to ensure adequate incentives are provided for the development of affordable housing and fulfillment of regional housing needs in the current and future housing element cycles. Any modifications shall occur within one+ year of identification of constraints associated with accommodating the 6<sup>th</sup> Cycle RHNA under the GMO.](#)
- Continue to track and reallocate unused and forfeited allocations.

Timeframe: Ongoing implementation.

**PROGRAM 18: PARKING INCENTIVES AND MODIFIED STANDARDS**

Residential parking requirements play a significant role in project design and achievable densities, and can greatly impact the cost of development. Sonoma offers reductions in its residential parking standards as a means of facilitating the development of affordable and special needs housing, as well as mixed-use, live-work, and pedestrian-oriented housing. The City has established reduced parking standards for senior housing and live-work developments, and allows reduced parking for mixed-use developments based on a determination by the Planning Commission. Parking reductions are also offered as an incentive for developments to provide increased pedestrian-oriented open space. Furthermore, the Planning Commission is permitted to grant exceptions to parking standards of up to 30 percent in response to environmental features and site conditions, to historic development patterns, and to promote creativity in site planning and development. Affordable housing projects are eligible for reduced parking under the City's density bonus ordinance.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Continue to provide options for reduced parking as an incentive for development of affordable, special needs, mixed-use, live-work, and pedestrian-oriented housing.

Timeframe: Ongoing implementation.

**PROGRAM 19: AFFORDABLE HOUSING/ ACCESS TO OPPORTUNITIES DENSITY BONUS AND INCENTIVES**

Pursuant to current State density bonus law (Government Code § 65915), applicants of residential projects of five or more units may apply for a density bonus and additional incentives if the project provides for one of the following:

- Ten percent of the total units of a housing development for rental or sale to lower income households; or
- Five percent of the total units of a housing development for rental or sale to very low income households; or
- A senior citizen housing development or a mobile home park that limits residency based on age requirements for housing for older persons; or
- Ten percent of the total dwelling units of a housing development are sold to persons and families of moderate income.; or
- Ten percent of the total units of a housing development for transitional foster youth, disabled veterans, or homeless persons; or
- Twenty percent of the total units for lower income students in a student housing development.

The amount of density bonus varies according to the amount by which the percentage of affordable housing units exceeds the established minimum percentage, but generally ranges from 20-50 percent above the specified General Plan density. In addition to the density bonus, eligible projects may receive 1-4 additional development incentives, depending on the proportion of affordable units and level of income targeting. The following development incentives may be requested:

- Reduced site development standards or design requirements.
- Approval of mixed-use zoning in conjunction with the housing project.
- Other regulatory incentives or concessions proposed by the applicant or the City that would result in identifiable cost reductions.

Applicants are also eligible to utilize the State's alternative parking ratio (inclusive of handicapped and guest spaces) of one space for 0-1 bedroom units, 2 spaces for 2-3 bedroom units, and 2.5 spaces for 4+ bedrooms.



[Under AB 2011, State law provides for increased densities for eligible projects on sites where office, retail, or parking are a principally permitted use. AB 2011 increases the viability of sites in the City to accommodate lower income housing, due to the increased densities and ministerial approval process established by Government Code Sections 65912.100 through 65912.131.](#)

Sonoma has approved density bonuses for several affordable housing projects in the past, including Firehouse Village and Maysonave Apartments. The City will review and update its Development Code to reflect current State density bonus provisions.

In addition to the density bonus and incentives for qualified projects, the City can encourage affordable and special needs housing, including housing for seniors, persons with a disability, large families, farmworkers, single female heads of household, by offering incentives for special needs housing that is affordable to very low, low, and/or moderate income households but does not qualify for a density bonus.

This approach can also be used to incentivize housing that improves Sonoma's opportunity scores. Recognizing that most of the City has low or moderate opportunity scores, affordable and workforce projects that improve educational, economic, and environmental conditions shall be prioritized and incentivized. Incentives for such projects shall include priority for commitment of the City's financial resources for affordable housing, streamlined processing, and a density bonus or incentives for projects that are not otherwise eligible for a density bonus or incentives under State density bonus law.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Continue to implement and grant density bonuses for projects meeting density bonus criteria, consistent with State law.

Update Chapter 19.44 to reflect the density bonus provisions of State law and to allow up to two additional incentives for special needs housing that is affordable to very low, low, and/or moderate income households in perpetuity and to establish density bonuses and incentives for housing projects that improve economic, educational, and environmental opportunities. Promote the use of density bonus incentives and provide technical assistance to developers in utilizing the density bonus to maximize feasibility and meet local housing needs.

Consider applying an Affordable Housing Overlay (AHO) to sites, including but not limited to Sites 1 and 28, identified for very low and low income development in the Background Report. The AHO would allow development of the sites at 25 units per acre for projects that provide a minimum of 40% of units affordable to very low and low income households. This shall include consideration of whether the City has received development applications for projects that would assist in meeting the RHNA and whether an AHO is necessary to further incentivize development of sites to meet the 6<sup>th</sup> Cycle RHNA.

[Apply an AB 2011 overlay to identify sites eligible for increased density under Government Code Sections 65912.100 through 65912.131](#)

Timeframe: Update Chapter 19.44 by December 2023.

[Apply AB 2011 overlay by December 2023.](#)

By ~~June~~ ~~December~~ 2024<sup>5</sup>, hold a workshop with the Planning Commission and/or City Council to discuss applying an Affordable Housing Overlay to the City's sites that

accommodate the very low and low income RHNA. If the AHO is warranted, implement by ~~December 2025~~ **February 2026**.

**PROGRAM 20. ADEQUATE SITES FOR LOWER INCOME HOUSEHOLDS ON NONVACANT AND VACANT SITES PREVIOUSLY IDENTIFIED**

The City of Sonoma will rezone to allow developments by right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Appendix A to accommodate the lower income RHNA that were previously identified in past housing elements. Specifically, the City will rezone Site 28 (APN 018-241-054), Site 70 (APNs 128-321-032 and 128-321-034), Site A (APNs 127-202-006 and 127-202-007), and Site H (APNs 018-131-012, 018-131-013, and 018-131-018).

Responsible Agency: Planning Department

Financing: General fund

Program Objectives: Create opportunity for at least 30 units of rental housing for lower income households.

Schedule: Site rezoned by October 2023.

**5. EQUAL HOUSING OPPORTUNITIES**

Ensuring residents can reside in the housing of their choice, including Sonoma’s special needs populations.

**PROGRAM 210: FAIR HOUSING SERVICES**

Fair Housing Advocates of Northern California (FHANC) is the designated provider of fair housing and tenant-landlord information throughout the County. FHANC provides fair housing investigation and coordinates referral services to assist individuals who may have been the victims of discrimination. They maintain a fair housing hotline and provide bilingual in-person counseling. Fair housing education and outreach includes publication and distribution of *A Handbook for Landlords & Tenants*, and presentations to community groups and housing providers on fair housing issues.

Responsible Department/Agency: Planning Department, FHANC

Funding Sources: General Fund, CDBG funds

2023-2031 Objectives: Continue to provide comprehensive fair housing services, including promoting fair housing practices, review and enforcement assistance with fair housing complaints, and education to housing providers, through FHANC. As a means of furthering fair housing education and outreach in the community, the City will advertise the fair housing program through placement of fair housing services brochures at the public counter, the Sonoma Community Center, and on the City’s website.

Timeframe: Ongoing implementation of fair housing services through FHANC, including semi-annual outreach events to the community to promote fair housing practices.

Increase access to fair housing information on the City’s website and at locations in throughout the City by December 2023

## **PROGRAM 221: AFFIRMATIVELY FURTHER FAIR HOUSING**

Facilitate equal and fair housing opportunities by taking meaningful actions to affirmatively further fair housing and address impediments identified in the AFFH analysis located in the Background Report. In summary, the City offers higher opportunity areas but faces challenges in promoting and providing a range of housing types and prices suitable for lower income households. Providing a range of affordable housing can help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes. Table 1 summarizes fair housing issues, contributing factors, and implementing actions.

The actions listed below, along with the other programs identified in this Housing Plan, were developed to cumulatively address the AFFH goals to counteract the disparities and issues that were identified in the AFFH analysis located in the Background Report. The timeframes and priority levels are added to ensure the implementation of these actions in a timely manner. The priority levels for these actions are defined as follows:

- High Priority contributing factors are those that have a direct and substantial impact on fair housing, and are core municipal functions that the City can control;
- Medium Priority factors are those that have a direct and substantial impact on fair housing, but the City has limited capacity to control their implementation;
- Low Priority factors may have a direct and substantial impact on fair housing choice, but the City lacks capacity to address it, or the factor may have only a slight or indirect impact on fair housing choice.

As shown in Table 1, the City intends to complete the necessary actions to meet the State AFFH requirements. These actions are integrated into the Housing Plan for the overall 6<sup>th</sup> Cycle Housing Element with the specialized timeframes for expedited implementation. The rationale for identifying these actions is to ensure they are implemented in a timely manner to better serve the Sonoma community. These actions are intended to alleviate the main issues identified in the Assessment of Fair Housing and the City intends to implement these and all the programs outlined in this Housing Plan during the 2023-2031 planning period. In addition, the City intends to monitor the AFFH actions on an annual basis in conjunction with the preparation of the Annual Progress Report (APR) to ensure the goals are being met. If any action items are not being achieved, the City will adjust its metrics, timeframes, and commitments as necessary to ensure it meets its AFFH goals.

Responsible Department/Agency: Planning Department, Fair Housing of Sonoma County

Funding Sources: General Fund, CDBG, grant funding

2023-2031 Objectives: Implement measures to affirmatively further fair housing.

Timeframe: Ongoing implementation for the 2023-2031 planning period, and as further outlined in Table 1.

**Table 1: Program 22 Fair Housing Program Action Items**

Program/Action Area <sup>1</sup>	Specific Commitment	Timeframe	Geographic Targeting	Metrics
<b>Fair Housing Outreach and Enforcement</b>				
<p>20. Fair housing services Ensure that educational and enforcement assistance is provided to renters, homebuyers, homeowners, and housing providers</p>	<ul style="list-style-type: none"> <li>• Provide comprehensive fair housing services through FHANC, including education, enforcement assistance, and outreach</li> <li>• Make fair housing information readily available to the community through providing information on the City's website and at the Sonoma Community Center and the public counter</li> </ul>	<ul style="list-style-type: none"> <li>• High priority/ within 9 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>• Citywide</li> </ul>	<ul style="list-style-type: none"> <li>• Information on the City's website, Sonoma Community Center, and Public Counter (2023)</li> <li>• Semi-annual outreach events (twice per year beginning in 2023)</li> </ul>
<b>Housing Mobility Enhancement</b>				
<p>5. Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) Encourage the development of ADUs and JADUs throughout the City to expand housing opportunities for all income levels and special needs groups.</p>	<ul style="list-style-type: none"> <li>• Update the ADU/JADU requirements;</li> <li>• Pursue funding and provide financial assistance to lower- and moderate-income homeowners in the construction of ADUs;</li> <li>• Prepare an ADU factsheet;</li> <li>• Conduct outreach and education on ADUs;</li> <li>• Conduct a mid-cycle review of ADU assumptions</li> </ul>	<ul style="list-style-type: none"> <li>• High priority/ within 18 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>• Citywide; target marketing in higher opportunity areas</li> </ul>	<ul style="list-style-type: none"> <li>• Update ADU requirements (2023);</li> <li>• Pursue funding for financial assistance (2025)</li> <li>• Prepare ADU factsheet (2024);</li> <li>• Conduct outreach and education (2025);</li> <li>• Conduct mid-cycle review (2027)</li> <li>• Annually monitor ADUs permitted at the time of the Annual Progress Report (APR);</li> <li>• Target 20% of ADUs in higher opportunity</li> </ul>

<sup>1</sup> Program numbers reference the corresponding program in the Housing Plan. Program 22 is the AFFH program and all associated actions, objectives, and timing are implemented solely as part of Program 22.

Program/Action Area <sup>1</sup>	Specific Commitment	Timeframe	Geographic Targeting	Metrics
<p>9. Rental Assistance/Housing Choice Voucher (HCV) Program Promote the Housing Choice Voucher (HCV) Program, with a special emphasis on promoting the program to the City's special needs populations.</p>	<ul style="list-style-type: none"> <li>• Make information regarding the HCV program available on the City website and in an annual direct mailing to all residents and property owners;</li> <li>• Provide annual outreach to property owners citywide encouraging owners of rental property to register with the Sonoma County Housing Authority;</li> <li>• Work with the City's fair housing services provider to encourage property owners to participate in the Housing Choice Voucher Program</li> </ul>	<ul style="list-style-type: none"> <li>• Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>• Increase the number of voucher assistance recipients in higher opportunity areas;</li> <li>• Target education and marketing efforts throughout the community with an emphasis on higher opportunity areas.</li> </ul>	<p>areas.</p> <ul style="list-style-type: none"> <li>• Increase the number of low-income recipients in receiving voucher assistance in higher opportunity areas by 5% by FY 26/27.</li> </ul>
<p><b>New Housing Choices and Affordability in Moderate and High Opportunity Areas/Improve Opportunity Scores</b></p>				
<p>1. Inclusionary Housing Provide Housing Opportunities in Sonoma's Higher (Moderate and High) Opportunity Areas for all Members of the Community</p>	<ul style="list-style-type: none"> <li>• Reevaluate the City's inclusionary housing provisions to ensure that they remain appropriate and do not impede the development of housing and are effective in providing an affordable component to new development.</li> </ul>	<ul style="list-style-type: none"> <li>• Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>• Target higher opportunity areas and areas of concentrated poverty.</li> </ul>	<ul style="list-style-type: none"> <li>• Review requirements and amend the Development Code, if necessary, by 2026.</li> <li>• Ongoing implementation.</li> </ul>
<p>2. Partnerships with Affordable Housing Developers Provide Housing Opportunities in Sonoma's Higher (Moderate and High) Opportunity Areas for all Members of the Community/</p>	<ul style="list-style-type: none"> <li>• Host an <del>annual</del> <u>quarterly</u> meeting with affordable housing developers and nonprofits to identify housing opportunities;</li> <li>• Support affordable housing developers through provision of land write-downs, regulatory incentives, and/or direct</li> </ul>	<ul style="list-style-type: none"> <li>• Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>• Target affordable housing throughout the City with an emphasis on higher opportunity areas</li> </ul>	<ul style="list-style-type: none"> <li>• Annual outreach to the development community.</li> </ul>

Program/Action Area <sup>1</sup>	Specific Commitment	Timeframe	Geographic Targeting	Metrics
	assistance.		and areas of concentrated poverty.	
<p>22. Improve the City's Opportunity Scores Affordable Housing/Access to Opportunities Density Bonus and Incentives</p>	<ul style="list-style-type: none"> <li>Incentivize and prioritize housing that improves educational, economic, and environmental opportunities</li> <li><a href="#">Coordinate with Sonoma Valley Unified School District in 2024 and 2025 to request that the District's enrollment boundaries and equity policy are reviewed and revised as necessary to ensure 1) the equity policy addresses nondiscrimination and equity in access to higher-scoring and proficient schools and prioritizes investment in lower-performing schools, and 2) enrollment boundaries are reviewed and revised to ensure equitable access to higher-performing schools, including access by a diverse population</a></li> </ul>	<ul style="list-style-type: none"> <li>High priority/identify projects within 18 months of Housing Element adoption and implement projects over 48 months</li> <li><a href="#">Coordinate with SVUSD 2023-2024 (see Metrics)</a></li> </ul>	<ul style="list-style-type: none"> <li>Citywide</li> </ul>	<ul style="list-style-type: none"> <li>Prioritize at least two projects that include components that improve educational, economic, and/or environmental opportunities and conditions</li> <li><a href="#">At least 4 annual meetings with SVUSD (2023, 2024, 2025, 2026) and presentation at two SVUSD Board meetings (2024, 2026) to promote revisions to enrollment boundaries</a></li> </ul>
<p><b>Place-Based Strategies for Community Preservation and Revitalization</b></p>				
<p><a href="#">3. Adaptive Reuse</a> <a href="#">Promote the adaptive reuse of identified structures/sites for the provision of multifamily and mixed-use housing.</a></p>	<ul style="list-style-type: none"> <li><a href="#">Develop strategies for the adaptive reuse of commercial structures and market-rate housing with potential to convert to affordable housing to provide for a range of housing types and residential uses;</a></li> <li><a href="#">Amend the Development Code to broaden the applicability of adaptive reuse.</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Medium priority/ within 24 months of Housing Element adoption</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Citywide with a focus on higher opportunity areas.</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Amend the Development Code by 2026;</a></li> <li><a href="#">Identify four sites with adaptive reuse potential by 2026;</a></li> <li><a href="#">Conduct outreach to property owners of sites in 2027 to</a></li> </ul>

Program/Action Area <sup>1</sup>	Specific Commitment	Timeframe	Geographic Targeting	Metrics
<p>10. Housing Rehabilitation Program Public Investment in Specific Neighborhoods, Including Services and Amenities</p>	<ul style="list-style-type: none"> <li>Promote the availability of the County Housing Rehabilitation Program on the City's website, through social media, and by way of handouts available at the City Hall;</li> <li>Continue to work with the SCCDC to ensure that funding remains available for housing rehabilitation activities.</li> </ul>	<ul style="list-style-type: none"> <li>Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>Citywide with focus on census tracts with highest concentrations of LMI households.</li> </ul>	<p><a href="#">promote adaptive reuse.</a></p> <ul style="list-style-type: none"> <li>Assist a total of 20 lower income households during the planning period.</li> </ul>
<p>20. -Fair Housing Services Provide education and outreach to reduce fair housing discrimination by landlords resulting from a lack of local fair housing education and outreach, resources for fair housing agencies and organizations, and state or local fair housing laws to support strong enforcement.</p>	<ul style="list-style-type: none"> <li>Allocate funding to creating locally hosted educational workshops on fair housing to reduce the amount of discrimination;</li> <li>Provide social media and factsheets regarding fair housing/equal housing opportunity requirements with links to the City website;</li> <li>Collaborate with HRC for continued tracking of fair housing enforcement for discrimination cases.</li> </ul>	<ul style="list-style-type: none"> <li>Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>Citywide</li> </ul>	<ul style="list-style-type: none"> <li>Allocate funding for an annual educational workshop and provide social media and factsheets on fair housing beginning in FY 23/24.</li> </ul>
<p><a href="#">22. Targeted Investment in Areas of Most Need</a> <a href="#">Improve median incomes and opportunity scores in areas identified as low-moderate income with less access to opportunities.</a></p>	<ul style="list-style-type: none"> <li><a href="#">Allocate funding for capital improvement projects specific to the targeted areas, focused on improving community assets such as recreational facilities, parks, streets, active transportation, and infrastructure;</a></li> <li><a href="#">Prioritize code enforcement efforts in the targeted areas and</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">High priority/ within 18 months of Housing Element adoption</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Target middle and southwest sections of City with higher concentrations of LMI households and low resources.</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Identify potential capital improvement projects by FY 25/26;</a></li> <li><a href="#">Proactively code enforce targeted areas (ongoing);</a></li> <li><a href="#">Distribute ADU factsheet (2023);</a></li> <li><a href="#">Identify grant funding opportunities by FY</a></li> </ul>

Program/Action Area <sup>1</sup>	Specific Commitment	Timeframe	Geographic Targeting	Metrics
	<p><a href="#">offer guidance to property owners on programs and funding opportunities for maintenance and rehabilitation (Program 10);</a></p> <ul style="list-style-type: none"> <li><a href="#">Distribute ADU factsheet within targeted areas informing property owners on ADU construction and grant funding opportunities (e.g., CalHFA) (Program 5);</a></li> <li><a href="#">Focus City efforts to secure grant funding to facilitate/benefit affordable housing, socio-economic services, job growth, and job-housing nexus within the targeted areas.</a></li> </ul>			<p><a href="#">25/26.</a></p>

**Displacement Protection**

<p>11. Tenant and Resident Protections</p> <p>Reduce displacement of lower income households, multifamily apartment residents, and mobile home park residents through prohibiting unjust evictions and excessive rent increases and requiring projects that would convert multifamily housing or mobile home parks to provide protections for residents, including adequate notice and relocation assistance.</p>	<ul style="list-style-type: none"> <li>Implementation strategies to strengthen protection for tenants. Strategies may include a Tenants Bill of Rights that serves to establish that all Sausalito residents have the right to clean, safe and secure housing, an eviction protection ordinance to ensure there are not evictions without just cause, a rent stabilization ordinance, recognizing the need to address displacement.</li> <li>As new affordable and market rate rental units are developed, ensure any displaced lower and moderate income residents receive priority for housing</li> </ul>	<ul style="list-style-type: none"> <li>Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>Citywide with a focus on inventory sites where development is anticipated to occur</li> <li>Promote the preservation of affordable units throughout the City</li> </ul>	<ul style="list-style-type: none"> <li>Develop a draft eviction protection ordinance and rent stabilization ordinance by July 2025 and consider ordinances for adoption by December 2025.</li> <li>Ongoing implementation and annual monitoring and reporting throughout the planning period</li> </ul>
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Program/Action Area <sup>1</sup>	Specific Commitment	Timeframe	Geographic Targeting	Metrics
<p>21. Rental Registry</p> <p>Identify and track rental units to increase Section 8 participation and to assist in implementing Program 11.</p>	<ul style="list-style-type: none"> <li>Institute a rental registry program to identify and track rental units, including units that accept Section 8 vouchers, and affordability levels and ensure all rental properties in the Housing Inventory are in the registry</li> </ul>	<ul style="list-style-type: none"> <li>Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>Citywide</li> </ul>	<ul style="list-style-type: none"> <li>Institute registry program in 2024 and ensure all owners of housing inventory sites have been contacted to register in 2025.</li> <li>Ongoing implementation and annual monitoring and reporting throughout the planning period</li> </ul>
<p>22. Displacement Risk of Lower Income Residents Due to Economic Pressures</p> <ul style="list-style-type: none"> <li>Economic Displacement Risk Analysis</li> <li>Preservation of Assisted Rental Housing</li> </ul>	<ul style="list-style-type: none"> <li>Conduct an analysis to determine if lower income individuals and families may be displaced as a result of new residential development in the City's mixed-use, Housing Opportunity, and high density residential areas.</li> <li>Monitor at-risk units, work with potential priority purchasers, provide tenant education</li> </ul>	<ul style="list-style-type: none"> <li>Medium priority/ within 24 months of Housing Element adoption</li> </ul>	<ul style="list-style-type: none"> <li>Focus analysis where development is anticipated to occur.</li> <li>Promote the preservation of affordable units throughout the City.</li> </ul>	<ul style="list-style-type: none"> <li>Conduct analysis by December 31, 2023 and establish resulting programs (if any) by December 31, 2024. Annually monitor program effectiveness.</li> <li>Ongoing implementation and annual monitoring and reporting throughout the planning period.</li> </ul>

**PROGRAM 232: UNIVERSAL DESIGN AND ACCESSIBILITY**

The goal of universal design is to accommodate a wide range of abilities including children, aging populations, and persons with disabilities, including developmental disabilities, by providing features in residential construction that enhance accessibility. Examples of universal design features include:

- Entrances without steps that make it easier for persons of all ages to enter the home.
- Wider doorways that enhance interior circulation and accommodate strollers and wheelchairs.
- Lever door handles that are easier to use, especially by parents with an infant or a person with arthritis.
- Light switches and electrical outlets that are located at a height more convenient and accessible to the elderly.

Housing that is “visitable” is accessible at a basic level, enabling persons with disabilities to visit the homes of their friends, relatives, and neighbors. Visitability can be achieved in new construction by utilizing two simple design standards: (1) providing a 32-inch clear opening in all interior and bathroom doorways; and (2) providing at least one accessible means of ingress and egress for each unit.

Sonoma’s Building Department has prepared a series of handouts on accessibility and visitability principles.

Ensuring that developments are designed to provide an accessible circulation system further ensures that housing and development accommodate persons with disabilities.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Continue to provide information on universal design and visitability principles to residential development applicants.

By December 2024, update the Municipal Code to include visitability requirements for new residential construction (single family and multifamily) and multifamily remodels

By December 2025, update the Circulation Element of the General Plan to ensure that the City’s circulation system, including sidewalks, bicycle lanes, and transit stops, are designed to promote accessibility for all persons, including persons with a disability

Timeframe: Ongoing implementation.

**PROGRAM 243: REASONABLE ACCOMMODATION PROCEDURES**

The City of Sonoma has developed an ordinance through which the City can grant reasonable modifications to the requirements of the Development Code to ensure persons with disabilities, including developmental disabilities, are afforded equal opportunity for the use and enjoyment of their dwelling. The ordinance establishes a ministerial process for requesting and granting reasonable modifications to zoning and development regulations, building codes, and land use. The City imposes no fees for a reasonable accommodation application.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Facilitate equal access to housing for persons with disabilities, including developmental disabilities, through implementation of the City's reasonable accommodation procedures.

Timeframe: Ongoing implementation.

#### **PROGRAM 254: HOMELESS SERVICES AND SHELTER**

In cooperation with community groups, the City constructed an emergency shelter in 2008 on the Police Station property. The Haven shelter accommodates eight individual and two family beds at maximum capacity, and is managed by the nonprofit Sonoma Overnight Support.

The City participates in the County's Continuum of Care operated by the Sonoma County Community Development Commission (SCCDC) as a means of coordinating a regional approach to issues of homelessness. The City also provides referrals, and as available, funding support to area homeless service providers. The City is in the process of creating a Homelessness Task Force comprised of City Staff, Council Members, local stakeholders, and County representatives and is working to hire a Sonoma Valley Social Safety Net specialist to oversee homeless services, facilitate coordination between agencies, non-profits and service providers, secure resources, and represent the Valley's interests.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Continue to support operation of The Haven and Safe Ground parking in the City, ensuring that overnight sleeping areas within the City are managed in a manner that respects those experiencing homelessness, are safe, clean, and sanitary, and include positive engagement of nearby businesses and neighbors to enhance community connections and partnerships.

Continue to address homelessness at the regional level, including participation in and support of the SCCDC and area homeless service providers in addressing homelessness, through ensuring adequate shelter space is available to accommodate the unmet need in the County and to ensure services are coordinated to provide unhoused persons with social, health, financial, and other supportive services necessary for persons to become and remain housed and live in a safe, dignified manner.

Continue to address homelessness at the local level through creating a Homelessness Task Force and coordinating with other agencies and organizations to hire a Sonoma Valley Social Safety Net specialist to oversee homeless services, including identification of service gaps and methods to increase access to services

Timeframe: Ongoing implementation, participate in SCCDC meetings at least semi-annually (twice a year), and annual reporting throughout the planning period.

Establish the Sonoma Valley Homelessness Task Force by December 2023 and the Sonoma Valley Social Safety Net specialist position by December 2024.

Provide information on the City website and at locations in the City convenient to the unhoused population by July 2023 that identifies local and regional shelter locations

and provides contact information for supportive services and review and update information annually

#### **PROGRAM 265: MOBILE HOME PARK SENIOR-ONLY OCCUPANCY RESTRICTIONS**

By way of background, each of Sonoma's three mobile home parks were originally developed as senior-only facilities at the choice of their respective developers. More recently, the Moon Valley Mobile Home Park converted to an all-age facility, with the Pueblo Serena and Rancho de Sonoma parks remaining restricted to seniors. In some jurisdictions, restrictions have been adopted, including zoning overlays that regulate or prohibit the conversion of senior-only parks to all-age facilities as a means of preserving senior housing.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Evaluate regulatory mechanisms, such as a senior-only zoning overlay, to accommodate mobile home parks wishing to maintain senior-only occupancy restrictions. Conduct outreach to the City's senior mobilehome parks to identify if there is interest in permanently setting the parks aside for senior housing and implement appropriate regulatory mechanisms to ensure that the senior housing will be maintained for any senior parks with resident interest and support.

Timeframe: Complete evaluation of regulatory mechanisms in 2023, conduct community and mobile home park outreach in 2024, and adopt an ordinance or other regulatory mechanism, if necessary, by 2026.

#### **PROGRAM 276: AFFORDABLE HOUSING RESOURCES FOR RENTERS AND OWNERS**

Sonoma has provided comprehensive rental and ownership opportunities to serve a variety of income levels and a range of household types. During the 6th Cycle, the City anticipates continuing to increase rental and ownership opportunities for all income levels. To ensure that housing opportunities are accessible to the City's existing residents that may be at-risk of displacement, to increase access to resources, and to affirmatively further fair housing access and opportunities, the City will develop a program that connects targeted extremely low, very low, and low income residents and employees in the City access to new housing opportunities. The program will also identify available local and regional resources for homeownership and housing rehabilitation opportunities to ensure the community is aware of these resources.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Develop an outreach program to connect lower income residents and the lower income workforce in the City with new rental and ownership opportunities, access to resources for home ownership, including counseling for new buyers and existing homeowners, and housing rehabilitation programs as those become available, and access to housing assistance providers, including Disability Services & Legal Center, Fair Housing of Northern California, F.I.S.H. Sonoma Valley, Legal Aid of Sonoma County, Napa Sonoma ADU, RISE Housing, Sonoma County Community Development Commission, Sonoma Housing Authority, Sonoma Overnight Support, Sonoma Tenants, Sonoma Valley Collaborative, promoting fair housing choice and access to safe and decent housing within the community.

Timeframe: Establish outreach program by June 2024 and conduct outreach annually, or more frequently, as housing opportunities become available.

**PROGRAM 287: MONITOR RESIDENTIAL CAPACITY (NO NET LOSS)**

Sonoma will monitor the consumption of residential acreage (i.e., land identified with residential development potential), and review proposed General Plan amendments, Zoning Ordinance amendments, and development projects to ensure an adequate inventory is available to meet the City’s 2023-2031 RHNA obligations.

To make certain sufficient residential development capacity is maintained, Sonoma will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level(s) than shown in the residential sites inventory. Should an approval of development result in a reduction of capacity below that needed to accommodate the remaining RHNA for lower income, moderate-income, or above moderate-income households, the City, and potentially the applicant (in accordance with State law), will identify and, if necessary, rezone sufficient sites within 180 days to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA allocation, consistent with State law. Any rezoned site(s) will satisfy the adequate sites requirements of Government Code Section 65583.2 and will be consistent with the City’s obligation to affirmatively further fair housing.

Responsible Agencies: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Maintain adequate capacity to accommodate the City’s RHNA obligations at all income levels throughout the planning period. Report as required through the HCD annual report process.

Timeframe: Ongoing implementation, at time of approval of a project on a site listed in the Housing Element, and annual reporting throughout the planning period.

**PROGRAM 298: REPLACEMENT OF UNITS ON SITES**

Government Code Section 65583.2(g)(3) requires the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site identified in the Housing Element consistent with those requirements set forth in Government Code Section 65915(c)(3). Replacement requirements shall be applied for sites identified in the residential sites inventory (Appendix A) that currently have residential uses, or within the previous five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income; or
- Subject to any other form of rent or price control through a public entity’s valid exercise of its police power; or
- Occupied by low or very low-income households.

For the purpose of this program, “previous five years” is based on the date the application for development was submitted.

Pursuant to Government Code Section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), Sonoma shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the

inventory unless: a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

Responsible Agencies:	Planning Department
Funding Sources:	General Fund; replacement costs to be borne by developer of any such site
2023-2031 Objectives:	For all project applications, identify need for replacement of housing units and ensure replacement, if required, occurs.
Timeframe:	Ongoing

**6. ENVIRONMENTAL SUSTAINABILITY**

Ensuring Sonoma grows in a responsible manner, in line with resource limitations such as water availability.

**PROGRAM 3029: GREEN BUILDING PROGRAM**

“Green buildings” are structures that are designed, renovated, re-used, or operated in a manner that enhances resource efficiency and sustainability. These structures reduce water consumption, improve energy efficiency, and lessen a building’s overall environmental impact. Sonoma has taken a number of significant actions towards becoming a green and sustainable city, including:

- Adoption of an Urban Growth Boundary to prevent urban sprawl;
- Establishment of a Climate Action Commission;
- Adoption of a local Bicycle and Pedestrian Master Plan (2008);
- Participation in the Sonoma County Energy Independent Loan Program, providing funds to property owners to install energy efficiency and water conservation improvements (2009);
- Adoption of a Green Building Ordinance (2009).

Beginning January 1, 2014, the 2013 California Green Building Standards Code (CALGreen) became effective for new buildings and certain addition or alteration projects throughout California. The City of Sonoma has adopted and amended the current CALGreen to require CALGreen+Tier 1 level of compliance for all new buildings (except Tier 1 Energy Efficiency measures need not be met, as amended within SMC14.10.050). The City of Sonoma requires project applicants to hire a third-party green building special inspector to verify compliance with CALGreen requirements as amended by the City. Customized green building checklists and informational brochures are provided by the City to facilitate compliance with requirements.

Responsible Department/Agency:	Planning Department
Funding Sources:	General Fund
2023-2031 Objectives:	Continue to provide outreach and education to developers, architects, and residents to provide information on how to incorporate sustainability in project design, as well as in existing structures.
Timeframe:	Ongoing implementation.

**PROGRAM 310: ENERGY CONSERVATION INITIATIVES**

Information regarding the City’s energy-efficiency standards and available programs to assist homeowners and property owners with energy-efficient improvements and with reducing energy-related costs, including those identified in the Housing Element

Background Report, will be made available on the City's website and at the Planning Department counter. In addition to promoting the programs citywide, the City will target special advertisements and education to the City's lower income census tracts to explain available programs and potential long-term utility cost savings.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Continue to advertise available programs to address energy-efficient improvements to single and multi-family units and to assist households with reducing energy-related costs on the City's website and at the Planning Counter

Timeframe: Ongoing implementation.

#### **PROGRAM 324: SONOMA WATER ACTION PLAN AND CONSERVATION INCENTIVES**

In response to the challenges associated with meeting projected water demand, the City has developed a broad strategy for meeting projected water needs through development of an updated Urban Water Management Plan (2020). A series of Demand Management Measures (DMMs) with timeframes for completion are set forth to move the City forward in meeting projected water demand. The City Council continues to review and update Sonoma's water supply and conservation strategies to reflect existing conditions and best practices.

Responsible Department/Agency: Planning Department

Funding Sources: General Fund

2023-2031 Objectives: Implement the Demand Management Measures called for in the Urban Water Management Plan (2020). Conduct periodic updates of the Plan and modify as necessary to ensure adequate water supply to meet Sonoma's regional housing needs (RHNA). Advertise available water conservation programs and incentives.

Timeframe: Ongoing implementation.

#### **D. QUANTIFIED OBJECTIVES**

State law requires the Housing Element to include quantified objectives for the maximum number of units that can be constructed, rehabilitated, or conserved. Policies and programs in the Housing Element establish the strategies to achieve these objectives. The City's quantified objectives are described under each program, and represent the City's best effort in implementing each of the programs. Assumptions are based on past program performance and funding availability, construction trends, land availability, and future programs that will enhance program effectiveness and achieve full implementation of the City's housing goals.

The new construction objectives shown in Table 2 are based on the City's RHNA for the 2023-2031 planning period for lower income, moderate-income, and above moderate-income housing, historic trends, and expectations for new ADUs. Rehabilitation and conservation objectives are based on specific program targets, including such programs as use of the Preservation of Assisted Rental Housing Program and Housing Choice Voucher Program.

Table 2 below summarizes the City’s quantified objectives for housing during the 2023-2031 planning period.

<b>Table 2. 2023–2031 Quantified Objectives</b>			
<b>Income Group</b>	<b>New Construction Objectives</b>	<b>Rehabilitation Objectives</b>	<b>Conservation Objectives</b>
Extremely Low: <30% AMI	41	15	15
Very Low: 30-50% AMI	42	30	64
Low: 50-80% AMI	48	30	92
Moderate: 80-120% AMI	50	-	168
Above Moderate: 120% + AMI	130	-	-
<b>Total</b>	<b>311</b>		

AMI – Area Median Income  
 New Construction Objectives: Reflects City’s 2023-2031 RHNA.  
 Rehabilitation Objectives: Reflects loans/grants anticipated through Sonoma County CDC CDBG-funded Housing Rehabilitation Loan Program.  
 Conservation Objectives: Reflects conservation of existing affordable housing, including all projects identified in Table 39 of the Background Report, all inclusionary units, and assisted ownership projects that have units committed to lower and moderate income households.





**City of Sonoma**

**6th Cycle Housing Element**

# **BACKGROUND REPORT**

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January 2023

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# BACKGROUND REPORT

## 1. INTRODUCTION

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The City of Sonoma Housing Element consists of two documents: the 6<sup>th</sup> Cycle Housing Element Background Report and the 6<sup>th</sup> Cycle Housing Element Housing Plan (policy document). The Background Report provides information regarding the City's population, household, and housing characteristics, quantifies housing needs, addresses special needs populations, describes potential constraints to housing, addresses fair housing issues, and identifies resources available, including land and financial resources, for the production, rehabilitation, and preservation of housing. The Housing Element Background Report provides documentation and analysis in support of the goals, policies programs, and quantified objectives in this Housing Element policy document.

The Background Report of this housing element identifies the nature and extent of Sonoma's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, impediments to fair housing, and energy conservation opportunities. By examining the City's housings, resources, and constraints, the City can then determine a plan of action to address housing needs and constraints. This plan is presented in the 6<sup>th</sup> Cycle Housing Element Housing Plan, which is the policy component of the Housing Element. In addition to identifying housing needs, the 6<sup>th</sup> Cycle Housing Element Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

### A. CONTENTS

This 6<sup>th</sup> Cycle Housing Element Background Report is divided into the following seven chapters:

#### 1. Introduction

The Introduction describes the components of the 6<sup>th</sup> Cycle Housing Element and the contents of the 6<sup>th</sup> Cycle Housing Element Background Report.

#### 2. Housing Needs Assessment

This Chapter includes an analysis of population and employment trends, quantified housing needs for all income levels, including the City's share of the Regional Housing Needs Allocation (RHNA), household characteristics, housing characteristics, housing stock condition, special housing needs, such as those of the elderly, disabled, including developmentally disabled, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter, and the risk of assisted housing developments converting from lower income to market-rate units.

#### 3. Constraints

This Chapter includes an analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and locally adopted ordinances that directly impact the cost and supply of residential development. This Chapter also provides an analysis of potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, proposed and approved densities versus minimum densities, and building permit timing. A discussion of resources available for housing development, including funding sources for affordable housing, rehabilitation, and refinancing is provided.

#### **4. Inventory of Residential Sites**

This Chapter provides an inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship between zoning, public facilities, and city services to these sites.

#### **5. Affirmatively Furthering Fair Housing**

This Chapter includes an assessment of fair housing, including a summary of fair housing issues, an assessment of the City's fair housing enforcement and fair housing outreach capacity, an analysis of available data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk, an assessment of the contributing factors for identified fair housing issues, identification and analysis of the City's fair housing priorities and goals, and identification of strategies and opportunities to implement fair housing priorities and goals.

#### **6. Evaluation of the 2015-2023 Housing Element**

This Chapter evaluates the implementation of the 2015-2023 Housing Element, including its effectiveness in achieving the community's housing goals and objectives and its effectiveness in addressing the City's housing needs.

#### **7. Other Requirements**

This Chapter addresses opportunities for energy conservation and the 6<sup>th</sup> Cycle Housing Element's consistency with the Sonoma General Plan.

## 2. HOUSING NEEDS ASSESSMENT

### A. INTRODUCTION

This chapter of the Housing Element Background Report discusses the characteristics of the City's population and housing stock as a means of better understanding the nature and extent of unmet housing needs. The Housing Needs Assessment is comprised of the following components: A) Demographic Profile; B) Household Profile; C) Housing Stock Characteristics; and D) Regional Housing Needs.

### B. DATA AND METHODOLOGY

To understand the context of local housing in the City of Sonoma, a review and analysis of the community's population characteristics and housing stock was performed. The primary data source for the 2023-2031 Housing Element Update are the California Department of Housing and Community Development Department (HCD)-Approved Housing Element 6th Cycle Data Package prepared by Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) staff. The ABAG 6<sup>th</sup> Cycle Housing Element Update data package has been reviewed and approved by the State of California Department of Community Development and was developed specifically to provide data adequate for use in 6th Cycle Housing Elements to all ABAG jurisdictions. Additional data sources include the U.S. Census Bureau (2010 Census and 2015-2019 American Community Survey (ACS)), California Department of Finance (DOF), California Employment Development Department (CEDD), HCD income limits, and other sources as noted in the document. Due to the use of multiple data sources (with some varying dates), there are slight variations in some of the information, such as total population and total household numbers, presented in this document.

### C. DEMOGRAPHIC PROFILE

Demographic changes such as population growth or changes in age can affect the type and amount of housing that is needed in a community. This section addresses population, age, race, and ethnicity of Sonoma residents.

#### 1. POPULATION GROWTH AND TRENDS

Table 1 shows population growth for the City of Sonoma and Sonoma County from 2000 to 2020. According to data prepared by the California DOF, the population of Sonoma in 2020 was 11,050 persons, an increase of approximately 3.8% or 402 people since 2010. During the previous decade (2000 to 2010), Sonoma experienced significantly greater growth, increasing by 14.8% or 1,373 people resulting in an annual growth rate of 1.5%. Between 2015 and 2020, Sonoma grew approximately 1.1% from 10,929 to 11,050 people, resulting in an annual growth rate of 0.2% (see Table 1). Looking at the growth rates for Sonoma County as a whole, it appears that Sonoma's recent growth (2010 to 2020) was double that of the growth experienced Countywide (1.9%). Additionally, during the 2000 to 2010 period, Sonoma County experienced significantly less growth than Sonoma, increasing only 5.5% while the City increased by 14.8% (see Table 1).

	<b>2000</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>
<b>Population, City of Sonoma</b>	<b>9,275</b>	<b>10,648</b>	<b>10,929</b>	<b>11,050</b>
Percent Change	--	14.8%	2.6%	1.1%
Annual Percent Change	--	1.5%	0.5%	0.2%
<b>Population, Sonoma County</b>	<b>458,614</b>	<b>483,878</b>	<b>500,640</b>	<b>492,980</b>
Percent Change	--	5.5%	3.5%	1.5%
Annual Percent Change	--	0.6%	0.7%	0.3%

Sources: ABAG 2021 6<sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, 2000 Census; 2010 Census, State of California, Department of Finance, E-5 Population Estimates for Cities, Counties, and the State, 2010-2020, California, April 2021

Table 2 compares the growth rate of Sonoma to other cities in Sonoma County from 2010 to 2020. City of Petaluma had the greatest percentage change in population (9.1%). Sonoma experienced less percentage change in population (3.8%).

Jurisdiction	2010	2020	Change	% Change
City of Santa Rosa	162,647	173,628	+10981	+6.8%
City of Petaluma	56,689	61,873	+5184	+9.1%
City of Cloverdale	8,618	9,213	+595	+6.9%
City of Cotati	7,265	7,533	+268	+3.7%
City of Healdsburg	11,254	12,089	+835	+7.4%
City of Sebastopol	7,379	7,745	+366	+5.0%
City of Rohnert Park	40,521	43,069	+2548	+6.3%
City of Windsor	26,801	28,248	+1447	+5.4%
Unincorporated Sonoma County	145,363	138,532	-6831	-4.7%
<b>City of Sonoma</b>	<b>10,648</b>	<b>11,050</b>	<b>+402</b>	<b>+3.8%</b>

Sources: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - State of California, Department of Finance, E-5 Population Estimates for Cities, Counties, and the State, 2010-2020, California, April 2021

## 2. AGE CHARACTERISTICS

Table 3 compares changes in age distributions between the years 2010 and 2019 for Sonoma. The U.S. Census Bureau data shows Sonoma has a diverse population, with mostly increases in the percentage share of the total population for age categories 45 to 64 years of age, and 65 year of age or older. The data also shows a decrease for age categories under 5 years of age, 5 to 24 Years, and 25 to 44 years of age. For Sonoma, the number of persons under 5 years of age decreased by 92 or about 20.4% since 2010 and persons between 25 to 44 years of age also decreased by 351 or 9.2%. Additionally, persons 65 years or older increased by 1,159 or 52.4% since 2010. The median age of Sonoma residents increased from 48.4 in 2010 to 52.3 in 2019, which is significantly higher than the State’s median age of 36.5 and significantly higher than Sonoma County’s median age of 42.1. This trend points to projecting a larger aging population in Sonoma and the need to plan for services, such as health and medical services for this older community.

Age Group	2010		2019	
	Number	Percent	Number	Percent
Under 5 Years	467	4.4%	358	3.2%
5 to 24 Years	2,012	18.9%	1,997	18.0%
25 to 44 Years	2,252	21.1%	1,946	17.6%
45 to 64 Years	3,250	30.5%	3,402	30.7%
65 + Years	2,667	25.0%	3,372	30.4%
Median Age	48.4		52.3	

Source: ABAG 2021 6<sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, 2010 Census; U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019

## 3. RACE AND ETHNICITY

Table 4 shows that the City’s residents are predominantly white (73.4%) or Hispanic (20.8%). Between 2010 and 2019, the population of other race or multiple races increased by about 146 people or 79.8%, and the number of Hispanic residents increased by about 673 people or 41.2%. During this time period, the City’s residents reporting two or more races increased from 1.7% to 3.0% of the City’s population, while Black or African American population declined from 0.5% to 0.1%, the American Indian or Alaskan Native population slightly declined from 0.3% to 0.1%, and the Asian and Pacific Islander population decreased from 3.0% to 2.6%. However, it is noted that the ACS data reflects an estimate based on a sample size and the small number of persons (less than 10 per category) may be too small to be accurately reflected in the 2019 ACS estimates.

Race	2010		2019	
	Number	%	Number	%
American Indian or Alaska Native, Non-Hispanic	35	0.3%	8	0.1%
Asian / API, Non-Hispanic	318	3.0%	291	2.6%
Black or African American, Non-Hispanic	48	0.5%	15	0.1%
White, Non-Hispanic	8,430	79.2%	8,125	73.4%
Other Race or Multiple Races, Non-Hispanic	183	1.7%	329	3.0%
Hispanic or Latinx	1,634	15.3%	2,307	20.8%
<b>Total</b>	<b>10,648</b>	<b>100.0%</b>	<b>11,075</b>	<b>100.0%</b>

Source: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, 2010 Census; U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019

#### 4. EMPLOYMENT

One of the factors that can contribute to an increase in demand for housing is expansion of the employment base. According to the ACS, the estimated civilian labor force in Sonoma totaled 5,274 people in 2019, increasing by 293 workers since 2010. The civilian labor force includes those civilians 16 years or older living in Sonoma who are either working or looking for work. Table 5 summarizes the employment by industry for Sonoma residents in 2010 and 2019. The largest industry in Sonoma in 2019 was Educational, Health, and Social Services at 21.3%. This is followed by Arts, Entertainment, Recreation, Accommodation, and Food Services at 11.5% and Manufacturing at 10.6%.

Industry	City of Sonoma				Sonoma County			
	2010		2019		2010		2019	
	Number	%	Number	%	Number	%	Number	%
Agriculture, Forestry, Fishing and Hunting, and Mining	55	1.1%	105	2.0%	6,511	2.8%	7,333	2.9%
Construction	390	7.8%	262	5.0%	20,348	8.7%	20,905	8.2%
Manufacturing	430	8.6%	559	10.6%	23,192	9.9%	24,321	9.5%
Wholesale Trade	203	4.1%	228	4.3%	7,330	3.1%	7,257	2.8%
Retail Trade	577	11.6%	488	9.3%	30,662	13.1%	29,750	11.6%
Transportation and Warehousing, and Utilities	107	2.1%	145	2.7%	7,587	3.3%	9,547	3.7%
Information	101	2.0%	62	1.2%	5,445	2.3%	5,118	2.0%
Finance and Insurance, and Real Estate and Rental and Leasing	379	7.6%	501	9.5%	16,565	7.1%	14,502	5.7%
Professional, Scientific, and Management, and Administrative and Waste Management Services	512	10.3%	497	9.4%	25,760	11.0%	30,249	11.8%
Educational Services, and Health Care and Social Assistance	1,125	22.6%	1,121	21.3%	46,154	19.8%	53,713	21.0%
Arts, Entertainment, and Recreation, and Accommodation and Food Services	634	12.7%	608	11.5%	21,572	9.3%	27,791	10.9%
Other Services, except Public Administration	227	4.6%	382	7.2%	12,980	5.6%	14,959	5.8%
Public Administration	241	4.8%	316	6.0%	9,076	3.9%	10,629	4.2%
<b>Total Civilian Employed Population 16 Years and Over</b>	<b>4,981</b>	<b>100.0%</b>	<b>5,274</b>	<b>100.0%</b>	<b>233,182</b>	<b>100.0%</b>	<b>256,074</b>	<b>100.0%</b>

Source: ACS 5-Year Estimates, 2006 – 2010, 2015-2019 (Table S2405)

Sonoma is located within County of Sonoma. EDD projections indicate that the total employment within the County of Sonoma is expected to increase by 7.1% between 2018 and 2028. The highest forecast for job growth is in the Private Educational Services



(19.3% increase), Health Care, and Social Assistance (19.0% increase), and Professional, Scientific, and Technical Services (16.3% increase) categories. EDD also predicts that the State Government Excluding Education and Computer, State Government, and Durable Goods Manufacturing categories will decrease by 26.3%, 9.1%, and 6.7% respectively, within this time period. (*State of California EDD, 2018–2028 Industry Employment Projections*). Table 6 shows examples of typical jobs and associated mean hourly wages and estimated annual wages in the County of Sonoma.

<b>Standard for 1 Adult in Sonoma County</b>	<b>Hourly Wages</b>	<b>Estimated Annual Wages</b>
Living Wage	\$18.90	\$37,800
Poverty Wage	\$6.13	\$12,260
Minimum Wage	\$12.00	\$24,000
<b>Occupation Title</b>	<b>Mean Hourly Wage</b>	<b>Mean Annual Wage</b>
Management	\$62.12	\$129,199
Business and Financial Operations	\$39.19	\$81,514
Computer and Mathematical	\$45.90	\$95,489
Architecture and Engineering	\$49.68	\$103,335
Life, Physical, and Social Science	\$44.45	\$92,459
Community and Social Service	\$29.63	\$61,615
Legal	\$60.02	\$124,843
Educational Instruction and Library	\$35.38	\$73,604
Arts, Design, Entertainment, Sports, and Media	\$35.84	\$74,563
Healthcare Practitioners and Technical	\$53.85	\$112,007
Healthcare Support	\$19.72	\$41,011
Protective Service	\$32.95	\$68,534
<i>Food Preparation and Serving Related</i>	<i>\$17.14</i>	<i>\$35,666</i>
Building and Grounds Cleaning and Maintenance	\$19.67	\$40,918
Personal Care and Service	\$19.32	\$40,182
Sales and Related	\$24.95	\$51,906
Office and Administrative Support	\$23.93	\$49,787
<i>Farming, Fishing, and Forestry</i>	<i>\$18.10</i>	<i>\$37,637</i>
Construction and Extraction	\$33.35	\$69,374
Installation, Maintenance, and Repair	\$29.52	\$61,402
Production	\$22.13	\$46,017
Transportation and Material Moving	\$20.62	\$42,880

Wages below the living wage for one adult supporting one child are in italics.  
 Annual wages assumed wages paid for 2,000 hours per year (50 weeks times 40 hours per week).  
 Source: MIT Living Wage Calculator for Sonoma County, California 2019; State of California EDD, Occupational Employment and Wage 2021 – 1<sup>st</sup> Quarter Data, June 2021.

## **D. HOUSEHOLD PROFILE**

Household size and type, income levels, and the presence of special needs populations all affect the type of housing needed by residents. This section details the various household characteristics affecting housing needs in Sonoma.

### **1. HOUSEHOLD CHARACTERISTICS**

According to the Census, a household is defined as all persons living in a housing unit. This definition includes families (related individuals living together), unrelated individuals living together, and individuals living alone.

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A housing unit is defined by the Census as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other persons in the building and have direct access from the outside of the building or through a common hall. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

The household characteristics in a community, including household size, income, and the presence of special needs households, are important factors in determining the size and type of housing needed in the City.

Table 7 below identifies households by tenure and ages of householder in Sonoma and Sonoma County in 2019 based on ACS data from 2015–2019. In Sonoma, 61% of households own their home and 39% rent. The City's renter rate and homeowner rate are similar to Sonoma County's. In Sonoma, homeowner households are generally headed by older residents, with 45.3% of households headed by a resident 55 years of age or older. Households who rent their homes are generally younger; only about 18.7% of renter households are headed by a person over the age of 55. Similarly, in Sonoma County, 39.6% of homeowner households are headed by a resident 55 years of age or older and only about 13.4% of renter households are headed by a person over the age of 55.

	City of Sonoma		Sonoma County	
	Number	%	Number	%
Total:	5,125	100.0%	189,374	100.0%
Owner Occupied:	3,124	61.0%	116,393	61.5%
Householder 15 to 24 years	6	0.1%	284	0.1%
Householder 25 to 34 years	64	1.2%	6,872	3.6%
Householder 35 to 44 years	247	4.8%	13,268	7.0%
Householder 45 to 54 years	487	9.5%	21,027	11.1%
Householder 55 to 64 years	673	13.1%	29,312	15.5%
Householder 65 to 74 years	975	19.0%	27,473	14.5%
Householder 75 to 84 years	532	10.4%	13,039	6.9%
Householder 85 years and older	140	2.7%	5,118	2.7%
Renter Occupied:	2,001	39.0%	72,981	38.5%
Householder 15 to 24 years	99	1.9%	3,551	1.9%
Householder 25 to 34 years	286	5.6%	15,434	8.2%
Householder 35 to 44 years	245	4.8%	15,875	8.4%
Householder 45 to 54 years	415	8.1%	12,782	6.7%
Householder 55 to 64 years	211	4.1%	10,828	5.7%
Householder 65 to 74 years	283	5.5%	8,335	4.4%
Householder 75 to 84 years	209	4.1%	3,859	2.0%
Householder 85 years and older	253	4.9%	2,317	1.2%

Source: 2020 ABAG 6<sup>th</sup> Cycle Housing Element Data Package – U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25007)

Table 8 identifies the household sizes by housing tenure. In 2019, the majority of households consisted of 2 to 4 persons. Large households of 5 or more persons only made up 3.8% of the total households in Sonoma and 9.3% of total households in Sonoma County. Additionally, the average household size in City of Sonoma in 2019 for an owner-occupied unit was 2.16 persons per household and 2.05 persons per household for a renter-occupied unit. While the average household size of owner-occupied units declined from 2.24 in 2010 to 2.16 in 2019, the average household size in rental-occupied units increased from 1.86 in 2010 to 2.05 in 2019. (Source: U.S. Census Bureau, 2015-2019 and 2006-2010 American Community Survey reports).

	City of Sonoma		Sonoma County	
	Number	%	Number	%
Owner	3,124	100.0%	116,393	100.0%
Householder living alone	1,019	32.6%	27,819	23.9%
Households 2–4 persons	2,009	64.3%	79,654	68.4%
Large households 5+ persons	96	3.1%	8,920	7.7%
Average Household Size	2.16 persons		2.57 persons	
Rental	2,001	100.0%	72,981	100.0%
Householder living alone	962	48.1%	24,191	33.1%
Households 2–4 persons	939	46.9%	40,156	55.0%
Large households 5+ persons	100	5.0%	8,634	11.8%
Average Household Size	2.05 persons		2.63 persons	
Total:	5,125	100.0%	189,374	100.0%
Total Householder living alone	1,981	38.7%	52,010	27.5%
Households 2–4 persons	2,948	57.5%	119,810	63.3%
Large households 5+ persons	196	3.8%	17,554	9.3%
Average Household Size	2.12 persons		2.59 persons	

Source: 2020 ABAG 6<sup>th</sup> Cycle Housing Element Data Package – U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25009); U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (DP04 & S1101)

## 2. HOUSEHOLD INCOME

Household income is one of the most important factors affecting housing opportunity and determining a household’s ability to balance housing costs with other basic necessities of life.

### INCOME CHARACTERISTICS

According to HCD, the estimated median household income (AMI) for a four-person family in the State of California in 2021 was \$90,100. The estimated median household income for Sonoma County was \$103,300 in 2021. In nearby counties, Lake County had a median income of \$70,700. Napa County had a median income of \$109,200. Mendocino County had a median income of \$70,700, and Marin County had a median income of \$149,600.

### INCOME BY HOUSEHOLD TYPE AND TENURE

Table 9 shows the income level of Sonoma residents by household tenure. A higher percentage of renter households (46.9%) were lower income (<80% median) compared to lower-income residents who owned their homes (23.9%). The high incidence of lower income renter households is of particular significance as market rents in Sonoma exceed the level of affordability for lower-income households. As shown in Table 10, all lower income households, including both renter and homeowner households, are more likely to pay more than 30% of their income for housing. This issue is further evaluated in the Housing Affordability section.

Income Level	Renters	Owners	Total
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	Number	%	Number	%	Number	%
Extremely Low Income (<30% AMI)	375	19.3%	240	8.1%	615	12.5%
Very Low Income (31–50% AMI)	175	9.0%	225	7.6%	400	8.1%
Low Income (51–80% AMI)	360	18.6%	245	8.2%	605	12.3%
Moderate Income & Above (>80% AMI)	1,030	53.1%	2,260	76.1%	3,290	67.0%
<b>Total</b>	<b>1,940</b>	<b>100.0%</b>	<b>2,970</b>	<b>100.0%</b>	<b>4,910</b>	<b>100.0%</b>

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data 2013–2017, City of Sonoma

As indicated by Table 10, there is a significant variation in cost burden (overpaying for housing) by income level. Approximately 2,005 (40.8%) of households in Sonoma overpay for housing, which is slightly higher than percent of households (38.4%) in Sonoma County overpaying for housing. The majority of households in Sonoma overpaying for housing are in the extremely low (545 households overpaying), very low (355 households overpaying), and low (415 households overpaying) categories. In Sonoma, more renter households overpay for housing (790 owner households overpaying) than owner households (525 renter households overpaying). Similarly, in Sonoma County, more renter households overpay for housing than owner households.

Total Households Characteristics	City of Sonoma		Sonoma County	
	Number	% of Total	Number	% of Total
Total Households	4,910	100.0%	190,060	100.0%
Total Renter households	1,940	39.5%	75,450	39.7%
Total Owner households	2,970	60.5%	114,610	60.3%
Total lower income (0-80% AMI) households	1,620	33.0%	69,230	36.4%
Lower income renters (0-80%)	910	18.5%	39,955	21.0%
Lower income owners (0-80%)	710	14.5%	29,275	15.4%
Extremely low income renters (0-30% AMI)	375	7.6%	13,380	7.0%
Extremely low income owners (0-30% AMI)	240	4.9%	6,920	3.6%
<b>Low, Very Low, and Extremely Low Income Households Overpaying for Housing</b>				
Lower Income Paying More than 30%	1,315	26.8%	48,440	25.5%
Lower Income Renter Overpaying	790	16.1%	30,755	16.2%
Lower Income Owner Overpaying	525	10.7%	17,685	9.3%
<i>Extremely Low Income (0-30%)</i>	<i>545</i>	<i>11.1%</i>	<i>15,885</i>	<i>8.4%</i>
<i>Very Low Income Overpaying (30-50% AMI)</i>	<i>355</i>	<i>7.2%</i>	<i>14,130</i>	<i>7.4%</i>
<i>Low Income Overpaying (50-80% AMI)</i>	<i>415</i>	<i>8.5%</i>	<i>18,425</i>	<i>9.7%</i>
<b>Low, Very Low, and Extremely Low Income Households Severely Overpaying for Housing</b>				
Lower Income Paying More Than 50%	900	18.3%	30,685	16.1%
Lower Income Renter Severely Overpaying	530	10.8%	19,255	10.1%
Lower Income Owner Severely Overpaying	370	7.5%	11,430	6.0%
<i>Extremely Low Income (0-30%)</i>	<i>510</i>	<i>10.4%</i>	<i>13,940</i>	<i>7.3%</i>
<i>Extremely Low Income Renter Severely Overpaying</i>	<i>300</i>	<i>6.1%</i>	<i>9,380</i>	<i>4.9%</i>
<i>Extremely Low Income Owner Severely Overpaying</i>	<i>210</i>	<i>4.3%</i>	<i>4,560</i>	<i>2.4%</i>
<i>Very Low Income Severely Overpaying (30-50% AMI)</i>	<i>230</i>	<i>4.7%</i>	<i>9,580</i>	<i>5.0%</i>
<i>Low Income Severely Overpaying (50-80% AMI)</i>	<i>160</i>	<i>3.3%</i>	<i>7,165</i>	<i>3.8%</i>

Total Households Characteristics	City of Sonoma		Sonoma County	
	Number	% of Total	Number	% of Total
Total Households Overpaying	2,005	40.8%	72,990	38.4%
Total Renter Households Overpaying	1,100	<del>22.4</del> 56.7%	38,360	<del>20.2</del> 50.8%
Total Owner Households Overpaying	905	<del>18.4</del> 30.4%	34,630	<del>18.2</del> 30.2%
Total Households Overpaying 30-50% Income for Housing	870	17.7%	38,670	20.3%
Total Households Severely Overpaying 50% of Income or More for Housing	1,135	23.1%	34,320	18.1%

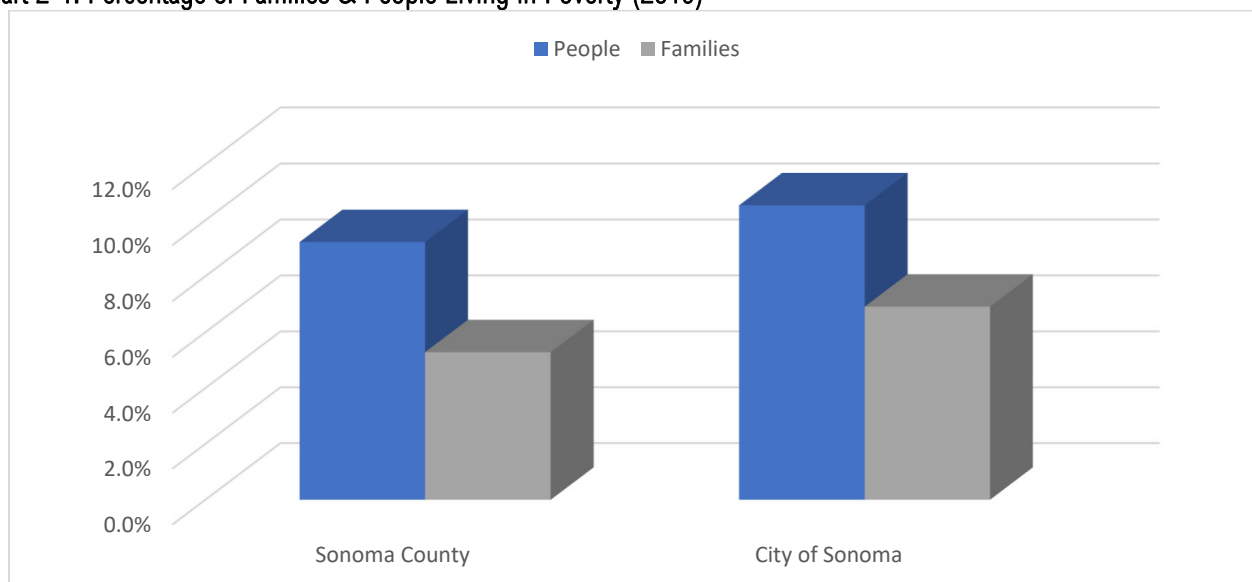
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data 2013-2017, City of Sonoma and Sonoma County.

### HOUSEHOLDS IN POVERTY

The level of poverty in a jurisdiction often influences the need for housing to accommodate those persons and families in the Very Low and Low-income categories. The U.S. Census Bureau measures poverty by using a set of money income thresholds that vary by family size and composition of who is in poverty. If a family’s total income is less than the family’s threshold, then that family and every individual in it is considered in poverty. For example, the poverty threshold for a family of two with no children would be \$17,331, a household of two with a householder aged 65 or older and no children has a poverty threshold of \$15,644, and the poverty threshold of a family of four with two children under the age of 18 would be \$26,246. (Source: U.S. Census Bureau, 2020).

Poverty rates in Sonoma are shown in Chart 2-1, which compares the numbers of families living in poverty in Sonoma to those living in Sonoma County. Compared with Sonoma County, there is a higher incidence of individuals and families in Sonoma living under the poverty line. In 2010, 2.4% or 60 families in Sonoma were listed as living below the poverty level. Corresponding numbers for 2019 show that the poverty rate increased to 6.9% in 2019.

Chart 2-1. Percentage of Families & People Living in Poverty (2019)



Source: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B17001&B17012)

Table 11 shows the poverty rates for families in Sonoma, with a focus on female-headed households. Overall, 189 of 2,733 families were in poverty (6.9%). Although female-headed households made up only 9.3% of all families, they accounted for 17.5% of families in poverty.

<b>Table 11. Families in Poverty in City of Sonoma (2019)</b>		
Family Type	City of Sonoma	
	Number	Percent
Total Families	2,733	100.0%
Female Headed Households	254	9.3%
Householder 65 Years and Over	813	29.7%
<b>Total Families Under the Poverty Level</b>	<b>189</b>	<b>6.9%</b>
Female Headed Households Under the Poverty Level	33	17.5%
Householder 65 Years and Over Under the Poverty Level	41	21.7%
Source: U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (S1702)		

**EXTREMELY LOW-INCOME HOUSEHOLDS**

Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income. For Sonoma County, the median household income in 2021 was \$103,300 for a family of 4. For ELI households in Sonoma County, this results in an income of \$34,900 or less for a four-person household or \$24,450 for a one-person household. ELI households have a variety of housing situations and needs. For example, most families and individuals receiving only public assistance, such as social security insurance or disability insurance are considered ELI households. Table 12 provides representative occupations with hourly wages that are within or close to the ELI income range. As shown in Table 9, ELI households make up 12.5% of all households in Sonoma. Based on Tables II-9 and II-10, approximately 88.6% of ELI households in Sonoma pay more than 30% of their incomes for housing.

<b>Table 12. Occupations with Wages for Extremely Low Income Households in Sonoma County (2021)</b>		
Occupation Title	Median Hourly Wage	Median Annual Wages
Dining Room and Cafeteria Attendants and Bartender Helpers	\$12.36	\$25,700
Ushers, Lobby Attendants, and Ticket Takers	\$12.52	\$26,030
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	\$12.58	\$26,164
Packers and Packagers, Hand	\$13.05	\$27,157
Amusement and Recreation Attendants	\$13.15	\$27,369
Real Estate Sales Agents	\$13.33	\$27,720
Waiters and Waitresses	\$13.49	\$28,069
Hairdressers, Hairstylists, and Cosmetologists	\$13.77	\$28,646
Food Servers, Nonrestaurant	\$13.84	\$28,790
Bartenders	\$13.98	\$29,079
Source: Employment Development Department, Long-Term Occupational Employment Projections 2018-2028, April 2021		

Pursuant to Government Code Section 65583(a)(1), 50% of the City’s very low-income regional housing needs assigned by HCD are extremely low-income households. As a result, from the very low-income need of 83 units, the City has a projected need of 42 units for extremely low-income households. Based on current figures, extremely low-income households will most likely be facing an overpayment, overcrowding, or substandard housing conditions. Some extremely low-income households could include individuals with mental or other disabilities and special needs. To address the range of needs of ELI households, Sonoma will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 1: Inclusionary Housing
- Program 2: Partnerships with Affordable Housing Developers
- Program 5: Accessory Dwelling Units and Junior Accessory Dwelling Units
- Program 6: Affordable Housing Funding Sources
- Program 8: Housing Choice Voucher Rental Assistance
- Program 10: Mobile Home Park Rent Stabilization and Conversion Ordinances
- Program 12: Preservation of Assisted Rental Housing
- Program 19: Affordable Housing Density Bonus
- Program 21: Affirmatively Further Fair Housing

### 3. SPECIAL NEEDS POPULATIONS

Government Code Section 65583(a)(7) requires a Housing Element to address special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The needs of these groups often call for targeted program responses, such as temporary housing, preservation of residential hotels, housing with features to make it more accessible, and the development of four-bedroom apartments. Special needs groups have been identified and, to the degree possible, responsive programs are provided. A principal emphasis in addressing the needs of these group is to continue to seek State technical assistance grants to identify the extent and location of those with special needs and identify ways and means to assist them. Local government budget limitations may act to limit effectiveness in implementing programs for this group. Please refer to Section II-H of this Element which provide information related to agencies and programs that serve special needs populations in Sonoma.

#### SENIOR HOUSEHOLDS

Table 13 below compares senior households and populations in Sonoma between the years 2000, 2010, and 2019. In 2019, there were 2,392 households with a head of household who is 65 years of age or older representing 46.7% of all households in Sonoma. Overall, it appears that the number of households with a head of household who is 65 years or older has been rapidly increasing over the last two decades. For example, the number of households with a head of household 65 years or older increased by approximately 12.8% (or 205 households) between 2000 to 2010 and about 32.4% (or 586 households) between 2010 to 2019. As shown in Table 13, a large portion of the senior households owned their own homes, with 68.9% or 1,647 senior households living in owner-occupied units and 31.1% or 745 senior living in renter-occupied housing. Additional information related to senior households relative to overall households is provided in Table 14 and Table 7, which summarizes households by age and tenure.

The overall population in Sonoma increased by approximately 7.6% between 2010 and 2019 with the number of 65+ persons increasing by 27.8% or 734, resulting in a total of 3,372 residents 65 years or older. According to 2015-2019 ACS Data (Table ID S1701), it appears that 344 or 10.2% of persons 65 years or older live below the poverty level in Sonoma. Additionally, the median age in Sonoma has been steadily increasing over the past two decades, increasing by nearly 1.5 years between 2000 and 2010 and approximately 4 years between 2010 to 2019. Compared to the state, Sonoma has experienced a greater increase in median age, with that overall state increasing by about 1.8 year from 35.2 in 2010 to 37.0 in 2019. The rapid increase in median age in Sonoma, represents a significantly growing population of persons 65 years or older. As such, this indicates a need to provide more services for this segment of the community.

Household by Age and Tenure	City of Sonoma		
	2000	2010	2019
<b>Total Owner Occupied:</b>	<b>2,706</b>	<b>2,915</b>	<b>3,124</b>
Owner Householders 65 years and over	1,097	1,083	1,647
<b>Total Renter Occupied:</b>	<b>1,667</b>	<b>1,898</b>	<b>2,001</b>
Renter Householders 65 years and over	504	723	745
<b>Total Occupied Households</b>	<b>4,373</b>	<b>4,813</b>	<b>5,125</b>

Total Householder 65 years and over	1,601	1,806	2,392
<b>Total Population</b>	<b>8,878</b>	<b>10,292</b>	<b>11,075</b>
Total Population 65 years and over	2,244	2,638	3,372
Source: ABAG 2020 6 <sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25007) ABAG 2020 6 <sup>th</sup> Cycle Housing Element Data Package - Census Bureau, 2010 Census; U.S. Census Bureau, 2000 Census (H016)			

Because seniors tend to live on fixed incomes dictated by Social Security and other retirement benefits, those who do not own their homes are significantly affected by rising housing costs. Also, while some seniors may prefer to live in single-family detached homes, others may desire smaller, more affordable homes with less upkeep, such as condominiums, townhouses, apartments, or mobile homes. According to the DOF E-5 Report, in 2021 about 55.7% of Sonoma’ housing stock was made up of single-family detached homes, leaving 44.3% of the housing stock for those who choose to or must live in other forms of housing (see Table 25). As described in Chapter 3, the City’s zoning and land use regulations accommodate a range of housing types that serve the senior population, including single-family housing, multi-family housing, mobile homes, senior housing, and care facilities.

There are several programs and services for the City’s senior citizens; many of which serve the disabled or otherwise underprivileged groups. Programs and services for seniors and their families and caregivers are summarized in Section H of this chapter.

**PERSONS WITH DISABILITIES**

A “disability” includes, but is not limited to, any physical or mental disability as defined in California Government Code Section 12926. A “mental disability” involves having any mental or psychological disorder or condition, such as mental retardation, organic brain syndrome, emotional or mental illness, or specific learning disabilities that limits a major life activity. A “physical disability” involves having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that affects body systems including neurological, immunological, musculoskeletal, special sense organs, respiratory, speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin and endocrine. In addition, a mental or physical disability limits a major life activity by making the achievement of major life activities difficult including physical, mental, and social activities and working.

Physical, mental, and/or developmental disabilities could prevent a person from working, restrict a persons’ mobility or make caring for oneself difficult. Therefore, disabled persons often require special housing needs related to potential limited earning capacity, the lack of accessible and affordable housing, and higher health costs associated with disabilities. Additionally, people with disabilities require a wide range of different housing, depending on the type and severity of their disability. Housing needs can range from institutional care facilities to facilities that support partial or full independence (i.e., group care homes). Supportive services such as daily living skills and employment assistance need to be integrated in the housing situation.

- Individuals with a mobility, visual, or hearing limitation may require housing that is physically accessible. Examples of accessibility in housing include widened doorways and hallways, ramps, bathroom modifications (i.e., lowered countertops, grab bars, adjustable shower heads, etc.) and special sensory devices including smoke alarms and flashing lights.
- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to convalescent care. Support services can include medical therapy, daily living assistance, congregate dining, and related services.
- Individuals with developmental disabilities and other physical and mental conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.



Table 14 compares the employment status of persons with and without a disability in 2015 and 2019. Between 2015 and 2019 there was 41.0% increase in the number of persons with a disability in Sonoma.

The number of persons employed with a disability increased by 76.4% from 301 persons in 2015 to 531 persons in 2019. Additionally, the number of persons unemployed with a disability decreased by 38.9% from 54 persons in 2015 to 33 in 2019. Conversely, the number of persons with a disability not in the labor force increased by about 9.8% from 204 persons in 2015 to 224 persons in 2019.

	2015		2019	
	Number	Percent	Number	Percent
<b>In the Labor Force:</b>	4,876	82.5%	4,807	82.6%
Employed:	4,396	74.4%	4,491	77.1%
With a Disability	301	5.1%	531	9.1%
No Disability	4,095	69.3%	3,960	68.0%
Unemployed:	480	8.1%	316	5.4%
With a Disability	54	0.9%	33	0.6%
No Disability	426	7.2%	283	4.9%
<b>Not in the Labor Force:</b>	1,033	17.5%	1,015	17.4%
With a Disability	204	3.5%	224	3.8%
No Disability	829	14.0%	791	13.6%
<b>Total:</b>	5,909	100.0%	5,822	100.0%
With a Disability	559	9.5%	788	13.5%
No Disability	5,350	90.5%	5,034	86.5%

Source: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2011-2015, 2015-2019(C18120)

Table 15 presents data on the types of disabilities for Sonoma and Sonoma County residents based on the ACS 2019 Data. According to ACS 2019 Data, 1,821 residents in Sonoma and 58,940 residents in Sonoma County have a disability. It is noted that persons may have more than one disability resulting in the total number of disabilities tallied in Table 15 exceeding the total number of disabled persons identified above. For persons ages 0 to 64, the most common disabilities are Cognitive Difficulty (37.1%), Vision Difficulty (18.9%), and Hearing Difficulty (18.5%). For the population of ages 65 and over, the most common disabilities are Hearing Difficulty (25.2%), Ambulatory Difficulty (24.9%), and Independent Living Difficulty (24.1%).

	City of Sonoma		Sonoma County	
	Number	Percent	Number	Percent
<b>Total Disabilities Tallied</b>	3,363	100.0%	110,465	100.0%
<b>Total Disabilities for Ages 0–64</b>	1,242	36.9%	55,419	50.2%
Hearing Difficulty	230	18.5%	6,511	11.7%
Vision Difficulty	235	18.9%	5,716	10.3%
Cognitive Difficulty	461	37.1%	15,481	27.9%
Ambulatory Difficulty	153	12.3%	12,149	21.9%
Self-Care Difficulty	48	3.9%	5,767	10.4%
Independent Living Difficulty (Ages 18-64)	115	9.3%	9,795	17.7%
<b>Total Disabilities for Ages 65 and over</b>	2,121	63.1%	55,046	49.8%
Hearing Difficulty	534	25.2%	11,766	21.4%
Vision Difficulty	129	6.1%	3,552	6.5%
Cognitive Difficulty	140	6.6%	6,244	11.3%
Ambulatory Difficulty	529	24.9%	16,107	29.3%
Self-Care Difficulty	278	13.1%	6,154	11.2%

Independent Living Difficulty	511	24.1%	11,223	20.4%
Source: ABAG 2020 6 <sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019, S1810)				

As described in Chapter 3, the City’s zoning and land use regulations accommodate a range of housing types that serve the disabled population, including residential care facilities for six or fewer persons which are treated as a single-family home, care facilities, and various housing types including multi-family housing and mobile homes. To address the range of needs of households with disabilities, Sonoma will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 2: Partnerships with Affordable Housing Developers
- Program 76: Affordable Housing Funding Sources
- Program 98: Housing Choice Voucher Rental Assistance
- Program 210: Fair Housing Services
- Program 224: Affirmatively Further Fair Housing
- Program 232: Universal Design
- Program 243: Reasonable Accommodation Procedures

**PERSONS WITH DEVELOPMENTAL DISABILITIES**

A developmental disability is a disability which originates before an individual attains age 18, continues or can be expected to continue indefinitely, and constitutes a substantial disability for the individual. This term includes intellectual disability, cerebral palsy, epilepsy, and autism. This term also includes conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with an intellectual disability, but shall not include other handicapping conditions that are solely physical in nature. (Lanterman Act, Welfare and Institutions Code, Section 4512.)

North Bay Regional Center (NBRC) is one of 21 Regional Centers for persons with developmental disabilities in California, and serves developmentally disabled residents living within the geographic boundaries of Napa, Sonoma, and Solano counties. In fiscal year 2019-2020, the average per capita expenditure in NBRC is \$26,331. While the US Census reports on a broad range of disabilities, the Census does not identify the subpopulation that has a developmental disability. The NBRC maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments, and reports that about 9,058 developmentally disabled persons in Sonoma County were served (Source: Performance Report for North Bay Regional Center 2021).

The California Department of Developmental Services (DDS) maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments. The DDS data is reported by zip code, so the data reflects a larger area than the City of Sonoma, however, approximately 31.3% of the population within the zip code resides in the City of Sonoma based on 2015-2019 ACS population data. As shown in Table 16, the DDS data indicates that a total of 102 developmentally persons reside in zip code 95476; applying Sonoma’s share of the population in the zip code results in an estimate of 32 living in the City.

	0 to 17 Years	18+ Years	Total
95476/Sonoma	102	132	234
City of Sonoma	32	41	73

Source: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - DDS, 2020 Developmental Disabilities by Zip Code; De Novo Planning Group, 2021

Table 17 breaks down the developmentally disabled population by residence type for the 95476 zip code as well as an estimate for the City based on the City’s share of the total population in zip code 95476. Of these persons living in Sonoma, the majority (83.3%) live at home with a parent or guardian, while 16.7% live independently or with support, 4.5% live in a community care

environment, 4.5% live in an intermediate care facility, 4.5 % live in foster/family home, and 4.5% live in another residence type. These distributions are fairly consistent with the client statistics for the NBRC service area, which notes 72.0% of developmentally disabled persons reside in homes of their families or private guardians and 14.0% of developmentally disabled persons reside in independent living or supported living situations.

Zip Code	Home of Parent, Family, or Guardian	Independent / Supported Living	Community Care Facility	Intermediate Care Facility	Foster / Family Home	Other	Total
95476/Sonoma	176	36	<11	<11	<11	<11	>212
City of Sonoma	>55	>11	<3	<3	<3	<3	>66

Source: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - DDS, 2021 Developmental Disabilities by Zip Code; De Novo Planning Group, 2021

While the majority of developmentally disabled persons in Sonoma and the County live with their parents, many need a supportive living environment, such as in-home care, a residential care home, or a community living facility. While many persons with developmental disabilities are eligible for various subsidy and assistance programs, many are unable to secure needed subsidized housing. Many of the individuals living with their parents will need alternative housing options as their parents age. This cycle triggers a need to explore other feasible housing alternatives, including in-home supportive care and adult residential care homes and facilities. Resources for persons with developmental disabilities are described in Section H of this chapter.

As described in Chapter 3, the City’s zoning and land use regulations accommodate a range of housing types that serve the developmentally disabled population, including single-family housing, multi-family housing, and mobile homes for persons living with their family or guardian. To address the range of needs of households with developmental disabilities, Sonoma will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 2: Partnerships with Affordable Housing Developers
- Program 76: Affordable Housing Funding Sources
- Program 98: Housing Choice Voucher Rental Assistance
- Program 210: Fair Housing Services
- Program 224: Affirmatively Further Fair Housing
- Program 232: Universal Design
- Program 243: Reasonable Accommodation Procedures

**LARGE HOUSEHOLDS**

Government Code Section 65583(a)(C) requires an analysis of housing needs for large families, those with five or more members. Large family households comprised 3.8%, or 196, of the total households in Sonoma according to the 2015–2019 ACS (see Table 18 below). As shown in Table 18, approximately 49% of large households in Sonoma owned their own homes. Additionally, 5-person households make up nearly 82.7% of the large family households in Sonoma with households with 6 or more persons accounting for the remaining 17.3% of large households.

Householder Type	City of Sonoma	
	Number	Percent
<b>Owner Households</b>	<b>3,124</b>	<b>60.96%</b>
5-Person Household	62	1.21%
6-Person Household	19	0.37%
7-or-more Person Household	15	0.29%

Householder Type	City of Sonoma	
	Number	Percent
Renter Households	2,001	39.04%
5-Person Household	100	1.95%
6-Person Household	0	0.00%
7-or-more Person Household	0	0%
<b>Combined Total</b>	<b>5,125</b>	<b>100.00%</b>
5-Person Household	162	3.16%
6-Person Household	19	0.37%
7-or-more Person Household	15	0.29%

Source: U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25009)

The needs of large families are unique in that they require more space to satisfy minimum household needs. The increase in average household size Statewide is, to some extent, linked to the subject of overcrowding. Overcrowding is defined as more than one person per room; as shown in Table 29, 1.5% of households in Sonoma live in overcrowded conditions. While it appears that overcrowding is not a significant issue in Sonoma, according to ABAG/MTC's Sonoma Housing Needs Data Report, communities of color are more likely to experience overcrowding similar to how they are more likely to experience poverty, financial instability, and housing insecurity. People of color tend to experience overcrowding at higher rates than White residents. In Sonoma, the racial group with the largest overcrowding rate is Hispanic/Latinx residents, which may be linked to the increase in permanent farmworkers living in Sonoma County. To ameliorate this impact in Sonoma, an increase in the number of affordable housing units with four bedrooms or more is needed. In many cases, housing units of this size constitute a small portion of the total housing supply, forcing families to continue to live in what may be considered as overcrowded units. To address this large household need, Program 6: Affordable Housing Funding Sources in the Housing Plan, ensures the City will continue to pursue available and appropriate State and Federal funding sources to support efforts to meet new construction needs of extremely low-, very low-, low-, and moderate-income households, as well as households with special needs, including large families. Additionally, Program 25 provides for fee reduction or deferral opportunities for affordable and special housing projects that address the needs of large families.

### FARMWORKERS

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farm laborers work in the fields, processing plants, or support activities on a generally year-round basis. When workload increases during harvest periods, the labor force is supplemented by seasonal workers, often supplied by a labor contractor. For some crops, farms may hire migrant workers, defined as those whose travel prevents them from returning to their primary residence every evening.

Estimating the size of the agricultural labor force can be problematic as farmworkers are historically undercounted by the census and other data sources. For instance, the U.S. Census Bureau does not track farm labor separate from mining, fishing and hunting, and forestry, nor does the U.S. Census Bureau provide definitions that address the specific nuances of farm labor (e.g., field laborers versus workers in processing plants), length of employment (e.g., permanent or seasonal), or place of work (e.g., the location of the business versus agricultural field). Data supplied by the United States Department of Agriculture, National Agriculture Statistics Service (USDA) reveals the breakdown of farm labor employment and the labor expense for Sonoma County as shown in Table 19. The 2017 USDA data is the most recent available data that provides a focused analysis of farming activities and employment in the County. Table 20 provides a breakdown of farm labor employment by days worked. The data from this table indicates that Countywide, there were 14,379 farmworkers in 2017. Of these farmworkers, 6,715 worked more than 150 days a year and 7,664 worked less than 150 days per year and are likely seasonal workers.

Hired Farm Labor	Farm Operations	Workers	Total Payroll
Sonoma County	1,713	14,379	\$230,410,000

Source: 2017 USDA Agricultural Census Data, Table 7

Hired Farm Labor	Farm Operations	Workers
150 Days or More	965	6,715
Less Than 150 Days	1,228	7,664

Source: 2017 USDA Agricultural Census Data, Table 7

Agricultural workers are a significant special needs population in the greater Sonoma County area, playing an important role in the region’s wine industry. Although agriculture is an important part of the Sonoma County economy, with over 7,000 farm-related jobs in Sonoma County, as shown in Table 5, only 105 persons (2.0 % of Sonoma residents in the labor force) were estimated to be employed in the agriculture, forestry, fishing, hunting, and mining industry based on 2015-2019 ACS data.

The City acknowledges the important role farmworkers play in the regional economy, and is committed to assisting in the provision of housing for this special needs group. Farmworkers and day laborers are an essential component of the region’s agriculture industry. Farmers and farmworkers are the keystone of the larger food sector, which includes industries that provide farmers with supplies and equipment and industries that process, transport, and distribute products to consumers. Sonoma is located in the heart of the world’s premier wine producing region. Grapes are the primary cash crop in the county. Grapevines account for a significant portion of the regional agricultural economy and the region’s overall financial stability. According to the most recent Sonoma County Agricultural Crop Report, the gross value of agricultural production in the County reached \$958,546,600 in 2019, with the top three crops for the region consisting of wine grapes, milk, and miscellaneous livestock and poultry, respectively.<sup>1</sup>

With only six parcels zoned Agriculture within the city (including the sphere of influence) and no farms of significant size, the city’s farmworker population is predominately non-migratory, and as such, their housing needs are best addressed through year-round affordable rental and ownership housing. On a regional scale, there is a larger demand for seasonal housing and a clear mismatch between housing costs and low farm worker wages, contributing to overcrowding and homelessness. Farmworker households are often comprised of extended family members or single male workers and as a result many farmworker households tend to have difficulties securing safe, decent and affordable housing. Far too often farmworkers are forced to occupy substandard homes or live in overcrowded situations. Additionally, farmworker households tend to have high rates of poverty, disproportionately live in housing that is in the poorest conditions, have very high rates of overcrowding, have low homeownership rates, and are predominately members of minority groups.

La Luz Center is a non-profit organization that provides a variety of community service, education and counseling programs to Sonoma residents. In addition to community service, education, and advocacy programs, the La Luz Center manages a Vineyard Worker Services program to provide seasonal housing for vineyard workers in the Sonoma Valley. Burbank Housing is a local nonprofit dedicated to building quality affordable housing in the North Bay. Burbank Housing has worked to increase affordable home ownership for farmworkers, among other special needs groups, and have partnered with the Vineyard Worker Services program in the past on a permanent farmworker housing project.

Table 21 summarizes the farmworker/employee housing units in the region; there are no employee housing facilities in the City. HCD’s Employee Housing database identifies a permanent employee housing facility, Sangiacomo Family Vineyards located at

<sup>1</sup> Sonoma County. *Sonoma County Agricultural Crop Report 2019*. Access: <https://sonomacounty.ca.gov/Agriculture-Weights-and-Measures/Reports/Crop-Reports/PDFs/2019-Sonoma-County-Crop-Report/>

21543 Broadway, and a seasonal employee housing facility, Shop House located at 21995 Bonness Road. Resources available for farmworkers are described in Section II-H.

<b>Facility Name/Address</b>	<b>Facility Type</b>	<b>Employee Count</b>
<b>Sangiacomo Family Vineyards</b> 21543 Broadway Sonoma, CA 95476	Permanent Employee Housing	20
<b>Shop House</b> 21995 Bonness Road Sonoma, CA 95476	H-2A Seasonal Employee Housing	13

Source: HCD Employee Housing Facility Portal. Access: <https://casas.hcd.ca.gov/casas/ehFacilityQuery/onlineQuery>

Agricultural Employee Housing is defined in the Sonoma Municipal Code Section 19.92.020 as “housing as described in California Health and Safety Code Sections 17021.5 and 17021.6, and employee housing as defined in California Health and Safety Code Section 17008.” However, it is noted that the Sonoma Municipal Code Section 19.10.050 does not identify Agricultural Employee Housing as potential use in the allowed land uses and permit requirement tables. Chapter 3, Constraints, provides additional discussion of current requirements of State law related to employee housing, including housing for agricultural employees, and addresses potential constraints to the development of farmworker/employee housing.

**FEMALE HEADS OF HOUSEHOLDS**

Households with female heads make up approximately 9.3% of households in the Sonoma (See Table 11, Families in Poverty). In 2019, about 13.0% of female-headed households in Sonoma had incomes below the poverty line, and female-headed households make up 17.5% of all households in poverty in Sonoma. Single female-headed households with children present would benefit from affordable housing types, particularly housing targeted at the ELI group, as well as housing located in the vicinity of daycare, schools, and other services. Battered women with children comprise a sub-group of female-headed households that are especially in need.

In Sonoma, there are a number of social service providers and emergency housing facilities serving women in need. For example, The Living Room in Sonoma County is committed to ease adversity, promote stability, and support self-reliance for women and children who are homeless, or at-risk of homelessness. The Living Room works within three primary areas, housing, food, and outreach to women and their children. As described in Section H of this chapter, there are also a number of health service providers, such as CommuniCare, as well as supportive, transitional, and emergency housing providers in the region to assist low-income women and women with children.

**HOMELESS AND OTHER GROUPS IN NEED OF TEMPORARY AND TRANSITIONAL AFFORDABLE HOUSING**

Government Code Section 65583(a)(7) requires that the Housing Element include an analysis of the needs of homeless persons and families. The analysis must include: (1) estimates of the number of persons lacking shelter; (2) where feasible, a description of the characteristics of the homeless (i.e., those who are mentally ill, developmentally disabled, substance abusers, runaway youth); (3) an inventory of resources available in the community to assist the homeless; and (4) an assessment of unmet homeless needs, including the extent of the need for homeless shelters.

The law also requires that each jurisdiction address community needs and available resources for special-housing opportunities, known as transitional and supportive housing. These housing types provide the opportunity for families and individuals to “transition” from a homeless condition to permanent housing, often with the assistance of supportive services to assist individuals in gaining necessary life skills in support of independent living.

The following discussion addresses the requirements of Government Code Section 65583(a)(7). It should be noted that data on homeless families and individuals is not developed based on jurisdictional boundaries. The Sonoma County Community

Development Commission (SCCDC) is the Countywide collaborative effort representing the homeless services system of care; the City participates as a member jurisdiction. The mission of SCCDC is to provide leadership on homelessness and poverty in Sonoma County with a vision to create and sustain a comprehensive, coordinated, and balanced array of human services for homeless and low-income individuals and families within Sonoma County. The SCCDC serves as a convening entity who hopes to achieve a synergistic relationship with the Strategic Plan to End Homelessness Executive Commission to achieve all of the goals in the Sonoma County General and Strategic Plan to End Homelessness and to address issues of homelessness and poverty countywide.

As the primary coordinating body for homeless issues and assistance for a geographic area encompassing the entire county, the SCCDC accomplishes a host of activities and programs vital to the community, including an annual point-in-time “snapshot” survey to identify and assess the needs of both the sheltered and unsheltered homeless, tracking homeless demographics using local service providers throughout the calendar year, and an annual action plan that helps direct community resources and actions in the form of comprehensive programs and activities.

**HOMELESS ESTIMATES**

According to the SCCDC, an estimate of the County’s homeless population was undertaken in concert with the requirements of the U.S. Department of Housing and Urban Development (HUD) for participating Continuums of Care nationwide. Those mandates require that a point-in-time study be taken. This study allows service agencies and local governments to spot trends in homelessness and to evaluate the success of existing programs. It is also a tool for agencies and their partners to plan for programs and services to meet the needs of homeless individuals and families in the community and to use in applying for grant and other funding.

The SCCDC conducted its 2020 Homeless Count in February 2020. The Homeless Count, also known as the Point-in-Time (PIT) Count, is a survey of individuals and families identified as experiencing sheltered or unsheltered homelessness within the boundaries of Sonoma County on a single night. While SCCDC conducted the majority of count activities on the morning of February 28, 2020, additional count activities occurred over the course of the seven days following the night February 28, 2020. This approach, known as a post-night count, allows enumerators several days to ensure a complete canvassing of the community. The majority of individuals counted in this way were those who had been sheltered in Emergency Shelter or Transitional Housing on the night of February 28, 2020. The one potential drawback to the “post-night count” approach is that it increases the chances of double counting. In an effort to avoid double counting, enumerators collected the initials as well as birth month and year of each participant.

The 2020 PIT Count identified 2,745 total homeless persons Countywide, consisting of 1,043 sheltered and 1,702 unsheltered homeless. Of the 2,745 total homeless persons, 61 (or 2.2%) were located in Sonoma, including 15 sheltered and 46 unsheltered homeless persons. The number of homeless persons in the City increased by 103% or 31 persons between the 2018 PIT Count and the 2020 PIT Count, as shown in Table 22. Conversely, the total number of homeless persons Countywide decreased by 8% or 251 homeless persons between the 2018 PIT and 2020 PIT Counts.

SCCDC PIT Count	City of Sonoma			Countywide		
	Sheltered	Unsheltered	Total	Sheltered	Unsheltered	Total
Homelessness PIT Count 2020	15	46	61	1,043	1,702	2,745
Homelessness PIT Count 2019	18	32	50	994	1,957	2,951
Homelessness PIT Count 2018	15	15	30	1,067	1,929	2,996

Source: 2020 Sonoma County Homeless Census Comprehensive Report

Additional demographics for the 2,745 homeless individuals Countywide are shown below in Table 23. Of the 2,745 individuals experiencing homelessness Countywide, 139 were veterans, 648 were over 55 years old, 235 had families with children, and 304

were unaccompanied children and transition-age youth; it is noted that these characteristics are not discrete and there is overlap between these groups. Additionally, approximately 508 of the 2,745 individuals experiencing homelessness met the definition of being chronically homeless. HUD defines a chronically homeless individual as someone who has experienced homeless for a year or longer, or has experienced at least four episodes of homelessness in the last three years and also has a diagnosed disability that prevents them from maintaining work or housing. The 2020 Sonoma County Homeless Census Comprehensive Report also included a survey of 444 individuals experiencing homelessness. Of the 444 survey respondents, 34% had alcohol and drug abuse issue, 40% had psychiatric/emotional conditions, 23% had physical disability, and 29% had post-traumatic stress disorder. Additionally, 77% were reported receiving government benefits.

Homeless Profile	Sheltered		Unsheltered		Combined	
	Number	%	Number	%	Number	%
<b>Total Homeless Population</b>	<b>1,043</b>		<b>1,702</b>		<b>2,745</b>	<b>100.0%</b>
Male	n/a	n/a	n/a	n/a	1729	63.0%
Female	n/a	n/a	n/a	n/a	906	33.0%
Gender Non-Conforming/Unknown	n/a	n/a	n/a	n/a	110	4.0%
<b>Additional Demographics</b>						
Chronically Homeless	174	16.7%	334	19.6%	508	18.5%
Veteran	47	4.5%	92	5.4%	139	5.1%
Older Adults over Age 55	383	36.7%	265	15.6%	648	23.6%
Families with Children	227	21.8%	8	0.5%	235	8.6%
Unaccompanied Homeless Children and Transition-age Youth	59	5.7%	245	14.4%	304	11.1%
Note: Respondents may be included in more than one subset. For example: a respondent may be a Veteran and also Chronically Homeless.						
Source: 2020 Sonoma County Homeless Census Comprehensive Report						

**EMERGENCY SHELTERS, TRANSITIONAL, AND SUPPORTIVE HOUSING**

**Resource Inventory**

Homeless programs are primarily administered at the County-level through SCCDC. SCCDC maintains a list of services for homeless and low-income families. The most recent inventory of resources available within Sonoma County for emergency shelters, transitional housing, and permanent supportive housing units comes from the 2020 Housing Inventory reported to the U.S. Department of Housing and Urban Development by the SCCDC, also known as: Santa Rosa, Petaluma/Sonoma County CoC. Table 24 below shows the total beds offered by homeless facilities in Sonoma County and 2,710 total beds available Countywide, which are described in greater detail in the following paragraphs.

Facility Type	Santa Rosa, Petaluma/Sonoma County CoC					
	Family Units	Family Beds	Adult-Only Beds	Total Year-Round Beds	Seasonal	Overflow
Emergency Shelter	36	194	537	737	119	90
Transitional Housing	18	74	301	375	n/a	n/a
Permanent Supportive Housing	36	79	744	823	n/a	n/a
Rapid Rehousing	136	285	345	630	n/a	n/a
Other Permanent Housing	14	36	109	145	n/a	n/a
<b>Total Beds</b>	<b>240</b>	<b>668</b>	<b>2,036</b>	<b>2,710</b>	<b>119</b>	<b>90</b>
Source: HUD 2020 Continuum of Care Homeless Assistance Programs - Housing Inventory Count Report						



### **Emergency Shelters**

28 emergency shelters are available to provide services in the SCCDC region. According to the HUD 2020 Continuum of Care Housing Inventory County Report for the Santa Rosa, Petaluma/Sonoma County CoC, a total of 737 year-round beds are available; thus, emergency shelters comprise 27.2% of the total year-round beds in the County. Of the 737 year-round beds available in Sonoma County, 10 shelter beds offered by Sonoma Overnight Support are located in Sonoma at The Haven. The City provides funding for shelter operations under a contractual agreement that was put in place by the Sonoma Community Development Agency prior to its elimination under State law and further the shelter by paying for utilities and maintenance of the City-owned facility in the amount of \$30,000 a year through 2030. The Haven provides 10 beds, including 2 family beds and 8 adult-only beds. The City also funds SOS operation of a Safe Parking Program serving 10 vehicles a night is operated at the City of Sonoma's Police Department parking lot next to The Haven. The City is working to identify a new location for the Safe Parking Program where the services SOS provides (safe parking, food, day services including showers, washing machines and case-management) can be co-located.

### **Transitional Housing**

11 transitional-housing providers were available to provide services in the SCCDC area, providing a total of 375 beds. No beds are located in the City.

### **Permanent Supportive Housing**

In 2019, the SCCDC area had 13 permanent supportive housing providers that offered the following 833 beds at 30 different facilities. While no facilities are located in the City, 9 of the beds are tenant based and can be located anywhere in the County.

### **Rapid Re-Housing**

In 2019, the SCCDC area had 9 Rapid Re-Housing providers that offered the 638 beds counts through 23 different programs. Several of the programs are Countywide and 26 beds are dedicated to the Sonoma Valley.

### **Other Permanent Housing**

In 2020, the SCCDC area had 5 other permanent housing facilities that offered 148 beds; none of these other permanent housing facilities are located within Sonoma.

### **Assessment of Need**

Based on the available information, there is a Countywide homeless population of 2,745 persons and 2,710 beds, indicating an unmet demand for 35 homeless persons Countywide. It is noted that the 2020 PIT Report identified only 1,043 sheltered homeless persons and 1,702 unsheltered homeless persons. The discrepancy between sheltered homeless persons and the County's total capacity to house homeless persons indicates a need for additional community services resources to assist and match the homeless population with the Countywide shelter and housing resources. Although there are seasonal fluctuations in bed counts, these figures demonstrate a demand for supportive housing. Reviewing the eligible populations for the County's various shelter opportunities indicates 668 beds are limited to occupancy by single adults with children or families with children. However, only 235 or 8.6% of the identified homeless persons during the 2020 PIT Survey were part of a family with children.

On a local-level, the 2020 PIT Report identified 46 unsheltered homeless persons in Sonoma compared to 32 unsheltered homeless persons in 2019, representing a 43.8% increase in unsheltered homeless individuals in Sonoma. Based on a review of the 2020 Housing Inventory reported to the U.S. Department of Housing and Urban Development by the SCCDC, it appears that there are only 25 beds of emergency shelters and no transitional housing or permanent supportive housing units located in or provided by Sonoma, indicating a demand and need for housing to assist the rising unsheltered homeless population in the City. To address this, Program 24 (Homeless Support Program) of the Housing Plan ensures the City will continue its agreement with Sonoma County SCCDC to provide ongoing homeless services and will continue to participate in the Sonoma County Homeless Plan Executive Commission, working cooperatively with other County jurisdictions to identify and address the needs of the homeless and at-risk population.

Spurred by national models and the drive to remain competitive for CoC funds, the Sonoma County CoC adopted its first 10-Year Homeless Action Plan in early 2007. Three key strategies were established in the updated 10-Year Plan in 2014: Increasing permanent affordable housing to meet the need, ensuring access to integrated health care, and increasing incomes. The 10-Year Plan also provides policies to support the creation of needed housing, strategies of homeless prevention and diversion, and a performance measurement plan.

The City is in the process of creating a Homelessness Task Force comprised of City Staff, Council Members, local stakeholders, and County representatives. The City is evaluating the availability of combined resources from local fundraisers, healthcare providers, the City, and the County to hire a Sonoma Valley Social Safety Net "Czar". The Safety Net "Czar" will then convene local partners (including the Task Force), facilitate collaboration, and represent the Valley's interests to the rest of the County and begin creating a workplan so that County, City, and Sonoma Valley service providers can align resources and services. In addition, the work plan will need to include steps to establish a shared database of users to ensure adequate services and progress towards coordinated entry, case management, and housing needs are being met.

**Zoning for Emergency Shelters, Transitional and Supportive Housing**

Chapter 3, Constraints, addresses zoning to accommodate emergency shelters, transitional housing, and supportive housing. As discussed in Chapter 3, Program 15: Development Code Amendments – Housing Constraints, in the Housing Plan requires the Development Code to be updated to accommodate supportive housing as required by AB 101, which includes allowing supportive housing by right in nonresidential zones that allow multi-family residential uses and in mixed use zones.

**E. HOUSING STOCK CHARACTERISTICS**

This section identifies the characteristics of Sonoma’ physical housing stock. This includes an analysis of housing types, housing tenure, vacancy rates, housing conditions, and overcrowding.

**1. HOUSING TYPE**

As shown by Table 25, in 2000 there were 4,332 housing units in Sonoma. By 2010, the number increased to 5,544 units, most of which was due to single-family construction. During this time period, the number of 5+ unit buildings also increased significantly by 345 units resulting in an increase rate of 66%. Additionally, 2 to 4-unit buildings saw a slight increase (6%) between 2010 and 2021 resulting in 50 new units for a total of 558 units in 2021. During this same period, single-family detached units saw a slight increase of 98 units or 3%. The number of mobile homes increased from 388 in 2000 to 484 in 2021. The DOF E-5 Report indicates that the number of total housing units in Sonoma increased from 5,544 in 2010 to 5,725 in 2021, most of which was due to an increase in single-family detached buildings and 5+ unit buildings.

	<b>2000</b>	<b>2010</b>	<b>2021</b>	<b>Change 2010-2021</b>
Single-Family Detached	2,435	3,088	3,186	+98 / 3.2%
Single-Family Attached	598	566	583	+17 / 3.0%
2 to 4 Units	392	538	558	+20 / 3.7%
5+ Units	519	864	914	+50 / 5.6%
Mobile Homes	388	488	484	-4 / -0.8%
<b>Total:</b>	<b>4,332</b>	<b>5,544</b>	<b>5,725</b>	<b>+181 / 3.3%</b>

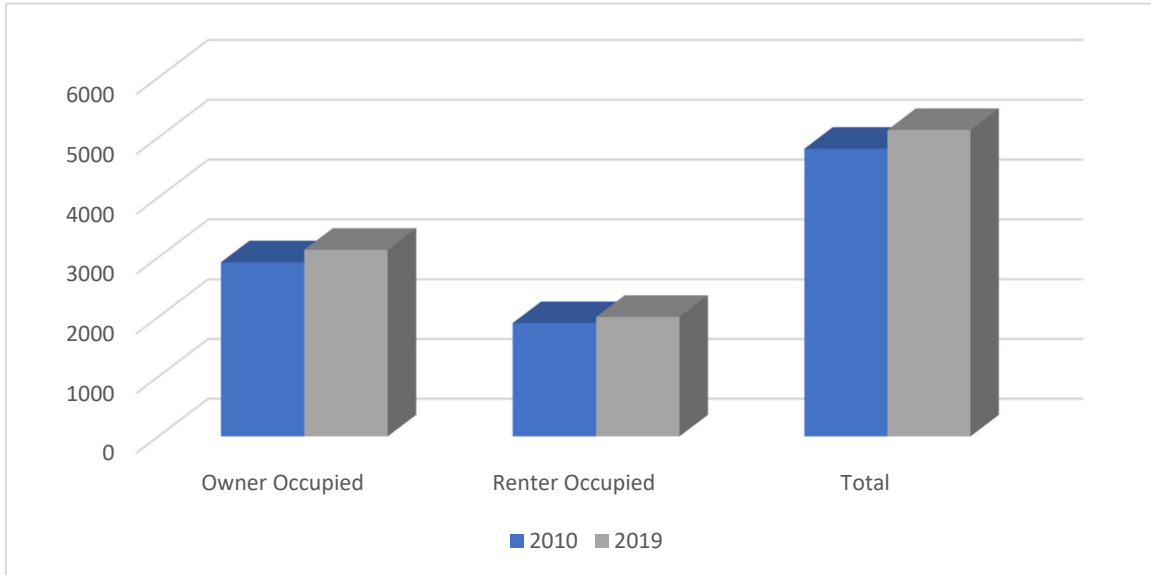
Source: ABAG 2020 6<sup>th</sup> Cycle Housing Element Data Package - U.S. Census Bureau, 2000 Census; Department of Finance, E-5 Population Estimates for Cities, Counties, and the State, 2010&2021

**2. HOUSING TENURE**

Housing tenure refers to the status of occupancy of a housing unit and whether it is an owner-occupied or a rental unit. Chart 2-2 below compares the distribution of housing tenure in Sonoma between 2010 and 2019. Of the total occupied housing units in Sonoma in 2010, 60.6% (2915 units) were owner-occupied and 39.4% (1898 units) were renter households. In 2019, the

distribution of occupied housing units in Sonoma generally stayed the same with 61.0% (3124 units) of the occupied housing units as owner-occupied and 39.0% (2001 units) as rental units. This is noteworthy when addressing viable strategies to expand the range of affordable housing in the rural areas.

**Chart 2-2. Distribution of Housing Tenure – City of Sonoma (2010, 2019)**



Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25003)

### 3. VACANCY RATES

The vacancy rate in a community indicates the percentage of units that are vacant and for rent/sale at any one time. It is desirable to have a vacancy rate that offers a balance between a buyer and a seller. Vacancy rates often are a key indicator of the supply of affordable housing options, both for ownership and rental purposes. Housing literature suggests that a vacancy rate in the range of 2–3% for owner-occupied housing is considered desirable while for rental housing the desirable range is 5–6%. Table 26 indicates the vacant housing stock by type in Sonoma as listed in the ACS 2015–2019 5-Year Community Survey. The 2019 ACS data indicates that there were 653 vacant units (11.3%) in Sonoma. Of the total vacant units, 452 units were classified as for seasonal, recreational, or occasional use, 84 were classified as for rent, and 46 were classified as for sale (not occupied), and 35 were classified as other vacant.

Housing Type	City of Sonoma	
	Number	Percent
<b>Total Vacant Units</b>	<b>653</b>	<b>100.0%</b>
For Rent	84	12.9%
Rented, Not Occupied	0	0.0%
For Sale	36	5.5%
For Sale, Not Occupied	46	7.0%
For Seasonal, Recreational, or Occasional Use	452	69.2%
Other Vacant	35	5.4%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25004)

Table 27 compares the vacancy status of housing in Sonoma in 2000, 2010, and 2018. Sonoma showed an overall increase in vacancy rate between 2000 to 2019 from 6.4% to 11.3%. The other vacancy rate column represents the vacancy rate for all seasonal, recreational, and occasional use units, as well as all units classified as other vacant units by the ACS. The other vacancy rate makes up the majority of the total vacancy rate in Sonoma. It should be noted that the total vacancy rate in Sonoma without

all other vacant types is only 2.9%, with a homeowner vacancy rate of 1.4% and a rental vacancy rate of 1.5%. This reflects a need for both rental and owner-occupied housing production to increase the vacancy rates to the desired range of 2–3% for owner-occupied housing and 5–6% for rental housing.

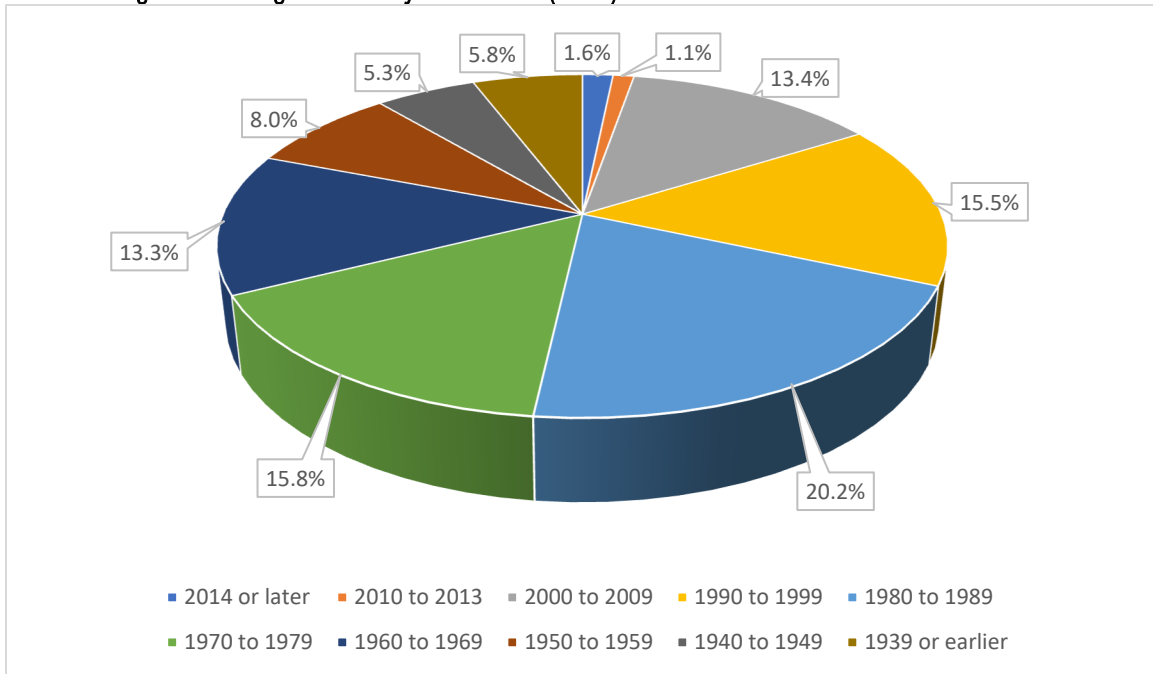
Year	Total Housing Units	Occupied Housing Units	Vacant Housing Units	Overall Vacancy Rate	Homeowner Vacancy Rate	Rental Vacancy Rate	Other Vacancy Rates
2000	4,671	4,373	298	6.4%	1.9%	0.9%	3.6%
2010	5,219	4,813	406	7.8%	0.0%	2.2%	5.5%
2019	5,778	5,125	653	11.3%	1.4%	1.5%	8.4%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25002 and B25004); U.S. Census 2000(H006&H008)

#### 4. HOUSING AGE AND CONDITIONS

Related to the condition of the housing stock in Sonoma is the age of the housing units. Generally, structures older than 30 years begin to show signs of deterioration and require reinvestment to maintain their quality. Unless properly maintained, homes older than 50 years may require major renovation to remain in a good, livable condition. Chart 2-3 illustrates the age of the housing stock in the City.

Chart 2-3. Age of Housing Stock –City of Sonoma (2019)



Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (DP04)

#### Housing Conditions

In the absence of a detailed housing conditions survey, existing ACS data, building inspection staff observations, and responses to the community housing needs and priorities survey are used to identify housing conditions and related needs in the City.

Limited data is available from the ACS that can be used to infer the condition of Sonoma housing stock. The ACS data identifies whether housing units have complete plumbing and kitchen facilities and whether units lack a source of household heat. Since only a very small percentage of all housing units in Sonoma lack complete plumbing facilities or kitchen facilities (see Table 28), these indicators do not reveal any significant needs associated with housing conditions. Additionally, only 2.1% of housing units

rely on wood fuel or do not have a heating source, which also does not reveal any significant needs associated with the housing conditions.

Housing Stock Indicators	Number	Percent
<b>Total Housing Units</b>	<b>5,778</b>	<b>100.0%</b>
Built 1970 or earlier	1,875	32.5%
Units Lacking Complete Plumbing Facilities	0	0.0%
Units Lacking Complete Kitchen Facilities	20	0.3%
No house heating fuel or wood fuel only	123	2.1%
No Phone Service Available	64	1.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (DP04)

Since housing stock age and condition are generally correlated, one ACS variable that provides an indication of housing conditions is the age of a community’s housing stock. The majority of the housing units in Sonoma (3,953 or 68.4%) were built before 1990 with 32.5% or 1875 units built before 1970 and 36.0% or 2078 built between 1970 to 1990. Over 16.1% of Sonoma’ housing stock was built after 2000 and another 15.5% was built between 1990 and 1999. These statistics reflect tremendous growth in the area during the 1970s and 1980s. The age of housing stock often indicates the potential for a unit to need rehabilitation or significant maintenance. As shown in Figure II-3 on the previous page, most of the Sonoma’ housing stock is more than 30 years old (approximately 68.4%) and 32.5% is over 50 years old, meaning these units may need moderate to significant rehabilitation, including replacement or refurbishing of roofs, siding, and windows as well as interior improvements including replacing or upgrading the plumbing and electric wires and outlets.

The housing needs and priorities survey conducted by the City in 2022 addressed housing conditions, desired housing improvements, and housing challenges. Regarding housing conditions, 57% of Sonoma residents indicated their home is in sound (very good to excellent) condition, 23% indicated their home shows signs of minor deferred maintenance, 11% indicated that their home needs one or more modest rehabilitation improvements, 8% indicated their home needs one or more major upgrades, and 0.9% indicated their home was dilapidated. When asked to identify desired improvements to their home, 36% of respondents identified exterior improvements such as roofing, painting, and general home repair, 27% identified landscaping, and 26% identified heating/air conditioning, solar, and electrical upgrades. When asked about housing challenges, 26% of survey respondents indicated that their home is in poor condition and needs repair.

Based on discussions with the City’s Planning Department staff and windshield surveys via google earth of a sampling of areas in the city, the City’s Planning staff and De Novo Planning Group estimates that the majority of the housing stock in the City is in good condition and requires limited or modest repairs. However, older homes in the City often need one or two minor or moderate repairs, including re-roofing, window replacement (to increase efficiency), plumbing repair or upgrades, electrical repair or upgrades, and siding repair or replacement. It is estimated approximately 20% of the housing stock may require significant repairs that involve replacement of a roof, siding, windows, electric, or plumbing but do not require replacement of the unit or significant rehabilitation of the unit. Approximately 2% to 10% of housing units in the City may require substantial repair, with up to 1% potentially requiring replacement. The City’s Community Development Department has identified that there are no concentrations of dilapidated housing in need of substantial repair within the City.

Program 9 in the Housing Plan ensures that the City monitors the condition of its housing stock and continues to participate in the County-administered housing rehabilitation program.

**Overcrowding**

Overcrowding is a measure of the ability of existing housing to adequately accommodate residents. The U.S. Census Bureau defines overcrowding as a household that lives in a dwelling unit with an average of more than 1.0 person per room, excluding kitchens and bathrooms. A severely crowded housing unit is one occupied by 1.5 persons or more per room. Too many individuals

living in housing with inadequate space and number of rooms can result in deterioration of the quality of life and the condition of the dwelling unit from overuse. Overcrowding usually results when either the costs of available housing with a sufficient number of bedrooms for a family exceeds the family's ability to afford such housing or unrelated individuals (such as students or low-wage single adult workers) share dwelling units because of high housing costs.

The number of overcrowded households in the City does not appear to be a significant issue compared to the State and surrounding areas. According to the 2015–2019 American Community Survey, overcrowding in the Sonoma was 1.5 percent (76 housing units), compared to 5.2 percent (9769 housing units) Countywide. The State average during this same period was 8.2 percent. Among renters in Sonoma, approximately 0.4 percent of housing units (or 18 housing units) were in overcrowded conditions, and none were in severely overcrowded conditions. Among homeowners, approximately 1.1 percent of housing units (or 58 housing units) were in overcrowded conditions, and none were in severely overcrowded conditions. Table 29 provides information on overcrowded housing in Sonoma.

	<b>Units</b>	<b>Percent</b>
Owner Occupied:	3,124	61.0%
<i>0.5 or less occupants per room</i>	1,237	24.1%
<i>0.51 to 1 occupants per room</i>	706	13.8%
<i>1.01 to 1.5 occupants per room</i>	58	1.1%
<i>1.51 to 2.0 occupants per room</i>	0	0.0%
<i>2.01 or more occupants per room</i>	0	0.0%
<b>Owner Occupied Overcrowded (1.01+)</b>	<b>58</b>	<b>1.1%</b>
<b>Owner Occupied Severely Overcrowded (1.5+)</b>	<b>0</b>	<b>0.0%</b>
Renter Occupied:	2,001	39.0%
<i>0.5 or less occupants per room</i>	2,555	49.9%
<i>0.51 to 1 occupants per room</i>	551	10.8%
<i>1.01 to 1.5 occupants per room</i>	18	0.4%
<i>1.51 to 2.0 occupants per room</i>	0	0.0%
<i>2.01 or more occupants per room</i>	0	0.0%
<b>Renter Occupied Overcrowded (1.01+)</b>	<b>18</b>	<b>0.4%</b>
<b>Renter Occupied Severely Overcrowded (1.5+)</b>	<b>0</b>	<b>0.0%</b>
Total Units	5,125	100.0%
<b>Total Overcrowded</b>	<b>76</b>	<b>1.5%</b>
<b>Total Severely Overcrowded</b>	<b>0</b>	<b>0.0%</b>

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25014)

## F. HOUSING COSTS AND AFFORDABILITY

### 1. HOUSING PRICES AND TRENDS

As indicated by Table 30, housing costs changed for some more than others in Sonoma through the years 2000 – 2019. From 2010 to 2019, renters saw a large rent increase of 32.9% while homeowners experienced a 17.5% increase in housing costs.

Cost Type	Year				% Change
	2000	2010	2015	2019	2010-2019
Median Monthly Ownership cost	n/a	\$1,536	\$1,526	\$1,805	17.5%
Median Gross Rent*	\$959	\$1,382	\$1,507	\$1,836	32.9%

\*Not adjusted for inflation  
Source: U.S. Census, 2000 Table DP4; 2006-2010 American Community Survey Table S2503; and 2015-2019 Table DP04

Table 31 indicates median housing value for homes in Sonoma. Value is defined as the amount for which property, including house and lot, would sell if it were on the market at a given point in time. As shown in Table 31, the median value for housing units in Sonoma in 2001 was \$471,378 and increased in value to \$483,117 in 2010. In 2015, the median value for housing units increased sharply to \$685,723. The value has since increased by 24.5 percent since 2015 to a median home value of \$853,551 in 2020.

Location	Median Home Values*					% Change
	2001	2005	2010	2015	2020	2015–2020
City of Sonoma	\$471,378	\$781,282	\$483,117	\$685,723	\$853,551	+24.5%
Sonoma County	\$382,894	\$633,791	\$382,617	\$543,351	\$691,582	+27.3%
Bay Area Average	\$444,501	\$698,759	\$531,581	\$831,074	\$1,077,233	+29.6%

\*Not adjusted for inflation  
Source: ABAG 6<sup>th</sup> Cycle Housing Element Data Package (Table HSG-08)

Table 32 indicates the value of owner-occupied housing units as reported on the ACS within Sonoma in 2019. Of the 3,124 owner-occupied units, 81 (2.6 percent) were less than \$50,000, 92 (2.9 percent) were in the \$150,000 to \$199,999 price range, 43 (1.4 percent) were in the \$200,000 to \$299,999 price range, and 328 (10.5 percent) were in the \$300,000 to \$499,999 range. Additionally, there were 1,425 units (45.6 percent) valued in the \$500,000 to \$999,999 price range and 966 units (30.9%) valued in the \$1,000,000 or more price range.

Value	Number of Units	% of Total
Less than \$50,000	81	2.6%
\$50,000 to \$99,000	146	4.7%
\$100,000 to \$149,999	43	1.4%
\$150,000 to \$199,999	92	2.9%
\$200,000 to \$299,999	43	1.4%
\$300,000 to \$499,999	328	10.5%
\$500,000 to \$999,999	1,425	45.6%
\$1,000,000 or more	966	30.9%
<b>Total</b>	<b>3,124</b>	<b>100.0%</b>

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (DP04)

### Single-Family Units

Table 33 indicates the median sales price of single-family residences housing units throughout Sonoma County in July 2000 and July 2021. Sonoma saw the fifth highest increase in median sales price than among jurisdictions in Sonoma County and had the second highest median sales price in July 2021. The median sales price of a single-family home in Sonoma in July 2021 was

\$850,000 or about 13.7% greater than the median sales in July 2020 of \$747,500. Only the City of Healdsburg and the City of Sebastopol saw decreases in median sales price of a single-family home from July 2020 to July 2021.

City/Area	Median Sales Price 2020	Median Sales Price 2021	Percent Change
<b>City of Sonoma</b>	<b>\$747,500</b>	<b>\$850,000</b>	<b>13.7%</b>
Sonoma County	\$662,000	\$715,000	8.0%
City of Santa Rosa	\$590,000	\$650,000	10.2%
City of Petaluma	\$715,500	\$805,000	12.5%
City of Rohnert Park	\$555,250	\$650,000	17.1%
City of Cloverdale	\$560,000	\$646,000	15.4%
City of Cotai	\$620,000	\$776,000	25.2%
City of Healdsburg	\$1,109,250	\$925,000	-16.6%
City of Sebastopol	\$875,000	\$850,000	-2.9%
City of Windsor	\$657,000	\$750,000	14.2%

Source: CoreLogic California Home Sale Activity July 2021

**Mobile Homes**

Mobile homes offer a more affordable option for those interested in homeownership. The median value of a mobile home in Sonoma County in 2019 was \$152,200 (*US Census Bureau, ACS 2015-2019 Table B25083*). Overall, there are 11,501 mobile homes in Sonoma County with 484 located in Sonoma. (*DOF, Table E-5, 1/1/2021*). As shown by Table 34, there are 3 mobile home parks in Sonoma with a total of 473 permitted mobile home spaces. As a means of preserving the affordability of its mobile home parks, primarily occupied by seniors, the City has implemented a mobile home park rent control ordinance since 1992 (Chapter 9.80 of the Municipal Code). This ordinance limits rent increases to a maximum of 80 percent of the increase in the consumer price index, but no greater than five percent in a 12-month period. The ordinance ensures stable rents for those residents of the mobile home parks who are not on long-term leases (in excess of 12 months).

There are 3 rent-controlled mobile home parks in Sonoma. According to the Confirmation of Calculation of Automatic Annual Rent Increase Letters in January 2020, Moon Valley’s 247 spaces have a rent range from \$698.91 to \$1,436.33 and Pueblo Serena’s 127 spaces have a median rent of \$700.60.

Name	Spaces
Moon Valley Mobilehome Park	247
Rancho De Sonoma	99
Pueblo Serena	127
<b>Total Spaces</b>	<b>473</b>

Source: HCD 2020 Mobile Home Park Listings

**2. HOUSING AFFORDABILITY**

According to HCD and HUD, housing is considered affordable if a household spends no more than 30% of its income on housing. Table 35 identifies housing affordability levels, including gross rents and home purchase price, by family size based on the HCD’s *2021 Income Limits* for Sonoma County.



<b>Table 35. Ability to Pay for Housing Based on Income Group/Household Size (2021) *</b>						
<b>Number of Persons</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
<b>Extremely Low-Income Households - 30% of Median Household Income</b>						
Income Level	\$24,450	\$27,950	\$31,450	\$34,900	\$37,700	\$40,500
Monthly Income	\$2,038	\$2,329	\$2,621	\$2,908	\$3,142	\$3,375
Max. Monthly Gross Rent**	\$611	\$699	\$786	\$873	\$943	\$1,013
Max. Purchase Price***	\$90,276	\$102,509	\$114,741	\$126,798	\$136,584	\$146,370
<b>Very Low-Income Households - 50% of Median Household Income</b>						
Income Level	\$40,750	\$46,550	\$52,350	\$58,150	\$62,850	\$67,500
Monthly Income	\$3,396	\$3,879	\$4,363	\$4,846	\$5,238	\$5,625
Max. Monthly Gross Rent**	\$1,019	\$1,164	\$1,309	\$1,454	\$1,571	\$1,688
Max. Purchase Price***	\$152,069	\$172,340	\$192,610	\$212,881	\$229,307	\$245,559
<b>Low-Income Households - 80% of Median Household Income</b>						
Income Level	\$65,150	\$74,450	\$83,750	\$93,050	\$100,500	\$107,950
Monthly Income	\$5,429	\$6,204	\$6,979	\$7,754	\$8,375	\$8,996
Max. Monthly Gross Rent**	\$1,629	\$1,861	\$2,094	\$2,326	\$2,513	\$2,699
Max. Purchase Price***	\$243,425	\$276,097	\$308,768	\$341,439	\$367,612	\$393,784
<b>Moderate-Income Households - 120% of Median Household Income</b>						
Income Level	\$86,750	\$99,150	\$111,550	\$123,950	\$133,850	\$143,800
Monthly Income	\$7,229	\$8,263	\$9,296	\$10,329	\$11,154	\$11,983
Max. Monthly Gross Rent**	\$2,169	\$2,479	\$2,789	\$3,099	\$3,346	\$3,595
Max. Purchase Price***	\$330,703	\$374,489	\$418,276	\$462,062	\$497,021	\$532,156
Notes:						
*Based on Sonoma County FY 2021 Annual Median Income (household)						
**Assumes that 30% of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowner's insurance.						
***Maximum affordable sales price is based on the following assumptions: 4.1% interest rate, 30-year fixed loan, Down payment: \$5,000 – extremely low, \$10,000 – very low; \$15,000 - low, \$25,000 – moderate, property tax, utilities, and homeowners insurance as 30% of monthly housing cost (extremely low/very low), 28% of monthly housing cost (low), and 25% of monthly housing cost (moderate/above moderate). Closing costs: 3.5% (extremely low/very low), 3.0% low, and 2.5% moderate)						
Calculation Illustration for 3 Bedroom, 4-person, Low Income Household						
1. Annual Income Level: \$74,000						
2. Monthly Income Level: \$74,000/12 = \$6,166.67						
3. Maximum Monthly Gross Rent: \$6,166.67 x .0.30 = \$1,850.00						
4 Max Purchase Price:						
a. Gross monthly income = \$7,754.17						
b. Down Payment and Closing Costs \$15,000; Closing Costs 3.0%						
c. Monthly housing costs \$7,754.17 x .0.30 = \$2326.25						
d. Principal and Interest plus utilities/taxes/mortgage/insurance: \$697.87 + \$1628.38 = \$2326.25						
Sources: HCD FY2021 State Income Limits, De Novo Planning Group						

## OVERPAYMENT

A household is considered to be overpaying for housing (or cost burdened) if it spends more than 30% of its gross income on housing. Severe housing cost burden occurs when a household pays more than 50% of its income on housing. The prevalence of overpayment varies significantly by income, tenure, household type, and household size. Table 10 identifies overpayment levels by income range. As shown in Table 10, approximately, 40.8% of all households in Sonoma overpaid for housing. Renters were more likely to overpay than homeowners; 56.7% of renter households paid more than 30 percent of their income for housing. Of the 2,005 households overpaying for housing in Sonoma, 1,100 were renter households, and 905 were owner households.

In general, overpayment disproportionately affects lower income and minority households; 81.2% of lower income households (0-80% of AMI) and 88.6% of extremely low income households (0-30% of AMI) paid more than 30% of their income for housing. Additionally, 100% of American Indian or Alaska Native households, 61.5% of Other Race or Multiple Races households, and 50% of Asian or Pacific Islander households paid more than 30% of their income for housing, while 41.8% White households and 26.4% Hispanic or Latinx households paid more than 30% of their income for housing.

**AFFORDABILITY - RENTERS**

Table 36 identifies the Fair Market Rent (FMR) for Sonoma County in 2020 and 2021 as determined by the U.S. Department of Housing and Urban Development (HUD). HUD determines the FMR for an area based on the amount that would be needed to pay the rent (and utilities) for suitable privately-owned rental housing. HUD uses FMRs for a variety of purposes, such as determining the rental prices and subsidy amounts for units and households participating in various Housing Choice Voucher assistance programs.

According to Sonoma County Housing Authority’s Fiscal Year 2021 Annual Agency Plan, the Sonoma County Housing Authority has issued approximately 3,125 Housing Choice Vouchers providing monthly rental assistance payments to lower income families. It is noted that the Sonoma County Housing Authority accepted applications for its Housing Choice Voucher waitlist lottery from October 1 until November 1, 2021. 750 applicants will be randomly selected, screened for eligibility, and notified in early December that they have a place on the new waitlist. Those who are not selected will be notified and are welcome to reapply when the waitlist reopens in approximately 24 months. The Sonoma County Housing Authority is committed to expanding its voucher program, applying for new vouchers each time they have been made available. During 2020, the Sonoma County Housing Authority was awarded 111 new Mainstream vouchers and 59 new Family Unification Program.

Bedrooms in Unit	Fair Market Rent (FMR)	
	2021	2022
Studio	\$1,340	\$1,373
1 Bedroom	\$1,519	\$1,549
2 Bedrooms	\$1,996	\$2,038
3 Bedrooms	\$2,825	\$2,851
4 Bedrooms	\$3,254	\$3,163

Source: HUD 2022/2021 FMR Sonoma County

As of October 2021, there were 18 rental listings posted on Zillow.com in the City and its vicinity, including 7 two-bedroom single family homes available between \$1,995 to \$5,500 a month, 7 three-bedroom single-family homes available between \$3,190 to \$5,700 a month, and 2 four-bedroom single-family homes between \$4,300 to \$5,700 a month, most of which are above the 2021 FMR. Table 37 identifies the recent homes listed for rent in the City, including type of housing unit (single-family, townhome, mobile home, etc.) and whether the rental unit is affordable to lower income households. The affordability of the recent homes is based on the max monthly rent identified in Table 33.

Address and Type of Unit	Bed	Bath	Listed Rent	Affordable to <sup>2</sup> :		
				Extremely Low Incomes	Very Low Incomes	Low Incomes
(Undisclosed Address) Apartment	1	1	\$1,650	No	Families of 6+	Families of 2+
(Undisclosed Address) Single-Family Detached Home	2	2	\$1,995	No	No	Families of 3+

133 Andrieux St Apartment	2	1	\$2,150	No	No	Families of 4+
742 1st St W #11 Apartment	1	1.5	\$2,200	No	No	Families of 4+
19323 Sonoma Hwy #5 Apartment	2	1	\$2,500	No	No	Families of 5+
840 W Napa St #G Townhome	2	2	\$2,775	No	No	No
836 2nd St W, Sonoma Single-Family Detached Home	3	2	\$3,190	No	No	No
1375 Bainbridge Ln Single-Family Detached Home	3	2.5	\$3,700	No	No	No
139 Malet St, Sonoma Single-Family Detached Home	4	2	\$4,300	No	No	No
616 Austin Ave Single-Family Detached Home	3	2	\$5,200	No	No	No
(Undisclosed Address) Single-Family Detached Home	3	2	\$5,700	No	No	No
Note: <sup>1</sup> This table includes the listed rental price of housing units on Zillow.com in October 2021.						
<sup>2</sup> Affordability is based on affordable home purchase prices amounts by income level and household size identified in Table 33						
Source: Zillow.com						

As shown in Table 30, the median gross rent in Sonoma was \$1,836 in 2019, an increase of 32.9% from 2010. Standard management practices require that a household have three times their rent in income. Under this scenario, a household would need to earn approximately to earn \$6,120 per month or \$73,440 per year to afford the average 2019 rental price in Sonoma. Therefore, for households of one person, the average 2019/2020 rents in Sonoma and currently available single-family home on Zillow.com would be unaffordable to the extremely low- (< \$24,450 per year), very low- (\$24,450 - \$40,750 per year), and low-income (\$40,750 - \$65,150 per year) households, but would be affordable to some moderate-income (\$72,300- \$86,750) households.

#### **AFFORDABILITY - HOMEOWNERS**

As shown in Table 31, the median home value in Sonoma was \$785,900 in 2019, which was a 37.7% increase from \$570,900 in 2015. Recent median sales data in Table 33 shows that the median sales price in Sonoma increased 13.7% from \$747,500 to \$850,000. Reviewing the median sales data in Table 33 along with the affordable home purchase price amounts by income level and household size in Table 35 indicates that median home sales prices in Sonoma are not affordable to lower income households nor moderate-income households.

According to Zillow.com as of October 2021, there are currently 27 three-bedroom single-family homes for sale in Sonoma and the vicinity listed between \$645,000 to \$4,950,000 and 15 four-bedroom single-family home listed between \$850,000 to \$8,495,000. Comparing the current listing prices to Table 35, it appears that these single-family homes in Sonoma are not affordable to lower-income households nor moderate-income households. While none of the current listings in Sonoma are affordable, a review of recent sale data for housing in Sonoma reveals that 264 homes sold in the past year were below the median sale price of \$850,000 but only 33 of them are affordable to lower income households.

Table 38 identifies homes sold in October 2021 in the City Sonoma that were affordable to lower income households, including type of housing unit (single-family, townhome, mobile home, etc.) and the level of affordability of homes in the lower price range. The affordability of the recent homes is based on affordable home purchase prices identified in Table 35.

<b>Table 38. Affordable Homes Sold in Sonoma (2021)</b>						
Address and Type of Unit	Unit Type	Bed / Bath	Sold Price	Affordable to <sup>2</sup> :		
				Extremely Low Incomes	Very Low Incomes	Low Incomes
720 3rd St W	Single Family	3/2	\$50,500	Families of 1 +	Families of 1+	Families of 1+
198 Del Rio Paseo	Manufactured	2/2	\$150,000	No	Families of 1+	Families of 1+
160 Chiquita Camino	Manufactured	2/2	\$160,000	No	Families of 2+	Families of 1+
779 W Spain St	Condo	1/1	\$385,000	No	No	Families of 6+
1254 Broadway APT 4	Condo	2/2	\$510,000	No	No	No
920 5th St W UNIT T	Condo	2/2	\$575,000	No	No	No
847 W Spain St #K	Condo	2/2	\$595,000	No	No	No
857 2nd St W	Townhome	3/2	\$699,000	No	No	No
825 2nd St W	Single Family	3/2	\$745,000	No	No	No

Note: <sup>1</sup> This table includes the sold housing units on Zillow.com in October 2021.  
<sup>2</sup> Affordability is based on affordable home purchase prices amounts by income level and household size identified in Table 33  
 Source: Zillow.com

As indicated by Table 38, among 21 housing units sold in Sonoma, there was only 1 housing unit affordable to extremely low income households, 4 housing units affordable to very low income households, and 5 housing units affordable to low income households. Overall, mobile homes offer the more affordable alternatives for these income groups. Also, new manufactured homes on vacant lots can provide another affordable solution.

### 3. ASSISTED HOUSING AT-RISK OF CONVERSION

Government Code Section 65583(a)(8) requires that a housing element shall contain an analysis of existing assisted housing developments, which are defined as multi-family rental housing that receives governmental assistance, and identify any assisted housing developments that are eligible to change from lower-income housing uses during the next ten years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. Assisted housing development means multi-family rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, State and local multi-family revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees.

Units at risk of conversion are those that may have their subsidized contracts terminated (“opt out”) or that may “prepay” the mortgage, thus terminating the rental restrictions that keep the unit affordable to lower income tenants. There are several reasons why the property owner may choose to convert a government-assisted unit to a market-rate unit, including a determination that the unit(s) can be operated more profitably as a market-rate development; difficulties in dealing with HUD oversight and changing program rules; the depletion of tax advantages available to the owner; and the desire to roll over the investment into a new property.

California Housing Partnership uses an at-risk category for assisted housing developments in its database. Very-High Risk assisted housing are those affordable homes that are at-risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. High Risk assisted housing are those affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Moderate Risk assisted housing are those affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Low Risk assisted housing are those affordable homes that are at-risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

The ABAG 6<sup>th</sup> Cycle Data package provided a list of assisted housing developments in Sonoma County. 4 subsidized projects are located in Sonoma. Table 39 identifies each multi-family rental housing development receiving governmental assistance in Sonoma and units provided through the City's below market rate requirement (BMR or inclusionary) program, the subsidy programs that are in place for each project, and the likelihood of each housing development to convert to market-rate units that would not provide assistance to lower-income residents.

<b>Table 39. Summary of Assisted Housing Developments</b>					
<b>Project/Address</b>	<b>Total Units</b>	<b>Subsidized Units</b>	<b>Type</b>	<b>Source</b>	<b>Risk of Conversion</b>
<b>Assisted Multifamily Developments</b>					
<b>Firehouse Village</b> 548 Second Street West Sonoma, CA 95476	30	23	Family	LIHTC	Low Risk (placed in service in 2001; affordable to 2056)
<b>Valley Oak Homes</b> 19344 Sonoma Highway Sonoma, CA 95476	43	42	Family	LIHTC	Low Risk (placed in service in 2013; affordable to 2068)
<b>Village Green II</b> 650 West Fourth Sonoma, CA 95476	34	34	Senior	USDA 515	Low Risk (LIHTC acquisition/rehabilitation underway; LIHTC funding committed in 2021 will provide affordability for 55 years upon completion of rehabilitation and additional City/Community Development Agency restrictions require permanent affordability)
<b>Altamira Family Apartments</b> 20269 Broadway, Sonoma, CA 95476	48	47	Family	LIHTC	Low Risk (placed in service in 2021, affordable to 2076)
<b>Below Market Rate Units</b>					
<b>Maysonnave Apartments</b> 270 First Street East	10	10	Rental	City Inclusionary	High Risk: Affordable Housing Agreement expires August 2025
<b>Setzer Senior Apartments</b> 673 1 <sup>st</sup> St W.	8	8	Rental	City Inclusionary	High Risk: Affordable Housing Agreement expires June 2023
<b>Sonoma Commons Phase I</b> Various	28	14*	Ownership	City Inclusionary	High Risk: Affordable Housing Agreement expires August 2025
<b>Fryer Creek Village</b> 1122 Fryer Creek	26	21	Rental	City Inclusionary	High Risk: Affordable Housing Agreement expires in 2033
<b>Willows Wild</b> Various	15	4	Owenership	City Inclusionary	Low Risk: Affordable Housing Agreement expires in 2062
<b>McKenna Mixed Use</b> 1254 Broadway	12	1	Rental	City Inclusionary	Low Risk: Affordable Housing Agreement expires in 2047
<b>Heritage Court II</b> 144 & 155 Piper Lane	5	2	Ownership	City Inclusionary	High Risk: Expiration date not identified.
<b>Wildflower</b>	34	34	Ownership	Community Development Agency	Low Risk: Affordable Housing Agreement expires in 2052
<b>Sonoma Creek Apartments</b>	38	34	Rental	Community Development Agency	Low Risk: Affordable requirements for the lifetime of the project

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<b>Marcy Court</b> 1225 Broadway	16	16	Ownership	Community Development Agency	Low Risk: Affordable requirements expire in 2035
<b>First Street West</b> Casa Primera	13	13	Ownership	Community Development Agency	Low Risk: Affordable requirements expire in 2035
<b>Palm Court</b> 905 West Spain Street	18	18	Ownership	Community Development Agency	Low Risk: Affordable requirements expire in 2035
<b>673 1st Street West Apartments</b> 673 First Street West	8	8	Senior Rental	Density Bonus	High Risk: Affordable requirements expire in 2025
<b>Waterstone</b> 254 Malet Street	21	4	2 Ownership 2nd unit rentals	Inclusionary	High Risk: Affordable requirements expire in 2030
<b>Troy Lane</b> 497 Troy Lane	12	1	Rental	Inclusionary	High Risk: Affordable requirements expire in 2031
<b>Fryer Creek Village 2</b>		6	Ownership	Inclusionary	High Risk: Affordable requirements expire in 2031
<b>Lynch Office/Apartments</b> 135 West Napa	7	1	Rental	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2047
<b>Heritage Court</b> 865 First Street West	26	2	Rentals	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2047
<b>MacArthur Village</b> 281 East MacArthur	27	6	3 rental/3 ownership	Inclusionary	High Risk: Affordable requirements expire in 2033
<b>Bainbridge PUD</b> 1395 Bainbridge Lane	8	1	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2048
<b>Brownstone Village</b> 5th St. West	6	1	2nd unit rental	Inclusionary	High Risk: Expiration date not identified.
<b>Carneros Lofts</b> 649 1st St. West	30	3	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2044
<b>Carneros Village</b> 623 1st St. West	13	1	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2058
<b>Gamber Rentals</b> 293-295 West MacArthur Street	11	4	Rental	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2037
<b>Maple Place</b> 961 Broadway	7	1	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2051
<b>Mulberry Place</b> 990 First Street West	9	1	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2049
<b>604 Curtin Lane</b>	6	1	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2036
<b>Vintage Sonoma</b> Fifth Street East	10	10	Rentals	Inclusionary	High Risk: Affordable Housing Agreement expires in 2033
<b>Eastside Estates Unit 3</b> 20305 Fifth Street East	24	11	Rental	Inclusionary	High Risk: Affordable Housing Agreement expires in 2033
<b>Remembrance</b> 825, 865 East Napa Street	22	5	Rental	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2058
<b>Sonoma Centro</b> 19230 Sonoma Highway	2	1	Rental	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2048

<b>Starr Ranch</b> 1337 Jones Street	20	4	Ownership/ Rental	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2035
<b>Bel Terreno</b> 392, 400, 402, 428 Fourth Street East	16	2	Rental	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2035
<b>Chiappellone</b> 1143 Broadway	2	1	Rental	Inclusionary	High Risk: Affordable requirements expire in 2022
<b>Montini Subdivision</b> Fifth Street West	25	4	Ownership	Inclusionary	Low Risk: Affordable Housing Agreement expires in 2035
*Discrepancy in project documents – 14/16 units listed in the City inventory, 34 units in the Affordable Housing Agreement which was entered into prior to foreclosure and subsequent sale to Burbank Housing Source: ABAG 2020 6 <sup>th</sup> Cycle Housing Element Data Package – Sonoma County; LIHTC List of Projects, California Tax Credit Allocation Committee, 2022; Rural Development (RD) Dataset, USDA, 2021					

As identified in Table 39, all of the affordable units in Sonoma have a low risk of conversion, meaning that the affordable properties are not at-risk of converting to market rate for at least 10 years; projects within the City are not anticipated to be eligible to convert to market rate until after 2050. Each of the projects in the City is operated by a stable non-profit or affordable housing provider. Sonoma takes an active and supportive role in the preservation of associated rental housing. The cost of conserving assisted units is significantly less than the cost required to replace units through new construction. Conservation of assisted units generally requires rehabilitation of the aging structure and re-structuring the finances to maintain a low debt service and legally restrict rents. Construction costs, land prices and land availability are generally the limiting factors to development of affordable housing, it is estimated that subsidizing rents to preserve assisted housing is more feasible and economical than new construction.

**Cost Analysis.** State Housing Element law requires that all Housing Elements include additional information regarding the conversion of existing, assisted housing developments to other non-low income uses (Statutes of 1989, Chapter 1452). This was the result of concern that many affordable housing developments would have affordability restrictions lifted when their government financing was soon to expire or could be pre-paid. Without the sanctions imposed due to financing restrictions, affordability of the units could no longer be assured.

In order to provide a cost analysis of preserving “at-risk” units, costs must be determined for rehabilitation, new construction or tenant-based rental assistance. The following costs anticipate rehabilitation, construction, or rental assistance of unit sizes comparable to those in the Oak Ridge Senior Apartments, which have primarily one-bedroom units and some two-bedroom units.

1. *Rehabilitation* – The primary factors used to analyze the cost of preserving low-income housing include: acquisition, rehabilitation and financing. Actual acquisition costs depend on several variables such as condition, size, location, existing financing and availability of financing (governmental and market). The acquisition cost assumption is based on an average cost of a multi-family unit within the region. This option would result in a cost of \$8.9 million to preserve 48 replacement units for a 55-year or longer affordability term, depending on the financing program and specific affordability restrictions. The estimated per unit preservation costs for Sonoma are summarized below.

<u>Costs</u>	
Acquisition	
(based on 671 5 <sup>th</sup> St W, 18 units, \$2,999,500 sales price, 10/2021)	\$166,639
Rehabilitation	\$40,000
Financing/Other (10% of Costs)	\$20,664
<b>Total Per Unit Cost</b>	<b>\$227,303</b>

2. *New Construction/Replacement* – New construction implies construction of a new property with the same number of units and similar amenities as the one removed from the affordable housing stock. Cost estimates were prepared by using regional information and data. The construction of new housing can vary greatly depending on factors such as location, density, unit sizes, construction materials and on-site and off-site improvements. The recently constructed

Altamira project cost \$28,771,537, or \$599,407 per unit (California Tax Credit Allocation Committee Project Staff Report, June 12, 2019, Project CA-19-042).

3. *Tenant-Based Rental Assistance* – This type of preservation largely depends on the income of the family, the shelter costs of the apartment and the number of years the assistance is provided. If the very low income family that requires rental assistance earns \$41,325 (50% of median income for a 2-person household), then that family could afford approximately \$1,033 per month for shelter costs. According to the ACS 5-Year Estimates 2015-2019, the median rental price in Sonoma was \$1,836 in 2019. The difference between the \$1,033 that a family of 4 can afford and the average rent of \$1,836 would result in necessary monthly assistance of \$803 a month or \$9,636 per year. For comparison purposes, typical affordable housing developments carry an affordability term of at least 55 years, which would bring the total cost to \$529,980 per household.

*Summary.* As demonstrated above, the most cost-effective method of providing affordable housing in Sonoma is to acquire and rehabilitate units, which would cost approximately \$227,303 per unit. Providing rental assistance for a 55-year period would cost approximately \$529,980 per household. New construction of affordable units is most expensive, with an estimated cost of approximately \$599,407 per unit. It is noted that the new construction costs do not reflect potential costs savings associated with various federal and State housing grant and loan programs, discussed below under Resources, which reduce the cost to the developer of providing the units.

[Qualified Entities.](#) HCD maintains a list of qualified entities, which are public and private nonprofit and for-profit corporations that have legal and managerial capacity to acquire at-risk housing. Qualified entities in Sonoma County are summarized below:

<u>Organization</u>	<u>Contact</u>	<u>Type of Organization</u>
<u><a href="#">Burbank Housing Development Corp.</a></u> <u><a href="#">3432 Mendocino Ave</a></u> <u><a href="#">Santa Rosa, CA 95403</a></u> <u><a href="#">(707) 526-9782</a></u>	<u><a href="#">John Lowry</a></u> <u><a href="mailto:burbank@sonic.net">burbank@sonic.net</a></u> <u><a href="#">(707) 526-9811</a></u>	<u><a href="#">Local, regional, national nonprofit org.</a></u>
<u><a href="#">Affordable Housing Foundation</a></u> <u><a href="#">P.O. Box 26516</a></u> <u><a href="#">San Francisco, CA 94126</a></u> <u><a href="#">(415) 387-7834</a></u>	<u><a href="#">Eric Tang</a></u> <u><a href="mailto:etloanmach@aol.com">etloanmach@aol.com</a></u> <u><a href="#">(415) 752-9902</a></u>	<u><a href="#">Local, regional, national nonprofit org.</a></u>
<u><a href="#">Pacific Community Services, Inc.</a></u> <u><a href="#">329 Railroad Ave, P.O. Box 1397</a></u> <u><a href="#">Pittsburg, CA 94565</a></u> <u><a href="#">(925) 439-1056</a></u>	<u><a href="#">Tom LaFleur</a></u> <u><a href="mailto:pacomseru@aol.com">pacomseru@aol.com</a></u> <u><a href="#">(925) 439-0831</a></u>	<u><a href="#">Local, regional, national nonprofit org.</a></u>
<u><a href="#">Divine Senior Apartments</a></u> <u><a href="#">P.O. Box 148</a></u> <u><a href="#">Occidental, CA 95465</a></u> <u><a href="#">(707) 874-3538</a></u>	<u><a href="#">Richard W. Blanz</a></u> <u><a href="#">(707) 874-3538</a></u>	<u><a href="#">Local, regional, national nonprofit org.</a></u>
<u><a href="#">Sonoma County Community Development Commission</a></u> <u><a href="#">1440 Guerneville Road</a></u> <u><a href="#">Santa Rosa, CA 95403</a></u> <u><a href="#">(707) 565-7901</a></u>	<u><a href="#">Nick Stewart</a></u> <u><a href="mailto:Nick.Stewart@sonoma-county.org">Nick.Stewart@sonoma-county.org</a></u>	<u><a href="#">Not identified</a></u>
<u><a href="#">SWJ Housing</a></u> <u><a href="#">PO Box 815</a></u> <u><a href="#">Sebastopol, CA 95473</a></u> <u><a href="#">(707) 823-9884</a></u>	<u><a href="#">Scott Johnson</a></u> <u><a href="#">(707) 634-1422</a></u>	<u><a href="#">Not identified</a></u>
<u><a href="#">Volunteers of America National Services</a></u> <u><a href="#">1108 34th Avenue</a></u> <u><a href="#">Sacramento, CA 95822</a></u> <u><a href="#">(916) 917-6848</a></u>	<u><a href="#">Paul Ainger</a></u> <u><a href="mailto:painger@voa.org">painger@voa.org</a></u>	<u><a href="#">Local, regional, national nonprofit org.</a></u>



## G. PROJECTED HOUSING NEEDS

California law requires each city and county to develop local programs within their housing element in order to meet their “fair share” of existing and future housing needs for all income groups, as determined by the California Department of Housing and Community Development. The RHNA is a State-mandated process devised to distribute planning responsibility for housing need throughout the State of California. Chapter IV discusses the City’s ability to accommodate the RHNA through approved projects and vacant and underdeveloped sites suitable for residential development. The regional housing needs allocation for Sonoma, as shown by Table 40 below, is allocated by ABAG to address existing and future needs and covers a time period from 2023–2031.

Income Group	Income Range <sup>1</sup> (Family of Four)	Affordable Monthly Housing Costs <sup>2</sup>	Sonoma Regional Share (units)
Very Low <sup>3</sup> : <50% AMI	< \$58,150	< \$1,453	83
Low: 50-80% AMI	\$58,150 - \$103,300	\$1,453 - \$2,583	48
Moderate: 80-120% AMI	\$103,300 - \$123,950	\$2,583 - \$3,099	50
Above Moderate: 120 + AMI	> \$123,950	> \$3,099	130
<b>Total</b>	n/a	n/a	<b>311</b>

<sup>1</sup> HCD has established these income limits for Sonoma County for 2021.  
<sup>2</sup> In determining how much families at each of these income levels should pay for housing, HCD considers housing “affordable” if the amount of rent or total ownership cost (principal, interest, taxes, and insurance) paid does not exceed 30% of gross household income.  
<sup>3</sup> 50% of the County’s very low-income housing needs (83 units) are for extremely low-income households, which are defined as those families earning less than 30% of median income.  
 Source: ABAG 2021 6<sup>th</sup> Cycle Housing Element Data Package – Sonoma County; HCD 2021 State Income Levels

## H. HOUSING RESOURCES

Resources available to assist with obtaining housing and services within the City and County, with a focus on assistance for lower income and special needs populations, are summarized below.

### 1. HOUSING PROGRAMS AND COMMUNITY SERVICES RESOURCES FOR INDIVIDUALS AND HOUSEHOLDS

**Accessing Coordinated Care and Empowering Self Sufficiency (ACCESS):** Accessing Coordinated Care and Empowering Self Sufficiency (ACCESS) Sonoma is a county initiative that focuses on the critical needs of residents who are experiencing physical and mental health challenges, economic uncertainty, housing instability, substance use disorders, criminal justice engagement and social inequity.

**Bucklew Programs:** Bucklew Programs helps people with behavioral health challenges lead healthier, more independent lives, strengthening families and communities in the process. Wide range of services for adults and children in the North Bay includes supported housing and employment for people living with mental illness, family support, outpatient counseling, substance use treatment, outreach, education, and suicide prevention.

**Burbank Housing:** Burbank Housing is a local nonprofit dedicated to building quality affordable housing in the North Bay and operates affordable housing projects in the Sonoma Valley. Burbank Housing create vibrant local communities that are carefully

designed, professionally managed, and sustainable both financially and environmentally, to foster opportunities for people with limited-income of all ages, backgrounds and special needs.

***California Rural Legal Assistance (CRLA):*** CRLA provides legal assistance to low-income persons in education, employment & labor, rural health, and housing/landlord-tenant issues including eviction and foreclosure defense. CRLA is committed to fight for justice and individual rights alongside the most exploited communities. CRLA provides a variety of community education and outreach programs including leadership development. CRLA also protects Ingenious Mexican communities, LGBT communities, and farm worker communities.

***California Work Opportunity and Responsibility to Kids (CalWORKs):*** CalWORKs is a public assistance program that provides cash aid and services to eligible families that have a child(ren) in the home. The program serves all 58 counties in the state and is operated locally in Sonoma County by the Health and Human Services Agency. If a family has little or no cash and needs housing, food, utilities, clothing or medical care, they may be eligible to receive immediate short-term help. Families that apply and qualify for ongoing assistance receive money each month to help pay for housing, food and other necessary expenses.

***Catholic Charities of the Diocese of Santa Rosa:*** Catholic Charities of the Diocese of Santa Rosa serves and advocates for vulnerable people of all cultures and beliefs, prioritizing those experiencing poverty. Catholic Charities of the Diocese of Santa Rosa provides over 20 programs of service to nearly 20,000 people each year. Catholic Charities of the Diocese of Santa Rosa serves the entire region the Diocese of Santa Rosa touches – Sonoma, Napa, Mendocino, Lake, and Humboldt counties.

***Child Care Planning Council (CCPC):*** The mission of the CCPC of Sonoma County is to convene and inspire the community through collaboration, leadership, and advocacy to promote and plan for quality childcare and development for the benefit of all children (primarily birth to 12) and their families.

***Children's Advocacy Centers of California (CACC):*** CACC is a membership organization dedicated to helping local communities respond to allegations of child abuse in ways that are effective and efficient – and put the needs of child victims first. CACC provides training, support, technical assistance and leadership on a statewide level to local child advocacy centers and multidisciplinary teams throughout California responding to reports of child abuse and neglect.

***Community United Against Violence (CUAV):*** Founded in 1979, CUAV works to build the power of LGBTQ (lesbian, gay, bisexual, transgender, queer) communities to transform violence and oppression. CUAV supports the healing and leadership of those impacted by abuse and mobilize our broader communities to replace cycles of trauma with cycles of safety and liberation. As part of the larger social justice movement, CUAV works to create truly safe communities where everyone can thrive.

***Council on Aging:*** Council on Aging Services for Seniors is a non-profit organization which has been providing services for Sonoma County citizens over the age of 60 since 1966. Council on Aging provides Meals On Wheels (meal delivery service), social services, including adult day care, assistance connecting persons with appropriate resources, legal and justice services for older adults, and dining and social activities.

***Disability Services and Legal Center (DSLCL):*** DSLCL is a non-profit organization and a primary resource for adults, children, veterans and seniors with disabilities and their families in Sonoma County since 1976. DSLCL is one of California's 28 Centers for Independent Living (CIL/ILC) that promotes the Independent Living philosophy through education, community partnerships and advocacy. DSLCL serves over 2,000 people annually, providing information, advice and assistance on a wide range of disability-related matters.

***Fair Housing Advocates of Northern California (FHANC):*** FHANC provides free comprehensive fair housing counseling, complaint investigation, and assistance in filing housing discrimination complaints with the U.S. Department of Housing and Urban Development (HUD) or the California Department of Fair Employment and Housing (DFEH). FHANC is HUD certified to offer pre-purchase counseling and education programs, as well as foreclosure prevention counseling and workshops in Marin, Sonoma (except the city of Petaluma), Solano, and other counties.

**Generation Housing:** Generation Housing’s partnership provides opportunities to increase the supply, affordability, and diversity of homes throughout Sonoma County. Generation Housing is directed by cross-sector leaders representing healthcare, education, environment, and business who agree that a housing advocacy organization to promote housing policy and educate the public is a crucial missing component in local housing development. Generation Housing promotes effective policy, sustainable funding resources, and collaborative efforts to create an equitable, healthy, and resilient community for everyone.

**Homeless Action Sonoma Inc.:** Homeless Action Sonoma Inc. is a 501c non-profit organization committed to ending homelessness in Sonoma. To fully address the issue, Homeless Action Sonoma Inc. is dedicated to a four-part program: Educate, Integrate, Innovate, and Create.

**Legal Aid of Sonoma County (LASC):** Legal Aid of Sonoma County (LASC) assists over 3,000 adults and 2,000 children every year with crisis legal needs. Founded in 1958 and incorporated in 1983 as a private nonprofit, LASC provides crisis legal services to low-income families, children, elders, immigrants, and other vulnerable Sonoma County residents. These include domestic violence, child and elder abuse, low-income housing issues, disaster recovery and legal obstacles to health and employment. LASC provides full scope legal services including legal advice, preparation of legal documents, negotiations, and in court representation.

**National Alliance on Mental Illness:** The National Alliance on Mental Illness has a Sonoma County chapter and dedicated to improving the quality of lives for individuals living with mental illness and their families through support, education and advocacy. NAMI contracts with Sonoma County to facilitate peer support groups and to offer one-on-one mentoring and provide numerous education programs throughout the community.

**North Bay Veterans Resource Center (NBVRC)** The NBVRC assists homeless veterans or veterans at risk of imminent homelessness to find and maintain housing through case management, referrals to housing programs, and in some cases financial assistance. The NBVRC also has computers available for veteran use, clothing, and hygiene packs for those in need, as well as coffee and snacks in the waiting room. The NBVRC has the following programs for local veterans:

- Supportive Services for Veterans and Families: A rapid rehousing and homeless prevention program for low-income veterans and their families. Provides case management and temporary financial assistance.
- Hearn House Behavioral Health Treatment Program: A 15-bed residential program for male veterans with a history of mental illness and/or substance abuse.
- Rocca House Transitional Housing Program: An 8-bed transitional housing program for male veterans; residents work toward training, employment, and permanent housing goals.

**Partnership Health Plan Care Management Ride Program:** Persons with Medi-Cal that receive their benefit through Partnership Health Plan and have complex medical needs can receive additional care management including free transportation assistance.

**Redwood Caregiver Resource Center:** In operation since 1985, Redwood Caregiver Resource Center continues to provide services to family caregivers throughout the Redwood Empire, including the counties of Del Norte, Humboldt, Mendocino, Lake, Sonoma, Napa, and Solano. Redwood CRC is part of a statewide system of eleven nonprofit Caregiver Resource Centers (CRCs) offering support and assistance to caregivers of adults with brain impairments through education, research, services and advocacy. Funding comes from the California Department of Mental Health, grants, fees for services, and gifts from donors. All services are free or low cost.

**Sonoma Valley Community Health Center (SVCHC):** SVCHC is a non-profit, federally qualified health center that opened in 1992 as a free-standing primary health care clinic. SVCHC began as a grassroots effort to address the lack of access and disparities of health care for the uninsured and underserved in Sonoma Valley. Since its inception, SVCHC has grown in capacity to serve MediCal, insured, underinsured, private insurance, private pay patients and provides sliding scale fees for those in need. In addition to medical services, SVCHC offers behavioral health, an in-house phlebotomy service, dental clinic, pharmacy services and certified bilingual enrollment professionals to help determine eligibility and enrollment options. SVCHC receives federal

funding under Public Health Services Act, Title III, Section 330, Public Health Services Act, Section 330, 42 U.S.C. 254b, the Affordable Care Act, Section 10503 and the Public Health Service Act, Section 330, 42 U.S.C. 254b, as amended.

***Sonoma County Continuum of Care Program:*** The Sonoma County Continuum of Care (CoC) is Sonoma County's collaborative effort representing the homeless services system of care. The City of Sonoma is a member jurisdiction. Governed by a fifteen-member Continuum of Care Board, the countywide effort is responsible for oversight of funds designated to the Continuum of Care and planning/policy development for addressing homelessness. The Board consists of local elected officials, nonprofit representatives, subject matter experts, and individuals with lived homeless experience. The SCCDC serves as the Lead Agency of CoC.

***Sonoma County Human Services Department:*** The Sonoma County Human Services Department strives to support the health, safety and well-being of individuals, families and the community.

- Every day, our programs and services benefit more than 100,000 seniors, veterans, adults, teens, children and people with disabilities, through our four service divisions:
- Adult & Aging helps ensure the safety, independence and well-being of older adults, persons with disabilities, and military veterans and their families.
- Economic Assistance helps low-income and other individuals and families apply for money for food, health care, dental care, financial assistance and other services to meet basic needs.
- Employment and Training provides job search, employment and training services, cash aid, and supportive services for residents, and helps business and other employers find qualified job applicants for positions.
- Family, Youth & Children's Services helps ensure the safety and well-being of children and teens who have been abused, neglected or abandoned.

***Sonoma County Family, Youth and Children's Division:*** The Family, Youth and Children's Division provides services for Sonoma County children and teens to be safe, healthy and supported. The Family, Youth and Children's Division is committed to protect youngest residents from abuse, neglect or parental abandonment. Its staff provide protective and supportive social services to help children and their families to create stable, nurturing homes, a caring, connected community, and a sense of personal empowerment and hope. Housing-related programs and services include:

- Foster care provides temporary shelter for children and youth moved from unsafe homes. Relatives and community caregivers are recruited to provide temporary foster homes since, once home is safe, children may be returned to their parents. For youth who cannot return home safely, permanent adoption may become an option.
- Valley of the Moon Children's Home is the temporary emergency shelter for children removed from unsafe homes. Children stay in this a stable, supportive, nurturing environment while a community foster home is arranged.

***Sonoma County Housing Authority (SCHA):*** SCHA is an award-winning local public agency that provides safe, decent and quality affordable housing and supportive services to eligible persons with limited incomes. SCHA currently assists over 2,700 households, largely comprised of working families, seniors on fixed incomes, veterans, and persons with disabilities. The Housing Authority also offers subsidies and supportive services for residents with particular needs.

***Sonoma County Paratransit:*** Many passengers with disabilities can utilize fixed-route service provided by Sonoma County Transit. For passengers whose disabilities prevent them from using fixed-route service, ADA paratransit service is an option. Paratransit services are provided the same hours and days as fixed-route service. In addition, local transit services are provided in Rohnert Park, Cotati, Sebastopol, Windsor, Healdsburg, Cloverdale, Sonoma, Sonoma Valley and Guerneville/Monte Rio.

***Sonoma County In-Home Supportive Services:*** In-Home Supportive Services (IHSS) provides services to support a person living in their home including personal care, light housekeeping, shopping, meal prep and accompanying to medical appointments. Eligibility: Medi-Cal, blind, disabled or 65 years of age or older, and unable to live at home safely without help.

**Sonoma Post Acute:** Sonoma Post Acute partners with hospice agencies in the community to offer compassionate end-of-life care. Sonoma Post Acute provides appropriate pain management and comfort to our hospice patients. Sonoma Post Acute is committed to supporting families and caregivers during their loved ones' transitions to hospice.

**Sonoma County Community Development Commission (SCCDC):** SCCDC is dedicated to creating homes for all in thriving and inclusive neighborhoods. The SCCDC was established in 1978 as the County's public housing authority and is Sonoma County's lead agency for housing and homeless programs. The SCCDC exists to open doors to permanent housing and opportunity. Services include:

- Homeowner Housing Rehabilitation Loan Program. Financial assistance for owner-occupants in need of repairs on their single-family homes or mobile homes, and owners of rental properties where at least half of the tenants are low-income households. The program provides low-interest loans to eligible property owners throughout the unincorporated areas of Sonoma County and in the city limits of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor.
- Rental Assistance
- Housing & Neighborhood Investments
- Strategic Support to Service Providers and Non-profits
- Administration of federal funds for housing development, acquisition and rehabilitation, preservation, housing assistance, emergency and other shelter, community development, and economic development.

**Sonoma Hills Retirement Community:** Sonoma Hills Retirement Community is an independent living community offering 80 one-level apartments in Sonoma.

**The Living Room:** The mission of The Living Room is to ease adversity, promote stability, and support self-reliance for women and children who are homeless, or at-risk of homelessness, in Sonoma County. The Living Room works within three primary areas: housing, food, and outreach to women and their children.

**The Family Justice Center Sonoma County:** The Family Justice Center Sonoma County empowers family violence victims to live free from violence and abuse by providing comprehensive services, centered on and around the victim through a single point of access. Building on strong interagency collaboration, the Family Justice Center Sonoma County protects the vulnerable and works to stop violence and restore hope.

**Vintage House Sonoma:** Vintage House is a diverse and growing membership-based nonprofit organization. The mission of Vintage House is to help support, preserve, and enhance the quality of life for residents of Sonoma Valley as they age. In addition to a wide range of classes and activities, Vintage House provides services such as myRide, a program that provides local no-cost rides to seniors who no longer drive, the "Soups On" program, support groups for those living with dementia, and much more. Facilities are also available to rent.

## **2. FINANCIAL RESOURCES TO DEVELOP, REHABILITATE AND PRESERVE HOUSING**

Table 41 summarizes financial resources for the development, rehabilitation, and preservation of housing and for housing-related services.

<b>Table 41: Financial Resources</b>		
<b>Program Name</b>	<b>Description</b>	<b>Eligible Activities</b>
<b>1. Federal Programs</b>		
Community Development Block Grant (CDBG)	Grants available to small counties and cities on a competitive basis for a variety of housing and community development activities. The City accesses CDBG funds as part of the Urban County entitlement jurisdiction, administered by Sonoma County Community Development Commission. The funds are used for many housing and community development activities, including acquisition and rehabilitation of housing, fair housing services, including education and outreach, public improvements, and housing construction.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- Home Buyer Assistance</li> <li>- Economic Development</li> <li>- Homeless Assistance</li> <li>- Public Services</li> </ul>
Continuum of Care	Grant program available to eligible applicants, including local governments, public housing agencies, and nonprofits, to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- New Construction</li> <li>- Rental Assistance</li> <li>- Supportive Services</li> <li>- Operative Costs</li> </ul>
HOME	Grant program available to County and cities on a competitive basis for housing activities. The City accesses HOME funds as part of the Urban County entitlement jurisdiction administered by the SCCDC. HOME funds are used for a variety of housing activities, including homebuyer assistance, homeowner and multifamily rental rehabilitation, new construction of housing, housing acquisition and rehabilitation, and tenant-based rental assistance.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- Home Buyer Assistance</li> <li>- Rental Assistance</li> </ul>
Low income Housing Tax Credits (LIHTC)	Tax credits are available to persons and corporations that invest in low income rental housing. Proceeds from the sales are typically used to create housing.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Acquisition</li> <li>- Rehabilitation</li> </ul>
Mortgage Credit Certificate (MCC) Program	Income tax credits available to first-time homebuyers to buy new or existing single-family housing.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>

<b>Table 41: Financial Resources</b>		
Housing Choice Voucher (HCV) Program	The Sonoma County Housing Authority via HUD administers the HCV Program in Sonoma County. As such, rental assistance payments from the Sonoma County Housing Authority to owners of private market rate units on behalf of very-low income tenants. The Housing Choice Voucher program includes vouchers issued to individual households as well as project-based vouchers issued to a developer to preserve a specified number of units in a project for lower income residents.	<ul style="list-style-type: none"> <li>- Rental Assistance</li> <li>- Home Buyer Assistance</li> </ul>
Section 202	Grants to non-profit developers of supportive housing for the elderly.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- New Construction</li> </ul>
Section 203(k)	Provides long-term, low interest loans at fixed rate to finance acquisition and rehabilitation of eligible property.	<ul style="list-style-type: none"> <li>- Land Acquisition</li> <li>- Rehabilitation</li> <li>- Relocation of Unit</li> <li>- Refinance Existing Indebtedness</li> </ul>
Section 811	Grants to non-profit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- New Construction</li> <li>- Rental Assistance</li> </ul>
U.S. Department of Agriculture (USDA) Housing Programs	Below market-rate loans and grants for very low, low, and moderate income multifamily housing, self-help subdivisions, and farmworker rental housing.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Rehabilitation</li> </ul>
<b>2. State Programs</b>		
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>
Cal HOME	Provides grants to local governments and non-profit agencies for local homebuyer assistance and owner-occupied rehabilitation programs and new home development projects. Will finance the acquisition, rehabilitation, and replacement of manufactured homes.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> <li>- Rehabilitation</li> <li>- New Construction</li> </ul>
California Housing Assistance Program	Provides 3% silent second loans in conjunction with 97% CHFA first loans to give eligible buyers 100% financing.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>
California Self-Help Housing Program (CSHHP)	Provides grants for the administration of mutual self-help housing projects.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> <li>- New Construction</li> </ul>
Emergency Housing and Assistance Program (EHAP)	Provides grants to support emergency housing.	<ul style="list-style-type: none"> <li>- Shelters and Transitional Housing</li> </ul>
Emergency Shelter Program	Grants awarded to non-profit organizations for shelter support services.	<ul style="list-style-type: none"> <li>- Support Services</li> </ul>
Farmworker Housing Assistance Program	Provides State tax credits for farmworker housing projects.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Rehabilitation</li> </ul>
Golden State Acquisition Fund (GSAF)	GSAF makes up to five-year loans to developers for acquisition or preservation of affordable housing.	<ul style="list-style-type: none"> <li>- Acquisition/Preservation</li> </ul>

<b>Table 41: Financial Resources</b>		
Joe Serna Jr. Farm-worker Housing Grant Program (FWHG)	Provides recoverable grants for the acquisition, development and financing of ownership and rental housing for farmworkers.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> <li>- Rehabilitation</li> <li>- New Construction</li> </ul>
Mobilehome Park Rehabilitation and Resident Ownership Program (MPRRP)	MPROP makes short- and long-term low interest rate loans for the preservation of affordable mobilehome parks for ownership or control by resident organizations, nonprofit housing sponsors, or local public agencies. MPRROP also makes long-term loans to individuals to ensure continued affordability.	<ul style="list-style-type: none"> <li>- Preservation</li> </ul>
Multifamily Housing Program (MHP)	MHP makes low-interest, long-term deferred-payment permanent loans for permanent and transitional rental housing for lower-income households.	<ul style="list-style-type: none"> <li>- New construction</li> <li>- Rehabilitation</li> <li>- Preservation</li> </ul>
<b>3. Private Resources/Financing Programs</b>		
Federal National Mortgage Association (Fannie Mae)	<ul style="list-style-type: none"> <li>- Fixed rate mortgages issued by private mortgage insurers.</li> <li>- Mortgages, which fund the purchase and rehabilitation of a home.</li> <li>- Low Down-Payment Mortgages for Single-Family Homes in underserved low income and minority cities.</li> </ul>	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>
		<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> <li>- Rehabilitation</li> </ul>
		<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. County provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>
<b>City Programs</b>		
Housing Trust Fund	The purpose of the Housing Trust Fund is to accumulate and distribute funds in accordance with Council's Affordable Housing Plan. The main source of funding is from General Fund transfers of one percent of the Transient Occupancy Tax.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Rehabilitation</li> <li>- Preservation</li> <li>- Conversion from market rate to affordable</li> <li>- First time homebuyer assistance</li> <li>- Land acquisition</li> </ul>



### 3. HOUSING CONSTRAINTS

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Constraints to housing development are defined as government measures or non-governmental conditions that limit the amount or timing of residential development.

Government regulations can potentially constrain the supply of housing available in a community if the regulations limit the opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (Government Code Section 65583(a)(4)). Sonoma is undertaking many changes to its Development Code as part of its work program to implement this Housing Element and is also addressing potential constraints identified during the preparation of this Housing Element.

Non-governmental constraints (required to be analyzed under Government Code Section 65583(a)(5)) cover land prices, construction costs, and financing. While local governments cannot control prices or costs, identification of these constraints can be helpful to Sonoma in formulating housing programs.

This section addresses these potential constraints and their effects on the supply of affordable housing.

#### A. GOVERNMENTAL AND ENVIRONMENTAL CONSTRAINTS

Sonoma's policies and regulations play an important role in protecting the public's health, safety, and welfare. However, governmental policies and regulations can act as constraints that affect both the amount of residential development that occurs and housing affordability. State law requires housing elements to "address and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Government Code Section 65583).

Therefore, the City is required to review its regulations to ensure there are no unnecessary restrictions on the operation of the housing market. If the City determines that a policy or regulation results in excessive constraints, the City must attempt to identify what steps can be taken to remove or minimize obstacles to affordable residential development. Sonoma's primary policies and regulations that affect residential development and housing affordability are land use controls; development processing procedures, fees, and improvement requirements; and building and housing codes and enforcement.

The governmental constraints analysis focuses on factors that are within the City's control, not on state, federal, or other governmental policies or regulations that the City cannot affect or modify. There are many such policies and regulations that could affect the City's ability to meet future housing needs and secure adequate funding to construct very low- and low-income housing. These are among other governmental constraints:

- Land use and environmental policies and regulations that could limit the City's ability to designate land in its planning area for future residential development. Examples include agricultural open space and natural habitat preservation, protection of endangered species, and flood control.
- Fiscal and financial constraints related to regional, state, or federal funding for housing, transportation, infrastructure, and services needed to support new residential development.
- State and federal requirements that add to the cost of constructing affordable housing, when public funds are used (such as so called "prevailing wage" requirements).
- Construction codes and regulations that the City must follow for new residential construction that could restrict the use of cost-saving techniques or materials.

**1. LAND USE CONTROLS**

Land use controls guide local growth and development. Sonoma applies land use controls through its General Plan and Development Code. All residential land use classifications pose a constraint on residential development in the sense that various conditions, building requirements, and limitations restrict a pure free market ability to construct housing. Land use regulations also have the potential of adding costs to construction, which indirectly may constrain housing. These impacts are measured against the general health and public safety served in the adoption of such regulations. Standards have been determined by the City to establish minimum constraints to provide for adequate separation of buildings for fire protection, air and light between structures, and the intensity of development. Implementation of these standards has not resulted in a serious constraint in providing housing to households of various income levels.

**GENERAL PLAN LAND USE DESIGNATIONS**

By definition, local land use controls constrain housing development by restricting housing to certain sections of the City and by limiting the number of housing units that can be built on a given parcel of land. In 2006, the City of Sonoma completed a comprehensive update of its entire General Plan, except the Housing Element. The 2020 General Plan is committed to responsible development aligned within natural resource limitations, providing a diversity of housing that is available and affordable to residents and the local workforce. In furtherance of this goal, the General Plan increased permitted residential densities in Sonoma’s multifamily, commercial and mixed use districts. The Plan provides expanded opportunities for multifamily housing, including encouraging residential uses in the Town Center and along Broadway through mixed use development. Furthermore, the City requires new development to include a residential component of at least 50% the total building area on parcels zoned Commercial that are larger than  $1\frac{1}{2}$ -acre, a policy that has proven effective in integrating housing within walking distance of commercial uses. Table 42 identifies the different land use designations in the Sonoma General Plan that accommodate residential development. Sonoma’s General Plan land use designations provide for a wide range of residential development types and densities.

<b>Land Use Category</b>	<b>Description</b>	<b>Residential Density</b>	<b>Residential Intensity</b>
Hillside	This designation is intended to preserve Sonoma’s hillside backdrop, while allowing limited residential development in conjunction with agricultural uses. Crop and tree farming are allowed.	1 unit per 10 or more acres (excluding second units)	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 20%
Agriculture	This designation is intended to protect remaining tracts of productive agriculture within city limits, including grazing land, truck farms, vineyards, and crop production areas.	1 unit per 10 or more acres	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 30%
Rural Residential	This designation is intended to preserve areas of lower density development within the city limits, especially adjacent to hillsides and in established low density neighborhoods. Day care facilities, fire stations, post offices, and similar activities may be allowed subject to use permit review. Home occupations are allowed, but retail and office uses are not.	0 to 2 dwelling units per acre (du/ac)	Height Limit: 35 feet (two stories) Maximum Lot Coverage: 40% FAR: 0.2
Low Density Residential	This designation is intended primarily for single-family housing and duplexes, with attached or clustered development allowed by use permit, in association with related public improvements such as streets. Other uses compatible with the primary use may be allowed subject to use permit review, including transitional housing, schools, day care facilities, churches, fire stations, post offices, nursing homes, convalescent hospitals, and parking areas. Home occupations are allowed, but retail and office uses are not	2 to 5 du/ac	Height Limit: 35 feet (two stories) Maximum Lot Coverage: 40% FAR: 0.35
Sonoma Residential	This designation, which usually applies to properties at least 3 acres in size, has three purposes: 1) to ensure a variety of unit types and lot sizes in new development, 2) to provide sufficient flexibility in site planning	3 to 8 du/ac	Height Limit: 35 feet (two stories)

<b>Table 42. Residential Land Use Categories, Density, and Intensity</b>			
	and design to allow individual developments to respond to site and neighborhood conditions, and 3) to ensure a range of housing prices and living opportunities for middle-income households. Through this designation housing units of different price ranges are mingled rather than segregated. Home occupations are allowed, but retail and office uses are not.		Maximum Lot Coverage: 40% FAR: 0.35
Medium Density Residential	This designation is intended to provide opportunities for multifamily housing and related public improvements, especially in transition areas between higher density and single-family development. Transitional housing, schools, day care facilities, churches, fire stations, post offices, nursing homes, convalescent hospitals, parking areas, and similar activities may be allowed subject to use permit review. Home occupations are allowed, but retail and office uses are not.	7 to 11 du/ac	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 50% FAR: 0.5
High Density Residential	This designation is intended to provide opportunities for relatively dense multifamily housing and related public improvements, especially close to commercial centers and mixed use development. Transitional housing, schools, day care facilities, churches, fire stations, post offices, nursing homes, convalescent hospitals, parking areas, and similar activities may be allowed subject to use permit review. Home occupations are allowed, but retail and office uses are not.	11 to 15 du/ac	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 60% FAR: 0.7
Housing Opportunity	This designation identifies sites suitable for higher density and affordable development, especially close to commercial centers and mixed use areas, and is intended to provide opportunities for low and very low income households. Uses other than housing and associated improvements are not allowed. Home occupations are allowed.	15 to 25 du/ac	Height Limit: 36 feet (two stories) Maximum Lot Coverage: 60% FAR: 0.7
Mobile Home	This designation is intended to acknowledge existing mobile home parks. Home occupations are allowed, but retail and office uses are not.	0 to 7 mobile homes per acre	Height Limit: 16 feet (one story) Maximum Lot Coverage: 50% FAR: 0.3
Commercial	This designation is intended to provide areas for retail, hotel, service, medical, and office development, in association with apartments and mixed-use developments and necessary public improvements. Schools, day care facilities, fire stations, post offices, emergency shelters, and similar activities may be allowed subject to use permit review.	0 to 20 du/ac	Height Limit: 36 feet Maximum Lot Coverage: 70% to 100% FAR: 0.6 to 2.0
Gateway Commercial	This designation is applied specifically to the Four Corners area and the Verano triangle. It is intended to promote high-quality neighborhood- and visitor-serving office and retail development while implementing a coordinated design program for these areas, in keeping with their status as gateways to the community and in recognition of the need to buffer residential development. Building coverage is limited compared to other commercial areas to allow for landscaping and transition areas. Cultural and recreational facilities, hotels, and small-scale agricultural support facilities are allowed in association with apartments and mixed use developments and necessary public improvements. Schools, day care facilities, fire stations, post offices, emergency shelters, and similar activities may be allowed subject to use permit review.	0 to 20 du/ac	Height Limit: 36 feet Maximum Lot Coverage: 50% FAR: 0.8
Mixed Use	This designation is intended to accommodate uses that provide a transition between commercial and residential districts, to promote a pedestrian presence in adjacent commercial areas, and to provide	0 to 20 du/ac	Height Limit: 36 feet

<b>Table 42. Residential Land Use Categories, Density, and Intensity</b>			
	neighborhood commercial services to adjacent residential areas. It is also intended to provide additional opportunities for affordable housing, especially for low and very low income households. The Mixed Use designation also is intended to recognize the continued existence of uses that contribute to the character or function of their neighborhood and to allow for the possibility of their expansion. Day care facilities, fire stations, post offices, transitional housing, and emergency shelters may be allowed subject to use permit review. A residential component is required in new development, unless an exemption is granted through use permit review.		Maximum Lot Coverage: 70% to 100% FAR: 0.6 to 1.2
Source: City of Sonoma General Plan (adopted October 2006)			

**DEVELOPMENT CODE**

Title 19 (Integrated Development Regulations and Guidelines) of the City of Sonoma Municipal Code carries out the policies and implementation measures of the General Plan by classifying and regulating the use of land and structures in the City. Specifically, Title 19 of the Sonoma Municipal Code (“Development Code”) contains standards and provisions to:

- Encourage the use of land as designated by the General Plan Land Use Plan and ensure compatibility between neighboring land uses;
- Retain the unique small-town character of the community and the integrity of its neighborhoods through detailed prescriptions for block form, site planning, and building design for specific geographic areas of the City;
- Conserve and protect the City’s natural beauty, including scenic views, hillside open space, creeks, and trees;
- Retain and create small pockets of open space and natural areas and require adequate, park, open space, landscaping, and tree planting in new development;
- Protect historic buildings and sites, and carry the historic character of the Plaza and old Sonoma into the rest of the City through careful attention to urban design;
- Minimize automobile use and congestion by promoting pedestrian- and bicycle-oriented development, safe and effective traffic circulation, and adequate off-street parking facilities, and by expanding bicycle and pedestrian connections; and
- Support continued agricultural opportunities.

Periodically, the Development Code is reviewed to ensure its consistency with the policies of the General Plan, as required by Government Code Section 65860, and amendments are initiated to enhance its value in accommodating new development. The Development Code provides for an array of residential districts throughout the City that allow a variety of different residential uses. The Development Code also permits residential uses in certain commercial zones. Table 43 identifies the zoning districts in Sonoma that allow residential uses and the corresponding General Plan land use designations.

<b>Table 43. Land Use Categories and Zoning</b>	
<b>Land Use Category</b>	<b>Zoning District</b>
Hillside	Residential – Hillside (R-HS)
Agriculture	Agricultural (A)
Rural Residential	Residential – Rural (R-R)
Low Density Residential	Residential – Low Density (R-L)
Sonoma Residential	Residential – Sonoma (R-S)
Medium Density Residential	Residential – Medium Density (R-M)
High Density Residential	Residential – High Density (R-H)
Housing Opportunity	Residential – Housing Opportunity (R-O)

<b>Table 43. Land Use Categories and Zoning</b>	
Mobile Home	Residential – Mobile Home Park (R-P)
Commercial	Commercial (C)
Gateway Commercial	Commercial – Gateway (C-G)
Mixed Use	Mixed Use (MX)
Source: City of Sonoma Development Code (Title 19)	

Additionally, Sonoma is comprised of 13 Planning Areas with individual characteristics and features representing different periods in the City’s history. Chapter 19.16 of the Development Code establishes the Planning Areas within the City and specific site planning and design standards for each area to ensure that projects are designed to enhance and maintain the development and environmental characteristics of each unique Planning Area. The Planning Areas are described in terms of three subtypes – areas, districts, and corridors – depending upon their function, their geography, and the range of land uses within them. Table 44 provides a description of each of the Planning Areas and identifies the applicable zoning districts within each.

<b>Table 44: Sonoma Planning Areas</b>		
<b>Planning Area</b>	<b>Existing Conditions / Potential Changes</b>	<b>Applicable Zoning Districts</b>
Northeast Area <i>(See Sonoma Municipal Code Chapter 19.18 for a complete description)</i>	The Northeast planning area lies immediately to the north and east of the Plaza and downtown, and extends to the northeast city boundary. The planning area, which encompasses 230 acres, includes many historical structures and diverse land uses. The general objective for this area is to preserve the quality and context of land uses and buildings, with an emphasis on residential mixed use development with some small-scale office or other compatible commercial land uses.	Residential – Hillside (R-HS) Residential – Rural (R-R) Residential – Low Density (R-L) Residential – Medium Density (R-M) Mixed Use (MX) Wine Production (W) Public (P) Agricultural (A)
Central-East Area <i>(See Sonoma Municipal Code Chapter 19.20 for a complete description)</i>	The Central-East planning area is located at the eastern edge of the city, between East Napa Street and East MacArthur Street, and includes some of the oldest residential areas in the community, with mature landscaping and street trees. The general objective of this area is to preserve the existing quality and fabric of residential neighborhoods in the Central-East planning area. This area, portions of which are currently outside of city limits, has an R-S designation, which calls for somewhat higher densities and a greater variety in lot sizes than what is found in the development to the west (Armstrong Estates), which features lots having a minimum area of 20,000 square feet.	Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Public (P)
Southeast Area <i>(See Sonoma Municipal Code Chapter 19.22 for a complete description)</i>	The Southeast area is roughly bounded on three sides by major collector streets, with Nathanson Creek forming the western boundary. The smaller lot sizes and street improvements associated with the three single-family subdivisions within the city contrast with the rural lands of the unincorporated sphere of influence, with little transition between the two. Future development in this area is required to be based on elements found in traditional Sonoma neighborhoods, including grid streets, a mix of lot sizes, and variation in the size and style of homes.	Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Public (P) Agricultural (A)
Northwest Area <i>(See Sonoma Municipal Code Chapter 19.24 for a complete description)</i>	The Northwest planning area is a predominantly residential district bounded by the West Napa Street/Sonoma Highway commercial corridor on the west and south and the Vallejo Home State Park on the east. Verano Avenue forms the	Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Mixed Use (MX)

<b>Table 44: Sonoma Planning Areas</b>		
	<p>northern boundary. In general, residential development within the area is of three types:</p> <ol style="list-style-type: none"> <li>1. Older tracts of single-family residences on long, narrow blocks arranged in a grid pattern (east of Fifth Street);</li> <li>2. (2) newer tracts of single-family residences arranged on curvilinear streets and cul-de-sacs (west of Fifth Street); and</li> <li>3. (3) multifamily development, in the form of condominiums and P.U.D.s, along West Spain Street.</li> </ol> <p>The largest opportunity for new residential development in this planning area is represented by the Montini property, a 14-acre parcel within the Residential – Sonoma (R-S) zoning district located at the northwest corner of the planning area, adjacent to the Vallejo Home State Park.</p>	Public (P)
<p>Central-West Area <i>(See Sonoma Municipal Code Chapter 19.26 for a complete description)</i></p>	<p>The Central-West planning area is large, at 297 acres, and contains a variety of housing types, including low density single-family, mobile home parks, duplexes and fourplexes, as well as large-scale multifamily developments. Sonoma Creek, on the west, represents the area's most distinct boundary. The development of this area is recent in terms of the city's overall history, with the oldest tracts dating back to the 1950s. Within single-family areas, front setbacks tend to be quite consistent (20 feet, usually), less so in the multifamily sections. The general objective for this area is to ensure single-family areas remain single-family with regular setbacks and development in multifamily areas, while having greater flexibility in site design and massing, respond to conditions on adjacent parcels.</p>	<p>Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Residential – High Density (R-H) Residential—Mobile Home (R-P) Commercial (C) Public (P)</p>
<p>Southwest Area <i>(See Sonoma Municipal Code Chapter 19.28 for a complete description)</i></p>	<p>The Southwest planning area, which is entirely residential, is marked by sharp contrasts between rural and urban development. Malet Street and Harrington Drive are rural enclaves, developed mainly with older residences. New residential development includes a single-family tract and a series of higher density tracts featuring detached units on small lots. The Southwest area is bounded by rural and agricultural lands outside of the City's sphere of influence on the south and west, with the Broadway corridor and the gateway at Four Corners to the east, and urban residential development to the north. Existing and planned single-family developments within the planning area will inevitably contrast with adjacent rural areas.</p>	<p>Residential – Rural (R-R) Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Public (P)</p>
<p>Gateway District <i>(See Sonoma Municipal Code Chapter 19.30 for a complete description)</i></p>	<p>Although the Gateway commercial district encompasses only 59 acres, its future development is crucial to the identity of Sonoma. It forms the southern entrance to the city and marks the division between the rural and agricultural character of the unincorporated area and the urban features of the city. The desired future of the Gateway District is to provide a mix of resident- and visitor-serving uses, along with a substantial residential component.</p>	Commercial – Gateway (C-G)
<p>Broadway Corridor</p>	<p>Connecting the southern gateway to the downtown, the Broadway Corridor provides a grand entrance to downtown Sonoma with its axial view of the Plaza, City Hall, and the</p>	<p>Commercial (C) Mixed Use (MX) Public (P)</p>

<b>Table 44: Sonoma Planning Areas</b>		
<i>(See Sonoma Municipal Code Chapter 19.32 for a complete description)</i>	northern hills. The Broadway Corridor is flanked by residential areas, with Nathanson Creek forming its eastern edge and First Street West its western boundary. The desired future of the Broadway Corridor is to preserve, restore, and re-use historic structures and ensure new development respect and contribute to the character of the area. Mixed use development will be directed so as to retain the predominantly residential character of First Street West while enlivening Broadway with small-scale retail, office, and residential uses.	
Downtown District <i>(See Sonoma Municipal Code Chapter 19.34 for a complete description)</i>	The Downtown District centers on the Plaza and the historic downtown, collectively designated as a National Historic Landmark. The Downtown encompasses a lively concentration of small businesses, including restaurants, bookstores, specialty retail, and offices. Outside of the original downtown area, the western portion of the district contains a mix of single-family, multifamily, retail, and office development, including a modern shopping center. Multifamily development lies at the northwest and southeast edges of the district. While commercial uses will remain preeminent, the downtown's housing stock should be preserved and extended. Higher density residential development at the edges of the district confers similar benefits and establishes a transition to lower density residential areas.	Residential – Low Density (R-L) Residential – Medium Density (R-M) Residential – Housing Opportunity (R-O) Commercial (C) Mixed Use (MX) Public (P)
West Napa Street/ Sonoma Highway Corridor  <i>(See Sonoma Municipal Code Chapter 19.36 for a complete description)</i>	The West Napa Street/Sonoma Highway corridor is a commercial strip comprised of segments of State Highway 12. The corridor is punctuated by shopping centers with expansive parking lots, some only lightly landscaped, which break the rhythm established by smaller-scale development. Existing residential uses include small multifamily developments and scattered single-family residences, as well as a mobile home park.	Residential – Medium Density (R-M) Residential – Mobile Home (R-P) Mixed Use (MX) Commercial (C) Commercial – Gateway (C-G) Public (P)
Open Space Districts  <i>(See Sonoma Municipal Code Chapter 19.38 for a complete description)</i>	The three open space districts are characterized by large areas of land in public ownership devoted to open space and recreational uses, as follows: <ol style="list-style-type: none"> <li>1. The Maxwell district has an area of approximately 89 acres;</li> <li>2. The Vallejo district is dominated by the 57-acre Vallejo Home State Park.</li> <li>3. The third open space district is comprised of the Mountain Cemetery.</li> </ol>	Residential – Hillside (R-HS) Residential – Low Density (R-L) Park (PK) Public (P)
Sources: City of Sonoma Development Code (Chapter 19.16); City of Sonoma General Plan (2006)		

**Development Standards**

Development standards directly shape the form and intensity of residential development by providing controls over land use, heights and volumes of buildings, open space on a site, etc. Site development standards also ensure a quality living environment for all household groups in the City, including special needs groups such as lower income households and senior citizens.

The Development Code contains specific development standards for each zoning district, which vary slightly depending on the specific Planning Area the development is located in. In addition, the Development Code provides different development standards for residential infill/addition projects and residential subdivision projects. The Table 45 shows the allowed densities, minimum lot sizes, and floor area ratios (FAR) of the various residential zoning districts and commercial zones that allow residential uses within the City.

<b>Table 45. Zoning District Density, Minimum Lot Size, and FAR Regulations</b>			
<b>Zoning District</b>	<b>Permitted Density<sup>1</sup></b>	<b>Minimum Lot Sizes (square feet/unit)</b>	<b>Floor Area Ratio (FAR)</b>
Residential – Hillside (R-HS)	Minimum: N/A Maximum: 1 unit per 10 acres	10 acres	0.1
Agriculture (A)	Minimum: N/A Maximum: 1 unit per 10 acres	10 acres	0.05
Residential – Rural (R-R)	Minimum: 0 Maximum: 2 du/ac	20,000 sf	0.2
Residential – Low Density (R-L)	Minimum: 2 du/ac Maximum: 5 du/ac	7,500 sf	0.35
Residential – Sonoma (R-S)	Minimum: 3 du/ac Maximum: 8 du/ac	5,000 sf <sup>2</sup>	0.35
Residential – Medium Density (R-M)	Minimum: 7 du/ac Maximum: 11 du/ac	5,000 sf <sup>3</sup>	0.5 <sup>6</sup>
Residential – High Density (R-H)	Minimum: 11 du/ac Maximum: 15 du/ac	3,500 sf	0.7
Residential – Housing Opportunity (R-O)	Minimum: 15 du/ac Maximum: 25 du/ac	4,500 sf	0.7
Residential – Mobile Home Park (R-P)	Minimum: 0 du/ac Maximum: 7 du/ac	10 acres	0.3 <sup>7</sup>
Commercial (C)	Minimum: 0 du/ac Maximum: 20 du/ac	10,000 sf	0.8 <sup>8</sup>
Commercial – Gateway (C-G)	Minimum: 0 du/ac Maximum: 20 du/ac	10,000 sf <sup>4</sup>	0.8
Mixed Use (MX)	Minimum: 0 du/ac Maximum: 20 du/ac	7,000 sf <sup>5</sup>	0.7 <sup>9</sup>
Notes:			
<sup>1</sup> Densities do not include density bonus. See Chapter 19.44 of the Development Code. <sup>2</sup> Minimum Lot Sizes requirements in the R-S district differ in the following Planning Areas: <i>Northwest Area = 5,500 sf; Southwest Area = 7,500 sf</i> <sup>3</sup> Minimum Lot Sizes requirements in the R-M district differ in the following Planning Areas: <i>Central-West Area = 4,500 sf; Central-East and Northeast Areas = 5,500 sf; Southwest Area = 7,500 sf</i> <sup>4</sup> Minimum Lot Sizes requirements in the C district differ in the following Planning Areas: <i>Broadway Corridor = 8,000 sf; Downtown District = 7,000 sf</i> <sup>5</sup> Minimum Lot Sizes requirements in the MX district differ in the following Planning Areas: <i>Broadway Corridor and West Napa Street/Sonoma Highway Corridor = 8,000 sf</i> <sup>6</sup> FAR requirements in the R-M district differ in the following Planning Areas: <i>Central-West and Southwest Areas = 0.45; West Napa Street/Sonoma Highway Corridor = 0.45</i> <sup>7</sup> FAR requirements in the R-P district differ in the following Planning Areas: <i>West Napa Street/Sonoma Highway Corridor = 0.2</i> <sup>8</sup> FAR requirements in the C district differ in the following Planning Areas: <i>Broadway Corridor = 0.6; Downtown District = 2.0</i> <sup>9</sup> FAR requirements in the MX district differ in the following Planning Areas: <i>Northeast Area = 0.6; Broadway Corridor = 1.0; Downtown District = 1.2</i>			
Source: City of Sonoma Development Code (Title 19)			

Table 46 provides setback, height, and site coverage requirements for residential infill/addition development within the various zoning districts that allow for residential development.



<b>Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions</b>					
<b>Planning Area</b>	<b>Front Setback</b>	<b>Side Setback</b>	<b>Rear Setback</b>	<b>Height</b>	<b>Site Coverage</b>
<b>Residential – Hillside (R-HS)</b>					
Northeast Area	30 feet	30 feet	30 feet	30 feet	15%
Open Space Districts					10%
<b>Agriculture (A)</b>					
Northeast Area	30 feet	30 feet	30 feet	35 feet	10%
<b>Residential – Rural (R-R)</b>					
Northeast Area	30 feet	20 feet minimum, 50 feet total	30 feet	30 feet	25%
Southwest Area	<u>1-Story</u> 20 feet <u>2-Story</u> 30 feet	15 feet			
<b>Residential – Low Density (R-L)</b>					
Northeast Area	20 feet <sup>1</sup>	7 feet minimum, 18 feet total	25 feet	30 feet	40%
Central-East Area	<u>New Structures</u> 25 feet <sup>1</sup>	<u>1-Story</u> 7 feet minimum, 18 feet total	20 feet		
	<u>Additions</u> 20 feet	<u>2-Story</u> 1-Story Setback, plus 3 feet for every 5 feet of height above 15 feet			
Southeast Area	20 feet <sup>1</sup>				
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined	20 feet		
		<u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Central-West Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Southwest Area	<u>1-Story</u> 20 feet	15 feet	30 feet		
	<u>2-Story</u> 30 feet				
Downtown District	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet		
<b>Residential – Sonoma (R-S)</b>					

<b>Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions</b>					
Central-East Area	<u>New Structures</u> 25 feet <sup>1</sup>	<u>1-Story</u> 5 feet minimum, 15 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet	30 feet	40%
Southeast Area	<u>Additions</u> 20 feet				
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet	30 feet	40%
Central-West Area					
Southwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet	30 feet	40%
<b>Residential – Medium Density (R-M)</b>					
Northeast Area	15 feet <sup>2</sup>	7 feet minimum, 18 feet total	20 feet	30 feet	60%
Central-East Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet total  <u>2-Story</u> 8 feet minimum	15 feet		
Southeast Area	15 feet		<u>1-Story</u> 5 feet minimum, 15 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>1-Story</u> 15 feet  <u>2-Story</u> 20 feet	30 feet
Northwest Area	<u>1-Story</u> 15 feet  <u>2-Story</u> 20 feet				
Central-West Area		20 feet	20 feet	30 feet	60%
Southwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet	30 feet	50%
Downtown District	15 feet for additions/replacement structures 10 feet for new development	<u>1-Story</u> 5 feet minimum, 15 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>1-Story</u> 15 feet  <u>2-Story</u> 20 feet	30 feet	60%
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet  <u>2-Story</u> 25 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet or 20 feet is abutting the R-L zone		
<b>Residential – High Density (R-H)</b>					
Central-West Area	15 feet	<u>1-Story</u> 5 feet minimum,	<u>1-Story</u> 12 feet	30 feet	60%

<b>Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions</b>					
		12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>2-Story</u> 15 feet		
<b>Residential – Housing Opportunity (R-O)</b>					
Downtown District	N/A	8 feet	12 feet	30 feet	65%
<b>Residential – Mobile Home Park (R-P)</b>					
Central-West Area	20 feet	<u>1-Story</u> 10 feet	20 feet	30 feet	35%
Napa Street / Sonoma Highway Corridor		<u>2-Story</u> 20 feet	10 feet		30%
<b>Commercial (C)</b>					
Central-West Area	<u>1-Story</u> 15 feet <u>2-Story</u> 20 feet	N/A <sup>3</sup>		30 feet	60%
Broadway Corridor	15 feet <sup>7</sup>	N/A <sup>3</sup>			
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet <u>2-Story</u> 25 feet	N/A <sup>3</sup>	N/A		70%
<b>Commercial – Gateway (C-G)</b>					
Gateway District	<u>Edge Property</u> 20 feet or consistent with existing structure <sup>4</sup> <u>Core Property</u> N/A	<u>Edge Property</u> N/A <sup>5</sup> <u>Core Property</u> N/A	<u>Edge Property</u> N/A <sup>6</sup> <u>Core Property</u> N/A	<u>Edge Property</u> 30 feet <u>Core Property</u> 35 feet	40%
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet <u>2-Story</u> 25 feet	N/A <sup>3</sup>	N/A	<u>30 feet</u>	
<b>Mixed Use (MX)</b>					
Northeast Area	N/A	N/A	N/A	N/A	60%
Northwest Area	N/A <sup>5</sup>			30 feet	60%
Broadway Corridor	20 feet <sup>7</sup>	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet <sup>3</sup>		
Downtown District	15 feet for additions/replacement structures	N/A <sup>3</sup>	N/A		

Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions					
	10 feet for new development				
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet  <u>2-Story</u> 25 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet or 20 feet is abutting the R-L zone		60%
Notes: <sup>1</sup> For new construction, the front setback is either the setback identified in the table or the same setback as the closest structure to the street on either side, whichever is greater. <sup>2</sup> For new construction, the front setback is either the setback identified in the table or the same setback as the closest structure to the street on either side, whichever is smaller. <sup>3</sup> Except when abutting a residential zone, in which case the corresponding setback in the residential zone shall apply. <sup>4</sup> Represents the front setback for additions or renovations. The front setback requirements for new development are as follows: Project fronting Broadway = 30-foot setback Project fronting Napa/Leveroni = 20-foot setback Project fronting internal drives = No setback requirement <sup>5</sup> None required, except 1) when abutting a residential zone, in which case the corresponding side setback in the residential zone shall apply; 2) when abutting the sphere of influence, in which case a 20-foot side setback is required. <sup>6</sup> None required, except when abutting a residential zone or the sphere of influence, in which case a 20-foot rear setback is required. <sup>7</sup> Replacement structures shall use the same front setbacks of the original structures. New development (not including additions to existing structures) may use a front setback of 15 feet or a setback within the range of adjacent structures on either side.					
Source: City of Sonoma Development Code (Title 19)					

Additionally, Table 47 provides the setback, height, and site coverage requirements for residential subdivisions of 5+ lots within the various zoning districts within Sonoma that allow this type of development.

**Table 47: Zoning District Setbacks, Height, and Site Coverage – Subdivisions of 5+ Lots**

Planning Area	Front Setback	Side Setback	Rear Setback	Height	Site Coverage
<b>Residential – Low Density (R-L)</b>					
Central-East Area	Average of 25 feet <sup>1</sup>	<u>1-Story</u> 7 feet minimum, 18 feet total  <u>2-Story</u> 1-Story Setback, plus 3 feet for every 5 feet of height above 15 feet	20 feet	30 feet <sup>2</sup>	40%
Southeast Area	Average of 20 feet <sup>1</sup>				
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Central-West Area	Average of 25 feet <sup>1</sup>				
<b>Residential – Sonoma (R-S)</b>					
Central-East Area	Average of 25 feet <sup>1</sup>	3 feet minimum <sup>1</sup>	20 feet	30 feet	40%
Southeast Area					
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Central-West Area	Average of 25 feet <sup>1</sup>	3 feet minimum <sup>1</sup>			
<b>Residential – Medium Density (R-M)</b>					
Northeast Area	<u>1-Story</u> 15 feet	<u>1-Story</u> 5 feet minimum, 15 feet total  <u>2-Story</u> 10 feet minimum	<u>1-Story</u> 20 feet  <u>2-Story</u> 25 feet	30 feet	50%
	<u>2-Story</u> 20 feet				
Central-East Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet total  <u>2-Story</u> 8 feet minimum	15 feet		
Southeast Area	15 feet				
Northwest Area	<u>1-Story</u> 15 feet  <u>2-Story</u> 20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>1-Story</u> 15 feet  <u>2-Story</u> 20 feet	60%	
Central-West Area		<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			

<b>Residential – High Density (R-H)</b>					
Central-West Area	15 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined  <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet	30 feet	60%
<b>Mixed Use (MX)</b>					
Northeast Area	TBD <sup>1</sup>	<u>1-Story</u> 5 minimum, 15 total  <u>2-Story</u> 8 minimum on two-story side	<u>1-Story</u> 15 feet  <u>2-Story</u> 20 feet	30 feet	60%
Northwest Area	N/A <sup>3</sup>				
Notes:					
<sup>1</sup> A variety of setbacks, compatible with neighborhood conditions, shall normally be required at the discretion of the Planning Commission.					
<sup>2</sup> For Central-East Area, maximum height requirement is 35 feet for parcels 20,000 sf or greater.					
<sup>3</sup> None required, except when abutting a residential zone, in which case the corresponding setback in the residential zone shall apply.					
Source: City of Sonoma Development Code (Title 19)					

In addition to the standards presented in Tables 45, 46, and 47, multifamily projects (except duplexes) are required to provide permanently maintained outdoor open space for each dwelling unit (private open space) and for all residents (common open space). Private open space requirements vary depending on unit size, and range from 75 square feet for studio and one-bedroom units, to 150 square feet for two-bedroom units, and 225 square feet for three-bedroom units and larger. Common open space is to be provided at a rate of 300 square feet per unit. A reduced open space requirement of 300 square feet (any combination of common and/or private) has been adopted for residential development within commercial and mixed use districts and 250 square feet for live/work developments; any combination of private and common open space may be used to fulfill these requirements. As a means of encouraging pedestrian-oriented open spaces that exceed the minimum requirements, the City offers reduced parking requirements, increased lot coverage, and reduced front and street-side setbacks.

Overall, the setback and height requirements are comparable to other communities throughout the region. The maximum building height allowed in the residential zoning districts is 30 feet or two-stories while the maximum building height allowed within the commercial and mixed use zoning districts ranges between 30-35 feet, depending on the Planning Area. According to SMC Section 19.40.040, a maximum building height of 36 feet may be allowed in order to accommodate third-floor multifamily residential development within the Commercial, Commercial – Gateway, Mixed Use, and Residential – Housing Opportunity zoning districts, at the discretion of the Planning Commission. [It is noted that the City has accommodated the RHNA for the 5<sup>th</sup> Cycle and the City's height limits and development standards have not imposed an impediment to residential development, including multifamily or affordable housing, and have not constrained the cost and supply of housing as the City has accommodated housing at all income levels and fully met the RHNA for each income level. -Altamira Apartments \(also referred to as the Alta Madrone project\), a 100% affordable housing project, developed at 121% of maximum permitted density with building heights of 20 to 30 feet, within the maximum allowed heights. -Still, the predominant 30-foot, two-story height limit for the zoning districts allowing residential development represents a potential constraint for \[affordable multifamily projects, specifically those seeking a higher density bonus where additional height is necessary to accommodate the proposed density.\]\(#\) - Housing Program 15: Development Code Amendments – Housing Constraints Program provides for a maximum building height of 36 feet for projects that exceed the maximum permitted density and include at least 20% of units for special needs households or affordable to lower income households or for projects that demonstrate that a 36-foot height is necessary to accommodate design features unique to the site, such as protection of on-site riparian features or open space. Furthermore, as indicated in Program 15, the City will review the feasibility of increasing heights to four stories for projects along the City's main corridor, Highway 12.](#)

Projects within the R-M and R-S zones have additional side setback requirements compared to the other zoning districts that allow multifamily development. Specifically, the Development Code requires two-story residential projects within the R-M and R-S

zoning districts to meet the one-story side setback requirement plus an additional 2-3-foot side setback for every 5 feet (or fraction thereof) of building/structure height over 15 feet. The increased setback requirements represent a potential constraint for multifamily developments, limiting the building footprint available for site development. For example, the side setback requirement for a 30-foot tall, two-story building located within the R-S zone in the Northwest Area would be to provide a side setback of 21 feet in total, with a minimum setback of 5 feet allowed on a side. The City's standards have not constrained development, as evidenced by the City meeting or exceeding its RHNA allocation for all income levels during the 5<sup>th</sup> Cycle. To ensure that the City's standards continue to accommodate development, Housing Program 15: Development Code Amendments – Housing Constraints Program requires the City to review development standards, including the setbacks associated with existing height restrictions, in all residential districts every three years to identify if standards have constrained potential development and to revise standards when necessary to remove constraints to multifamily residential developments, including mixed use development.

Additionally, projects that qualify under the density bonus provisions of California Government Code Section 65915 may receive a further reduction in site development standards, such as reduced setbacks or increased building heights, which can further reduce development costs. Density bonus provisions pursuant to California Government Code Section 65915 are located in Chapter 19.44 (Affordable Housing and Density Bonuses) of the Development Code. While Chapter 19.44 implements some requirements of State density bonus law, including Government Code Section 65915(f) and (k), it does not address the provisions of Government Code Section 65915(g) and (h) and incorrectly references parking provisions, which are located at Government Code Section 65915(p). I, Therefore, Program 15 of the Housing Plan is included to ensure that the City will review and update the Development Code to reflect the current requirements of State law, including density bonus provisions.

### Parking Requirements

Sonoma's parking regulations are set forth in Chapter 19.48 of the Development Code, which identifies the number of spaces required for each land use. Table 48 below shows the parking regulations pertaining to the development of residential units.

<b>Residential Use</b>	<b>Minimum Off-Street Parking</b>
Accessory Dwelling Unit (ADU)	0 spaces
Single-Family	1 space (in garage or carport)/unit
Two-Family/Duplex	1.5 spaces/unit
Multifamily, Condominiums, and Other Attached Dwellings	1.5 spaces/unit <sup>1</sup> ; and An additional 25% of total required parking spaces for guest parking
Mobile Home Park	1 space/mobile home; and 1 guest space/4 mobile homes
Mixed Use Developments	Determined by Use Permit
Senior Housing Projects	1 space/2 units with half the spaces covered; and 1 guest space/10 units
Senior Congregate Care Facilities	0.5 space/unit; and 1 guest or employee space/4 units
Group Quarters (including boarding houses, rooming houses, and dormitories)	1 space/bed; 1 guest space/8 beds; and 1 space for each employee on largest shift
Emergency Shelter	No parking requirements
Transitional and Supportive Housing	No parking requirements
Notes:	
<sup>1</sup> A minimum of one covered or enclosed space provided per unit	
Source: City of Sonoma Development Code (Chapter 19.48)	

As shown by Table 48, the Development Code requires zero parking spaces for ADUs, one parking space (which must be covered or enclosed) for each dwelling unit for single-family residences, and 1.5 parking spaces per unit for duplexes/two-family dwelling

units. The ADU and one or two-family residential parking requirements are not considered a development constraint and are comparable to those in jurisdictions throughout the region.

Additionally, multifamily parking standards require 1.5 spaces per unit and guest parking at a rate of 25% of total required spaces. This requirement is not considered a constraint to multifamily development as it is generally comparable to jurisdictions throughout the region. The parking requirements for mixed use projects are determined as part of the Use Permit review process. Parking for commercial and residential mixed uses located in a commercial zone may be reduced upon determination by the Planning Commission that a reduction is justified. A parking demand study may be required to justify the requested modification. Furthermore, a portion of all of the parking spaces required for the commercial component of a mixed use project need not be provided by the use if an in-lieu fee is approved by the Planning Commission and contributed by the developer to a parking improvement trust fund. Therefore, mixed use projects are given the option to pay in-lieu fees to meet the parking requirements, which provides more flexibility in the overall design of a project.

It is also noted that projects that qualify under the density bonus provisions (Chapter 19.44 of the Development Code) would be eligible for parking reductions. However, the existing multifamily parking standards are comparable to the parking reductions allowed under the density bonus provisions, which would remove the guest parking requirement and require only one space for zero to one bedroom units, two parking spaces for two to three bedroom units, and 2.5 parking spaces for four and more bedroom units for projects that qualify. Therefore, the existing multifamily parking standards are not considered a constraint.

### **Permitted and Conditional Uses**

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. This includes housing to meet the needs of different types of households with incomes ranging from low to above moderate. The City's Development Code allows a range of residential uses within the various zoning districts to accommodate a variety of housing types, such as single-family, duplex, multifamily, mobile homes, residential care facilities, agricultural employee housing, single room occupancy housing, supportive housing, transitional housing, and emergency shelters. As shown in Table 49, a number of zoning districts in Sonoma allow a range of residential uses that are permitted by right while districts also allow additional residential uses with a Use Permit (UP). UPs are discretionary permits that address whether a proposed use complies with applicable zoning standards and is compatible with surrounding uses.

The following describes the permitted and conditional uses allowed by the Sonoma Municipal Code and their consistency with current State laws and regulations:

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**Table 49: Zoning Districts Permitting Residential Uses**

Housing Type	A	R-HS	R-R	R-L	R-S	R-M	R-H	R-O	R-P	C	C-G	MX <sup>1</sup>	PK	P	W
ADU/Junior ADU	P	P	P	P	P	P	P	P	P	P	P	P			
Single-Family Dwelling	P	P	P	P	P	P	UP					P <sup>2</sup>			
Duplex				UP	P	P	UP	UP							
Multifamily (3 to 4 units)					UP	P	P	P		UP	UP	P			
Multifamily (5+ units)					UP	UP	UP	P		UP	UP	UP			
Live/Work Facilities						UP				UP	UP	UP			
Agricultural Employee Housing	P														
Mobile Home Park									UP						
Single Room Occupancy										UP					
Residential Care Homes (6 or fewer beds)				P	P	P									
Residential Care Homes (7 or more beds)						UP						UP			
Senior Residential Care Facilities						UP									
Emergency Shelters						UP	UP	UP		UP	UP	UP		P <sup>3,4</sup>	
Supportive Housing <sup>2,3</sup>		P	P	P/UP	P/UP	P/UP	P/UP			UP	UP	P/UP		UP	
Transitional Housing <sup>2,3</sup>		P	P	P/UP	P/UP	P/UP	P/UP			UP	UP	P/UP		UP	
Caretaker and Employee Housing	UP												UP	UP	UP

Notes: P = Permitted use      UP = Permitted with Use Permit

\*New residential developments are subject to the City's growth management ordinance.

<sup>1</sup> New development in the mixed use zone shall include a residential component unless waived by the planning commission through use permit review (see Development Code Section 19.10.020(C)).

<sup>2</sup> ~~Limited to single residence on existing lot; otherwise UP required.~~

<sup>2,3</sup> Supportive and transitional housing shall be subject to those restrictions that apply to other residential dwellings of the same type in the same zone. For example, such housing structured as single-family is permitted in the R-HS, R-R, R-L and R-S residential zones, whereas supportive and transitional housing structured as multifamily is limited to the R-M and R-H residential zones and the mixed use zone.

<sup>3,4</sup> Emergency shelters with 16 or more beds shall require a UP.

Source: City of Sonoma Development Code (Chapter 19.10 – Zones and Allowable Uses)

## **Accessory Dwelling Units (ADU)**

Government Code Section 65852.2 establishes State standards for accessory dwelling units (ADUs). Jurisdictions may adopt local ordinances that meet the State standards; however, without a local ordinance, State ADU regulations apply and local governments cannot preclude ADUs. The purpose of an ADU is to provide additional housing options for family members, students, the elderly, in-home health care providers, the disabled, veterans, and others, in existing urban, suburban, and rural residential areas without substantially changing the use, appearance, or character of a neighborhood.

In 2019, the Governor signed a series of bills that significantly limit a local jurisdiction's ability to restrict the development of ADUs. Assembly Bill (AB) 68, AB 587, AB 670, AB 671, AB 881, and Senate Bill (SB) 13 provide revisions to Government Code Section 65852.2 to further lift constraints on ADUs. These recent laws also provide numerous other standards, addressing lot coverage restrictions, lot size restrictions, owner-occupancy requirements, and changes to parking requirements, and addressing certain covenants, conditions, and restrictions that prohibit or unnecessarily restrict ADUs. In general, under these new laws:

- A Junior ADU and ADU are allowed on the same property;
- A local jurisdiction must ministerially approve an attached or detached ADU that is less than 800 feet, is 16 feet in height or less, and has at least 4-foot rear and side-yard setbacks;
- If there is an existing primary dwelling, the total floor area of an attached ADU shall not exceed 50 percent of the primary dwelling;
- The total floor area for a detached ADU shall not exceed 1,200 square feet;
- A local jurisdiction must review and approve compliant ADUs within 60 days instead of 120 days;
- A local jurisdiction is prohibited from imposing development impact fees, excluding connection fees or capacity charges, on ADUs smaller than 750 square feet;
- A local jurisdiction is prohibited from establishing a minimum square footage requirement for either an attached or detached ADU that prohibits an efficiency unit;
- A local jurisdiction may now choose to allow the sale of an ADU in certain circumstances; and
- Homeowner Associations and other common interest developments are prohibited from not allowing or unreasonably restricting the development of ADUs.

Section 19.50.090 of the Sonoma Development Code provides general provisions and development standards for ADUs and Junior ADUs in the City, which are consistent with State laws and regulations. Nonetheless, Program 5: Accessory Dwelling Units and Junior Accessory Dwelling Units, of the Housing Plan is included to ensure that the City will review and update the ADU ordinance as necessary to reflect the current requirements of State law and work with HCD to ensure continued compliance with the law throughout the 6<sup>th</sup> Cycle. The City will also monitor trends pertaining to the extent of ADU production to ensure that the Housing Element goals can be met.

## **Single-Family Dwellings**

Single-family dwellings are defined in Section 19.92.020 of the Sonoma Development Code as a building designed for and/or occupied exclusively by one family. Also includes factory-built, modular housing units, constructed in compliance with the Uniform Building Code (UBC), and mobile homes/manufactured housing on permanent foundations. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), single-family dwellings are permitted by right in the A, R-HS, R-R, R-L, R-S, and R-M zoning districts and are allowed with an approved Use Permit in the R-H zone. In the MX zoning district, single-family dwellings are limited to a single residence on an existing lot, otherwise a UP is required.

## **Duplexes**

Duplexes are defined in Section 19.92.020 of the Sonoma Development Code as a residential structure under single ownership containing two dwellings. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), duplexes are permitted by right in the R-S and R-M zoning districts and are allowed with an approved Use Permit in the R-L, R-H, and R-O zones.

## **Multifamily Dwellings**

Multifamily dwellings are defined in Section 19.92.020 of the Sonoma Development Code as a building or a portion of a building used and/or designed as residences for three or more families living independently of each other. Includes: triplexes, fourplexes (buildings under one ownership with three or four dwelling units, respectively, in the same structure), and apartments (five or more units under one ownership in a single building); townhouse development (three or more attached single-family dwellings where no unit is located over another unit); and senior citizen multifamily housing. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), multifamily dwellings of 3-4 units are permitted by right in the R-M, R-H, R-O, and MX zoning districts and are allowed with an approved Use Permit in the R-S, C, and C-G zones. Multifamily dwellings of 5 or more units are permitted by right in the R-O zoning district and are allowed with an approved Use Permit in the R-S, R-M, R-H, C, C-G, and MX zoning districts.

## **Live/Work Facilities**

Live/work facilities are defined in Section 19.92.020 of the Sonoma Development Code as an integrated housing unit and working space, occupied and utilized by a single household in a structure, either single-family or multifamily, that has been designed or structurally modified to accommodate joint residential occupancy and work activity. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), live/work facilities are allowed with an approved Use Permit in the R-M, C, C-G and MX zoning districts.

## **Agricultural (Farmworker) Employee Housing**

Section 19.92.020 of the Sonoma Development Code defines “Agricultural employee housing” as housing as described in California Health and Safety Code Sections 17021.5 and 17021.6, and employee housing as defined in California Health and Safety Code Section 17008.

HSC Section 17021.5 requires that employee housing serving six or fewer employees shall be deemed a single-family structure and shall be treated subject to the standards for a family dwelling in the same zone.

HSC Section 17021.6 requires that any employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces shall be deemed an agricultural land use and permitted in the same manner as agricultural uses, with exceptions related to various health, safety, and resource conservation provisions identified in HSC Section 17021.8. As shown by Table 49, agricultural (farmworker) employee housing is allowed by right in the Agriculture (A) zoning district. It is noted that agricultural uses are a permitted use in the Wine Production (W) zoning district, but agricultural employee housing is not addressed in this district.

Further, HSC Section 17021.8 requires streamlined, ministerial approval and application of reasonable objective development standards for eligible agricultural employee housing, which must not contain dormitory-style housing and must be 36 or fewer units or space designed for use by a single-family or household. To qualify for the streamlined, ministerial approval process, an eligible agricultural housing development must meet the health, safety, and resource conservation provisions in HSC Section 17021.8(a).

[Agricultural uses are permitted in the R-HS, R-R, R-L, Agricultural \(A\), and Wine Production \(W\) districts. The Allowed Uses and Permit Requirements tables in the Development Code allow agricultural employee housing as a permitted use in the A district and caretaker and employee housing with a Use Permit in the A, Park, Public Facilities, and W districts.](#) The Development Code currently ~~provides for ministerial approval of eligible developments as required by HSC Section 17021.8; nonetheless~~ [does not provide for agricultural employee and employee housing as required by State law.](#) – Program 15: Development Code Amendments – Housing Constraints Program will ensure that the City’s provisions for employee housing and agricultural employee housing are consistent with the requirements of HSC Sections 17021.5, 17021.6, and 17021.8.

## **Mobile Home Parks and Manufactured Homes**

Manufactured homes are defined in Section 19.92.020 of the Sonoma Development Code as a dwelling unit including mobile homes and factory-built housing as defined in California Health and Safety Code Sections 18210.5 and 19971, respectively.

“Mobile home park” means any site that is planned and improved to accommodate two or more mobile homes used for residential purposes, or on which two or more mobile home lots are rented, leased, or held out for rent or lease, or were formerly held out for rent or lease and later converted to a subdivision, cooperative, condominium, or other form of resident ownership, to accommodate mobile homes used for residential purposes.

Government Code Section 65852.3 requires that a mobile home or manufactured home attached to a permanent solid foundation system be allowed on lots zoned for conventional single-family residential dwellings and, except for architectural requirements for the roof overhang, roofing material, and siding material, shall only be subject to the same development standards applicable to a single-family residential dwelling on the same lot. A mobile/manufactured home shall conform to all of the residential use development standards for the zoning district in which it is located.

The R-P zoning district is applied to the City’s three mobile home parks. Only uses consistent with the continued operation of these sites as mobile home parks are allowed. The maximum residential density is seven dwelling units per acre. The R-P zoning district is consistent with the Mobile Home Park land use designation of the General Plan.

Mobile homes and manufactured homes on a permanent foundation are permitted by right in the A, R-HS, R-R, R-L, R-S, and R-M zoning districts and are allowed with an approved Use Permit in the R-H zone, similar to single-family dwellings. In the MX zoning district, they are limited to a single residence on an existing lot, otherwise a UP is required.

### ***Residential Care Facilities***

California Health and Safety Code (HSC) Section 1566.3 establishes requirements for the local zoning standards for residential care facilities that serve six or fewer persons. Section 1566.3(e) specifies that no conditional use permit, zoning variance, or other zoning clearance shall be required of a residential care facility that serves six or fewer persons that is not required of a family dwelling of the same type in the same zone, while paragraph (g) indicates “family dwelling” includes, but is not limited to, single-family dwellings, units in multifamily dwellings, including units in duplexes and units in apartment dwellings, mobile homes, including mobile homes located in mobile home parks, units in cooperatives, units in condominiums, units in townhouses, and units in planned unit developments. HSC Section 1569.85 further specifies these same requirements for residential care facilities for the elderly that serve six or fewer persons.

According to Chapter 19.10 of the Sonoma Development Code (see Table 49), residential care homes that serve six or fewer persons are permitted by right in the R-L, R-S, and R-M zoning districts. The current Development Code does not allow residential care homes that serve six or fewer persons in any other residential zone, which is inconsistent with State law and could be viewed as a constraint to the development of residential care facilities. Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to allow residential care facilities for six or fewer persons to be allowed in the same manner as a residential use of the same type in all residential zoning districts.

Additionally, within the R-M and MX zoning districts, residential care homes serving seven or more clients are allowed with a Use Permit granted by the Planning Commission through a public hearing process. Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to allow residential care facilities that serve seven or more people in all zones that allow residential uses, in the same manner as a residential use of the same type, and to ensure all conditions of approval are objective and do not create barriers for housing for seniors, persons with disabilities, or other special needs populations, and to clarify that this type of facility is intended to serve as a residence for individuals in need of assistance with daily living activities.

### ***Single-Room Occupancy Units***

Although single-room occupancy (SRO) units are identified as an allowed use in the C zoning district with a Use Permit, the Sonoma Development Code does not provide general provisions or standards for SRO units. Typically, SRO units are intended to provide housing opportunities for lower-income individuals, persons with disabilities, seniors, and formerly homeless individual. Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to define single-room occupancy units and to establish objective standards for SROs.

## **Emergency Shelters**

Government Code Section 65583 requires each jurisdiction to identify one or more zoning districts where emergency shelters are allowed without a discretionary permit, such as a use permit. California HSC Section 50801(e) defines an emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person.” The City’s Development Code defines emergency shelters as the meaning set forth in HSC Section 50801(e). According to Chapter 19.10 of the Sonoma Development Code (see Table 49), emergency shelters are permitted by right in the Public Facilities (P) zoning district and are allowed with an approved Use Permit in the R-M, R-H, R-O, C, C-G, and MX zones. In the P zoning district, emergency shelters with 16 or more beds require a UP.

Section 19.50.033 of the Development Code provides objective standards for emergency shelters that address waiting and intake areas, security, concentration (no closer than 300 feet to any other emergency shelter), and management plans, and which are consistent with the requirements identified in Government Code Section 65583(a)(4). Government Code Section 65583(a)(4) limits parking standards to only sufficient parking to accommodate all staff working in the emergency shelter; the Development Code does not contain parking standards for emergency shelters and will therefore be amended to clarify that the parking standards are consistent with the requirements of State law (Program 15: Development Code Amendments – Housing Constraints Program).

The City currently has 14 parcels in the P zoning district that could accommodate shelters of varying size. These sites could accommodate a shelter the size of a single-family home (at least 6 bed capacity) at a minimum; larger shelters are more likely on sites that are 0.25 acres or larger. There are 28 total shelters in the Sonoma County Community Development Commission (SCCDC) region, ranging from 4 to 125 beds; the City’s inventory of sites could accommodate shelters comparable to those in the mid-range. These sites are all in proximity to existing public utilities. [While the sites have adequate capacity to accommodate emergency shelters that could house the City’s most recent unsheltered homeless population count \(61 persons\), the requirement for shelters with 16 or more beds to receive a Use Permit may constrain provision of emergency shelters. Use Permit requirements include subjective language that addresses the compatibility of the use with existing and future land uses in the vicinity as well as that the use will not impair the architectural integrity and character of the zoning district; these requirements may constrain development of a shelter through introducing subjective requirements that may be used to deny a project. Use Permit requirements are discussed in more detail in the Processing and Permit Procedures section. Program 15: Development Code Amendments – Housing Constraints would amend the Development Code to allow emergency shelters of up to 30 beds in the P zone as a permitted \(ministerial, by-right\) use and to revise Use Permit findings to use objective terminology or to define subjective terms to ensure Use Permits are applied consistently.](#) Recent California Legislation (AB 761) has provided an update to Government Code Section 65583 to authorize vacant armories to be used as emergency shelters; however, there are no armories located in Sonoma.

## **Transitional and Supportive Housing**

Government Code states that transitional and supportive housing shall be considered a residential use and only subject to the restrictions that apply to other residential uses of the same type in the same zone. Transitional housing is defined (Government Code Section 65582(j) and HSC 50675.2(h)) as “buildings configured as rental housing developments, but operated under program requirements that require for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.” Supportive housing is defined (Government Code Section 65582(g) and HSC 50675.14(b)) as “housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.”

The City’s Development Code defines transitional housing as the meaning set forth in HSC Section 50675.2(h) and defines supportive housing as the meaning set forth in HSC Section 50675.14(b). The Development Code addresses both transitional and supportive housing as uses allowed subject only to the requirements and restrictions that apply to other residential dwellings of the same type in the same zone.

Government Code Section 65583(c)(3) and Government Code Article 11 (commencing with Section 65650) were revised in 2019 to implement AB 2162, which requires that specified supportive housing developments shall be a use by right in multifamily and mixed use zones with a streamlined and ministerial review and not be subject to discretionary review (e.g., Use Permit, etc.). For a project to be eligible for the streamlined and ministerial AB 2162 process, it is required to meet specific criteria, including, but not limited to, the following:

- Units within the development are subject to a recorded affordability restriction for 55 years;
- One hundred percent of the units within the development, excluding managers' units, are dedicated to lower-income households and are receiving public funding to ensure affordability of the housing to lower-income Californians;
- A specified number of units are designated as supportive housing;
- Nonresidential floor areas are used for onsite supportive services in specified amounts; and
- Units within the development, excluding managers' units, include at least one bathroom and a kitchen or other cooking facilities.

The City may require a supportive housing development subject to this article to comply with objective, written development standards and policies; provided, however, the development is only subject to the objective standards and policies that apply to other multifamily developments within the same zone. Housing Plan Program 15: Development Code Amendments – Housing Constraints Program will revise the Development Code in compliance with AB 2162.

### ***Low Barrier Navigation Centers***

A “low barrier navigation center” is housing or shelter in which a resident who is homeless or at risk of homelessness may live temporarily while waiting to move into permanent housing. Assembly Bill (AB) 101 was approved on July 31, 2019, which added Article 12 (commencing with Section 65660) to Chapter 3 of Division 1 of Title 7 of the Government Code to address “low barrier navigation centers”. Government Code Section 65660 requires a low barrier navigation center use to be allowed by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. Additionally, AB 101 defines “low barrier navigation center” as a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. Low barrier navigation center developments are essential tools for alleviating the homelessness crisis and are considered a matter of statewide concern. Low barrier navigation centers are a “by right use” in areas zoned for mixed use and nonresidential zones permitting multifamily uses.”

The Sonoma General Plan and Development Code do not address or define low barrier navigation centers; therefore, Housing Plan Program 15: Development Code Amendments – Housing Constraints Program will ensure that the City updates the Development Code to address low barrier navigation centers consistent with Government Code Sections 65660 through 65668.

### **Historic Preservation and Infill in the Historic Zone**

Chapter 19.42 of the Development Code addresses designation of historic structures, adaptive reuse, and infill development. Adaptive reuse of historic structures is allowed, including single-family dwellings, multifamily dwellings, and residential condominiums. Densities are allowed to exceed the allowable densities under the General Plan and zoning standards, with Planning Commission approval. Chapter 19.42 establishes guidelines for infill development in the historic zone that address site plan/site design, architectural considerations, provisions for single family residences, sustainable construction techniques, and accessory structures. Chapter 19.42 includes subjective requirements, which is the nature of guidelines rather than objective standards. To ensure that Chapter 19.42 is implemented consistently and in a predictable manner, Program 15 provides for revisions to Chapter 19.42 to remove subjective requirements or to provide clarification, such as definitions and illustrations for subjective terms, and clarify whether the guidelines are a requirement or are optional for a project to implement.

## Density Bonus

Chapter 19.44 of the Development Code (Affordable Housing and Density Bonuses) addresses the provisions of California Government Code Section 65915 (State Density Bonus law), to facilitate the development of affordable housing to serve families of moderate and less-than-moderate incomes within the City through density bonus and other incentives. This section of the Development Code was last updated in 2021 and currently allows a density bonus of up to 50% depending on the proportion of total affordable dwelling units and their level of affordability. In addition to the density bonus, an applicant may request one or more incentives or concessions that may include a reduction of local zoning standards that indirectly increase housing costs, including, but not limited to, development standards for setbacks, lot size, building coverage, open space, parking, building height, and floor area ratio (FAR).

In October 2019, the Governor approved AB 1763, which revised the existing Density Bonus law found in Government Code Section 65915. In general, AB 1763 provides an 80% density bonus and four incentives or concessions for housing projects that contain 100% affordable units (including the density bonus units but excluding managers' units) for low and very low-income households. If the project is located within a half-mile of a major transit stop, all restrictions on density are eliminated and a height increase of up to three stories or 33 feet is allowed. For housing projects that qualify as a special needs or supportive housing development, the legislation eliminates all local parking requirements. Sonoma's Development Code currently does not comply with these most recent revisions to Government Code Section 65915; therefore, Program 19: Affordable Housing Density Bonus Program in the Housing Plan includes measures to update the City's density bonus provisions consistent with State law.

## Inclusionary Housing Ordinance

Chapter 19.44 of the Development Code (Affordable Housing and Density Bonuses) also provides for the City's inclusionary housing requirements. The provisions require that at least 25 percent of the total parcels and/or units in a residential development be affordable to varying lower and moderate-income categories depending on whether the project is for rental units or ownership units. Moreover, affordable units must be integrated into the overall project design and distributed throughout the residential development. To prevent the inclusionary requirements from impeding development, a qualifying residential development project is entitled to incentives and/or concessions as provided for by State law. These include:

- Reduction in Standards. A modification (reduction or increase) of the site development standards of the Development Code (e.g., parking design requirements, setbacks, site coverage, zero lot line and/or reduced parcel sizes, etc.) that would result in identifiable, financially sufficient, and actual cost reductions;
- Mixed Use Zoning. Approval of mixed use zoning in conjunction with the residential development project if nonresidential land uses would reduce the cost of the project, and the nonresidential land uses would be compatible with the project and surrounding development;
- Other Incentives. Other regulatory incentives or concessions proposed by the developer or the City that would result in identifiable, financially sufficient, and actual cost reductions; and
- Alternative Parking Ratios. Use of the parking ratios that result in a parking reduction in excess of that provided in the parking standards set forth in Government Code Section 65915(c).

The City provides flexibility to developers in implementing the inclusionary housing provisions to ensure that the requirements do not render a development infeasible. The City allows projects to pay in-lieu fees instead of providing affordable units in a residential project of four or fewer units. Additionally, as provided in SMC 19.44.020(D), if the number of affordable units results in a fractional unit below 0.50, an in-lieu fee may be paid instead of providing an affordable unit. [-The City has not adopted an in-lieu fee and is in the process of establishing an in-lieu fee. -Program 1 ensures that: the City evaluates the City's inclusionary housing provisions to ensure they remain appropriate and do not impede the development of housing, including ensuring that alternatives are provided to on-site production of inclusionary units and that any adopted in-lieu fee is not economically infeasible.](#)

## **Planned Development Permit**

The planned development permit, as described in Section 19.54.070 of the Development Code, is intended to provide a mechanism to allow greater flexibility in site planning and design than afforded by the general development standards of the Development Code, to encourage more innovative and desirable projects, and efficient use of land than may be possible through strict application of conventional zoning regulations. In general, planned development permits are intended to address development under the following circumstances:

- Properties with unique, challenging, or valuable topographic or environmental features;
- Infill properties that are oddly shaped, narrow, or otherwise difficult to design for using normal development standards;
- Site plans or building designs that are clearly responsive to the objectives of the Development Code, but which require variations from the normal development standards in order to achieve a useful innovation or a higher level of design quality than would otherwise be possible; or
- Developments that include affordable housing, where departures from normal development standards are used to reduce development costs while maintaining design quality.

A mixture of residential housing types (i.e., attached, detached, single-family, condominium, senior, etc.) as well as densities can be accommodated through a planned development permit.

## **ZONING AND LAND USE PROVISIONS FOR A RANGE OF HOUSING TYPES**

State and federal housing laws encourage an inclusive living environment, where persons of all walks of life have the opportunity to find housing suited to their needs. As previously described, single-family homes, multifamily homes, single-room occupancies, emergency shelters, transitional housing, supportive housing, employee and agricultural employee housing, accessory dwelling units, residential care facilities, mobile/manufactured homes, and mobile home parks are accommodated by the City's Development Code. As described under the Permitted and Conditional Uses discussion, Program 15: Development Code Amendments – Housing Constraints Program will remove constraints associated with these uses to ensure such uses are allowed consistent with the requirements of State law. Additionally, Housing Plan Program 16: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws Program will ensure that the City monitors the development processes and zoning regulations to identify and remove constraints to the development of housing consistent with federal and state legislation.

## **PERSONS WITH DISABILITIES (REASONABLE ACCOMMODATION)**

On January 1, 2002, SB 520 became effective and required local jurisdictions to analyze local government constraints on developing, maintaining, and improving housing for persons with disabilities. In accordance with SB 520 and Government Code 65583(a)(7), the City recognizes the importance of providing housing for persons with disabilities. Additionally, Government Code Section 65008 requires localities to analyze potential and actual constraints upon housing for persons with disabilities, demonstrate efforts to remove governmental constraints, and include programs to accommodate housing designed for disabled persons. As part of the Housing Element update process, the City analyzed the Development Code, development standards, building code interpretation and enforcement, other regulatory standards, and permit processes for compliance with State accessibility standards. The City determined whether these requirements are constraints to special housing accommodations for persons with disabilities (such as disabled access within required setbacks or yards), whether the City facilitates alternative housing types with supportive services for persons with disabilities who cannot live independently, and whether conditions of approval are reasonable.

The Lanterman Development Disabilities Act (Lanterman Act) is that part of California law that sets out rights and responsibilities of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use of property for the care of six or fewer disabled persons to be classified as a residential use under zoning. According to Section 19.92.020 of the Sonoma Development Code, "Residential care homes" means intermediate care facilities providing residential, social, habilitative, and personal care for children, the elderly, the developmentally disabled, and persons with limited ability for self-care, but where medical care is not a major element. Includes: children's homes; transitional houses; orphanages; rehabilitation centers; and self-help group homes. A residential care facility serving six or fewer clients shall be a self-contained entity located and



operated within a single parcel of record and shall not be operated or managed in conjunction with the same or similar use on any adjoining parcel.

As discussed above under Residential Care Facilities, the City's Development Code provides for residential care homes that serve six or fewer persons by right in the R-L, R-S, and R-M zoning districts. As further discussed, Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to allow residential care facilities for six or fewer persons to be allowed in the same manner as a residential use of the same type in all residential zoning districts.

[The City's Development Code does not define "family" or "household", so there are no constraints regarding how households are treated \(e.g., discrimination based on number of persons, how members are related, etc.\).](#)

The City provides reasonable accommodations for persons with disabilities from zoning, permit processing, and building regulations to provide those individuals with an equal opportunity to use and enjoy a dwelling [pursuant to Development Code Section 19.54.100. There is no fee to process an application for reasonable accommodation.](#) A decision on whether to grant a reasonable accommodation is made by the Planning Director, or his/her designee. If the request for an accommodation is related to another discretionary permit, then the request is processed with the project as a whole. However, no special permit is required for the granting of a reasonable accommodation. [-Findings required for a reasonable accommodation request are identified below: the findings are consistent with the Model Ordinance provided on HCD's website, while not limiting the disability to one protected by State and Federal law thus reducing the burden on the applicant to demonstrate a disability, and do not pose a constraint:](#)

- [1. The housing will be used by a disabled person or persons;](#)
- [2. The requested accommodation is necessary to make specific housing available to a disabled person;](#)
- [3. The requested accommodation would not impose an undue financial or administrative burden on the city;](#)
- [4. The requested accommodation would not require a fundamental alteration in the nature of a city program or law, including land use and zoning.](#)

Currently, residential parking standards for persons with disabilities are not different from other parking standards. When a special needs project proponent requests a reduction in parking requirements and can demonstrate a reduced need for parking, the request would likely be addressed during the review of the reasonable accommodation request. The City's Development Code does not have occupancy standards that apply specifically to unrelated adults nor does it require a minimum distance between two (or more) housing facilities that accommodate individuals with disabilities or other special needs. The City permits housing that accommodates individuals with disabilities without regard to distances between such uses or the number of uses in any part of the City.

### **Permits and Processing**

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City consistently applies the requirements of the Development Code to all residential projects and has not noted any impacts which suggest a limitation on the construction of housing units designed for persons with disabilities. The City has received no complaints from local building contractors or lower income and/or senior citizen housing advocates regarding any impacts on the construction or rehabilitation of housing for persons with physical disabilities created as a result of building codes.

The City does not impose special occupancy permit requirements or business licenses for the establishment or retrofitting of structures for residential uses serving persons with a disability.

### **Building Codes**

Sonoma enforces the 2019 California Building Standards Code, including Chapter 11A which addresses the provisions for housing accessibility for people with disabilities and Chapter 11B which addresses the provisions for accessibility to public buildings, public accommodations, commercial buildings, and public housing for people with disabilities. These standards include

requirements for a minimum percentage of fully accessible units in new multifamily developments. The City also permits existing and new homes to be retrofitted or fitted for features that provide for accessibility and independent living for persons with disabilities. Further, the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint.

### **Universal Design**

The current Housing Element has a Universal Design Program in place to promote the construction or modification of homes using design principles that allow individuals to remain in their homes as their physical needs and capabilities change. The objective of the program is to promote accessibility principals to accommodate a wide range of abilities including children, aging populations, and persons with disabilities by providing features in residential construction that enhance accessibility. Examples of universal design features include:

- Entrances without steps that make it easier for persons to enter the home;
- Wider doorways that enhance interior circulation and accommodate strollers and wheelchairs;
- Lever door handles that are easier to use, especially by parents with an infant or persons with arthritis; and
- Light switches and electrical outlets that are located at a height more convenient and accessible to the elderly.

The City promotes the program by distributing a brochure on universal design available at City Hall and on the City's website.

### **STREAMLINED REVIEW AND OBJECTIVE DESIGN STANDARDS**

California legislation has been adopted to address the housing shortage within the State, requiring a streamlined and ministerial process for specific residential developments. SB 35 (Government Code Section 65913.4), which went into effect on January 1, 2018, was part of a comprehensive package aimed at addressing the State's housing shortage and high costs. SB 35 requires the availability of a streamlined ministerial approval process for developments located in jurisdictions that have not yet made sufficient progress towards their required allocation of the regional housing need. For a project to be eligible for streamlining pursuant to SB 35, it must:

- Contain at least two multifamily units;
- Provide a specified level of affordability;
- Be located on an eligible site in an urbanized area or urban cluster;
- Comply with residential or mixed use General Plan and Zoning provisions; and
- Comply with other requirements, such as locational and/or demolition restrictions.

A streamlined and ministerial review per State legislation requires projects to be reviewed against existing objective standards, rather than through a discretionary entitlement process, in specified timeframes. Residential development that is a permitted use by right is not required to go through a discretionary process. However, there is potential for multifamily projects with an affordable component to be eligible for the streamlining provisions of SB 35, but to require a degree of discretionary review under current zoning requirements, such as a UP for certain multifamily projects in the residential and commercial zoning districts or projects requiring design review. The City's design review provisions are somewhat subjective in nature and demonstrate preferences or characteristics for consideration while allowing discretion and flexibility, and as such, cannot be enforced through a streamlined ministerial process. Consistent with existing State law, objective standards are those that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark. [The City does not have formal written procedures specific to SB 35.](#)

The City of Sonoma has a preliminary application for projects requesting review under SB 330. The application addresses the eligibility screening criteria identified at Government Code Section 65913.4(a)(6,7). [The preliminary application does not include written instruction.](#)

On June 15, 2022, Sonoma has adopted multi-family objective design standards to ensure multi-family projects are permitted pursuant to an objective project review. The standards address general requirements, including affordable housing and on-site management, neighborhood compatibility, orientation of units and project components, site design, parking, structure design, including heights up to 3 stories (36 feet), utilities, and refuse.

While the City's objective design standards address duplexes that can be developed under SB 9, the objectives do not address multi-unit development allowed under SB 9, such as two single family homes on a property or a lot split to allow 4 single family units – these types of projects must also be permitted pursuant to objective development and design standards.

A streamlined ministerial review removes multiple constraints to residential development including, financial, time, and environmental constraints and the City's development application process for streamlined ministerial review should be codified to ensure the projects that must be allowed under the streamlined ministerial (by-right) review, such as SB 330 SB 9 projects, are processed in accordance with State law. Program 15: Development Code Amendments – Housing Constraints Program in the Housing Plan provides for revisions to the Development Code to identify a streamlined approval process, [application materials](#), [written procedures](#), and objective zoning and design standards for eligible residential projects per [State law, including projects subject to AB 2011, SB 330, SB 35, SB 9, and](#) Government Code Section 65913.4.

### **SUBDIVISION ORDINANCE**

The City's Subdivision Ordinance (Division VI of the Development Code) defines the City's official requirements governing the division of land into separate parcels for future development. The City's Subdivision Ordinance is patterned after the model version recommended by the State Office of Planning and Research and adheres to the requirements of the State Subdivision Map Act. The requirements for adequate roads, lot size dimensions, provisions for water supply and sewage disposal, and drainage improvements are among the key factors addressed in the Subdivision Ordinance. The ordinance has proven valuable in sustaining a cohesive pattern of development with unified street standards that are coordinated with the existing City street network. These regulations ensure that residential building sites can exist in a safe environment to accommodate a wide range of residential building options desired by the public. Annual monitoring of the effectiveness of these regulations is achieved through input received from the City's Public Works Department, Building Department, Planning Department, and the Sonoma Valley Fire & Rescue Authority (SVFRA).

### **SHORT-TERM RENTALS**

Section 19.50.110 (Vacation rentals) of the Sonoma Development Code outlines the requirements for short-term rentals in the City. The purpose of this section is to minimize the potential adverse impacts of transient occupancy uses in residential neighborhoods on traffic, noise, and density to ensure the health, safety, and welfare of renters and guests patronizing vacation rentals in order to ensure the long-term availability of housing stock in compliance with the Housing Element. Short-term rentals in Sonoma are required to obtain a business license, as outlined in Section 19.50.110 of the Sonoma Development Code.

As of June 2022, there were ten short-term rentals listed on *Airbnb.com*. Three of the rentals are limited to a room or loft within a home and six are for the entire house, guest house, or apartment in Sonoma, while one was listed as a hotel room. In addition, there are eight short-term rentals listed in the City on *VRBO.com* for the entire house. These eight rental listings for the entire house minimally decrease the amount of housing stock available for permanent occupancy.

The City's Code Enforcement Officer ensures that all operating short-term rentals are legal vacation rentals or bed and breakfasts. The short-term rental of one room in a single family residence is prohibited.

### **GROWTH CONTROLS/GROWTH MANAGEMENT**

Sonoma's residential growth control system – the Growth Management Ordinance or GMO (SMC Chapter 19.94) – was adopted by City Council in 1980 based on a computer model developed by ABAG that examined various rates of growth against the City's ability to maintain an appropriate level of services. Factors addressed in the model included City revenues, water supply and infrastructure requirements, police and fire service, street maintenance, and capital improvements. The evaluation indicated that an annual average of 100 new units would allow for manageable increases in service without exceeding the available water supply

for at least 20 years. In 2005, the average rate of allowed development was reduced to 88 units, and in 2008 reduced to 65 units to reflect the current and projected availability of water and sewer treatment capacity and the actual rate of development experienced, while maintaining sufficient development capacities to accommodate Sonoma's fair share housing allocation (RHNA).

Key provisions of the current GMO are as follows:

- Each September, the City Council distributes allotments from a pool of 65 allocations, as follows:
  1. Any unused development or forfeited allocations from the prior year are added to the pool, at the discretion of the City Council, except that the number of allocations available for distribution shall not exceed 165 allocations;
  2. The number of small developments approved during the previous year is subtracted from the available development applications;
  3. Thirty (30) allocations are made available for potential "infill" developments;
  4. Development allocations are distributed to large developments and exempt developments which have received some but not all of their allotments requested through their pre-application (up to 20 per year);
  5. Any remaining development allocations are distributed to the next available pre-applications in the processing queue in order of date received (up to 20 per project). Allotments are distributed until either the pool is used up or there are no more projects in line to receive them.
- Projects of fewer than five (5) units, which are defined as "small developments," may be processed at any time, but the number of units in such projects is counted against the succeeding year's available allotment.
- Developments of five (5) units or more that do not otherwise qualify as "infill developments" (defined as "large developments") are processed on a first-come/first-served basis depending on their place on a "Pre- Application Waiting List." There is no fee to get on the list; all that is required is a preliminary development plan and the authorization of the property owner.
- The 30 allocations for "infill" development are made available for that development year on a first-come, first-served basis to projects of 15 units or fewer that are proposed for sites that have been within city limits for at least three years and that fully develop the site.
- Large developments may receive a maximum of 20 allotments per development year (in order to prevent one project from taking an entire year's allocation).
- Once a potential development on the waiting list receives at least 50% of the requested allotments, the prospective developer has four years to file an application; otherwise, the allotments are forfeited. Forfeited allotments are added to the following year's allocation pool.
- In cases where a development is denied or withdrawn, any allotments accumulated by such developments are added to the following year's allocation pool, except that the number of allocations available for distribution shall not exceed 165 allocations.
- Although over the long term the 65-unit per year average is maintained, the system may result in some peaks in actual construction because of varying market conditions or a group of approved projects all building at the same time.

The GMO exempts the following types of development from the allocation process in that a qualifying development may apply for a building permit or planning approval, as applicable, at any time:

1. Small projects are exempt from the planning approval allocation process, but the number of small projects approved in any one development year are deducted from the 65-unit allocation of the following year.
2. Condominium conversions where no additional dwelling units are created.
3. ADUs and JADUs.

4. Density bonus units.
5. Inclusionary units provided at the low-income level (except within projects located in the Sonoma residential zone) or at the very low-income level.
6. Inclusionary units provided in numbers in excess of the normal requirement.
7. As determined by the City Council on a case-by-case basis, applications in which at least 60% of the proposed units qualify as affordable housing and which involve City participation in planning, financing, or development.

Since the Growth Management Ordinance allows for 65 units to be built per year, and Sonoma's 2023-2031 RHNA allocation is 311 units, or an average of 39 units per year over the eight year period, the GMO will not prohibit the City from meeting its target housing needs allocation. The GMO is not a voter-approved initiative, allowing City Council the discretion to amend the ordinance over time as appropriate. Further, based on the Housing Accountability Act ([SB 330](#)), City staff has determined that the ordinance is not currently enforceable and has not been limiting units based on the Growth Management Ordinance. As indicated in Housing Program 17: Growth Management Ordinance, upon any reactivation of the Growth Management Ordinance, the Council will [review the GMO to ensure it does not conflict with SB 330 or other provisions of State law, including ensuring that the GMO will accommodate the RHNA at all income levels, and will](#) annually review the GMO in conjunction with the monitoring of affordable housing production to ensure adequate incentives for the provision of affordable housing and fulfillment of regional housing growth needs. Monitoring will continue in future housing element cycles to ensure the GMO does not impede Sonoma from addressing its regional housing needs for all income levels.

#### **BUILDING CODES AND ENFORCEMENT**

Building codes regulate the physical construction of dwellings and include plumbing, electrical, and mechanical divisions. The purpose of the Building Code and its enforcement is to protect the public from unsafe conditions associated with construction. The City enforces the California Building Code (CBC) for existing units, new construction, and residential rehabilitation. State law affords local government some flexibility when adopting the uniform codes; the building codes can be amended based on geographical, topological, or climate considerations. Further, State Housing law provides that local building departments can authorize the use of materials and construction methods other than those specified in the uniform code if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the building codes.

The 2019 California Building Code, Title 24, Part 2, Volumes 1 and 2, published by the International Code Council, was adopted by the City by reference as Title 14 of the City's Municipal Code and subject to the amendments contained in that Title. No local amendment to the CBC has been initiated or approved that directly impacts housing standards or processes. [The City enforces its codes on a complaint-driven basis and enforces codes to the degree necessary to ensure health and safety conditions are addressed.](#)

#### **CEQA (CALIFORNIA ENVIRONMENTAL QUALITY ACT) AND RELATED CONSULTATION**

Section 21082 of the Public Resources Code, referred to as the California Environmental Quality Act of 1970 or "CEQA", requires all projects subject to discretionary review by the City adopted guidelines consistent with the CEQA Guidelines to assure compliance with State law pertaining to environmental review. Since there is uncertainty as to what specific environmental impacts a development might have there is also a lack of predictability of how long it can take to negotiate this process before a project can be approved by the City. In some instances, a project can be exempt from environmental review which has very little impact on the timing or costs of review. However, in other instances where a project may be found to have a potential adverse impact on the environment, the environmental review process can take over a year to complete, undergoing thousands of dollars in environmental analysis, before it is ready to be approved.

#### **NATIVE AMERICAN CONSULTATION**

AB 52, Consultation with Native American Tribes, took effect July 1, 2015. It seeks to protect a new class of resources under CEQA: "tribal cultural resources." It requires that agencies undertaking CEQA review must, upon request of a California Native American tribe, begin consultation as part of a project review to consider impacts to "tribal cultural resources." A tribal cultural

resource is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, which may include non-unique archeological resources. Consultations can have an impact on project budgets and timing. Sonoma regularly consults with local tribes concerning projects, and thus far, these consultations have not resulted in any impediments to the development review process.

SB 18, Local and Tribal Intergovernmental Consultation, requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of general plans (defined in Government Code § 65300 et seq.). To comply with SB 18 for this Housing Element update, Sonoma contacted Native American tribes to provide an opportunity for consultation. ~~[Tribal notice occurring concurrently with public and HCD review; this section will be updated to reflect tribes contacted and their input.]~~

## **2. FEES AND EXACTIONS**

The City requires a number of permits and development fees to cover the cost of processing development requests, providing public facilities and services to new development, and mitigating the environmental impacts of new development. Although these fees are needed to provide services necessary for health and safety and to meet State environmental mitigation requirements, they can have a substantial impact on the cost of housing, particularly affordable housing.

Residential development is assessed fees by the City, County, and school district to cover the costs of infrastructure improvements and maintenance, and the provision of services. Fees are also charged to cover the costs of City staff's review and processing of applications and permits related to housing development. A number of a project's application fees are estimated upon submittal and the developer pays a deposit covering the estimate. Actual staff time spent on the project is then deducted from the deposit amount and any unspent remainder is refunded. If staff time exceeds the deposit, the project applicant will be required to pay the outstanding fees.

Other types of exactions include land dedication, which may be required of residential development for rights-of-way or as an alternative to the park development fee, in addition to on-site improvements that are necessary for the public health, safety, and welfare. On-site improvements may include water, sewer and other utility line extensions, street construction, and traffic control device installations that are reasonably related to a project.

Table 50 details the City's current planning processing fees for project entitlements. One or more of the entitlements would be required to process a residential project and a building permit is required for each residential structure.

<b>Table 50. Development Project – Planning Fees</b>	
<b>Permits/Entitlements</b>	<b>Fee</b>
<b>General Plan / Development Code Amendment</b>	
General Plan Amendment	\$16,581
Rezoning	\$981
Zoning Permit	\$77
<b>Design Review</b>	
Design Review (Alteration)	\$371
Design Review (Minor)	\$602
Design Review (Major)	\$1,114
Design Review ((Landscaping Plan)	\$371
Design Review (Demolition or Relocation)	\$807
<b>Use Permits</b>	
Temporary Use Permit	\$525
Minor Use Permit/Exception	\$1,995
Major Use Permit	\$10,634
<b>Environmental Review</b>	
Environmental Review (Initial Study)	\$15,281
Environmental Review (EIR)	\$29,045
<b>Subdivisions</b>	
Tentative Parcel Map	\$3,735 plus \$395 per lot plus engineering time
Tentative Subdivision Map	\$10,481 plus \$726 per lot plus engineering time
Lot Line Adjustment /Lot Merger	\$1,253
<b>Miscellaneous Fees</b>	
Prezoning/Annexation	\$15,041
Variance	\$2,279
Planned Unit Development	\$9,830
Modification of an Approved Plan	\$1,908
Building Plan Review	\$162 (per hour)
Source: City of Sonoma, Schedule of Fees (effective 8/23/2021)	

Table 51 describes the City’s current fee schedule for residential building permits and Public Works/Engineering fees. Building permit fees are deposited by an applicant at the time an application is made for a building permit. This deposit is applied towards the costs of processing the permit application, plan checking services, training fees, and other permit costs required to be paid by the applicant. Permit processing fees and training fees apply to every permit application. Plan checking fees only apply on those permit applications where plan review services are provided.

Actual City staff time spent in the project is calculated and an invoice is prepared, which includes a \$54.00 permit processing fee. The invoice amount is then deducted from the deposit amount, and any unspent remainder is refunded. If the invoice exceeds the deposit, the project applicant will be required to pay the outstanding fees.

<b>Table 51: Residential Building Permit and Public Works/Engineering Fees</b>	
<b>Building Permit</b>	
<b>Estimated Project Cost</b>	<b>Deposit Rate<sup>1</sup></b>
Design Change for an existing Permit	\$54.00
<\$100,000	\$100 MINIMUM OR \$10.00 for each \$1000 of Estimated Project Cost or portion thereof, whichever is greater

>=\$100,000 but <\$1,000,000	\$1,000 MINIMUM OR \$5.00 for each \$1,000 of Estimated Project Cost or Portion thereof, whichever is greater
>=\$1,000,000	\$5,000 MINIMUM OR \$3.00 for each \$1,000 of Estimated Project Cost or Portion thereof, whichever is greater
Plan Check Fee	\$125 (per hour)
Building Permit Inspection Fee	Based on the valuation of the work to be performed
Grading Permit Inspection Fee	20% of calculated Building Permit Inspection Fee
<b>Public Works</b>	
City Engineer Map and Plan Checking Services	\$157 (per hour)
City Engineer Inspection Fee	\$142 (per hour)
Public Works Inspection Fee	\$95 (per hour)
Stormwater Plan Review and Inspection Fee	\$108 (per hour)
<b>Note:</b>	
<sup>1</sup> Deposit is applied towards the costs of processing the permit application, plan checking services, training fees, and other permit costs required to be paid by the applicant. Does not include the Mechanical Permit Fee, Electrical Permit Fee, or Plumbing Permit Fee.	
Source: City of Sonoma, Schedule of Fees (effective 8/23/2021)	

Development impact fees can have a much larger effect than permit fees on the final cost of a residential development. Development impact fees include water and sewer impact and hook-up costs, park fees (in lieu of land dedication), traffic impact fees, and similar charges. Table 52 shows the current residential development impact fee per unit.

With regard to school fees, the Sonoma Valley Unified School District (SVUSD) collects school impact fees, which must be paid prior to building permit issuance, based on the square footage of each residential unit developed. The current fee for residential construction is \$3.36 per square foot. Sonoma Valley Fire Protection District charges an impact fee per square foot of \$1.72 for single family housing, \$2.91 for multifamily housing, and \$1.90 for mobile homes. Sonoma Water/Sonoma Valley Community Services District charges \$15,547.44 per single family equivalent connection; this fee is estimated to be approximately \$11,660.58 per multifamily unit.

<b>Estimated Project Cost</b>	<b>Deposit Rate<sup>1</sup></b>
Capital Improvement Fee	Single-Family Dwelling: \$410 (1-BD) - \$614 (3-BD) Multifamily Dwelling: \$410 (1-BD) - \$614 (3-BD) Additions and Alterations to Dwelling: \$68 Mobile Home Lot: \$152
City Impact Fee	\$966 per residential unit
Non-Residential Affordable Housing Impact Fee	Office: \$4.33 (per square foot) Retail: \$4.33 (per square foot) Hotel: \$16.24 (per square foot)
Parkland Fee (in lieu of land dedication)	(2)
<b>Note:</b>	
<sup>1</sup> Deposit is applied towards the costs of processing the permit application, plan checking services, training fees, and other permit costs required to be paid by the applicant. Does not include the mechanical, electrical, or plumbing permit fee.	
<sup>2</sup> The fee shall equal the parkland acreage obligation, less the amount of parkland, if any, offered for dedication by the subdivider, times the average per-acre fair market value for the appropriate park planning area.	
Source: City of Sonoma, Schedule of Fees (effective 8/23/2021)	



Table 53 compares the total City and regional fees, including planning, building, and development impact fees for a 48-unit single-family subdivision, a single-family unit, and a 48-unit multifamily project. This assumes that the 48-unit subdivision and single-family unit is constructed in the Residential – Low Density (R-L) zone and the multifamily project is constructed in the Residential – High Density (R-H) zone. Additionally, the calculations assume that the single-family residential homes average 1,850 square feet and the multifamily development averages 750 square feet per unit.

As shown in Table 53, the City’s fees range from approximately \$1,901.17 per unit for a multifamily development of 48 units averaging 750 square feet to \$3,803.47 per unit for a 48-unit single-family subdivision with a typical home size of 1,850 square feet to \$8,341.75 for an individual single-family home on an existing lot. When taking outside agency fees into account, fees per unit are approximately \$18,264.25 for a 48-unit multifamily development and \$28,748.91 for a 48-unit single family development.

<b>Fees</b>	<b>48-Unit Subdivision</b>	<b>Single-Family Unit</b>	<b>48-Unit Multifamily Project</b>
Planning Fees			
<i>Design Review</i>	\$1,114	\$602	\$1,114
<i>Tentative Subdivision Map</i>	\$45,329 <sup>1</sup>	--	--
<i>Environmental Review (CEQA)</i>	\$15,281 <sup>1,2</sup>	\$50 <sup>3</sup>	\$50 <sup>3</sup>
Building Permit Fees <sup>4</sup>	\$34,898.40	\$1,211.75	\$14,148.00
Public Works/Engineering Fees <sup>1</sup>	\$15,000	\$5,000	\$5,000
City Development Impact Fees	\$70,944	\$1,478	\$70,944
School Developer Fees	\$298,368	\$6,216	\$120,960
Sonoma Valley Fire Protection District	\$152,736	\$3,182	\$104,760
Sonoma Valley CSD (Sewer)	\$746,277.12	\$15,547.44	\$559,707.84
<b>Total Fees</b>	<b>\$1,379,947.52</b>	<b>\$17,739.75</b>	<b>\$876,683.84</b>
Total Fees Per Unit	\$28,748.91	\$33,287.19	\$18,264.25
Notes:			
<sup>1</sup> Estimated cost or recommended deposit.			
<sup>2</sup> Assumes appropriate CEQA document is an Initial Study/Mitigated Negative Declaration.			
<sup>3</sup> Assumes a single-family unit and 48-unit multifamily project would be exempt from CEQA review.			
<sup>4</sup> Construction valuation assume \$131 per square foot. Single-Family Unit: 1,850 sf x \$131 = \$242,350 per unit; 48-unit Single-Family Subdivision: \$242,350 x 48 units = \$11,632,800; 48-unit Multifamily Project: 750 sf x \$131 = \$98,250 per unit x 48 units = \$4,716,000			
Sources: City of Sonoma, Schedule of Fees (effective 8/23/2021); HomeGuide: How Much Does It Cost to Build A House, <a href="https://homeguide.com/costs/cost-to-build-a-house">https://homeguide.com/costs/cost-to-build-a-house</a>			

Table 54 compares the development fees for a single-family unit and multifamily unit in Sonoma to the cities of Santa Rosa, Rohnert Park, and Petaluma. Development fees throughout Sonoma County vary widely due to the different needs of individual communities and the different fee programs adopted by local agencies serving the individual communities. The City of Sonoma’s fees, which include planning, development impact, and outside agency fees, are the lowest of local jurisdictions as shown in Table 54 below and do not constrain the development of housing.

<b>Jurisdiction</b>	<b>Single-Family Unit Development Fee</b>	<b>Multifamily Unit Development Fee</b>
City of Sonoma	\$28,748.91	\$18,264.25
City of Napa <sup>1</sup>	\$50,803+	\$31,830
City of Santa Rosa <sup>2</sup>	\$51,862 + school fees	\$29,386.46 + school fees

City of Rohnert Park <sup>3</sup>	\$24,000 (City impact fees only – no planning or outside agency fees, estimate total fee to be \$33,000+)	\$15,000 (City impact fees only – no planning or outside agency fees, estimate total fee to be \$23,000+)
City of Petaluma <sup>4</sup>	\$51,376	\$35,160
Sources: <sup>1</sup> City of Santa Rosa Draft Housing Element, June 2022 <sup>2</sup> City of Napa Housing Element, March 3, 2015 <sup>3</sup> City of Rohnert Park, November 25, 2014 <sup>4</sup> City of Petaluma, 2015-2023 Housing Element, November 19, 2018		

### 3. PROCESSING AND PERMIT PROCEDURES

The evaluation and review process required by City procedures contributes to the cost of housing in that holding costs incurred by developers are ultimately manifested in the selling price of the home. The City Council and Planning Commission govern the review process in the City, or depending on the project, it might be reviewed by the Design Review and Historic Preservation Commission (DRHPC).

The time required to process a project varies greatly from one entitlement to another and is directly related to the size and complexity of the proposal, as well as the number of actions or approvals needed to complete the process. Table 55 identifies the typical processing times for most entitlements and the reviewing body for each entitlement. It should be noted that each project does not necessarily have to complete each step in the process (i.e., small scale projects consistent with General Plan and zoning designations do not generally require Environmental Impact Reports (EIR), General Plan Amendments, rezones, or variances). Also, certain review and approval procedures may run concurrently. For example, a design review for a multifamily condominium project would be processed concurrently with the subdivision map.

Type of Approval or Permit	Typical Processing Time	Approval Body
General Plan Amendment	24-52 weeks	City Council
Rezoning/Zoning Map Amendment	24 weeks	City Council
Development Code Amendment	24 weeks	City Council
Site Design and Architectural Review	6-12 weeks	DRHPC
Site Design and Architectural Review	6-12 weeks	Planning Commission
Temporary Use Permit	2-4 weeks	City Staff
Use Permit	8-16 weeks	Planning Commission
Tentative Parcel Map	24 weeks	Planning Commission
Tentative Parcel Map with Dedications	52 weeks	City Council
Tentative Subdivision Map	52 weeks	City Council
Variance	16 weeks	Planning Commission
Planned Development Permit	16-24 weeks	Planning Commission
Source: City of Sonoma, 2022		

The City also encourages the joint processing of related applications for a single project. For example, a rezone petition may be reviewed in conjunction with the required site plan, a tentative subdivision map, and any necessary variances. These procedures save time, money, and effort from both the public and private sector and could substantially decrease the costs for a developer. It is important to note that some processing timelines cannot be made shorter without violating State laws, particularly as they relate to public noticing, compliance with CEQA, etc. Table 56 outlines typical approval requirements for a [typical](#) single-family infill project, a [typical](#) 48-unit subdivision, and a [typical](#) 48-unit multifamily project, assuming that the land is zoned appropriately.

	<b>Single-Family Unit</b>	<b>Single-Family Subdivision</b>	<b>Multifamily Project</b>
<b>Approval Requirements</b>	Site Plan/Design Review	Tentative Subdivision Map	Design Review
		Initial Study/Negative Declaration	Initial Study/Negative Declaration or CEQA Exemption
		Design Review	
		Final Map	
<b>Estimated Total Processing Time for Entitlements</b>	Up to 30 days <a href="#">(4-6 months in Historic Overlay)</a>	6-12 months	2-4 months with CEQA Exemption 6-8 months with IS/MND
<b>Construction Requirements</b>	<a href="#">Building Permit</a>	<a href="#">Building Permit, Grading and Infrastructure Plans</a>	<a href="#">Building Permit, Grading and Infrastructure Plans</a>
<b>Estimated Total Processing Time for Building Permit Approval</b>	<a href="#">30 days</a>	<a href="#">30-90 days</a>	<a href="#">30-60 days</a>
Source: City of Sonoma, 2022			

City staff avoids any unnecessary timing constraints on development by working closely with developers and property owners to expedite approval procedures. In addition, City staff will assist the developer through the permit processing to ensure a rapid processing time. It should be noted that Tables 56 and 57 assume the following:

1. The applicant and staff meet and discuss the project before submitting the application;
2. The applicant provides a complete application and may need to work with staff to adjust the project before it is initially reviewed and considered by the approving authority;
3. There are not significant environmental issues that would require an Environmental Impact Report; and
4. The approval of the project is not appealed to the City Council.

For most proposed projects, the City invites the developer to a pre-application meeting to strategize about project design, City standards, necessary public improvements, and funding strategies (where appropriate).

The next step in the process usually includes submittal of an application for the proposed entitlement. The application includes instructions that are meant to simplify the process for the applicant by providing steps on how to proceed. Once staff is satisfied that all required information has been submitted to the City, and the application is consistent with Sonoma’s General Plan and Development Code, an Initial Study in accordance with CEQA may follow depending on the scope of the project. During the Initial Study period, many departments will review the project and provide comments. At the same time, Planning staff is likely to be preparing other documents to expedite the process as previously mentioned. All scheduling, noticing, and correspondence with interested parties usually coincides with this period. After the project is approved, the Building Department performs plan checks and issues building permits. Administrative approval projects requiring minor permits are approved by City staff. Throughout construction, the Building Department will perform building inspections to monitor the progress of the project. This process does not put an undue time constraint on most developments because of the close working relationship between City staff, developers, and the decision-making body.

**PROCESSING PROCEDURES**

The City does not normally conduct discretionary design review for single-family units or duplexes, unless such units fall within the Historic Overlay zone. There is, however, design review for all multi-unit projects of more than two units. The following is a summary of the seven (7) steps involved with the planning entitlement and public hearing process for housing development:

**Step 1 (Application filed)** – The applicant submits a completed Uniform Application along with the necessary plans and materials and application fee as identified on the submittal checklist to Planning Department staff.

**Step 2 (Completeness review)** – Upon receipt of a complete application, the Planning Department routes the project plans and materials to multiple City departments for their concurrent review and comment, and for recommended conditions of approval. Although the Planning Department is primarily responsible for administering the planning permit process, there is close coordination with all branches of the City government, including the Public Works Department, Building Department, City Engineer, Police Department, and the Fire Department. Outside agencies and organizations may also play a role in the review process, depending upon the circumstances of the application. For example, the State Department of Fish and Game participates in the review of projects involving wetlands, while Caltrans reviews developments involving changes to the right-of-way associated with State Highway 12.

**Step 3 (Incomplete notification)** – If the application is incomplete, the applicant will be required to submit follow-up information as requested. The time to complete this step varies and is determined by the applicant. If the application was initially found to be complete, this step is skipped.

**Step 4 (Environmental review)** – The application is reviewed to determine whether the project is exempt from the requirements of the California Environmental Quality Act (CEQA) or if an Initial Study is required. Projects in Sonoma may be found to be exempt from CEQA under the urban infill exemption. If a Negative Declaration is prepared, environmental review may take up to six months.

**Step 5 (Staff report and COAs)** – Once all departments and agencies have reviewed the project, Planning Department staff prepares Conditions of Approval (COAs), which are included within the staff report that is forwarded to the approving authority for its review and consideration, and for public review.

**Step 6 (Noticing)** – The Planning Department will prepare a Public Hearing notice for the project (this notice will include the environmental determination).

**Step 7 (Public Hearing)** – At the Public Hearing, testimony is heard on the project and the approving authority takes final action on the project. Note: Permits for new development that include land use and/or zoning issues such as General Plan Amendments or Rezoning require two public hearings (one Planning Commission meeting and one City Council meeting). In these cases, the City Council is the final approving authority.

### **SB 330 Application**

SB 330 (Housing Crisis Act of 2019) provides for streamlined review and preliminary application for housing development projects in order to increase certainty in the development review process. The City utilizes its standard Housing Development Project, Preliminary Application and Uniform Application forms for processing SB 330 applications, which adequately address the SB 330 submittal requirements.

### **Use Permit Process**

The Use Permit (UP) process is described in Section 19.54.040 (Use permits) of the Sonoma Development Code. The purpose of the Use Permit process is to allow for activities and uses which may be desirable in the applicable zoning district and compatible with adjacent land uses, but whose effect on the site and surroundings cannot be determined prior to being proposed for a particular location. The Use Permit procedures provide for the review of the location, design, configuration, and potential impacts of the proposed use, to evaluate the compatibility of the proposed use with surrounding uses and the suitability of the use to the site. In granting a Use Permit, the Planning Commission must find all of the following general conditions to be fulfilled by the requested use:

1. The proposed use is consistent with the General Plan and any specific plan;
2. The proposed use is allowed with a conditional use permit within the applicable zoning district and complies with all applicable standards and regulations of this development code (except for approved variances and exceptions);

3. The location, size, design, and operating characteristics of the proposed use are compatible with the existing and future land uses in the vicinity; and
4. The proposed use will not impair the architectural integrity and character of the zoning district in which it is to be located.

Where one or more of these findings cannot be made, the UP application shall be denied. The Planning Commission may conditionally approve applications by imposing conditions on the project to allow the findings noted above to be made. However, conditions may not be imposed which by their nature would effectively preclude the development of the project.

### **Site Design and Architectural Review (Design Review) Process**

The Site Design and Architectural Review (Design Review) process is described in Section 19.54.080 of the Sonoma Development Code. The City does not normally conduct design review for single-family units or duplexes, unless such units fall within the Historic Overlay zone. There is, however, design review for all multi-unit projects of more than two units and all planned developments (including landscape review).

When applicable, the design review of new residential development is conducted by the City's Design Review and Historic Preservation Commission (DRHPC), a five-member citizen commission that normally meets once each month. The authority of the DRHPC can differ depending on the scope of a project. If a project is subject to discretionary review by the City's Planning Commission, then the preceding DRHPC review is normally limited to three areas: 1) architectural details; 2) colors and materials; and, 3) landscaping and lighting. This approach is intended to ensure that when a project is subject to Planning Commission review, the preceding design review does not result in changing or revisiting key elements of the project. However, when projects are nondiscretionary, the DRHPC's authority is much broader, including consideration of the project site plan, building massing, and elevation concepts. The applicant is required to submit a one-page application form, the application fee, site plan, and drawings documenting proposed building designs, colors, materials, lighting, and landscaping. The application is evaluated by the DRHPC in a public meeting. The applicant has the option of conducting the review in stages (e.g., having the architecture colors and materials reviewed at one meeting and having the landscaping reviewed at another meeting) or all at once. Usually, only one or two meetings are necessary to receive an approval.

The DRHPC makes use of design guidelines set forth in the City's Development Code that address site plan elements, building types, and materials appropriate to Sonoma. Although they are reasonably detailed and give an applicant practical guidance as to the City's expectations with regard to design, they are necessarily somewhat subjective. The findings required for approval of site design and architectural review are as follows:

1. The project complies with applicable policies and regulations, as set forth in the Development Code (except for approved Variances and Exceptions), other City ordinances, and the General Plan;
2. On balance, the project is consistent with the intent of applicable design guidelines set forth in the Development Code; and
3. The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features.

In addition to the basic findings set forth above, additional findings are applicable for any project located within the Historic Overlay zone:

1. The project will not impair the historic character of its surroundings;
2. The project substantially preserves the qualities of any significant historic structures or other significant historic features on the site;
3. The project substantially complies with the applicable guidelines set forth in Chapter 19.42 SMC (Historic Preservation and Infill in the Historic Zone); and

4. The project substantially complies with any applicable preservation plan or other guidelines or requirements pertaining to a local historic district as designated through SMC 19.42.020.

While the design review requirements have not posed a constraint to development, the design guidelines contained in SMC Chapter 19.42 include a subjective components related to compatibility, including language related to whether the project responds appropriately to the context of development, site conditions, and surrounding features. As well, and the findings for projects within the Historic Overlay zone include subjective language. ~~regarding~~ Finding 2 should be ~~to clarified~~ regarding the language ~~what~~ “substantially preserves the qualities...” and Finding 3 should ~~to define or clarify~~ “substantial compliance” with applicable guidelines, plans, and requirements ~~for Finding 3~~. These subjective components can pose ~~as~~ a constraint on housing, including fair housing opportunities, as they may result in inconsistent determinations on project applications due to the ability for multiple interpretations. Program 15: Development Code Amendments – Housing Constraints ~~Program~~ will ensure the design review criteria and findings are revised to address potentially subjective terminology in order to provide objectivity in the design review process.

### ***Downtown Sonoma Historic Preservation Design Guidelines***

The Downtown Sonoma Historic Preservation Design Guidelines were prepared in 2017 in response to community concerns about future growth and development within the Downtown Planning District. The purpose of the Design Guidelines is to supplement Sonoma’s existing design review and preservation planning framework by establishing guidelines that manage change while also preserving the qualities that are most important to the Downtown Planning District’s historic character – thereby recognizing that historic preservation and urban growth are not mutually exclusive.

The Downtown Sonoma Historic Preservation Design Guidelines impose design guidelines that are not contained in the City’s Development Code. Besides the obvious aesthetic issues, one of the goals, or perhaps the focus, of design review is to ensure that the City’s historic, small-town character is preserved and enhanced. Thus, the guidelines are subjective; however, to ensure the guidelines are consistently applied to each residential project, a list of design elements or qualities that could be incorporated into the design of projects is included below each guideline to identify how to meet the applicable design guideline.

The use of design review has created minimal cost impact on single-family and multifamily development because the types of architectural styles and embellishments required by the City do not, by themselves, cost significantly more to construct than other types of architectural styles.

## **4. LOCAL EFFORTS TO REMOVE GOVERNMENTAL BARRIERS**

### **DEVELOPMENT CODE UPDATES**

The City periodically updates the Development Code to reduce potential governmental constraints and provide for a variety of housing types. Recent revisions to the Development Code addressed emergency shelters, transitional and supportive housing for those moving from various circumstances, and farmworker/agricultural employee housing. Additionally, the Development Code was revised to address pre-manufactured buildings to allow more mobile/manufactured homes within the community, which are viewed as more affordable. The Development Code was also updated to address ADUs, which provide for higher densities to support senior and lower income housing.

### **FEE DEFERRALS, WAIVERS, AND REDUCTIONS**

The City has previously provided fee reductions for affordable housing when funds were available and when necessary to ensure the affordability of a project. While the City’s development fees are necessary to provide services and utilities to the community, the City reviewed requests for fee reductions on a case-by-case basis. Should funding become available again, the City may resume a program of building and impact fee reductions.

In addition, the application of AB 641 (2007) helps to address the cash flow challenges inherent in many affordable housing projects during the construction phase. For affordable housing developments in which at least 49% of the units are affordable to

low or very low-income households, AB 641 prohibits local governments from requiring payment of local developer fees on affordable housing projects prior to receiving a certificate of occupancy.

## **TRANSPARENCY**

Government Code Section 65940.1 requires the City to make the following available on its website:

- A current schedule of fees, exactions, and affordability requirements applicable to a proposed housing development project, presented in a manner that clearly identifies the fees, exactions, and affordability requirements that apply to each parcel and the fees that apply to each new water and sewer utility connection.
- All zoning ordinances and development standards adopted by the city or county presenting the information, which shall specify the zoning, design, and development standards that apply to each parcel.
- The list(s) that specify in detail the information that will be required from any applicant for a development project, pursuant to Government Code Section 65940.
- The current and five previous annual fee reports or the current and five previous annual financial reports, that were required pursuant to subdivision (b) of Section 66006 and subdivision (d) of Section 66013.
- An archive of impact fee nexus studies, cost of service studies, or equivalent, conducted by that city, county, or special district on or after January 1, 2018.

The City of Sonoma provides its fee schedules, development application and permit forms, its General Plan, the Zoning Map, a link to the Development Code, and other applicable planning-related documents on its website to assist interested parties in understanding the fees and requirements associated with development of a parcel (or parcels) in the City. To provide financial transparency, the City also provides current budget and rate information, as well as archived comprehensive annual financial reports prepared since 2011/2012, and City budgets prepared from the 2011/2012 fiscal year to the current budget.

## **5. VOTER INITIATIVES**

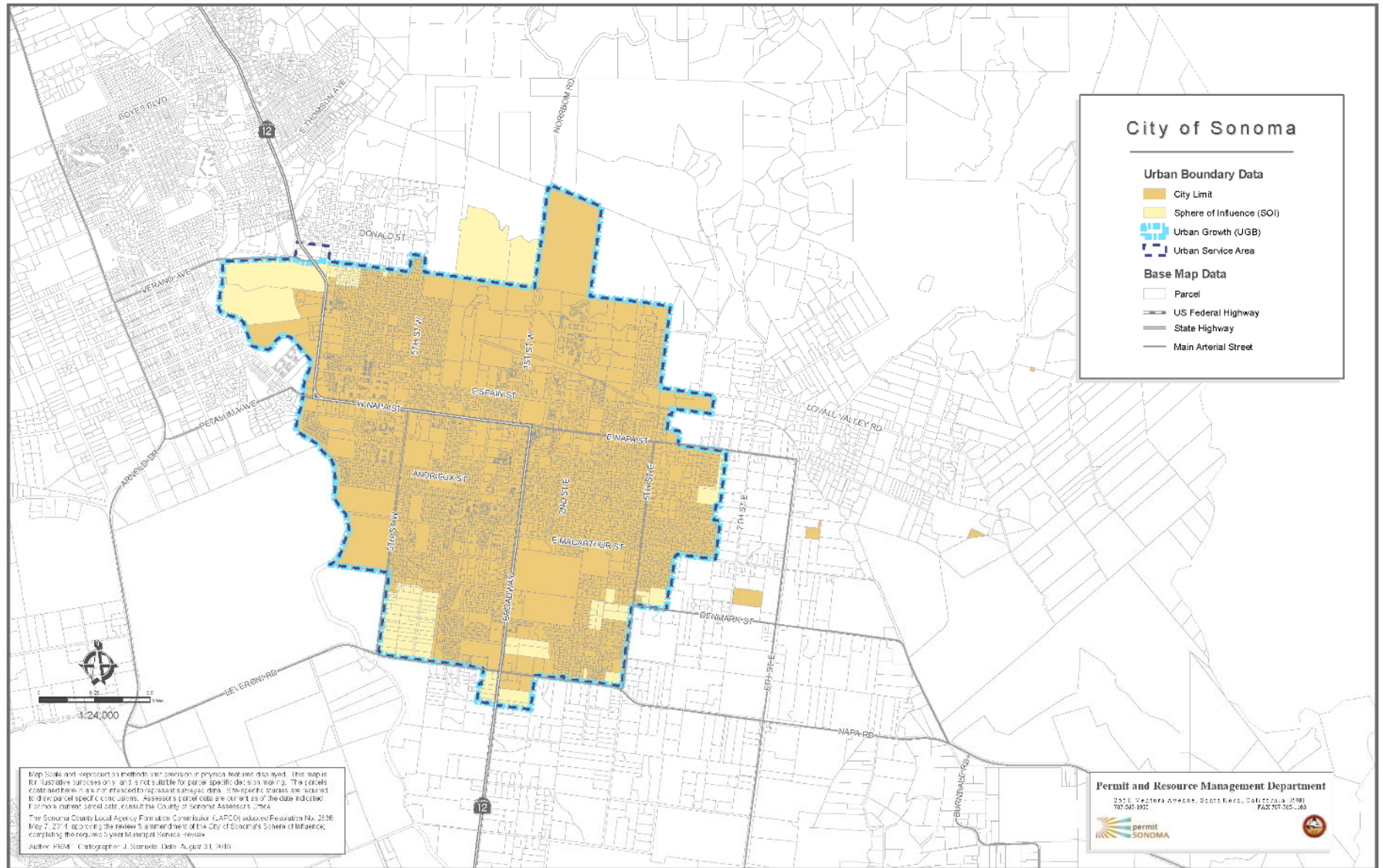
In November 2020, Measure W: City of Sonoma, Urban Growth Boundary Extension, was passed by 78.68% of Sonoma voters. Measure W continued protections provided by the existing Urban Growth Boundary (“UGB”), such as preventing urban sprawl and preserving agricultural land and open space, through December 31, 2040, and requires that future changes to the UGB be approved by the voters except under limited circumstances requiring a 4/5ths vote of the City Council.

The Urban Growth Boundary was created to promote stability in long-term planning for the City of Sonoma by setting a cornerstone policy within the General Plan establishing the geographic limits of long-term development, while allowing sufficient flexibility within those limits to respond to the City's changing needs over time. The UGB is a line beyond which urban development is not to be allowed, except for public schools and public parks. Only uses consistent with the General Plan "agricultural" land use designation as it existed on February 25, 2000 and "open space lands" as set forth in Government Code Section 65560(b) as of February 25, 2000, are allowed beyond the UGB.

Figure 1: Measure W – Urban Growth Boundary (below) shows the City Limits, the Sphere of Influence (SOI), and the approved Urban Growth Boundary (UGB). The areas shaded yellow are those lands within the UGB and not in the City Limits, with the exception of the area extending beyond the northern City Limit (“Montini Preserve” – owned by the City), which is outside the City Limits but within the SOI and outside the UGB.

As discussed in Chapter 4, the City does not rely on lands outside of the City limits to accommodate the 6<sup>th</sup> Cycle RHNA and the UGB is not an impediment to the City accommodating its fair share of housing.

Figure 1: Measure W – Urban Growth Boundary



File No. S12 SDATA\FPM\DC\_BASE\Index\MapCity of Sonoma Urban Boundaries 11.dwg



## B. NONGOVERNMENTAL CONSTRAINTS

Government Code Section 65583(a)(5) requires a housing element to contain an analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction. The cost parameters of these elements fluctuate significantly in response to a wide variety of local, state, natural, and global economic and social events. The influence that city government has on these factors is negligible. As regional and state economic conditions change, the demand and supply of affordable housing is impacted. Historically, the cost of housing in general in Sonoma, relative to Bay Area communities, has been considered moderate; however, the housing market has recently been surging and median home prices in the City are reaching all-time highs.

### 1. DEVELOPMENT COSTS

#### LAND COSTS

The price of residential building sites is influenced by fundamental factors such as location, topographical or geographical constraints, natural amenities such as existing streams or lakes, tree cover, and the availability of services (i.e. road systems, public utilities, schools, shopping outlets, etc.). Table 57 shows the land on the market with a Sonoma address and its current listed price as of June 2022 based on *Zillow.com* data.

Address	List Price	Total Acres	Price per Acre
0 W Napa St, Sonoma, CA 95476	\$518,000	0.18	\$2,877,778
471 York Ct, Sonoma, CA 95476	\$579,000	0.22	\$2,631,818
1120 Napa Rd, Sonoma, CA 95476	\$1,800,000	8.16	\$220,588
Source: Zillow.com (as of June 8, 2022)			

As shown in Table 57, the current price of land per acre in Sonoma ranges between \$220,588 to \$2.9M per acre for unentitled land that would require planning entitlements and permit processing prior to development.

#### COST OF CONSTRUCTION

The cost of construction is primarily dependent on the cost of labor and materials. Construction costs in Sonoma are comparable to costs throughout the Oakland region. Non-union labor is typically used for residential construction and there are no unusual costs with obtaining materials. Many factors can affect the cost of building a house, including site conditions, type of construction, materials, finishing details, amenities, and structural configuration. In recent years, factors such as materials demanded by China for major construction projects and the price of fuel have adversely impacted overall construction costs.

The previous 2015-2023 Housing Element cited construction costs of \$125 per square foot for residential construction. Average residential construction costs in the Oakland region (the closest region to Sonoma with estimated costs from BuildingJournal.com) are estimated to range between \$135.33 – \$200.95 per square foot, with a median construction cost of \$151.84 per square foot, for basic construction.<sup>2</sup> As shown in Table 58, construction costs for a 1,750 square foot single-family home are estimated to be \$257,736.68, or \$147.28 per square foot. An 850 square foot multifamily unit would cost approximately \$153.37 per square foot; therefore, a 48-unit multifamily development with an average unit size is estimated to have a construction cost of approximately \$6.3 million, with a cost of \$130,360.77 per unit and \$153.37 per square foot.

<sup>2</sup> Oakland Home Construction Costs & Prices - ProMatcher Cost Report. June 2022. Access: <https://home-builders.promatcher.com/cost/oakland-ca-home-builders-costs-prices.aspx>

	<b>Single-Family (1,750 sq. ft.)</b>	<b>Multifamily (850 sq. ft./unit)</b>
Construction Cost	\$174,146.41	\$88,081.60
Contractor (25%)	\$43,536.60	\$22,020.40
Design Fees (8%)	\$13,931.71	\$7,046.53
Contingency (15%)	\$26,121.96	\$13,212.24
Total Cost	\$257,736.68	\$130,360.77
Per Square Foot	\$147.28	\$153.37
Note:		
<sup>1</sup> 1,750 sq. ft., 2-stories, stucco exterior, no basement, custom grade		
<sup>2</sup> 850 sq. ft. per unit, 3-stories, stucco exterior, no basement, standard grade		
Source: BuildingJournal.com, 2022		

A residential developer may need to make certain site improvements to “finish” the lot before a home can actually be built on the property. Such improvements could include the installation of water mains; fire hydrants; sewer mains; storm drainage mains; streetlights; and the construction of streets, curbs, gutters, and sidewalks. In addition, the developer may be required to provide other improvements, including, but not limited to, bridges, culverts, fencing of watercourses and hazardous areas, ornamental walls, landscaping, noise barriers, and recreation areas and facilities.

Construction cost increases, like land cost increases, affect the ability of consumers to pay for housing. Construction cost increases occur due to the cost of materials, labor, and higher government-imposed standards (e.g., energy conservation requirements). The development community is currently producing market rate, for-sale housing that is affordable to moderate and above moderate-income households.

#### **COST AND AVAILABILITY OF FINANCING**

Financing is critical to the housing market. Developers require construction financing and buyers require permanent financing. The two principal ways in which financing can serve as a constraint to new residential development are the availability and cost of construction financing and the availability and cost of permanent financing.

- If financing is not easily available, then more equity may be required for developing new projects and fewer homebuyers can purchase homes, since higher down payments are required.
- Higher construction period interest rates for developers result in higher development costs. For homebuyers, higher interest rates translate into higher mortgage payments (for the same loan amount), and therefore reduce the purchasing power of homebuyers.

#### **Homebuyer Financing**

On June 2, 2022, the reported average rate for a 30-year mortgage was 5.09% with 0.8 points (Freddie Mac). From 2005 through 2021, average monthly mortgage rates have ranged from a high of 6.8% in July 2006 to a low of 2.65% in January 2021. The record low in mortgage rates has been attributed by Freddie Mac to a slowdown in the economic recovery igniting robust purchase demand activity. The intense growth in purchase demand will result in a continued constraint to homeownership due to a lack of housing supply being readily available to support this growth momentum despite low mortgage rates. In addition, for homebuyers, it is necessary to pay a higher down payment than in the immediate past, and demonstrate credit worthiness and adequate incomes so that loan applications meet standard underwriting criteria. While adherence to strict underwriting criteria was not required during the early and mid-2000s, the return to stricter standards is consistent with loan standards prior to 2001.

#### **Landowner and Developer Financing**

With respect to landowners and developers seeking to provide housing or retain affordable housing in Sonoma, a variety of federal, state, and local resources are available to help fund affordable housing and reduce financing constraints on housing development, as shown in Table 59.

<b>Table 59: Financial Resources</b>		
<b>Program Name</b>	<b>Description</b>	<b>Eligible Activities</b>
<b>1. Federal Programs</b>		
Community Development Block Grant (CDBG)	Grant program administered by HUD on a formula basis for entitlement communities, and by HCD for non-entitled jurisdictions. Allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- Home Buyer Assistance</li> <li>- Economic Development</li> <li>- Homeless Assistance</li> <li>- Public Services</li> </ul>
HOME	HOME funds awarded annually as formula grants to participating jurisdictions. HUD establishes HOME Investment Trust Funds for each grantee, providing a line of credit that the jurisdiction may draw upon as needed. HOME funds can be used for grants, direct loans, loan guarantees, or other forms of credit enhancement or rental assistance or security deposits.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- Home Buyer Assistance</li> <li>- Rental Assistance</li> </ul>
Low Income Housing Tax Credits (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sales are typically used to create housing.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Acquisition</li> <li>- Rehabilitation</li> </ul>
Mortgage Credit Certificate (MCC) Program	Income tax credits available to first-time homebuyers to buy new or existing single-family housing. The Sonoma County Housing Authority does not currently participate in the program, but would be the implementing agency.	<ul style="list-style-type: none"> <li>- Home Buyer Assistance</li> </ul>
Housing Choice Voucher Program	Rental assistance payments from the Sonoma County Housing Authority to owners of private market rate units on behalf of very low-income tenants. The Housing Choice Voucher Program includes vouchers issued to individual households as well as project-based vouchers issued to a developer to preserve a specified number of units in a project for lower income residents.	<ul style="list-style-type: none"> <li>- Rental Assistance</li> <li>- Home Buyer Assistance</li> </ul>
Section 202	Grants to non-profit developers of supportive housing for the elderly.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- New Construction</li> </ul>
Section 203(k)	Provides long-term, low interest loans at fixed rate to finance acquisition and rehabilitation of eligible properties.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- Relocation of Unit</li> <li>- Refinance Existing Indebtedness</li> </ul>
Section 811	Grants to non-profit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- New Construction</li> <li>- Rental Assistance</li> </ul>
U.S. Department of Agriculture (USDA) Housing Programs	Below market-rate loans and grants for very low, low, and moderate-income multifamily housing, self-help subdivisions, and farmworker rental housing.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Rehabilitation</li> </ul>

<b>Table 59: Financial Resources</b>		
<b>Program Name</b>	<b>Description</b>	<b>Eligible Activities</b>
<b>2. State Programs</b>		
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	- Home Buyer Assistance
CalHOME	Provides grants to local governments and non-profit agencies for local homebuyer assistance and owner-occupied rehabilitation programs and new home development projects. Will finance the acquisition, rehabilitation, and replacement of manufactured homes.	- Home Buyer Assistance - Rehabilitation - New Construction
California Housing Assistance Program	Provides 3% silent second loans in conjunction with 97% CHFA first loans to give eligible buyers 100% financing.	- Home Buyer Assistance
California Self-Help Housing Program (CSHHP)	Provides grants for the administration of mutual self-help housing projects.	- Home Buyer Assistance - New Construction
Emergency Housing and Assistance Program (EHAP)	Provides grants to support emergency housing.	- Shelters and Transitional Housing
Emergency Shelter Program	Grants awarded to non-profit organizations for shelter support services.	- Support Services
Farmworker Housing Assistance Program	Provides State tax credits for farmworker housing projects.	- New Construction - Rehabilitation
Joe Serna Jr. Farmworker Housing Grant Program (FWHG)	Provides recoverable grants for the acquisition, development, and financing of ownership and rental housing for farmworkers.	- Home Buyer Assistance - Rehabilitation - New Construction
Multifamily Housing Program (MHP)	Provides low interest loans to developers of permanent and transitional rental housing. Funds may be used for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing.	- New Construction - Rehabilitation - Preservation
Project Homekey	Provides grants to local entities to acquire and rehabilitate a variety of housing types – such as hotels, motels, vacant apartment buildings, and residential care facilities – in order to serve people experiencing homelessness.	- Acquisition - Rehabilitation

<b>Table 59: Financial Resources</b>		
<b>Program Name</b>	<b>Description</b>	<b>Eligible Activities</b>
<b>3. Local Programs</b>		
Housing Rehabilitation Program	Sonoma residents are eligible to participate in the Sonoma County Community Development Commission's Housing Rehabilitation Loan Program. This program offers below market rate loans to low-income owner-occupants of single-family homes or mobile homes, and owners of rental properties where at least half of the tenants are low-income households, to make necessary repairs to their dwellings. Loans can offer up to \$50,000 for single-family homes, \$24,000 for mobile homes, and \$25,000 per unit for multifamily rental properties.	- Rehabilitation
<b>4. Private Resources/Financing Programs</b>		
Federal National Mortgage Association (Fannie Mae)	Fixed rate mortgages issued by private mortgage insurers.	- Home Buyer Assistance
	Mortgages which fund the purchase and rehabilitation of a home.	- Home Buyer Assistance - Rehabilitation
	Low down-payment mortgages for single-family homes in underserved low-income and minority cities.	- Home Buyer Assistance
Freddie Mac HomeOne	Provides down-payment assistance to first-time homebuyers and second mortgages that include a rehabilitation loan.	- Home Buyer Assistance

These financing programs are essential to facilitating affordable housing development by providing necessary financial relief. For example, the project site at 20269 Broadway was identified in the previous Housing Element as an important opportunity site. With prior redevelopment funding, the City acquired the property for the affordable housing project that became Alta Madrone. The property was transferred to the Sonoma County Community Development Commission as part of the transition of shifting the Housing Successor Agency role to the County after the dissolution of redevelopment. The City secured \$1.45 million from a 2011 redevelopment bond sale to invest in the project and support affordable housing, and provided a \$100,000 loan for seed money to assist with up-front costs for the entitlement process. The project was also funded with Low Income Housing Tax Credits (LIHTC), which is a federal subsidy used to finance the construction and rehabilitation of low-income affordable rental housing, and which gives investors a dollar-for-dollar reduction in federal tax liability if they finance affordable housing. Additional funding is provided by Project-Based Vouchers through the Sonoma County Housing Authority.

The City has established a number of programs in the Housing Plan to encourage affordable housing development and encourage collaboration with non-profit agencies and affordable housing developers, and to assist affordable housing developers obtain federal, state, and local grant funding.

**2. MARKET CONDITIONS**

Most developers respond to market conditions, both in the project design in terms of density and unit sizes, and in terms of the timing between receiving entitlements and applying for building permits.

**BUILDING PERMIT TIMING**

Typically, single-family home developers apply for the first building permits for a subdivision upon receipt of a grading permit. For simple projects or projects that must remain static in their design, building permits may be processed concurrently with

grading plan reviews. Building permits typically take 60–90 days, assuming two to three plan checks. Building permits can be issued in as few as 30 days if there are no corrections, but this is rarely the case for residential subdivisions or multifamily projects. During the 4<sup>th</sup> and 5<sup>th</sup> Housing Element Cycles, there was a significant lag between project approvals and requests for building permits. Projects that received approvals in the mid-2000s (2005 and 2006) requested multiple extensions in order to delay development due to the Great Recession and lack of market demand. These projects requested building permits more than ten years after receiving initial entitlements. Project entitlements expired in some cases without any building permit applications.

Building activity has increased, particularly over the 2017–2021 period, and it is anticipated that projects will be quicker to request building permits if the current residential demand and stronger housing market continues. It has also been observed that affordable projects often take longer to request building permits following project approval. This is due, in part, to the need for these projects to assemble funding and financing to make the development feasible. Affordable housing projects will often need to go through several funding rounds in order to procure adequate tax credits and/or project-based rental assistance and may request building permits years after receiving project approval.

[Table 6046 summarizes multi-unit \(2 or more\) development projects in the City that were approved or received permits during the 5<sup>th</sup> Cycle. -Table 16 includes a range of projects, such as subdivisions and mixed use projects, but does not include individual single family units approved for a single family lot or individual ADUs approved on an existing subdivided lot as these types of projects are typically quicker to receive building permits and are not reflective of the timing and process for projects with more than one4 unit. -As shown in Table 60, of the 177 multi-unit projects that were approved or permitted, 14 units \(8% of approved projects\) did not request a building permit. Of the remaining 163 units, the average time from project approvals to building permit application was a little over a year \(approximately 60 weeks / 14 months\). -This timing does not demonstrate any hindrances on housing development and the City is not aware of any governmental or non-governmental conditions that would cause extensive delays for projects requesting building permits. The typical timing of 14 months reflects the range of projects that are anticipated to occur on the Inventory of Residential Sites during the 6<sup>th</sup> Cycle.](#)

### APPROVED AND BUILT DENSITIES

As discussed in Section III.A.1, Land Use Controls, the City of Sonoma General Plan and Development Code regulate the residential densities for each land use and zoning designation. Future development must be consistent with the allowed densities anticipated by the City's General Plan, Specific Plans, and Development Code. However, while the City's regulations identify minimum and maximum densities that may be developed in the City, individual developers may opt to build at the lower, mid-range, or higher end of allowed densities. If developers choose to develop at the lower end of allowed residential densities, this could result in significantly fewer units at full buildout of the City and result in an overall lower contribution to the City's RHNA. In recent years, developments in Sonoma have typically occurred at or slightly below the maximum permitted densities, as shown in Table 60. The City's project that is affordable to lower income households – Alta Madrone Family Apartments – proposed units at 120% of the maximum allowed density through a 35% density bonus. Maximum densities in Sonoma are not an obstacle to development, as demonstrated by the majority of projects requesting entitlements at or below permitted densities. [-Table 6046 summarizes multi-unit \(2 or more\) development projects in the City that were approved or received permits during the 5<sup>th</sup> Cycle. Table 6046 includes a range of projects, including subdivisions, mixed use projects, and small projects \(i.e., duplexes\). -These projects types are representative of typical developments in Sonoma and are applicable to the sites included in the Inventory of Residential Sites for which multiple units are projected during the 6<sup>th</sup> Cycle. -As shown in Table 60, the average density of projects on residentially zoned sites \(R-S, R-M, R-O\) has been 95% of allowed maximum density. The average density on Commercial and Mixed Use sites has been 77% of allowed maximum density. ; It is noted that this includes two underutilized sites \(19380 Sonoma Multifamily and Jacks Diner Duplex\) that retain the existing use and are only developing a portion of the site. -Without these two projects, the average density on Commercial and Mixed Use sites that are more comparable to the sites included in the Inventory is 88%. As shown in Table 60, densities at the upper end of the allowed density range are typical for affordable, mixed income, and moderate/above moderate income development in the City.](#)

<b>Table 60. Building Permit Timing and Densities</b>				
<b>Project</b>	<b>Building Permit Timing</b>		<b>Densities</b>	
	<b>Project Approval</b>	<b>Building Permit Application</b>	<b>Maximum Allowed</b>	<b>Approved/Built</b>
<b>Approved Projects</b>				
<b>Taub Apartments</b> 19410 Sonoma Highway 0.68 acres Underutilized: Two residences, detached garage	9/2018: 14 units (12 apartments, 2 live/work units) (3 moderate + 11 above moderate units)	No building permit application submitted	C/West Napa Street/Sonoma Highway Corridor: 20 units/acre	20.6 units/acre (103% of max.)
<b>Oliva Apartments</b> 655 West Spain Street 1.52 acres Vacant	11/2017: 30 units (6 moderate + 24 above moderate income units)	10 – 6/29/2018 <del>30-20</del> – 2/13/2019	MX/Northwest Area: 20 units/acre	19.73 units/acre (99% of max.)
<b>Alta Madrone Family Apartments</b> 20269 Broadway 1.98 acres Previously underutilized with residence, detached garage, water tower, and barns removed in 2008 and two billboards removed in 2017 while the project was under review)	11/2017: 48 units w/ Density Bonus (15 extremely low, 23 very low, 9 low, + 1 moderate units)	1/2019: 48 units	MX/Broadway Corridor: 20 units/acre	24.24 units/acre (121% of max.)
<b>Jinks Planned Development/Fifth Street West Homes</b> 405 Fifth Street West 0.50 acres Underutilized: Existing residence	2/2015: 7 units w/ Planned Development Permit (1 moderate + 6 above moderate units)	2/25/16: 7 units	C/Northwest Area: 20 units/acre	14 units/acre (70% of max.)
<b>Rabbitt Apartments</b> 840 West Napa Street 1.01 acres Underutilized: single family residence, detached accessory structure, and a well	9/2014: 11 units (11 above moderate units)	6/29/2018: 11 units	C: 20 units/acre R-M: 7-11 units/acre	11 units/acre (100% of max.)
<b>Nicora Place</b> 821-845 West Spain St 0.86 <del>2.0</del> acres Underutilized: Eight residential and accessory buildings with a total of 10 housing units	9/26/2013: 18 units <del>12/16/2016: 18 units</del> (3 moderate + 15 above moderate units)	9/26/2013: <del>18 units</del> 12/16/2016: 18 units	R-M: 7-11 units/acre	9 units/acre (82% of max.)
<b>Mockingbird Lane</b> 853 Fourth Street West	12/13/2018:	12/13/2019: 2 units	R-S: 3-8 units/acre	9 units/acre (113% of max.)

3.54 net acres (1.33 acres of original 4.87-acre parcel was retained as parking for original owner, Sonoma Valley Hospital) Vacant	32 units ( <a href="#">2 low, 14 moderate, and 16 above moderate units</a> )	12/16/2019: 30 units		
<b>Caymus Capital UP</b> 800 West Spain 0.86 acres Underutilized: Residence, water tower, garage, and hatchery buildings	10/9/2014: 7 units ( <a href="#">1 moderate + 6 above moderate units</a> )	5/2/15: 7 units	R-M: 7-11 units/acre	9.30 units/acre (85% of max.)
<b>Pending Projects</b>				
First Street East Townhomes 216-254 First Street East 2.60 acres	Proposed: 52 units ( <a href="#">5 low, 5 moderate, + 40 above moderate units</a> )	--	<del>R-O</del> <b>MX: 15-25</b> units/acre	19.98 units/acre (proposed) ( <del>80</del> <b>100</b> % of max.)
Montaldo Apartments 19320 Sonoma Highway 2.15 acres	Proposed: 55 units ( <a href="#">3 extremely low, 5 very low, 5 low, and 37 above moderate units</a> )	--	R-O: 15-25 units/acre	25.6 units/acre (proposed) (102% of max.)
Hummingbird Cottages 19910 Fifth Street West 1.50 acres	Proposed: 15 units ( <a href="#">1 low, 2 moderate, and 12 above moderate units</a> )	--	<del>R-M: 7-11 units/acre</del> <b>R-O: 15-25 units/acre</b>	10.0 units/acre ( <del>40</del> <b>91</b> % of max.) (proposed)
<a href="#">1211 Broadway Housing</a> <a href="#">1211 Broadway</a> <a href="#">0.34 acres</a>	Proposed: 5 units ( <a href="#">2 moderate + 3 above moderate units</a> )	--	<b>MX: 20 units/acre</b>	<a href="#">14.7 units/acre (proposed)</a> ( <a href="#">73.5% of max.</a> )
<a href="#">19380 Sonoma Hwy Multifamily</a> <a href="#">19380 Hwy 12</a> <a href="#">Approx. 0.5 acres of 1.19-acre site</a>	Proposed: 7 units, in addition to existing use ( <a href="#">1 very low, 1 low, + 5 above moderate units</a> )	--	<b>MX: 20 units/acre</b>	<a href="#">14.0 units/acre (proposed)</a> ( <a href="#">70% of max.</a> )
<a href="#">Jacks Diner Duplex</a> <a href="#">899 Broadway</a> <a href="#">Approx. 0.17 acres of 0.34-acre site</a>	Proposed: 2 units, in addition to existing use ( <a href="#">2 moderate units</a> )	--	<b>MX: 20 units/acre</b>	<a href="#">11.7 units/acre (proposed)</a> ( <a href="#">58.5% of max.</a> )
<a href="#">Sweetwater Spectrum Inc.</a> <a href="#">34 W. Spain St</a> <a href="#">0.25 acres</a>	Proposed: 2 units ( <a href="#">2 above moderate units for adults with developmental disabilities, Sweetwater may have funds to</a> )	--	<b>MX: 20 units/acre</b>	<a href="#">8 units/acre (proposed)</a> ( <a href="#">40% of max.</a> )



	<a href="#">provide financial assistance</a>			
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**3. AFFORDABLE HOUSING DEVELOPMENT CONSTRAINTS**

In addition to the constraints to market rate housing development discussed above, affordable housing projects face additional constraints. While there is a range of sites available for potential affordable housing projects, as well as projects that focus on special needs populations, there is very little financial assistance for the development of affordable housing.

Multiple funding sources are needed to construct an affordable housing project, since substantial subsidies are required to make the units affordable to extremely low, very low, and low-income households. It is not unusual to see five or more financing sources required to make a project financially feasible. Each of these sources may have different requirements and application deadlines, and some sources may require that the project has already successfully secured financing commitments. Since financing is so critical and is also generally competitive, organizations and agencies that provide funding often can effectively dictate the type and sizes of projects. Thus, in some years senior housing may be favored by financing programs, while in other years family housing may be preferred. Target income levels can also vary from year to year.

This situation has worsened in recent years. Federal and state funding has decreased and limited amounts of housing funds are available, and the process to obtain funds is extremely competitive. Tax credits, often a fundamental source of funds for affordable housing, are no longer selling on a one for one basis. In other words, once a project has received authorization to sell a specified amount of tax credits to equity investors, the investors are no longer purchasing the credits at face value, but are purchasing them at a discount. (Tax credits are not worth as much to investors if their incomes have dropped.)

As previously described, Chapter 19.44 of the Development Code (Affordable Housing and Density Bonuses) requires 25% of the total parcels and/or units in a residential development be affordable to varying lower and moderate-income categories depending on whether the project is for rental units or ownership units. For rental units, 5% are required for the extremely low-income (ELI) household category, 10% for the very low-income (VLI) household category, and 10% for the low-income (LI) household category. For ownership units, 5% are required for the low income (LI) household category; 10% for the moderate-income (M) household category, and 10% for the middle-income (MI) household category. While the City encourages the units to be provided as part of the proposed development on-site, applicants may choose to pay in-lieu fees instead of providing affordable units in a residential project of four or fewer units. These in-lieu fees are subsequently used to provide financial assistance to affordable housing developments.

The City has the lowest fees in the region for residential development, encouraging both affordable and market rate development and reducing the cost of development in Sonoma in comparison to other regional jurisdictions. The City also sponsors funding applications, either for HOME or CDBG funds through the Sonoma County CDC or for State funds administered by HCD, on behalf of affordable housing developers. While the City can support CDBG, HOME, and various State funding applications, there are limited funds available for City projects and there is no guarantee of funding.

**C. PUBLIC FACILITIES AND INFRASTRUCTURE**

The City requires that developers complete certain minimum site improvements in conjunction with new housing development. Water, sewer, drainage, police, fire, parks, schools, and transportation will require improvements in capacity to treat and distribute water, to treat sewage, to handle run-off, and to provide sufficient space and capacity for public safety, recreation, education, and movement of people and goods. Required improvements include the construction of streets, curbs, gutters, and sidewalks and, where necessary, the installation of water mains, fire hydrants, sewer mains, storm drainage mains, and street lights. These standards are typical of many communities and do not adversely affect the provision of affordable housing in Sonoma. However, whenever a developer advances the costs for improvements not located on the development project, which may be required as a condition of such development project, the developer shall be entitled to reimbursement for that part of the required improvement which contains supplemental size, capacity, number, or length for the benefit of property not within the development project. In

each case, the cost of expansion most likely will be financed through development fees, exactions, assessment districts, or some combination of these.

## ROADWAY IMPROVEMENTS

The City of Sonoma General Plan Circulation Element outlines the official classification of the existing and proposed streets and roads in Sonoma, including State highway, arterial streets, collector streets, local streets, and rural roads. The following provides a description of the various roadway classifications, including a description of the specific roadway standards for each classification. Pavement width, sight distance, and travel speed generally increase as one moves from local streets to collector streets and arterials to highways. The following provides a description of the various roadway classifications, including a description of the specific roadway standards for each classification. [The City is primarily built out and all of the parcels in the Inventory of Residential Sites are adjacent improved roadways, so projects will not typically be required to build the full standard street section for the street half adjacent the project as streets are in place. Projects typically would need to improve the curb, gutter, and sidewalk to meet City standards in locations where those do not yet exist. -The City's improvement standards are not burdensome and are developed to address the safety of the circulation system. The City's improvement standards have not posed a constraint for development projects, including related to housing supply and affordability. The City of Sonoma Standard Plans, updated August 17, 2015, establish the rights-of-way and improvement requirements for City streets.](#)

- **State Highway** – Although in traffic engineering parlance Highway 12 is considered an arterial, it is unique among local roadways. The highway is not only a primary route for through traffic, commuters, and tourists, but it also carries the majority of local trips of any distance. Existing peak hour capacity ranges from 755 – 1,460 vehicles per hour along different roadway segments. [Caltrans has not established a standard for frontage improvements along the Caltrans right-of-way of Highway 12; requirements vary from project to project. However, Highway 12 is constructed through the City and frontage improvements are typically limited to striping for parking and bicycle facilities where needed and curb, gutter, and sidewalk.](#)
- **Arterial Streets** – These streets carry traffic to and from the highway and to major commercial and public destinations. Volumes are heavy compared to connectors and local streets. Existing peak hour capacity ranges from 685 – 970 vehicles per hour along different roadway segments (excluding SR 12). [The City requires an 80-foot right-of-way with a 32-foot travel lane \(2 lanes including parking\), curb, and gutter, a minimum 5-foot sidewalk \(sidewalks must meet ADA clearance requirements\), and a 5-foot public utilities easement in each direction for arterial streets.](#)
- **Collector Streets** – These link arterials to local streets and commercial and public destinations. In some cases, a connector may also serve as a lesser link to the highway. Existing peak hour capacity ranges from 560 – 660 vehicles per hour along different roadway segments. [The City requires a 55-foot or 60-foot right-of-way with an 20-foot travel and parking lane \(includes parking\), curb, and gutter, a minimum 5-foot sidewalk \(sidewalks must meet ADA clearance requirements\), and a 5-foot public utilities easement in each direction for collector streets.](#)
- **Local Streets** – Typically residential streets, these provide access to neighborhoods and individual parcels within them. [The City requires a 50-foot right-of-way with an 18-foot travel lane \(includes parking\), curb, and gutter, a minimum 5-foot sidewalk \(sidewalks must meet ADA clearance requirements\), and a 5-foot public utility easement in each direction for local streets](#) ~~are generally developed with curb, gutter, and sidewalk.~~ Typical existing peak hour capacity is 660 vehicles per hour.
- ~~**Rural Roads** – These carry traffic to outlying districts. They are generally not developed with curb, gutter, or sidewalk. Typical existing peak hour capacity is 545 vehicles per hour.~~

The Circulation Element identifies the existing (2020) traffic conditions of the local roadways and intersections in Sonoma. The continued development of Sonoma would require an expanded circulation system in order to adequately serve the growing mobility needs of the community. Future changes to traffic patterns in the City will be largely determined by the location of jobs and housing in Sonoma and the region, and by improvements to the local roadway system. Growth will determine future volume, while circulation improvements can only modify its distribution. Traffic projections for the year 2020 (Table CE-2 of the Circulation

Element) indicated increased traffic volumes citywide. This traffic was the result of growth in the City, Sonoma Valley, and the greater Bay Area.

### **WATER SERVICE**

Most of the City's water is supplied via connection to the Sonoma County Water system (approximately 95%). Total water allocated annually to the City under its agreement with Sonoma Water is fixed through 2035. Any additional water made available to the City will result from increased pumping of municipal wells (existing and future). The City's contract with Sonoma County Water Agency provides for a peak delivery rate of 6.3 million gallons per day (mgd), with an annual limit of 3,000 acre-feet on total water purchases by the City. However, through consultations between the City and Sonoma County Water Agency, Sonoma County Water Agency clarified that the City was projected to receive a maximum of 2,355 AFY in 2019, increasing in five-year increments to 2,626 in 2035.

The Sonoma Water supply is supplemented by a system of city-owned groundwater wells. These wells would provide a potable water source in the event that aqueduct deliveries are interrupted or are otherwise unable to meet demand. They also serve to help meet peak demands during the summer. The City currently owns eight groundwater production wells, five of which are operational. During a typical water year, the groundwater wells are only used during seasonal high water demand months, and are not operated during the winter except for short-term operation to exercise the pumps. The capacity of the well system is estimated to be 820 gpm. City wells supply an average of 4.4 percent of annual water needs.

On an annual basis, the City has received less than 2,355 AFY from the Sonoma County Water Agency over the past several years, meaning that additional capacity remains available to serve new development. According to the 2020 Urban Water Management Plan (UWMP) prepared for Sonoma Water, the actual amount of water delivered by the Sonoma County Water Agency in 2020 was 2,000 AFY. Projected deliveries increase for the City from 2,168 AFY in 2025 to 2,233 AFY in 2045. The UWMP also compares the total water supply available in multiple dry water years with projected total water use over the next 25 years, in five-year increments, and shows that there is adequate water supply during multiple dry years to meet demands through 2045 across the region, including the City of Sonoma.

The City's current water strategy is to meet the water demands using purchased water from Sonoma Water and use local groundwater supplies to supplement water demand needs during peak periods and also during periods of drought and/or Sonoma Water shortages and shortfalls. The City's local groundwater supply is a key element of its drought contingency plan and it is expected to remain as such throughout the planning horizon of the 2020 UWMP.

The City's 2020 UWMP anticipated an increase of approximately 406 households from 2020 through 2035 and population increase from approximately 11,725 persons in 2020 to 12,582 persons in 2035 and a total of 643 households (1,357 persons) from 2020 through 2045. The City's 2020 UWMP shows a surplus in water supply versus demand in normal dry year conditions, single dry year conditions, and multiple dry year scenarios for all study years (2025, 2030, 2035, 2040, and 2045). The City's planned water supply is adequate to accommodate the RHNA.

### **SEWER SERVICE**

The treatment of wastewater generated within the City of Sonoma and the urbanized unincorporated area of Sonoma Valley is provided by the Sonoma Valley County Sanitation District (SVCSD), which has one treatment plant, located on 8<sup>th</sup> Street East. The SVCSD is operated and maintained by Sonoma County Water Agency. The SVCSD service area encompasses central Sonoma Valley from Glen Ellen to south Sonoma, including all of the City of Sonoma. The service area, which is approximately eight miles long and two miles wide, is roughly aligned with Sonoma Creek. Not all properties within the service area have been annexed to the SVCSD. As of 2022, the SVCSD served 17,548 equivalent single-family dwellings (ESDs). An ESD is a measure of sewage flow equal to the amount generated by a single-family residence. The District uses ESDs, rather than population, to monitor treatment capacity and estimate future needs.

The SVCSD treatment plant operates under a National Pollutant Discharge Elimination System (NPDES) permit, which was granted by the San Francisco Regional Water Quality Control Board. While the estimated maximum capacity of the treatment plant is 20

million gallons per day (MGD), the NPDES permit limits the permitted average dry weather flow (ADWF) of the treatment plant to 3.0 MGD. Currently, the average dry weather flow at the treatment plant amounts to 2.7 MGD or 90% of permitted plant dry weather discharge limit. When a treatment plant reaches 75 percent of its permitted capacity, the Regional Water Quality Control Board and the State Water Resources Board require the preparation of plans for additional treatment and disposal capacity. The Sonoma Valley Treatment Plant was identified as exceeding the 75 percent threshold as early as 1985. Since that time, the SVCSD has analyzed alternative methods to increase treatment capacity and limit discharge. In this regard, the District has focused on water conservation and the recycling of treated wastewater as the preferred methods of conserving the effective capacity of the plant by limiting discharge in accordance with its NPDES permit limitations. Water conservation benefits capacity by reducing flows into the plant. The recycling of treated wastewater reduces discharge into the Bay. The addition of tertiary treatment capability further assists the District in limiting discharge from the plant by expanding the range of uses for reclaimed water, although storage and distribution improvements are needed to take full advantage of options for recycled water use.

This NPDES permit does not directly cover wet weather flows, which are difficult to estimate due to stormwater infiltration. During the wet weather months, the plant discharges treated water into Schell Slough (no discharge is allowed during the dry weather period, defined as May 1st through October 31st). In addition, the plant has several equalization basins, which can store excess wastewater during wet weather flows. During wet weather months, discharges from the plant are currently limited to approximately 11 MGD by the capacity of the pumps that release water into Schell Slough. Because the equalization basins allow the plant to store excess flows until they can be treated, the plant is currently able to adequately treat all of the wet weather flows.

Since 1994, the District has implemented a number of effective water conservation programs aimed at conserving treatment capacity by reducing flows. In addition, the District has entered into agreements with local farmers and others to use reclaimed water (treated at the secondary level) for the irrigation of nearby dairies and vineyards, as well as wetland enhancement. Currently, the use of recycled water in this manner amounts to 1,000-1,200 acre-feet per year.

The treatment plant has a current unused capacity of approximately 0.3 MGD ADWF (per the NPDES permit). The SVCSD strategy for meeting projected treatment requirements is focused on conservation and recycling. The District estimates that its water conservation programs will successfully conserve treatment capacity within the current allowance of 3.0 MGD during the dry period through 2020-2030. This estimate is based on 2% growth rate within the District, an amount that is consistent with City and County growth management regulations and accommodates the City's share of regional housing needs. To address projected treatment demand through the year 2030 and beyond, the SVCSD has implemented tertiary treatment, which enhances its recycled water programs. Achieving this capability will allow the SVCSD to greatly increase the recycling of treated wastewater while respecting the 3.0 MGD discharge limit, thereby meeting the treatment needs associated with future development within the SVCSD. However, storage facilities will have to be expanded and new users of reclaimed water found in order to take advantage of the tertiary treatment capability. In addition to implementing tertiary treatment capability, the SVCSD is taking the following actions to provide treatment capacity necessary to serve projected growth within the City and the SVCSD as a whole:

- Continuing to implement water conservation programs aimed at reducing flows from existing connections.
- Upgraded the reclamation facility by providing for tertiary treatment and is increasing the amount of reclaimed wastewater use by pursuing additional reclaimed water user contracts.
- Working with the Regional Water Quality Control Board for renewal of the plant's NPDES permit.
- Completing additional engineering and environmental studies on required improvements as needed.

In consideration of these factors, it is anticipated that wastewater treatment will be adequately available to serve development as anticipated in the City's General Plan. Therefore, wastewater will not be a constraint to residential development during this Housing Element planning period.

## DRY UTILITIES

PG&E is responsible for the transmission and distribution system that delivers natural gas and electricity to sites in Sonoma. Sonoma Clean Power provides electricity via PG&E's infrastructure. Telecommunications services are provided to the City by a variety of providers, including Xfinity, AT&T, and Verizon. –The dry utilities providers serving the City have capacity in their transmission, generation, and distribution systems to serve the City and have planned to accommodate growth. –No capacity issues are known that would result in the dry utilities providers inability to serve the RHNA growth identified in the Inventory of Sites.

## **D. ENVIRONMENTAL ISSUES**

Environmental constraints affecting residential development in Sonoma include geologic and seismic conditions, which provide the greatest threat to the built environment, urban fires and wildfires, and flooding hazards. Apart from the larger issues discussed below, there are no known site-specific environmental constraints that would substantially impact development on the identified Housing Opportunity Sites.

### **1. GEOLOGIC AND SEISMIC HAZARDS**

Earthquakes pose the most serious potential threat in the Planning Area, particularly the City, as urban areas are more prone to damage than less developed areas. Although no known faults lie cross the Planning Area, Sonoma County is traversed by seven active or potentially active faults, including the San Andreas fault, the Tolay fault, and the Healdsburg/Rodgers Creek fault. The Rodgers Creek fault, which has been identified as an extension of the Hayward fault, lies closest to the Planning Area and represents a significant earthquake risk. Earthquake hazards in the Planning Area include fault rupture, ground shaking, liquefaction, seismically induced landslides, and subsidence. Each can result in extensive property damage, personal injury, and/or death. The most widespread effect of an earthquake is ground shaking, or movement of the Earth's surface in response to seismic activity. Ground shaking is often the greatest cause of physical damage. Buildings and utility facilities may suffer severe damage or collapse if not properly designed to withstand shaking.

California has a long history of strong earthquakes that have affected communities in the San Francisco Bay Area. The largest earthquake to occur within the area was the 1906 San Francisco Earthquake (7.8 magnitude) that occurred along the San Andreas Fault. The City's proximity to fault zones and other potentially active faults suggests a high probability that a strong earthquake will occur in the future in the City's vicinity.

The Sonoma Planning Area is located within Zone VIII (Very Strong) and Zone VII (Strong) of the Modified Mercalli Intensity (MMI) Shaking Severity Level. The MMI estimates the intensity of shaking from an earthquake at a specific location or over a specific area by considering its effects on people, objects, and buildings. At high intensities (MMI  $\geq$  6), earthquake shaking damages buildings. The severity of the damage depends on the building type, the age of the building, and the quality of the construction. Masonry and non-ductile concrete buildings can be more severely damaged than wood-frame or engineered buildings. Buildings built to older building codes can be more severely damaged than recently constructed buildings using newer codes.

In order to minimize potential damage to the buildings and site improvements, all construction in California is required to be designed in accordance with the latest seismic design standards of the California Building Code. The California Building Code, Title 24, Part 2, Chapter 16 addresses structural design and Chapter 18 addresses soils and foundations. Collectively, these requirements, which have been adopted by the City, include design standards and requirements that are intended to minimize impacts to structures in seismically active areas of California. Section 1613 specifically provides structural design standards for earthquake loads. Section 1803.5.11 and 1803.5.12 provide requirements for geotechnical investigations for structures assigned varying Seismic Design Categories in accordance with Section 1613. Design in accordance with these standards and policies is typical in Sonoma and addresses risks associated with seismic activity.

### **2. FIRE HAZARDS**

Structural fires pose a significant potential threat. The closely packed wood-frame buildings around Sonoma Plaza, many of them without sprinklers, raise a particular concern. The risk of structure fires may increase in the future due to changes in land use patterns, such as an increased emphasis on infill and planned unit developments, if not mitigated through site planning and

building design and retrofit requirements. The risk of a widespread structure fire is related to seismic risks in that major earthquakes in urban areas often cause conflagrations and make firefighting more difficult.

With the exception of Sonoma Mountain Cemetery, the entirety of the Planning Area lies within a Local Responsibility Area (LRA) and no properties within the Planning Area are in a fire hazard severity zone.

### **3. FLOODING**

Flooding, even at its worst, presents only localized threats to property and little or no threat to life in Sonoma. Although some local urbanized areas lie within the 100-year floodplain mapped by the Federal Emergency Management Agency, flood water heights rarely exceed one-to-two feet and flood control improvements have eliminated many former problems. Urban development could increase the rate and volume of drainage runoff within the community by increasing areas of impervious surface, which could result in localized flooding in some areas where the existing storm drainage system may not be sufficient. However, mitigations measures would reduce the risk of flooding and may include: requiring development within the Planning Area to document the adequacy of proposed storm drain improvements; requiring development projects to contribute to the cost of implementation of the Sonoma Area Master Drainage Plan; and requiring development within the Planning Area to be designed and constructed consistent with Sonoma Water Flood Control Design Criteria.

## 4. INVENTORY OF RESIDENTIAL SITES

This section of the Housing Element describes resources available for housing development, rehabilitation, and preservation in Sonoma. Resources include land designated for housing development, financial resources to assist with the development, rehabilitation, and preservation of housing, and resources for energy conservation.

### A. AVAILABILITY OF SITES FOR HOUSING

Housing element law requires an inventory of land suitable for residential development (Government Code Section 65583(a)(3)). An important purpose of this inventory is to determine whether a jurisdiction has allocated sufficient land for the development of housing to meet the jurisdiction’s share of the regional housing need, including housing to accommodate the needs of all household income levels.

This section documents the availability of sites for future residential development and the adequacy of these sites to accommodate Sonoma’s 6<sup>th</sup> Cycle RHNA. In addition to assessing the quantity of land available to accommodate the City’s total housing needs, this section also considers the availability of sites to accommodate a variety of housing types suitable for households with a range of income levels and housing needs. Sonoma will fulfill its share of regional housing needs using a combination of the methods below, as further described in this section:

- Residential projects with development entitlements with occupancy post June 30, 2022
- Sites with zoning in place
  - Vacant and underutilized sites with a proposed project
  - Vacant sites with zoning in place (R-R, R-S, R-L, R-M, R-H, R-O, MX, and C zoned sites):
    - Residential sites (R-R, R-S, R-L, R-M, R-H, R-O) are assumed to develop at 85% of capacity,
    - Mixed use (MX and C) sites are assumed to develop with residential uses at 75% of capacity, and
    - Realistic capacity assumptions are consistent with approved and built densities shown in Table 60.
  - Underutilized sites with zoning in place (R-O, MX, and C zoned sites):
    - Residential sites (R-R, R-S, R-L, R-M, R-H, R-O) are assumed to develop at 85% of capacity,
    - Mixed use (MX and C) sites are assumed to develop with residential uses at 75% of capacity, and
    - It is noted that underutilized sites are only necessary to accommodate 5 of the very low income RHNA units; the remainder of underutilized sites are included to demonstrate additional capacity.
- Projected accessory dwelling units

Table 61 summarizes the residential unit potential from the above methods and provides a comparison with Sonoma’s RHNA and inventory parcels are shown on Figures 2 and 3. Parcel-specific site inventories are included in Appendix A.

<b>Table 61: Comparison of RHNA to Inventory of Sites, Approved Projects, and ADUs</b>					
<b>Category</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>
2023-2031 RHNA (Table II-39)	83	48	50	130	311
<b>Approved Projects</b>					
Approved Projects with occupancy post June 30, 2022	0	0	30	53	83
<b>Pending Projects</b>					
Pending Projects with occupancy post June 30, 2022	911	1211	1512	108	144142
<b>Vacant Sites by Zoning District</b>					

<b>Table 61: Comparison of RHNA to Inventory of Sites, Approved Projects, and ADUs</b>					
Category	Very Low	Low	Moderate	Above Moderate	Total
C	27	18	8	12	65
MX	0	0	5	7	12
R-H	0	0	10	1	21
R-L	0	0	0	61	61
R-M	0	0	1815	2019	3834
R-O	42	27	0	0	69
R-R	0	0	0	7	7
R-S	0	0	0	3	3
<b>Subtotal Vacant Sites</b>	<b>69</b>	<b>45</b>	<b>3228</b>	<b>111110</b>	<b>257252</b>
Underutilized Sites by Zoning District					
C	0	0	4	4	8
MX	32	21	2	3	58
R-L	0	0	0	19	19
R-M	0	0	2	23	45
<u>R-S</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>3</u>	<u>3</u>
R-O	0	0	5	5	10
<b>Subtotal Underutilized Sites</b>	<b>32</b>	<b>21</b>	<b>13</b>	<b>3637</b>	<b>102103</b>
Accessory Dwelling Units					
ADUs	0	0	64	0	64
Total Capacity (Inventory, plus Approved Projects, plus ADUs)					
<b>TOTAL CAPACITY</b>	<b>110112</b>	<b>7877</b>	<b>127117</b>	<b>264258</b>	<b>579564</b>
Shortfall	--	--	--	--	--
Excess Capacity	2729	3029	7767	134128	268253
<sup>1</sup> Moderate income units based on affordability of ADUs produced during the 5 <sup>th</sup> Cycle. Source: City of Sonoma, 2022; Sonoma County Assessor Data, 2021; De Novo Planning Group, 2022					

As shown in Table 61, Sonoma has a total realistic capacity for 679-564 units, reflecting an excess capacity of 268-253 units to accommodate the RHNA.

### 3. REALISTIC CAPACITY AND AFFORDABILITY

To evaluate the adequacy of the sites identified to address the affordability levels established by the RHNA, State law (Government Code Section 65583.2(c)(3)) provides for the use of “default densities” to assess affordability. Based on its population and location within Sonoma County, the City of Sonoma falls within the default density of 20 units per acre for providing sites affordable to very low and low income households.

Sites suitable for very low and low income households are sites zoned C, MX, and R-O that are sized from 0.5 to 10 acres, based on Government Code Section 65583.2(c)(2), as well as pending projects that propose low income units. Sites anticipated to accommodate very low and low income units include Site J (Pending 1<sup>st</sup> Street East Townhomes), Site 38 (vacant 3.0-acre site zoned C), Site 80 (underutilized 6.1-acre site zoned MX), Site A (Pending Montaldo Apartments), Site C (Pending 19380 Sonoma Highway Multifamily), and Site 94 (3.25-acre vacant site zoned R-O).



Sites suitable for moderate density households can be provided at 10 or more units per acre (R-M, R-H, C, and MX districts). The City has used these default density thresholds as a guide in allocating its sites inventory by income category, as presented in Table 61 and detailed by site in Appendix A.

Realistic capacity was calculated at 85% of maximum density for residential zoning districts and 75% of maximum density for commercial and mixed use districts that allow residential development. [The City performed a detailed analysis of residential projects to support these assumptions. As shown in Table 60, approved and proposed projects in the City tend to be at the upper end of the permitted density range, with multiple affordable and mixed income projects exceeding the maximum permitted densities.](#) These assumptions [for the City's inventory](#) are more conservative than development patterns in the City, which reflect development at [97.577% to 88%](#) of maximum density for projects built in the C and MX districts and at [93.395%](#) of maximum density for projects built in the residential districts, [as discussed in Table 60](#). Where appropriate, additional considerations, such as the need for stream setbacks, are factored into the maximum capacity [with units reduced accordingly; reductions for such sites and](#) are identified in Appendix A. [It is also noted that AB 2011 allows eligible sites where retail, office, and parking are principally permitted uses to have densities that either: meet or exceed the allowed residential density, develop with a minimum of 20 units per acre \(sites less than 1 acre\), develop with a minimum of 30 units per acre \(sites 1 acre or larger located on a commercial corridor of less than 100 feet in width\) – these provisions support projects on the C sites and other sites in the City that are 100% or more than the maximum permitted densities and further increase development potential.](#)

The City's capacity to accommodate new residential development exceeds the minimum RHNA required within each income category, which will help offset any sites that may be developed with fewer units or at less affordable levels than assumed in the inventory of residential sites.

All identified developable land designated for residential use (all residential land use designations in the General Plan) is considered available for residential development. Additionally, land within the C and MX zoning districts is also considered available for residential development as the Zoning Code permits residential uses by right for these sites. The methodology considers factors including the extent to which existing uses may constitute an impediment to additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites, as discussed below.

#### 4. NONVACANT SITES

State law allows use of underutilized (nonvacant) sites to accommodate the RHNA. The City encourages redevelopment of underutilized uses and infill development. With the exception of 5 very low income units, the City does not need underutilized sites to accommodate the RHNA and the excess underutilized sites are included to encourage development throughout the 6<sup>th</sup> Cycle by including additional opportunities for development.

The City has completed a detailed assessment of the suitability of all nonvacant sites identified to accommodate its RHNA.

In evaluating the potential for nonvacant sites to accommodate additional residential development beyond the RHNA, the methodology for Inventory of Residential Sites considered a number of factors, including the extent to which existing uses may constitute an impediment to additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Appendix A provides data supporting the methodology to determine nonvacant sites suitable for development, including the existing uses (type of use and amount of development) located at each site, land and improvement values, any known constraints to development, and any other relevant information which supports the City's finding that all sites identified in its inventory are suitable for redevelopment during the planning period at densities and intensities consistent with the realistic capacity assumptions identified for the site, by income level. Each of the underutilized sites in the inventory was selected based on a combination of factors rendering it suitable and likely to redevelop during the planning period.

All non-vacant sites are appropriate for development at the residential densities and intensities identified in this chapter and Appendix A and are anticipated to be developed with urban uses as planned by the City's General Plan and Zoning Ordinance.

## EXISTING USES

Existing uses were evaluated based on several factors to determine if the existing uses would render a site suitable and likely to redevelop during the 6<sup>th</sup> Cycle. Sites are considered to have low utilization if there is physical underutilization of a site or economic obsolescence of the existing use. Physical underutilization of the site is measured by a structure-to-land ratio of less than 0.25. Economic obsolescence of the existing use is measured by an improvement-to-land value ratio of less than 1.0. Existing uses on the sites are limited to single family residential uses. As discussed below, development trends in the City indicate strong support for redeveloping sites with more intense residential uses.

## DEVELOPMENT TRENDS

The majority of recently approved and constructed projects in Sonoma, as shown in Table 60, have occurred on underutilized sites, with existing development ranging from individual residences to 10 residential units. As evidenced by Table 60, the housing market in Sonoma has supported development on underutilized sites during the 5<sup>th</sup> Cycle. It is anticipated that these trends will continue into the 6<sup>th</sup> Cycle, particularly given the strong demand for housing as reflected by the State's projection of housing needs for the Bay Area and assigned through the 6<sup>th</sup> Cycle RHNA.

## MARKET CONDITIONS

The market demand for housing, including affordable housing, has been well-documented by the State in support of passage of multiple bills in recent years to better accommodate the strong housing demand throughout the State. Development trends in the City during the 5<sup>th</sup> Cycle demonstrated a strong demand for housing in Sonoma at all income levels (see Chapters 2 and 7), as evidenced by the City meeting or exceeding the RHNA at all income levels 2 years prior to the end of the 5<sup>th</sup> Cycle. This strong demand and need for housing will continue to encourage redevelopment of underutilized sites and to encourage lot splits and other mechanisms that maximize capacity of sites. The market demand for more housing, including more density housing that takes advantage of opportunities such as underutilized sites in order to intensify development in the midst of a State-identified housing crisis, has been highlighted repeatedly by the Governor and State legislators [bold added for emphasis]:

*"California's severe housing shortage is badly damaging our state, and **we need many approaches** to tackle it," said Senator Wiener.<sup>3</sup>*

*"California needs more housing, and we need it now," said Senator Skinner.<sup>2</sup>*

*"For too long, California has kicked the can down the road when it came to building more housing," said San Francisco Mayor London Breed. "The housing crisis is at the center of our state's biggest challenges – with our children and our most vulnerable bearing the brunt of sky-high costs and **a severe shortage of housing inventory**. Thankfully, Governor Newsom and our legislative leaders are taking bold action to address this shortage with a smart, targeted housing packing that will allow our communities to grow with inclusion and expand the dream of home ownership and housing stability to people across California."<sup>2</sup>*

*"The **acute affordability crisis we are experiencing in California** was decades in the making, and now we're taking the necessary steps to fix it," said Governor Newsom, who signed the legislation at an affordable housing development in Oakland today. "This package of smart, bipartisan legislation boosts housing production in California – more streamlining, more local accountability, more affordability, **more density**. These bills, plus this year's historic budget investments in affordable housing, will directly lead to **more inclusive neighborhoods** across the state. Creating denser housing near jobs, parks and schools is key to meeting our climate goals as well as our affordability goals."<sup>4</sup>*

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<sup>3</sup> Office of the Governor, Gov. Newsom Signs Sb 8, Extending The Housing Crisis Act, September 16, 2021

<sup>4</sup> Office of the Governor, Governor Newsom Signs Legislation to Increase Affordable Housing Supply and Strengthen Accountability, Highlights Comprehensive Strategy to Tackle Housing Crisis, September 28, 2021

*“Administration has advanced \$800 million in new or accelerated funding to build affordable, climate-friendly housing and infrastructure... Since taking office, the Governor has prioritized tackling the housing crisis, signing major legislation to boost housing production, remove barriers to construction of accessory dwelling units and streamline state laws to **maximize housing production.**”* Office of the Governor<sup>3</sup>

### Incentives for Residential Development

The most significant incentive Sonoma offers for residential development that it can boast is the lowest fee structure in the region. As shown in Table 54, the City’s fees are substantially less than other jurisdictions – even when taking into account school fees and outside agency fees which are not addressed uniformly and comprehensively in the other jurisdiction fee calculations. Further, the State has committed new and accelerated funding to assist with providing housing to address the current housing shortage throughout the State. Program 2: Partnerships with Affordable Housing Developers in the Housing Plan commits the City to working with developers to access State and other funding available to support development of underutilized sites.

## 5. PROJECTS WITH ENTITLEMENTS

The City has 9 projects with development entitlements that will have occupancy post June 30, 2022 and will contribute towards addressing its 6<sup>th</sup> Cycle RHNA, as described below. It is noted that sites with rental units are assumed to be affordable to a mix of moderate and above moderate units, based on market rental rates in the City and ADUs are anticipated to be affordable to moderate income households with Program 5 in the Housing Plan addressing the affordability of ADUs. The projects listed below are approved and are either under construction or only require issuance of a building permit, timing of which is at the developer’s discretion; no other entitlements or approvals are required and the projects are anticipated to be constructed toward the beginning (2023/2024) of the 6<sup>th</sup> Cycle. There are no phasing, conditions of approval, or other requirements that would delay these projects.

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- ~~588 1<sup>st</sup> St West, APN 018-213-001 – 1 live/work unit, above moderate~~
- 515 Lasuen St, 127-471-038, 2 single family units, above moderate. Building permit issued for 1 single family unit on 7/27/22 and construction of both units anticipated to be complete toward the beginning of the 6<sup>th</sup> Cycle.
- ~~700 W Spain St, 127-204-011, 2 single family units, above moderate~~
- ~~392 Arroyo Way, 018-393-001, ADU, moderate~~
- ~~819 Virginia Ct, 018-381-040, single family dwelling, above moderate~~
- ~~301 First Street West, 018-161-017, duplex, 1 moderate and 1 above moderate~~
- 481 York Court, 018-382-029, single family dwelling, 1 above moderate. Entitlements/approvals: building permit. Building permit application not yet submitted but anticipated to be submitted in first half of 6<sup>th</sup> Cycle; there are no known impediments to permit issuance that would delay the project.

## 6. PENDING PROJECTS

The City has 17 pending residential projects that will have occupancy post June 30, 2022 and contribute toward addressing its 6<sup>th</sup> Cycle RHNA, as summarized below. Sites with deed-restricted units are identified. It is noted that sites with rental units are assumed to be affordable to a mix of moderate and above moderate units, based on market rental rates in the City and ADUs are anticipated to be affordable to moderate income households with Program 5 in the Housing Plan addressing the affordability of ADUs. Additional information regarding each site is provided in Appendix A. For each project, its status is described, along with the necessary approvals and steps required prior to development. The projects listed below are anticipated to be entitled within the next 1 to 2 years and constructed in the first half of the 6<sup>th</sup> Cycle. While these projects are not yet approved, there are no known or anticipated phasing or timing requirements that would delay these projects from being constructed during the 6<sup>th</sup> Cycle.

- 1211 Broadway Housing - 1211 Broadway, APN 128-181-004, 5 multifamily units (2 deed-restricted moderate, 3 above moderate proposed on a 0.34-acre underutilized site with a single family dwelling. Entitlements/approvals required: Site Design and Architectural Review permit (approximately 4-6 months) and building permits (timing at developer’s discretion).

- **19380 Sonoma Hwy Multifamily** - 19380 Hwy 12, APN 127-202-013, 7 multifamily units (1 [deed-restricted](#) very low, 1 [deed-restricted](#) low, 5 above moderate) proposed on [approximately 0.5 acres of](#) a 1.19-acre underutilized site with a cocktail lounge. [Entitlements/approvals required: Site Design and Architectural Review permit, Tentative Subdivision Map approval \(processed concurrently with Site Design and Architectural Review\), and Final Subdivision Map. Decision anticipated within 6 months. Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Jacks Diner Duplex** - 899 Broadway, APN 018-411-012, 2 duplex units (2 moderate) proposed on a 0.55-acre underutilized site with service station. [Entitlements/approvals required: Site Design and Architectural Review permit \(4-6 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling** - 470 Harrington Dr, APN 128-162-042, 1 single family unit (above moderate) proposed on a 0.28-acre underutilized site with single family dwelling. [Entitlements/approvals required: Site Design and Architectural Review permit \(4-6 months\). Entitlements/approvals required: building permit \(30-60 days\). Following approval, building permits will be processed \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling** - 315 5<sup>th</sup> St W, APN 127-204-021, 1 single family unit (above moderate) proposed on a 0.65-acre underutilized site with: single family dwelling. [Entitlements/approvals required: Site Design and Architectural Review permit \(4-6 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Sweetwater Spectrum Inc.** - 734 W Spain St, APN 127-204-009, 0.248, 2 duplex units (above moderate – it is noted that Sweetwater does have limited funds available to reduce burden of monthly costs, units are for special needs-developmental disabilities) proposed on a 0.25-acre vacant lot. [Entitlements/approvals required: Site Design and Architectural Review permit \(4-6 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling**, 420 Patten St, APN 018-273-013, 1 single family unit (above moderate) proposed on a 0.24-acre underutilized site with single family dwelling. [Site Design and Architectural Review \(2-4 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **HSU Residence ADU** - 214 E Napa St, APN 018-222-008, 0.256, -1 ADU (moderate) proposed on a 0.26-acre underutilized site with single family dwelling. [Entitlements/approvals required: building permit \(30-60 days\).](#)
- **DeNova Homes/Hummingbird Cottages** - 19910 Fifth Street West, APN 128-061-001, 15 single family attached units (1 [deed-restricted](#) low, 2 [deed-restricted](#) moderate, and 12 above moderate) proposed on a 1.50-acre underutilized site with a single family dwelling. [Entitlements/approvals required: Site Design and Architectural Review permit, Tentative Subdivision Map approval \(processed concurrently with Site Design and Architectural Review – approximately 6-12 months\), Final Subdivision Map, and building permits \(timing for building permit application at developer's discretion but anticipated within 15 months of project approval\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(60-90 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **1st Street East Townhomes** - 216-254 First Street East, APNs 018-131-012, -013, -018, 2.60, 5th, 50 single family attached units (5 [deed-restricted](#) low, 5 [deed-restricted](#) moderate, and 40 above moderate) proposed on a 2.60-acre underutilized site with two single family dwellings on two of the parcels, industrial uses (5,000 s.f.) on one parcel. [Entitlements/approvals required: SB 330 Application completed, SB 330 streamlined review \(anticipated within 3 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)

- **DeNova Homes/Montaldo Apartments** - 19320 Sonoma Highway, APNs 127-202-006, -007, 2.15, 5th, 50 multifamily units (3 [deed-restricted](#) extremely low, 5 [deed-restricted](#) very low, 5 [deed-restricted](#) low, and 37 above moderate/market rate) proposed on a 2.15-acre underutilized site with single family dwelling on one parcel, other parcel is vacant. [Entitlements/approvals required: Site Design and Architectural Review approval, Initial Study and CEQA review \(approximately 12-16 months depending on CEQA determination\). An Initial Study is required for this project to determine the scope of CEQA review as the project applicant's historic evaluation identified potentially significant impacts to historical resources. There are multiple options for addressing this, including reuse of the structure and its incorporation into project site plans \(would likely require a Mitigated Negative Declaration\) or demolition of building \(would likely require an Environmental Impact Report\). This condition does not render the project infeasible, but must be addressed pursuant to State law requirements for environmental impacts. Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling** - 20029 1st Street W, APN 128-131-016, 1 single family unit (above moderate) proposed on a 0.57-acre underutilized site with single family dwelling. [Site Design and Architectural Review \(2-4 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling** - 114 Malet St, APN 128-071-023, 1 single family unit (above moderate) proposed on a 0.50-acre underutilized site with single family dwelling. [Site Design and Architectural Review \(2-4 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling** - 234 Malet St, APN 128-071-014, 1 single family unit (above moderate) proposed on a 1.36-acre underutilized site with single family dwelling. [Site Design and Architectural Review \(2-4 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)
- **Single Family Dwelling** - 525 Lasuen St, 1 single family unit (above moderate) and 1 ADU unit (moderate). [Site Design and Architectural Review \(2-4 months\). Following approval, building permits, grading and infrastructure plans will be processed concurrently \(30-60 days\), timing of application is at developer's discretion but anticipated to occur within approximately 15 months of project approval.](#)

## 7. ACCESSORY DWELLING UNITS

From 2018 through 2021, an average of 8 ADUs were permitted annually (8 moderate income in 2018, 15 moderate income in 2019, 5 moderate income in 2020, and 5 moderate income in 2021). [For the preparation of the 6<sup>th</sup> Cycle Housing Element, the City reviewed all of its building permit data to identify ADUs permitted each year.](#) The City collected information regarding proposed rents and applied affordability assumptions to all ADUs constructed during the 5<sup>th</sup> Cycle as documented in the City Annual Performance Reports. ADU development averaged 8 units per year, which results in 64 ADUs when projected over the 2023-2031 6<sup>th</sup> Cycle. All ADUs are estimated to be affordable to moderate income households. While it is anticipated that a portion of the ADUs will be affordable to very low and low income households, the Inventory of Residential Sites has assumed that ADUs will be affordable to moderate income households, at a minimum. Program 5: Accessory Dwelling Units and Junior Accessory Dwelling Units in the Housing Plan requires the City to track affordability of ADUs, which will ensure accurate reporting of 6<sup>th</sup> Cycle progress and will assist the City in assuming affordability of ADUs for the 7<sup>th</sup> Cycle.

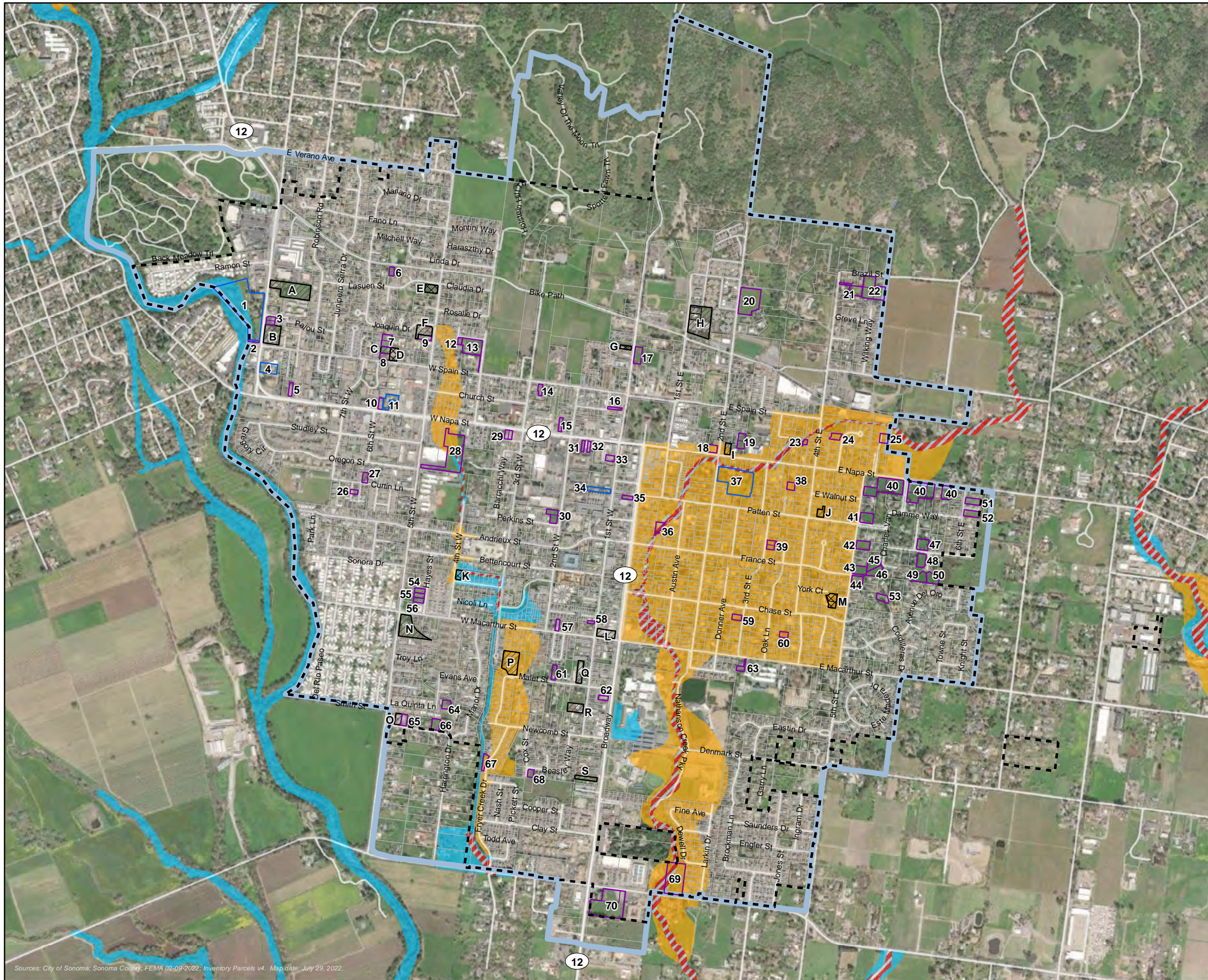
## 8. SIZE OF SITES

As shown in Table 62, the City has sites in a range of sizes, with the majority of the City's sites in vacant condition. Sites available for single-family development appropriate for above moderate income households range from small lots of 0.05 up to 0.25 acres in existing and approved subdivisions, to infill lots from approximately 0.3 to over 5 acres. Lots for moderate income households accommodate higher density single-family (e.g., townhomes, attached single-family, cluster housing) and medium/high density multi-family units, primarily in the R-M and R-S zones and on smaller lots in the C, MX, and R-O zones. These lots vary in size from smaller lots of 0.12 acres to lots of more than 1 acres. Sites for lower income, multi-family housing are located in the C,

MX, and R-O zones and range from 0.5 acres to over 5 acres and are identified with more details in Appendix A. There are no lots over 10 acres in the inventory.

<b>Table 62: Vacant and Underdeveloped Parcels by Size</b>							
<b>Zoning District</b>	<b>&lt;0.25</b>	<b>&lt;0.5</b>	<b>&lt;1</b>	<b>&lt;2.5</b>	<b>&lt;5</b>	<b>&lt;10</b>	<b>Total Parcel County</b>
<b>Pending Projects</b>							
MX	-	1	1	1	-	-	3
R-L	2	2	1	-	-	-	5
R-O	-	3	-	3	-	-	6
R-R	-	1	1	1	-	-	3
<b>Vacant Sites</b>							
R-R	-	1	4	1	-	-	6
R-L	20	23	2	1	-	-	46
R-S	-	2	-	-	-	-	2
R-M	5	1	1	1	-	-	8
R-H	1	-	-	-	-	-	1
R-O	-	-	1	1	-	-	2
C	8	-	-	-	1	-	9
MX	8	0	-	-	-	-	8
<b>Nonvacant (Underutilized) Sites</b>							
R-L	-	-	-	-	1	-	1
C	-	-	1	-	-	-	1
MX	-	1	-	-	-	1	2
R-O	-	-	1	-	-	-	1
<b>Total</b>	<b>44</b>	<b>35</b>	<b>13</b>	<b>9</b>	<b>2</b>	<b>1</b>	<b>104</b>

**FIGURE 2**  
Inventory of Housing Sites  
Aerial Map



**Legend**











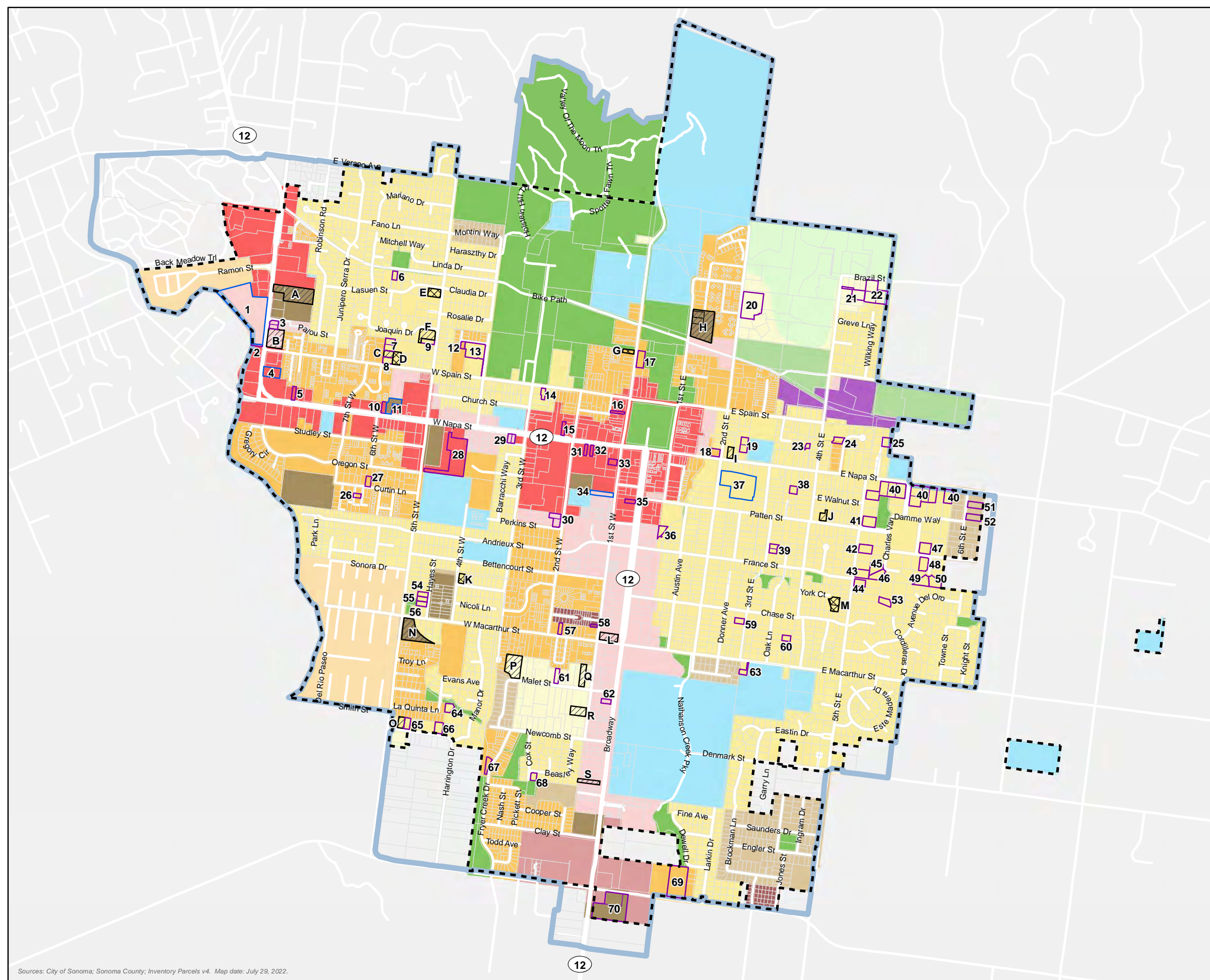
-  City of Sonoma
-  Sonoma Sphere of Influence
- Inventory of Housing Sites**
-  Vacant
-  Underutilized
-  Project - Pending
-  Project - Approved
- FEMA Designation**
-  100-year Flood Zone
-  Regulatory Floodway
-  500-year Flood Zone
-  unshaded Area of Minimal Flood Hazard







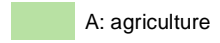
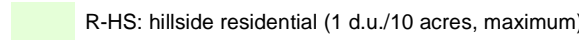
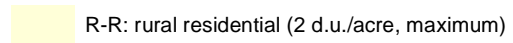
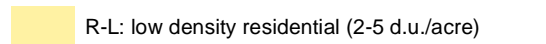
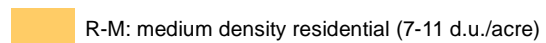

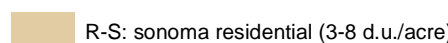
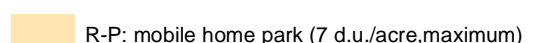


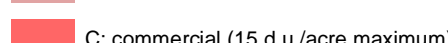
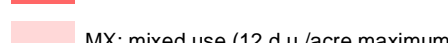
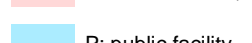




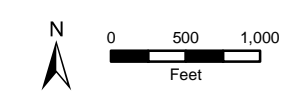
FIGURE 3

### Inventory of Housing Sites Zoning Map



**Legend**

-  City of Sonoma
-  Sonoma Sphere of Influence
- Inventory of Housing Sites**
-  Vacant
-  Underutilized
-  Project - Pending
-  Project - Approved
- Zoning Designation**
-  A: agriculture
-  R-HS: hillside residential (1 d.u./10 acres, maximum)
-  R-R: rural residential (2 d.u./acre, maximum)
-  R-L: low density residential (2-5 d.u./acre)
-  R-M: medium density residential (7-11 d.u./acre)
-  R-H: high density (11-15 d.u./acre)
-  R-S: sonoma residential (3-8 d.u./acre)
-  R-P: mobile home park (7 d.u./acre, maximum)
-  R-O: housing opportunity (15-20 d.u./acre)
-  C-G: commercial-gateway (15 d.u./acre, maximum)
-  C: commercial (15 d.u./acre, maximum)
-  MX: mixed use (12 d.u./acre, maximum)
-  P: public facility
-  Pk: Park
-  W: wine production



Sources: City of Sonoma; Sonoma County; Inventory Parcels v4. Map date: July 29, 2022.



Figure 4: Intentionally left blank.

## 5. AFFIRMATIVELY FURTHERING FAIR HOUSING ANALYSIS

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All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015. Under State law, affirmatively further fair housing 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”. These characteristics can include, but are not limited to, race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The AFFH analysis must contain the following:

- A: Outreach
- B: Assessment of Fair Housing
  - Key Data and Background Information
  - Fair Housing Enforcement and Outreach Capacity
  - Integration and Segregation Patterns and Trends
  - Racially or Ethnically Concentrated Areas of Poverty
  - Disparities in Access to Opportunity
  - Disproportionate Housing Needs in the Jurisdiction
  - Displacement Risk
- C: Sites Inventory
- D: Identification of Contributing Factors
- E: Goals and Actions

While this section provides a focused analysis of fair housing issues in Sonoma, several other sections of the Housing Element address the issue and are included in this section by reference.

### A. OUTREACH

The City of Sonoma deeply values the role of public participation in the planning process and has worked diligently to engage all members of the Sonoma community, including non-English speakers and those typically underrepresented in the planning process. This summary highlights those steps taken as part of the Housing Element Update.

#### 1. PROJECT WEBSITE

A dedicated project website (<https://www.sonomacity.org/housing-element-update/>) serves as the main conduit of information for individuals who can access material online. The project website launched in 2021 and is regularly updated to reflect ongoing community input opportunities, advertise draft work products, and answer commonly asked questions. The website includes the following information:

- Upcoming meeting information
- Project timeline
- Narrated presentation on the City’s Housing Needs, including an animated video explaining Housing Elements (narrated and subtitled in Spanish)
- Contact/sign-up information
- Links to other relevant resources

## 2. GENERAL MULTI-LINGUAL ADVERTISEMENTS

The City utilized a variety of methods to advertise the project, engage the community, and solicit input on the Housing Element. These efforts are summarized herein to demonstrate the City's meaningful commitment to community collaboration. The City prepared and implemented the following general advertisements:

- Emails to interested individuals
- Virtual workshop flyer (in English and Spanish)
- Social media posts (in English and Spanish)
- Emails to stakeholders requesting involvement and providing flyers and outreach information in English and Spanish

## 3. WORKSHOPS, POP-UP, AND PUBLIC HEARINGS

### CITY COUNCIL/PLANNING COMMISSION WORKSHOP

In January 2022, a public joint workshop was held with the City Council and Planning Commission to provide an overview of the Housing Element Update, invite input on housing-related needs and priorities, and to give the community an opportunity to identify housing-related concerns.

### VIRTUAL WORKSHOP

As part of the community outreach, a virtual community workshop was conducted to educate the community about housing issues and opportunities facing Sonoma, and to gather input on housing-related topics. The virtual workshop was hosted on the project website in Spring 2022 from March 23, 2022 through May 8, 2022. The extended timeframe was intended to allow community members and stakeholders to participate at their leisure and in accordance with their schedule and availability. The Virtual Community Workshop consisted of two parts:

- Part A: Overview video describing Housing Elements and why they are important, g existing conditions in Sonoma, and the City's Housing Element Update process
- Part B: Housing Needs and Priorities Survey (described below)

### ONLINE PUBLIC ENGAGEMENT TOOL

In 2021, the City of Sonoma was awarded a Balancing Act license through the ABAG Technical Assistance Program. The Balancing Act tool is an online public engagement tool. The Balancing Act tool was hosted on the project website from February 14, 2022 to July 15, 2022. The Balancing Act survey was available in English and Spanish and asked for input from the community by exploring how different housing densities can help Sonoma meet its housing goals, envisioning where that housing might go, and providing input on where they want to see new housing built. A total of 1,173 (765 English speaking and 408 Spanish speaking) individuals visited the site and 14 individuals submitted responses, including 12 residents of Sonoma. Participants identified plans for growth ranging from 315 units to 620 units. The majority of participants focused housing growth in the Gateway District and Southeast Area. Participants planned for an average of 7% of units in the Downtown, 9% in West Napa/Sonoma Corridor, 6% in the Northwest Area, 9% in the Broadway Corridor, 5% in the Vallejo District, 12% in the Central-West Area, 7% in the Southwest Area, 10% in the Gateway District, 13% in the Southeast Area, 12% in the Central-East Area, and 11% in the Northeast Area. Balancing Act submissions are provided in Appendix B.

### COMMUNITY POP-UP

To encourage involvement in the Housing Element Update, the City staffed a booth at the Tuesday Night Market on July 19, 2022, sharing information about the City's Housing Element Update and the City's dedicated web page that includes the most up-to-date information on the process.

### DRAFT HOUSING ELEMENT PUBLIC REVIEW AND OPEN HOUSE

The Draft Housing Element was made available for a 38-day review period from August 9 through September 16, 2022. During the public review period, the community and stakeholders were invited to comment in writing and to attend an open house to

learn about the Draft Housing Element and provide feedback. The City received 13 comments. A summary of comments and responses to the comments is provided in Appendix E. As discussed in Appendix H, revisions have been made to the Draft Housing Element where necessary to address comments.

## **PUBLIC HEARINGS**

Prior to adoption of the Housing Element, the Planning Commission and City Council each held a public hearing to provide the community with an opportunity to comment.

## **4. HOUSING NEEDS AND PRIORITIES SURVEY**

The City hosted an online Housing Element survey which was available from March 28 through May 9, 2022. The survey was available in English and Spanish. The surveys asked for input on the community's housing priorities and strategies to address Sonoma's future housing growth needs. A total of 381 individuals, including 343 residents of Sonoma (90%), responded to the survey, which focused on issues of home maintenance, affordability, home type, living conditions and homelessness. A summary of the key survey results is provided in the Housing Element Introduction section, with the complete results included in Appendix C. The City received the following feedback:

- 57% of respondents rated their housing as sound (very good to excellent condition), 23% as showing signs of minor deferred maintenance; 11% as needing moderate repairs or upgrades, 8% as needing two or more major upgrades, and less than 1% as dilapidated.
- 52% of respondents indicated they are happy with the current type of housing available in Sonoma; 44% are unhappy
- 52% of respondents said they are very satisfied with their current housing situation, 28% are somewhat satisfied, and 23% are somewhat dissatisfied or dissatisfied
- 50% of respondents chose to live in Sonoma for its proximity to friends or family
- 32% of respondents indicated they would like to buy a home in Sonoma and cannot find a home in their price range
- 14% of respondents indicated they wish to rent a home in Sonoma and cannot find a home within their rental cost range
- 5% of respondents indicated they have encountered housing-related discrimination
- 43% of respondents indicated they are concerned with their rent increasing to an amount they cannot afford
- 29% of respondents indicated they struggle to pay their rent or mortgage payment
- 30% of respondents indicated they are concerned that if they ask their property manager or landlord to make repairs their rent will increase or they will be evicted

## **5. STAKEHOLDER INPUT**

The City invited representatives from 33 community stakeholders to provide input on housing-related issues in Sonoma; this invitation list included housing developers (affordable and market-rate), religious organizations, school representatives, fair housing service providers, and other social service providers. Stakeholders invited to participate included representatives from:

- Altimira Middle School
- Burbank Housing
- DeNova Homes
- Council on Aging
- Disability Services and Legal Center
- Fair Housing Advocates of Northern California
- Farm Bureau
- FISH of Sonoma Valley
- Housing Sonoma County
- Inclusion Services & Specialized Programs Northern California
- Las Luz

- Legal Aid of Sonoma County
- Lodge at Sonoma
- MacArthur Place
- North Bay Regional Center
- Prestwood Elementary School
- Sassarini Elementary School
- Satellite Affordable Housing Associates
- Sonoma County Agricultural Preservation and Open Space District
- Sonoma County Department of Agriculture
- Sonoma County Human Services Department
- Sonoma Ecology Center
- Sonoma Land Trust
- Sonoma Overnight Support
- Sonoma Valley Chamber of Commerce
- Sonoma Valley Collaborative
- Sonoma Valley Community Health Center
- Sonoma Valley High School
- Sonoma Valley Hospital
- Sonoma Valley Vintners and Growers Alliance
- St. Francis Solano School
- Teen Services Sonoma
- Vintage House Sonoma

3 stakeholders responded to the service provider survey. Survey results are provided in Appendix D. In the future, the City will include Homeless Action Sonoma, Inc. as a stakeholder in addressing homeless issues.

## **B. ASSESSMENT OF FAIR HOUSING ISSUES**

This section presents an overview of available federal, state, and local data to analyze fair housing issues in Sonoma. This data is supplemented with local knowledge of existing conditions in the community to present a more accurate depiction of fair housing issues in Sonoma, and a more informed perspective from which to base goals, policies, and programs to affirmatively further fair housing.

### **1. KEY DATA AND BACKGROUND INFORMATION**

Sonoma is a participating city with SCCDC in the Sonoma County Urban County and is served by the Sonoma County Housing Authority, which provides wide-ranging programs related to affordable housing and community and economic development. The Sonoma County Regional Analysis of Impediments to Fair Housing Choice (AI) was prepared in 2012. In 2019, the SCCDC began preparation of an Assessment of Fair Housing but the effort was suspended. The 2012 AI is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The 2012 AI is one source of information regarding fair housing issues in the region and is the most recent comprehensive regional analysis of fair housing issues. The 2012 AI identified the following impediments to fair housing choice:

1. Residents report high levels of discrimination in Sonoma County
2. Some areas in the county are ethnically segregated; this may be related to lack of affordable housing.
3. There is a shortage of transit opportunities and services for persons with disabilities.
4. Information about fair housing is not available on jurisdictions' websites.
5. In some jurisdictions, Hispanics/Latinos have much higher loan application denial rates than Non-Hispanics/Latinos.

Barriers to fair housing choice specific to the City of Sonoma that were identified in the AI, supplemental data analysis, including use of HCD’s Affirmatively Furthering Fair Housing (AFFH) mapping tool, and the commitments of the City to address identified barriers were incorporated into this AFFH analysis. Supplemental data analysis was conducted to further understand potential fair housing issues, within the context of AFFH topics, at the city-level. Figure 5 shows the Tract and Block Group boundaries. The City’s demographic and income profile, household and housing characteristics, housing cost and availability, and special needs populations are discussed in previous sections of this Background Report.

## 2. FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

The City’s fair housing services are provided by Fair Housing Associates of Northern California (FHANC). Through a contract with the SCCDC, FHANC provides fair housing education and empowerment services to all residents of Sonoma County, except the cities of Petaluma which funds these services separately. FHANC provides comprehensive fair housing enforcement, education, and outreach services, including:

- Intake, counseling and investigation of housing discrimination complaints
- Mediations with housing providers on fair housing matters
- Referral and support when filing a complaint or lawsuit
- Assistance with reasonable accommodation/modification requests for people with disabilities
- Education programs for tenants and housing providers
- Foreclosure prevention counseling

The City of Sonoma complies with fair housing laws and regulations as described in **Table 63**. [The City has not been issued or notified of any existing or pending findings, lawsuits, enforcement actions, settlements, or judgments related to fair housing or civil rights.](#)

Law	Description	Compliance
California Fair Employment and Housing Act (FEHA)	<p>The Fair Employment and Housing Act (FEHA) applies to public and private employers, labor organizations and employment agencies and prohibits discrimination in housing and employment on the basis of protected characteristics.</p> <p>The FEHA prohibits those engaged in the housing business – landlords, real estate agents, home sellers, builders, mortgage lenders, among others – from discriminating against tenants or homeowners on the basis of protected characteristics.</p> <p>It is also illegal for cities, counties, or other local government agencies to make zoning or land-use decisions, or have policies, that discriminate against individuals based on those traits.</p>	<p>In its local practices, the City requires all development projects assisted with City funding to comply with the FEHA. The City achieves compliance with employment requirements through strict enforcement in hiring practices and regular training of and by Human Resources staff.</p> <p>Through the Urban County CDBG annual funding, the City obtains fair housing enforcement, education, and outreach services through FHANC. The City refers all parties with concerns related to housing discrimination to FHANC.</p>
Government Code Section 65008	<p>Covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.</p> <p>For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable development as compared to market-rate developments, or multifamily housing as compared to single family homes.</p>	<p>Compliance is achieved by uniform application of the City’s codes, regulations, policies and practices, including development standards, design guidelines, application submittal requirements, fees and approval findings.</p>

<b>Table 63: Compliance with Fair Housing Laws</b>		
<b>Law</b>	<b>Description</b>	<b>Compliance</b>
Government Code Section 8899.50	Requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.	Compliance is achieved through consultations with community stakeholders and support agencies as part of program evaluating and funding decisions. The 6th Cycle Housing Element Housing Plan describes how each program addresses fair housing issues and contributing factors.
Government Code Section 11135 et seq.	Requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.	Compliance is achieved through promotion/availability of activities and programs to all persons of all backgrounds to participate equally in community programs and activities.
Density Bonus Law (Gov. Code, § 65915.)	Density bonus law is intended to support the construction of affordable housing by offering developers the ability to construct additional housing units above an agency's otherwise applicable density range, in exchange for offering to build or donate land for affordable or senior units. Density Bonus Law also provides for incentives intended to help make the development of affordable and senior housing economically feasible.	Compliance is achieved by administration of Sonoma Municipal Code Chapter 19.44 – Affordable Housing and Density Bonuses, which provides for compliance with Government Code Section 65915 et seq.
Housing Accountability Act (Gov. Code, § 65589.5.)	Provides that a local agency shall not disapprove a housing development project, for very low, low-, or moderate-income households, or an emergency shelter, or condition approval in a manner that renders the housing development project infeasible for development for the use of very low, low-, or moderate-income households, or an emergency shelter, including through the use of design review standards, unless it makes certain written findings, based upon a preponderance of the evidence in the record.	Compliance is achieved through the development review process consistent with the Housing Accountability Act. Additionally, the City is in the process of preparing objective development standards to facilitate an objective and equitable review of applicable projects.
No-Net-Loss Law (Gov. Code, § 65863)	Ensures development opportunities remain available throughout the planning period to accommodate a jurisdiction's RHNA allocation, especially for lower- and moderate- income households.	The City's draft Housing Element identifies a surplus of sites with a capacity to accommodate the City's RHNA allocation. The City reviews all General Plan and zoning amendment applications to ensure there is no net loss in density or adequate sites to accommodate its housing needs.
Least Cost Zoning Law (Gov. Code, § 65913.1)	Provides that, in exercising its authority to zone for land uses and in revising its housing element, a city, county, or city and county shall designate and zone sufficient vacant land for residential use with appropriate standards, in relation to zoning for nonresidential use, and in relation to growth projections of the general plan to meet housing needs for all income categories as identified in the housing element of the general plan.	Compliance is achieved through implementation of the City's General Plan and the implementation of Housing Element Housing Plan Programs which commit the City to ensuring adequate sites to accommodate the City's RHNA at densities and intensities consistent with those discussed in the Inventory of Residential Sites section.
Excessive Subdivision Standards (Gov. Code, § 65913.2.)	Provides that, in exercising its authority to regulate subdivisions a city, county, or city and county shall:  (a) Refrain from imposing criteria for design, as defined in Section 66418, or improvements, as defined in Section 66419, for the purpose of rendering infeasible the development of housing for any and all economic segments of the community. However, nothing in this section shall be construed to enlarge or diminish the authority of a city, county, or city and county under other provisions of law to permit a developer to construct such housing.  (b) Consider the effect of ordinances adopted and actions taken by it with respect to the housing needs of the region in which the local jurisdiction is situated.  (c) Refrain from imposing standards and criteria for public improvements including, but not limited to, streets, sewers, fire stations, schools, or parks, which exceed the standards and criteria	Compliance is achieved through the implementation of a fair and equitable development review process which is administrated consistent with the Excessive Subdivision Standards Act.

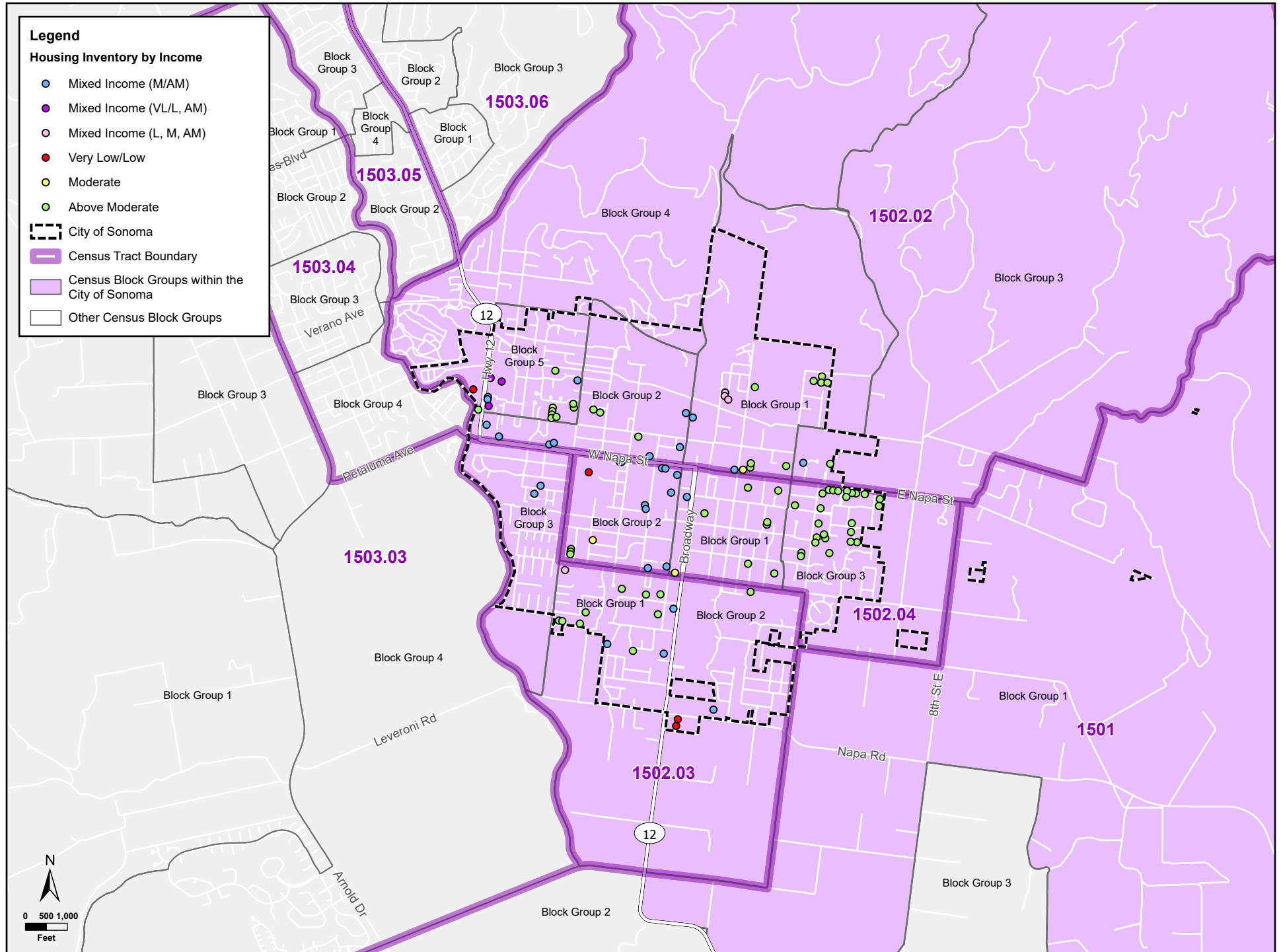
Table 63: Compliance with Fair Housing Laws		
Law	Description	Compliance
	being applied by the city, county, or city and county at that time to its publicly financed improvements located in similarly zoned districts within that city, county, or city and county.	
Limits on Growth Controls (Gov. Code, § 65302.8.)	<p>Provides that, if a county or city, including a charter city, adopts or amends a mandatory general plan element which operates to limit the number of housing units which may be constructed on an annual basis, such adoption or amendment shall contain findings which justify reducing the housing opportunities of the region. The findings shall include all of the following:</p> <p>(a) A description of the city's or county's appropriate share of the regional need for housing.</p> <p>(b) A description of the specific housing programs and activities being undertaken by the local jurisdiction to fulfill the requirements of subdivision (c) of Section 65302.</p> <p>(c) A description of how the public health, safety, and welfare would be promoted by such adoption or amendment.</p> <p>(d) The fiscal and environmental resources available to the local jurisdiction</p>	The City's draft Housing Element and the elements in the City's adopted General Plan do not include any provisions which further limits (relative to the current Housing Element and prior General Plan) the development of housing, except such provisions as may be required by state or federal laws.
Housing Element Law (Gov. Code, § 65583, esp. subds. (c)(5), (c)(10).)	<p>Section 65583 stipulates that the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.</p> <p>Subdivision (c)(5) provides that, in order to make adequate provision for the housing needs of all economic segments of the community, the program shall promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.</p>	Compliance is achieved through preparation and adoption of a Housing Element found to be in substantial compliance with State Housing Element law by the California Department of Housing and Community Development.

Of the five impediments identified by the 2012 AI, three impediments are related to fair housing enforcement and outreach: including #1 (Residents report high levels of discrimination in Sonoma County), #3 (Information about fair housing is not available on jurisdictions' websites), and #5 (In some jurisdictions, Hispanics/Latinos have much higher loan application denial rates than Non-Hispanics/Latinos). The 2012 AI indicated that approximately 25% of residents reported discrimination and respondents to the City's Housing Needs and Priority Survey identified concerns related to discrimination, including discrimination when trying to purchase housing (10%), rent housing (11%), understanding fair housing rights (22%), and concern about potential rent increases or eviction in response to requests for repair (30%). While the City provides information regarding fair housing services on its website and at City Hall, the information could be made more prominent and provide clear guidance to persons with fair housing concerns. Lack of readily accessible information can be an impediment to fair housing if information is not equally available to all protected classes or if the lack of information prevents individuals from understanding their rights and housing providers from understanding their responsibilities.



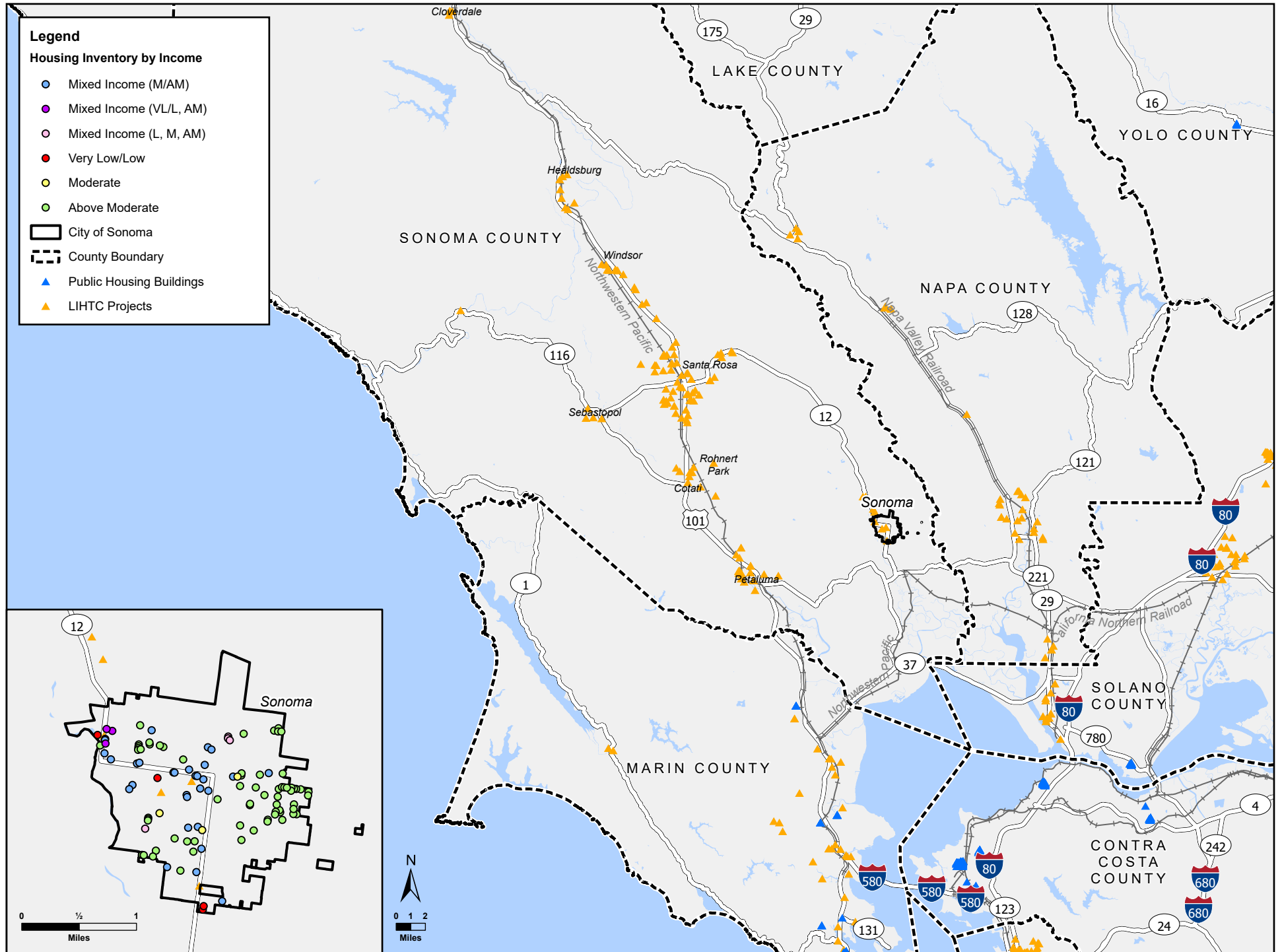


**FIGURE 5: CENSUS TRACT BOUNDARIES**



Sources: County of Sonoma GIS; U.S. Census Bureau.  
Map date: October 16, 2022.

**FIGURE 6: HOUSING CHOICE VOUCHERS**



Sources: U.S. Department of Housing and Urban Development; California Tax Credit Allocation Committee.  
 Map date: October 16, 2022.

### 3. ANALYSIS OF AVAILABLE FEDERAL, STATE, AND LOCAL DATA AND LOCAL KNOWLEDGE

This section presents an overview of available federal, state, and local data to analyze fair housing issues in Sonoma. These data sources are supplemented with local knowledge of existing conditions in the community to present a more realistic picture of fair housing concerns in Sonoma and a more informed perspective from which to base goals, policies, and programs to affirmatively further fair housing.

#### OTHER RELEVANT FACTORS

The City of Sonoma works cooperatively with the Sonoma County Housing Authority, which administers the Housing Choice Voucher Program. The program assists very low-income, elderly and disabled households by paying the difference between 30% of an eligible household's income and the actual cost of renting a unit. Figure 6 shows housing choice vouchers and LIHTC-assisted housing by census tract. As shown in Figure 6, there are four LIHTC-assisted housing developments and no Public Housing buildings in census tracts located in Sonoma.

#### INTEGRATION AND SEGREGATION PATTERNS AND TRENDS

To inform priorities, policies, and actions, Sonoma has included an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Conversely, integration refers to a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. The following analysis will analyze levels of segregation and integration for race and ethnicity, persons with disabilities, familial status, age, and income to identify the groups in Sonoma that experience the highest levels of segregation.

#### Local Knowledge

The City recognizes that segregation and discriminatory practices have occurred in Sonoma and the region. Members of the public commented on patterns of segregation and racially restrictive covenants, as evidenced by the divide between the race and income demographics of Sonoma and The Springs community to the north.

Restrictive covenants were used to stabilize the property values of white families and caused segregation of neighborhoods. Beginning in 1934, the Federal Housing Authority recommended the inclusion of restrictive covenants in the deeds of homes it insured. Racially restrictive covenants made it illegal for African Americans, as well as other people of color, to purchase, lease rent, or use homes (unless as a servant).

In a landmark 1948 ruling, the Supreme Court deemed all racially restrictive covenants unenforceable. While Titles VIII and IX of the 1968 Civil Rights Act, also known as the Fair Housing Act, prohibited discrimination in the sale, rental, and financing in housing-related transactions based on race, color, national origin, religion, sex, disability, marital status, and familial status, many restrictive covenants continue to remain in property deeds throughout Sonoma County. Residents of Sonoma have indicated that the covenants, and restrictions (CC&Rs) for their homes or in the community include racially restrictive language.

Sonoma County's Restrictive Covenant Modification (RCM) program provides for a modification document to be recorded with the unlawful covenant language stricken, where a property owner submits their title documents for such a change and the existence of unlawfully restrictive language is confirmed by County Counsel. However, most people are not even aware that these covenants exist and very few, eligible, property owners in Sonoma County have completed this process.

In 2021, Assembly Bill 1466 made changes to the RCM processes and added Government Code Section 12956.3, which imposes a state-mandated local program and opens the ability to all, including the County Recorder, to submit a RCM document for recording and redact the illegal restrictive language. As part of the new processes, GC Section 12956.3(b)(1), requires the Sonoma County Clerk-Recorder's Office create a Restrictive Covenant Modification Program Implementation Plan to address the following requirements:

- Identify unlawfully restrictive covenants
- Redact unlawfully restrictive covenants
- Track identified illegal restrictive covenants
- Establish a timeline to identify, track, and redact unlawfully restrictive covenants
- Make index of recorded RCM documents available to the public
- Maintain original non-redacted recording
- Provide status reports to the County Recordors Association of California

Separate from racially restrictive covenants, the Home Owners Loan Corporation mapped regions and “redlined” areas, depicting “best” areas in green, “still desirable” in blue, “definitely declining” in yellow, and “hazardous” in red. This practice was known as “redlining”. The City is not aware of any known redlining maps that include Sonoma or Sonoma County.

**Diversity Index**

Tracking the diversity of cities and counties throughout California is crucial to understanding the shifting demographics of race and ethnicity in California and the United States. ESRI, a provider of geographic information system (GIS) software, locational intelligence, and mapping, has developed a Diversity Index, which captures the racial and ethnic diversity of a geographic area in a single number, from 0 to 100. Scores less than 40 represent lower diversity in the jurisdiction while scores of greater than 85 represent higher diversity. Additionally, scores between 40-55 represent low diversity, 55-70 represent moderate diversity, and 70-85 represent high diversity.

**Table 64** shows the demographic trends over time for the City and Sonoma County. Since 1990, the percentage of population that are Hispanic or Latinx residents has increased in the City from 5.1% to 20.8% compared to the County which has increased at a slightly higher rate from 10.6% to 26.7%. The percentage of population that are White residents has decreased in the City from 92.5% to 73.4% compared to the County which has decreased at a slightly higher rate from 84.3% to 63.2%. The percentage of population that are Other Races or Multiple Races residents has increased in the City from 0.0% to 3.0% compared to the County which has increased at a higher rate from 0.1% to 3.8%. The percentage of population that are Asian or Native Hawaiian and Other Pacific Islander residents has increased from 1.7% to 2.6% in the City compared to the County which has increased at a higher rate from 2.6% to 4.3%.

<b>Table 64: Demographic Trends</b>				
<b>Racial/Ethnic</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>Current</b>
<b>Sonoma</b>				
American Indian or Alaska Native, Non-Hispanic	0.3%	0.3%	0.3%	0.1%
Asian / API, Non-Hispanic	1.7%	1.4%	3.0%	2.6%
Black or African American, Non-Hispanic	0.3%	0.4%	0.5%	0.1%
White, Non-Hispanic	92.5%	88.7%	79.2%	73.4%
Other Race or Multiple Races, Non-Hispanic	0.0%	2.5%	1.7%	3.0%
Hispanic or Latinx	5.1%	6.7%	15.3%	20.8%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Sonoma County</b>				
American Indian or Alaska Native, Non-Hispanic	0.9%	0.8%	0.7%	0.5%
Asian / API, Non-Hispanic	2.6%	3.2%	4.0%	4.3%
Black or African American, Non-Hispanic	1.4%	1.3%	1.4%	1.5%
White, Non-Hispanic	84.3%	74.3%	66.1%	63.2%

Other Race or Multiple Races, Non-Hispanic	0.1%	3.0%	2.9%	3.8%
Hispanic or Latinx	10.6%	17.4%	24.9%	26.7%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Source: 1990 US Census; 2000 US Census; 2010 US Census, 2016-2020 ACS

As shown in Figure 9, there generally appears to be lower to moderate diversity index scores throughout the City of Sonoma (compared to its neighbors), with the highest diversity index scores (55-70) located west of the California State Route 12. From 2010 to 2018, there has been a slight increase to the diversity index in the City, as illustrated by Figures 9 and 10. As shown in Figure 9, communities in Sonoma County with higher diversity scores are somewhat more likely to be located in the central portions of the County generally along the Highway 101 corridor than they are in the eastern and western portions of the County.

**Racial Dissimilarity Index**

Another way to measure segregation is by using a dissimilarity index. This index measures how evenly any two groups are distributed across neighborhoods relative to their representation in a city overall. The dissimilarity index at the jurisdiction level can be interpreted as the share of one group that would have to move neighborhoods to create perfect integration for these two groups. The dissimilarity index ranges from 0 to 1. Higher values indicate that groups are more unevenly distributed (e.g., they tend to live in different neighborhoods).

Table 65 below provides the dissimilarity index values indicating the level of segregation in Sonoma between White residents and residents who are Black, Latinx, or Asian/Pacific Islander. The table also provides the dissimilarity index between White residents and all residents of color in the jurisdiction, and all dissimilarity index values are shown across three time periods (2000, 2010, and 2020).

Race	Sonoma			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	0.031*	0.018*	0.056*	0.185
Black/African American vs. White	0.165*	0.109*	0.063*	0.244
Latinx vs. White	0.079	0.059	0.066	0.207
People of Color vs. White	0.068	0.048	0.046	0.168

Source: AFFH Segregation Report: Sonoma – IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Note: If a number is marked with an asterisk (\*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

In Sonoma, the highest segregation is between Latinx and White residents (see Table 65). Sonoma’s Latinx /White dissimilarity index of 0.066 means that 6.6% of Latinx (or White) residents would need to move to a different neighborhood to create perfect integration between Latinx residents and white residents.

**Theil’s H Index**

The Theil’s H Index can be used to measure segregation between all groups within a jurisdiction:

- This index measures how diverse each neighborhood is compared to the diversity of the whole city. Neighborhoods are weighted by their size, so that larger neighborhoods play a more significant role in determining the total measure of segregation.

- The index ranges from 0 to 1. A Theil’s H Index value of 0 would mean all neighborhoods within a city have the same demographics as the whole city. A value of 1 would mean each group lives exclusively in their own, separate neighborhood.
- For jurisdictions with a high degree of diversity (multiple racial groups comprise more than 10% of the population), Theil’s H offers the clearest summary of overall segregation.

The Theil’s H Index values for neighborhood racial segregation in Sonoma for the years 2000, 2010, and 2020 can be found in Table 66 below. The “Bay Area Average” column in the table provides the average Theil’s H Index across Bay Area jurisdictions in 2020. Sonoma’s Theil’s H index is very low (at 0.006 is much closer to 0 than 1), indicating that demographics are similar throughout the City. It is noted that between 2010 and 2020, the Theil’s H Index for racial segregation in Sonoma increased, suggesting that there is now more neighborhood level racial segregation. In 2020, the Theil’s H Index for racial segregation in Sonoma was 85% lower than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in Sonoma is much less than in the average Bay Area city.

	Sonoma			Bay Area Average
Index	2000	2010	2020	2020
Theil’s H Multi-racial	0.003	0.002	0.006	0.042

Source: AFFH Segregation Report: Sonoma – IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

**Mapped Patterns of Integration and Segregation**

Patterns of integration and segregation are considered for people with disabilities, familial status, and income groups. Relying primarily on data available from the US Census, it is possible to map and consider existing patterns which may indicate historical influences and future trends by census tract and census block groups.

[Predominant Racial/Ethnic Population](#)

Figure 7 identifies the predominant racial/ethnic population by census tract for Sonoma and the surrounding area. As shown in Figure 7, the predominant population in Sonoma and most of Sonoma County is White majority. In the Springs community, just north of Sonoma, and in the Santa Rosa and Healdsburg areas along the Highway 101 corridor there are several tracts with a Hispanic majority. As shown in Figure 7, the Bay Area region located south and southwest of Sonoma shows more diversity, with a variety of racial and ethnic majorities, including areas of Asian, African American, and Hispanic majorities.

[Concentrations of Race and Ethnicity](#)

Figure 8 provides another lens to look at concentrations of race and ethnicity, evaluating areas with a single racial/ethnic majority, with two ethnic majorities, areas with a mix of 3 groups, areas with a mix of 4 groups, and diverse areas. The City of Sonoma’s census tracts are all Latinx-White, similar to areas immediately north, east, and south of Sonoma. To the west as well as in the broader region, there are large areas identified as mostly White. In Sonoma County, there is more diversity around Rohnert Park and eastern Santa Rosa than in Sonoma and its surrounding area. The Bay Area region located south and east of Sonoma, in Napa County, Solano County, and Contra Costa County is much more diverse than Sonoma and Sonoma County, with many areas of 3- and 4-group mixed races/ethnicities.

Figure 9 shows the diversity index for Sonoma and the surrounding area in 2018 and Figure 10 depicts the diversity index in 2010. Sonoma’s diversity index by block group remained relatively static in the majority of the City from 2010 to 2018, with an increase in diversity (from <40 to a 40-55 score) in the southeast area of the City (Block Group 2 of Census Tract 1502.03). Sonoma does not have any census block groups with the highest diversity index scores (above 85) in either 2010 or in 2018.

### [Population with a Disability](#)

As shown in Figure 11, the southern portion of the City has a higher percentage of persons with a disability. As discussed in the Housing Needs Assessment section of this Background Report, approximately 13.5% of Sonoma's population in 2019 had at least one disability and 63.1% of those individuals were seniors. For persons ages 0 to 64, the most common disabilities are Cognitive Difficulty (37.1%), Vision Difficulty (18.9%), and Hearing Difficulty (18.5%). For the population of ages 65 and over, the most common disabilities are Hearing Difficulty (25.2%), Ambulatory Difficulty (24.9%), and Independent Living Difficulty (24.1%).

Looking beyond Sonoma's boundaries, the census tracts in the City exhibit similar level of concentrations of persons with disabilities. As shown in Figure 11, one census tract in the City has a rate of disability that is at less than 10%, one census tract in the City has a rate of disability that is between 10-20%, and one census tracts in the City has a rate of disability that is between 20-30%, indicating that communities in the City of Sonoma with higher percentage of population with disabilities are more likely to be located in north and south portions of the City.

Based on this analysis, the City finds that, in Sonoma, census tracts with higher concentrations of disabilities are also some of the City's census tracts with higher cost burdens of owner households, indicating that households with disabilities may be particularly susceptible to these economic impacts. Moreover, the City recognizes that at a regional level, Sonoma is home to higher concentrations of persons with disabilities than other cities and communities in southern Sonoma County, which can be correlated with the community's older resident profile. [In other cities in the region, such as Rohnert Park, Cotati, and Petaluma, all census tracts have a rate of disability that is less than 10% or between 10-20% and there are no areas or concentrations of higher levels of persons with a disability. Therefore, Sonoma is the only city in southern Sonoma County and the region that has a census tract with a rate of disability that is between 20-30%.](#)

### [Percent of Population 18 Years and Over in Households Living with Spouse](#)

[Figure 12 identifies the percent of population over the age of 18 years and over in households living with spouse in Sonoma. As shown in Figure 12, all census tracts in Sonoma have 40 to 60% of their population over the age of 18 years and over in households living with spouse. This is similar to much of the area surrounding the City. Countywide, the areas with higher concentrations of population over the age of 18 years and over in households living with spouse are located in less densely developed areas of the County, as illustrated in Figure 12. Dense communities have a lower percentage of population over the age of 18 years and over in households living with spouse. Based on this analysis, it appears that there are no significant patterns of segregation impacting population over the age of 18 years and over in households living with a spouse in Sonoma. Other cities in Sonoma County have different percentages of population over the age of 18 years and over in households living with spouse. Santa Rosa, Sebastopol, Rohnert Park, and Cotati have census tracts that have 20% - 40% of their population over the age of 18 years and over in households living with spouse. Petaluma, Windsor, and Healdsburg have census tracts that have 60% - 80% of their population over the age of 18 years and over in households living with spouse.](#)

### [Percent of Children in Married Households](#)

[As shown in Figure 13, the percentage of children in married couple households varies across different census tracts in Sonoma. Citywide, the areas with higher concentrations of children in married couple households are located in the southern portion of the City. Census tract 1502.03 that covers the southern portions of the City have 40-60% of its children in married households. Census tract 1502.04 that covers the central portions of the City have 60-80% of its children in married households. Census tract 1502.02 that covers the northern portions of the City have over 80% of its children in married households. It is noted that some census tracts with higher percentages of children in married households extends out into areas of the unincorporated County. Based on this analysis, the County finds that there are no significant patterns of segregation impacting children in married households in Sonoma County, given that the concentration of married households has no correlation with the degree of diversity throughout the County. As shown in Figure 23 and Figure 24, census tracts that have higher percentage of children in married couple households area also some of the census tracts that with higher cost burdens for renter households, indicating that these households may be particularly susceptible to these economic impacts. Family makeup, including married couples \(with or without children\), persons over the age of 18 living alone and female headed households can provide insight into potential segregation issues in the community. As shown in Figure 12, all census tracts in Sonoma have 40 to 60 percent of the population in married households. Countywide, the areas with higher \[percentage of children in married couple households\]\(#\) concentrations of married](#)



households are located in less densely developed areas of the County, as illustrated in Figure 12. Dense communities have a lower percentage of children in married couple households ~~married households~~ and this pattern is consistent throughout Sonoma County. Census tracts within other cities and communities in Sonoma County have similar percentage of children in married couple households as census tracts in Sonoma.

### Female-headed Households

Sonoma is also home to a number of female-headed households located throughout the community with approximately one third of the City's census tracts exhibiting higher proportions than the rest of the City. This pattern is present in the region as well; regional jurisdictions like Cotati, Rohnert Park, Santa Rosa, Windsor, and Healdsburg generally have some census tracts with higher proportions of female-headed households with no spouse or partner and with children present, as shown in Figure 14. In the City as well as Countywide, there are no census tracts with higher proportions of female-headed households with no partner/spouse and with children; there are some tracts with higher concentrations, in the Bay Area including in Marin, Napa, and Contra Costa County. In Sonoma, census tracts with higher concentrations of female-headed households are also some of the City's census tracts with vulnerable sensitive communities.

### Persons 65 Years of Age or Older

The community's older residents, persons 65 years of age or older, are dispersed throughout the community, as shown in Figure 15. All census tracts in the City are comprised of populations where over 25% of residents are 65 years of age or older. The highest concentrations of senior residents are located in the south portion of the City. As members of the community age-in-place (remain in their residence as they get older), it's possible that some areas of the City will continue to see higher proportions of their neighborhood occupied by senior residents. Safe and convenient access to goods and services is especially important for seniors, who may have mobility limitations or minimum household income. As shown in Figure 15, in Sonoma, census tracts with higher concentrations of senior households are also some of the City's census tracts with higher cost burdens for renter households, indicating that senior households may be particularly susceptible to these economic impacts. Compared with other cities and communities in Sonoma County, such as Santa Rosa, Sebastopol, Rohnert Park, Cotati, and Petaluma, and Windsor, Sonoma is the home of a higher percentage of senior residents. Only Healdsburg has similar proportion of its population as senior residents.

### Median Household Income

Patterns of moderately segregated economic wealth, as indicated by median household income, do exist in Sonoma, as illustrated on Figure 16. In general, those areas with higher median household incomes are located in the eastern and western portion of the City, and areas with lower median household incomes are more likely located in the central portion of the City. As shown in Figure 16, communities in Sonoma County with lower median incomes are somewhat more likely to be located in the more racially and ethnically diverse portion of the County. There are not strong patterns of household income in the region, with a range of range of household income levels are reflected throughout the County as shown on Figure 16. There are clusters of lower income areas located southwest of Sonoma, in the Cotati/Rohnert Park area, north of Rohnert Park, throughout Santa Rosa, between Windsor and Healdsburg, and between Healdsburg and Cloverdale. The cities of Healdsburg, Windsor, Sebastopol, and Rohnert Park have more of the highest income block groups than other areas in the County. Compared with census tracts within other cities and communities in Sonoma County, census tracts in Sonoma have similar distribution and range of median household income levels. In comparison, the median income in Sonoma County (\$103,300) is higher than the Statewide median of \$90,100.

Income segregation can be measured using similar indices as racial segregation. The isolation index values for all income groups in Sonoma for the years 2010 and 2015 can be found in Table 67 below. Above Moderate-income residents are the most isolated income group in Sonoma. Sonoma's isolation index of 0.483 for these residents means that the average Above Moderate-income resident in Sonoma lives in a neighborhood that is 48.3% Above Moderate-income. Among all income groups, the Above Moderate-income population's isolation index has changed the most over time, becoming more segregated from other income groups between 2010 and 2015. As shown in Table 67, Sonoma's very low, moderate, and above moderate income groups are less isolated than those in the Bay Area as a whole, while the low income groups are slightly more isolated than average in the Bay Area.

<b>Table 67: Income Group Isolation Index Values for Segregation within Sonoma</b>			
<b>Income Group</b>	<b>Sonoma</b>		<b>Bay Area Average</b>
	<b>2010</b>	<b>2015</b>	<b>2015</b>
Very Low-Income (<50% AMI)	0.191	0.196	0.269
Low-Income (50%-80% AMI)	0.177	0.185	0.145
Moderate-Income (80%-120% AMI)	0.173	0.166	0.183
Above Moderate-Income (>120% AMI)	0.469	0.483	0.507

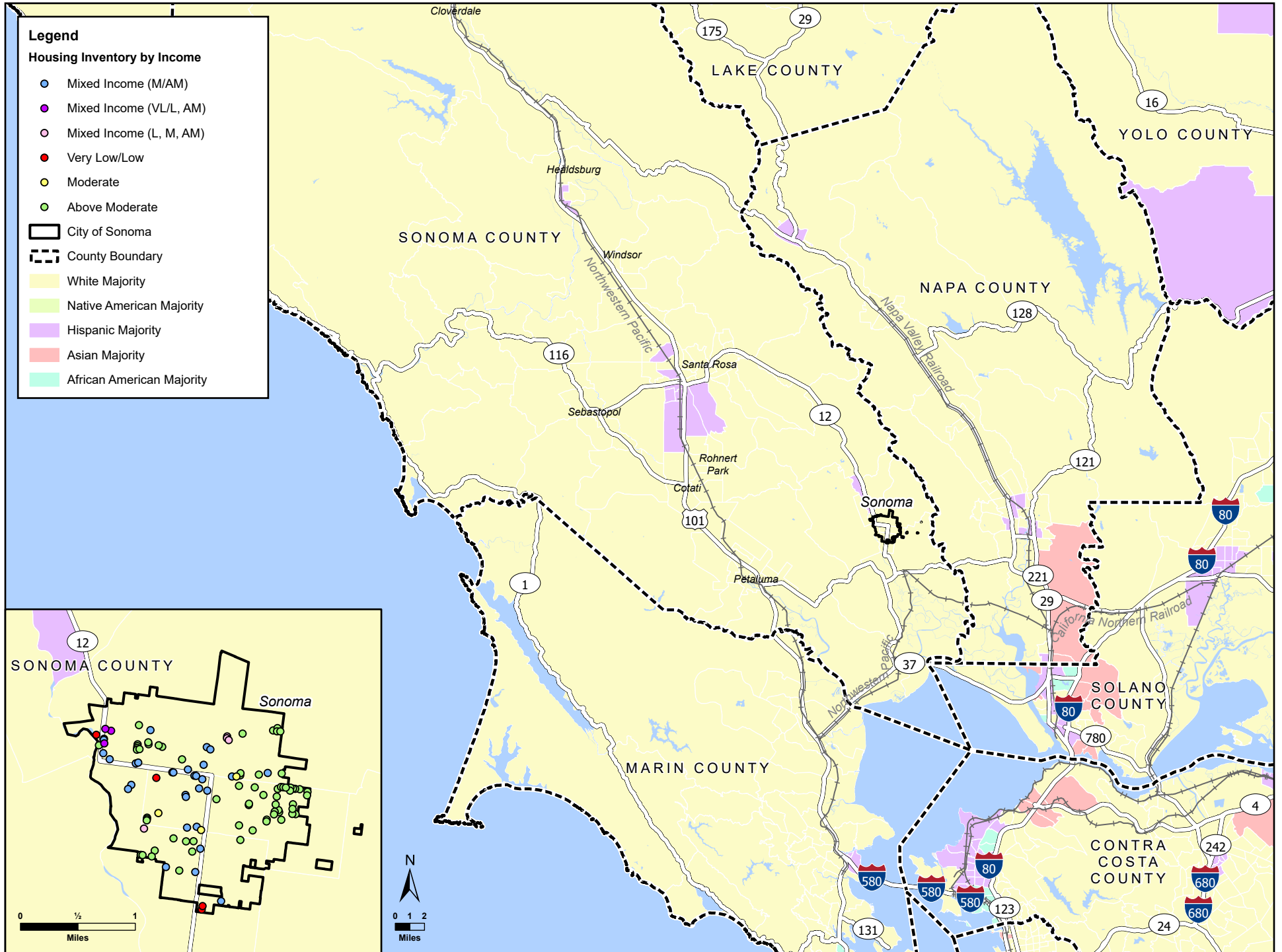
Source: AFFH Segregation Report: Sonoma – Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011- 2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

As described throughout this Housing Element, the City is committed to supporting the development of housing affordable to lower income households in locations throughout the City and has identified sites for future growth and development which are designed to promote a more balanced and integrated pattern of household incomes.

**Findings**

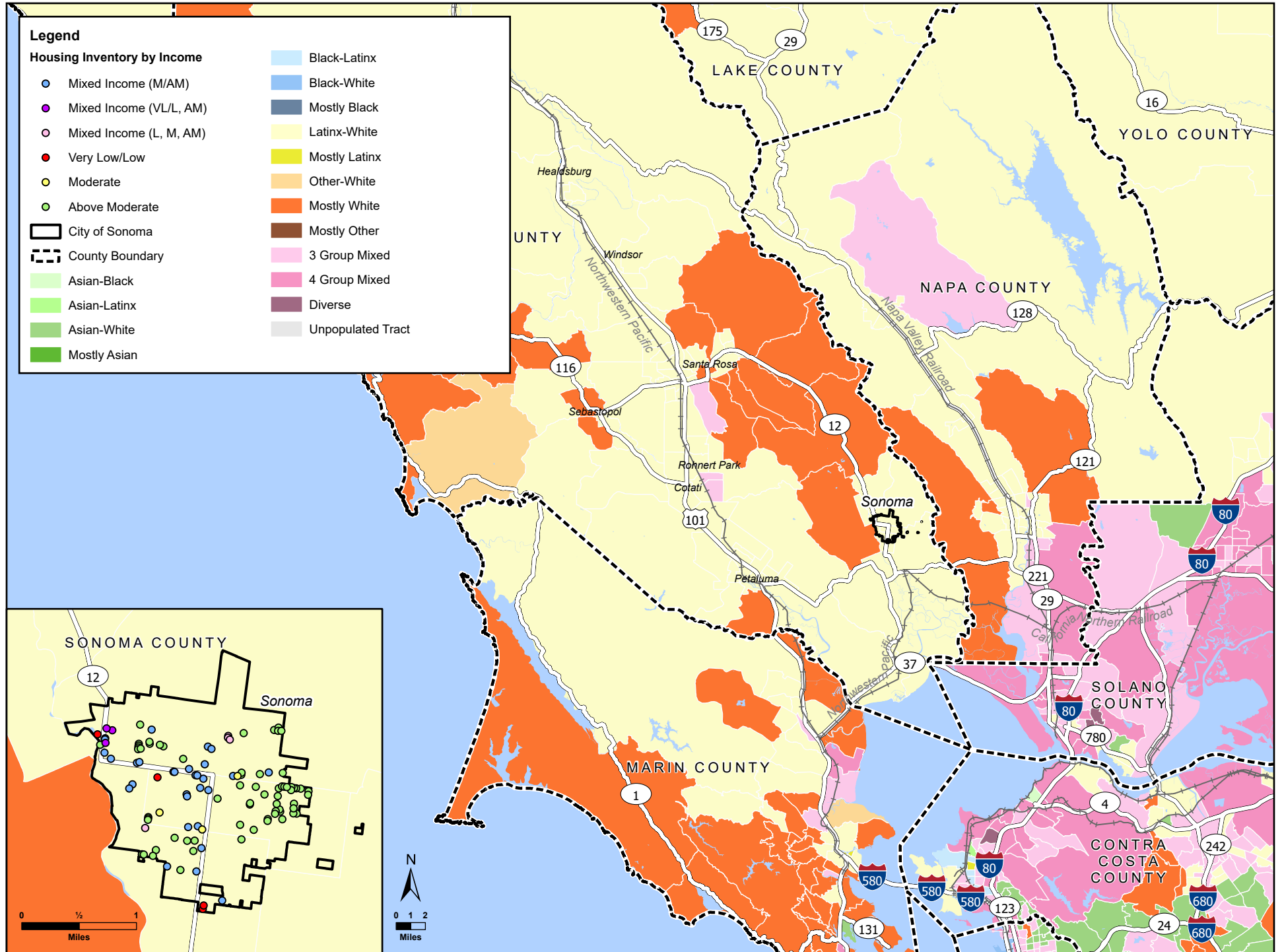
The City has considered trends and patterns related to integration and segregation based on racial and ethnic factors, disability, family status, seniors, and median household income. There are some patterns of isolation or segregation apparent when considering certain characteristics, including population with disabilities, female-headed households, seniors, and households with lower median household incomes. As part of the City’s regular participation in the County AI and through implementation of programs in the Housing Plan as summarized in Table 1 of the Housing Plan, the City will continue to consider these patterns to program funding and resources to reduce patterns of isolation and segregation and increase access to housing-related and other resources in these areas in order to effect change from current conditions.

**FIGURE 7: PREDOMINANT POPULATION BY CENSUS TRACT**



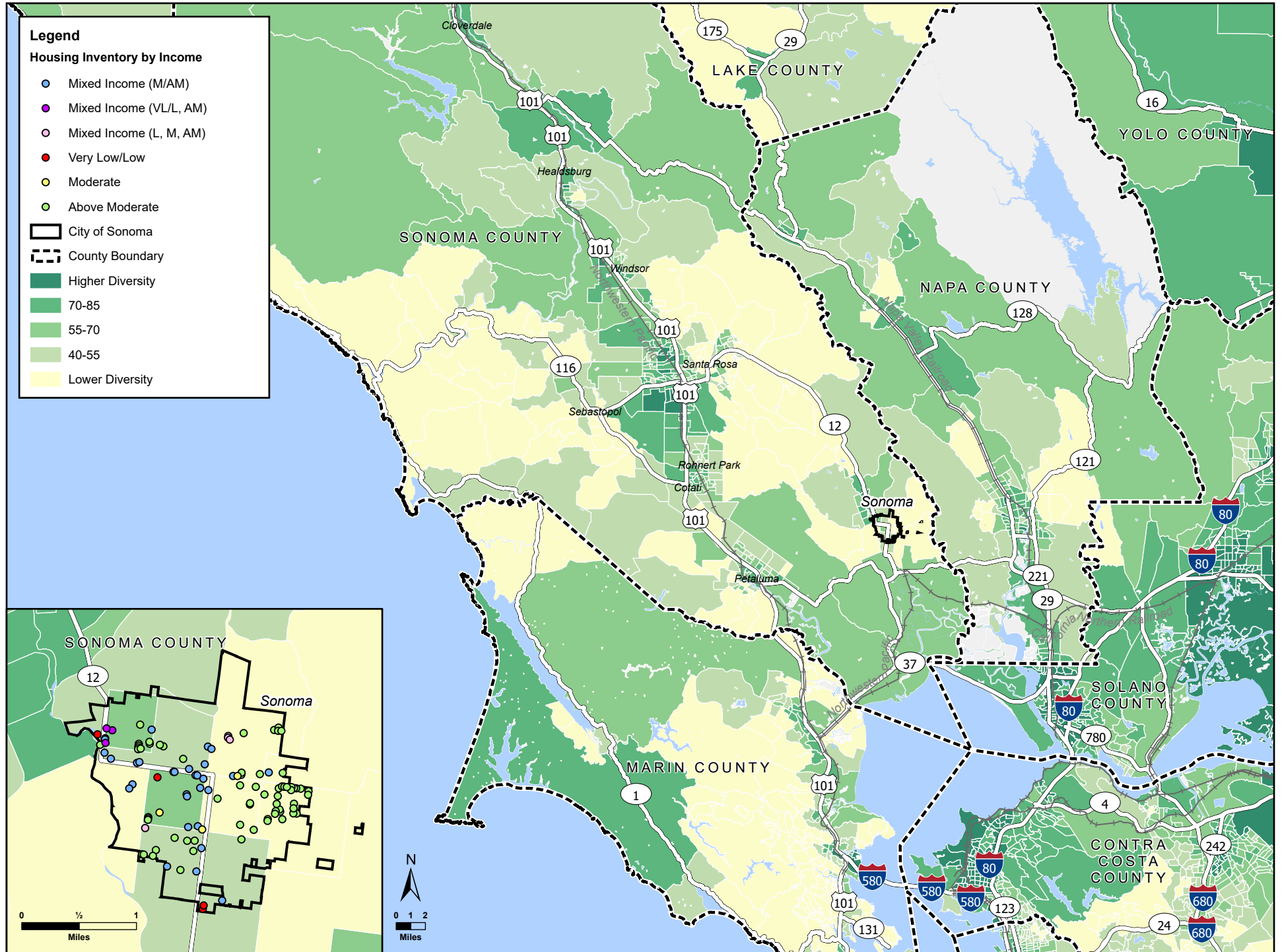
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "PredominantPop\_AfricanAmericanMajority", "PredominantPop\_AsianMajority", "PredominantPop\_HispanicMajority", "PredominantPop\_NativeAmericanMajority", "PredominantPop\_WhiteMajority". Map date: October 16, 2022.

**FIGURE 8: NEIGHBORHOOD CONCENTRATION BY CENSUS TRACT**



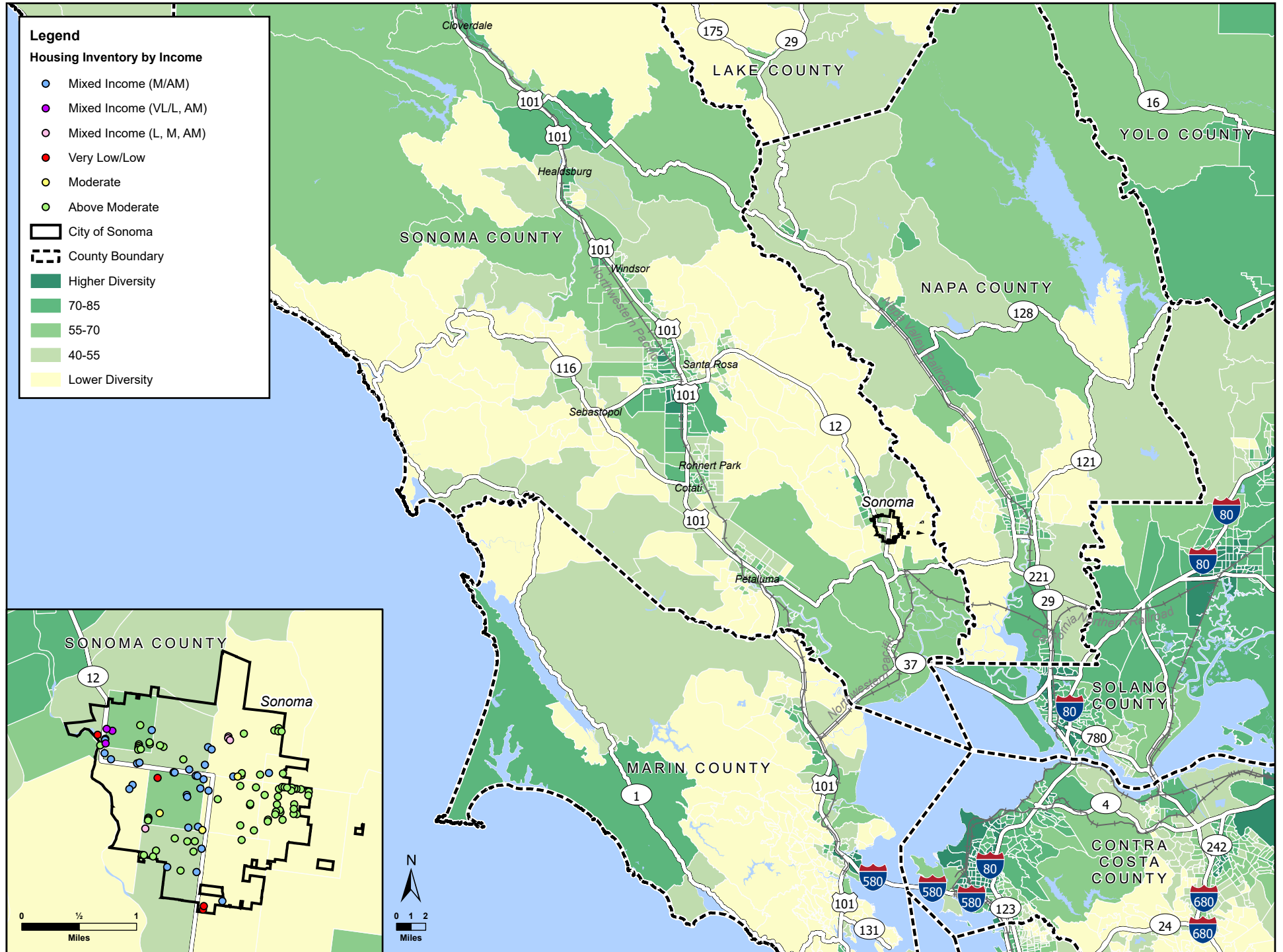
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "NeighborhoodSegregation\_Tract\_2019."  
Map date: October 16, 2022.

**FIGURE 9: DIVERSITY INDEX BY CENSUS BLOCK GROUP 2018**



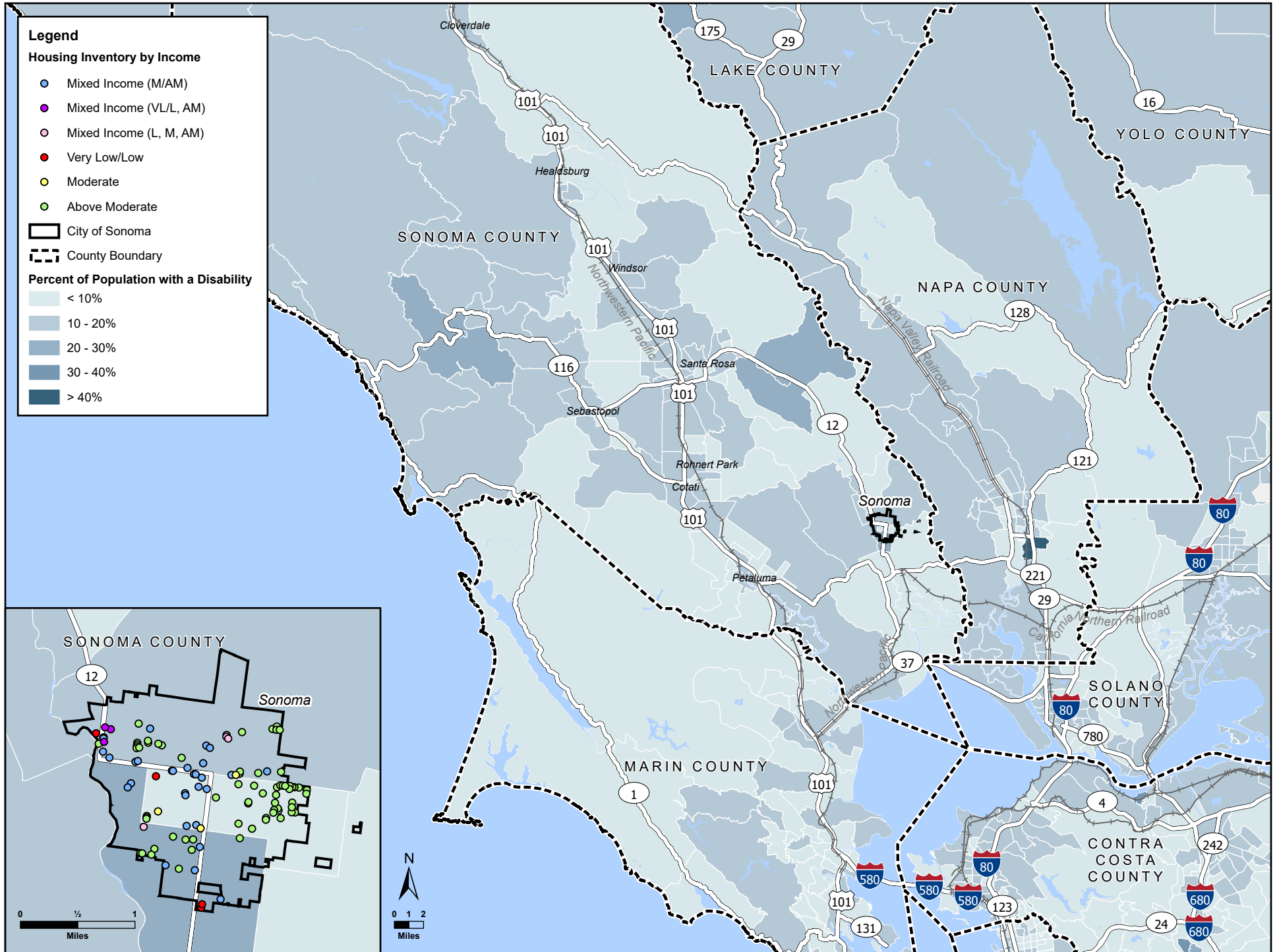
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "RaceDemographics\_BlockGrp\_2018."  
Map date: October 16, 2022.

**FIGURE 10: DIVERSITY INDEX BY CENSUS BLOCK GROUP 2010**



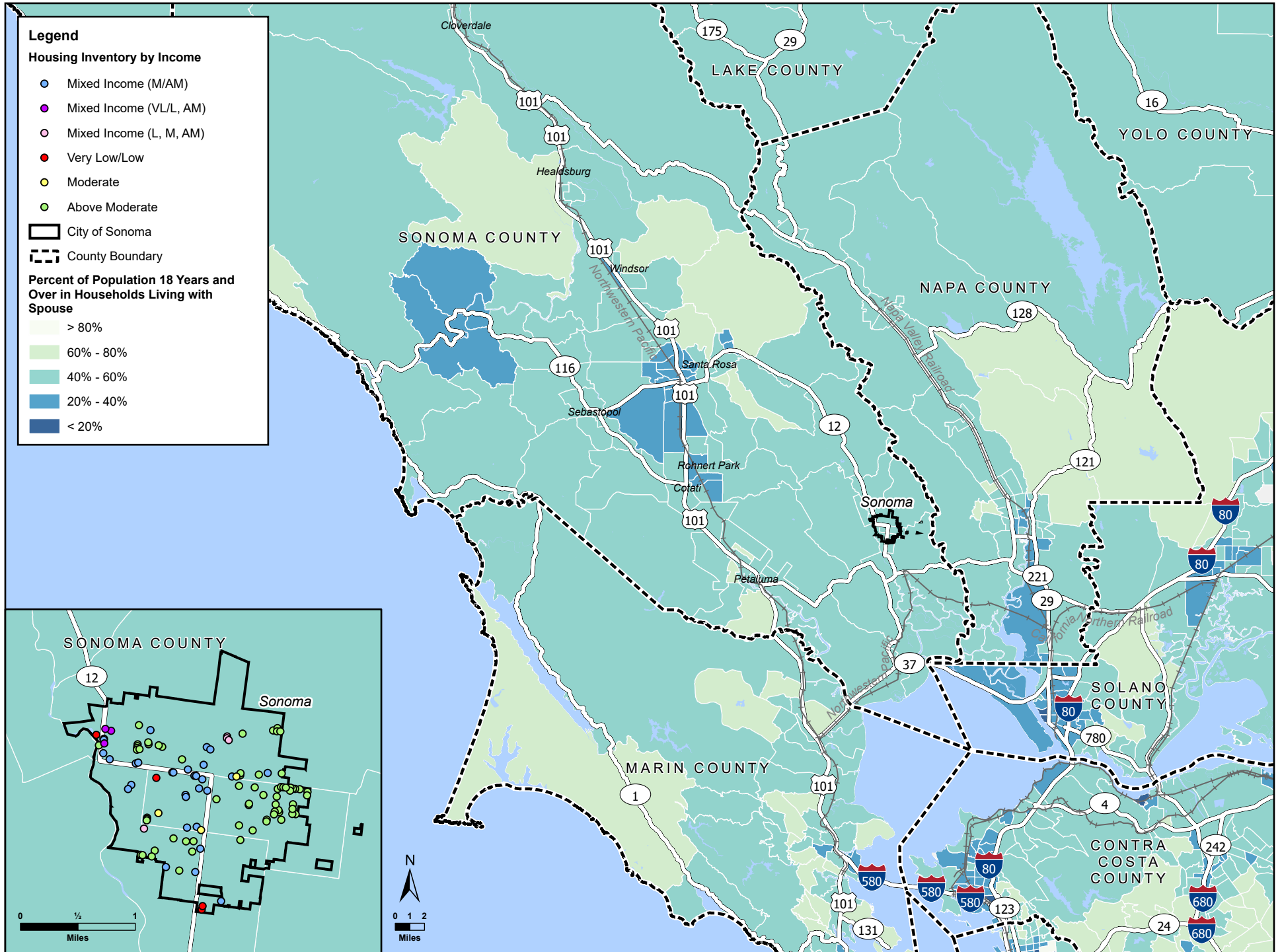
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "RaceDemographics\_BlockGrp\_2010."  
Map date: October 16, 2022.

**FIGURE 11: PROPORTION OF POPULATION WITH DISABILITIES BY CENSUS TRACT**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "DisabilityPopulation\_Tract\_2015\_19."  
Map date: October 16, 2022.

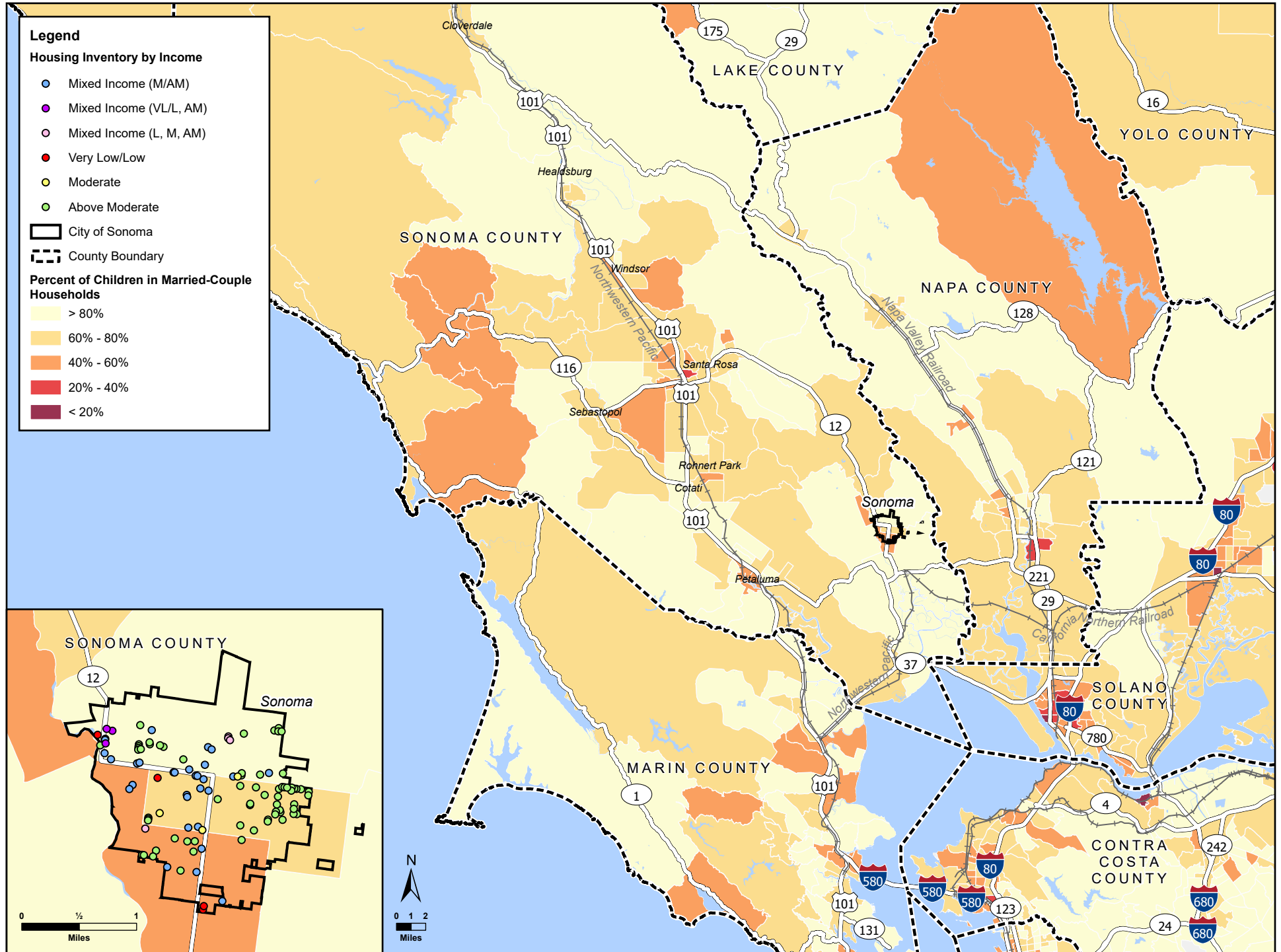
**FIGURE 12: PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING WITH SPOUSE**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "FamilyStatus\_Tract\_2015\_19." Map date: October 16, 2022.

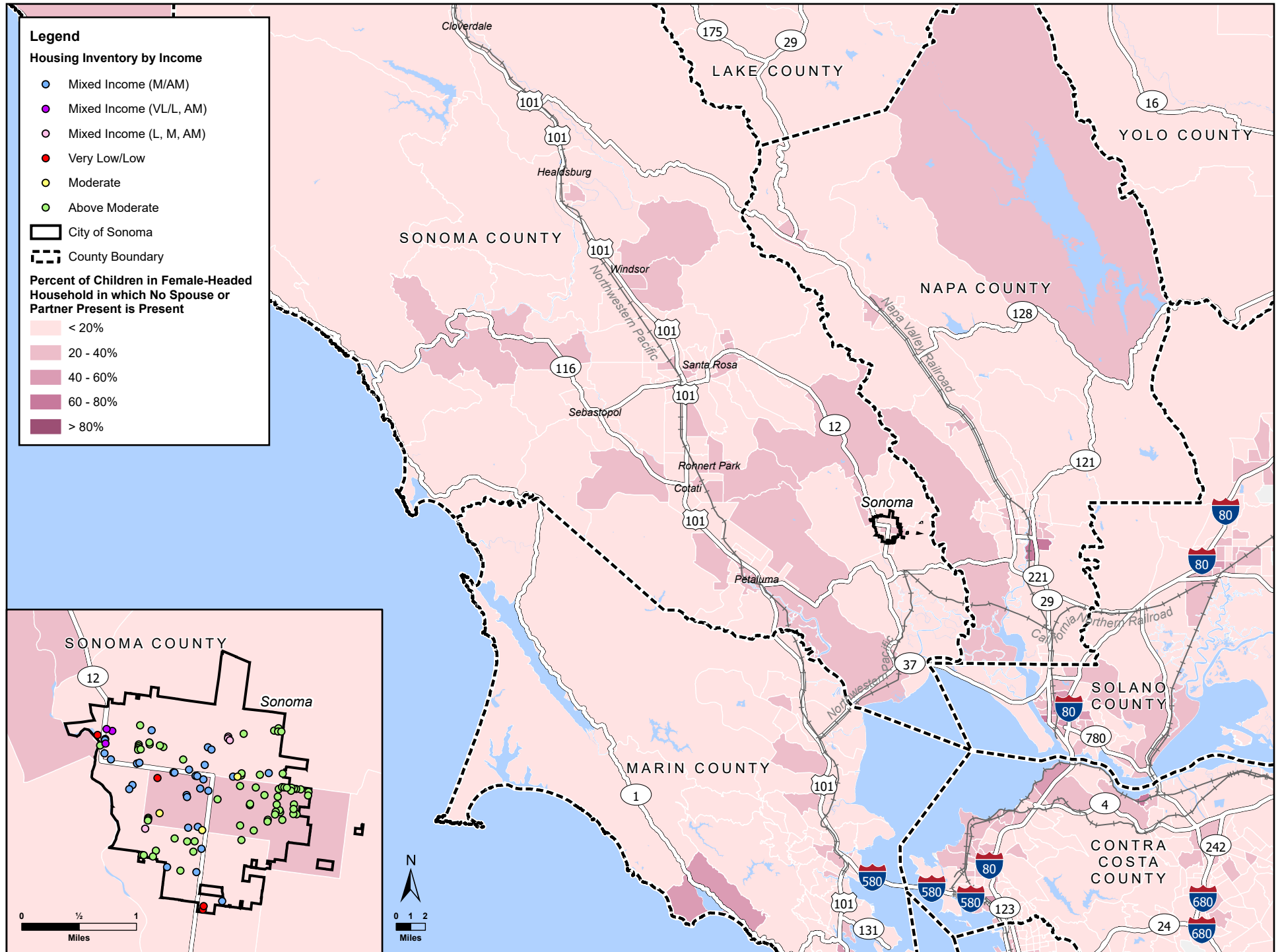


**FIGURE 13: PERCENT OF CHILDREN IN MARRIED COUPLE HOUSEHOLDS**



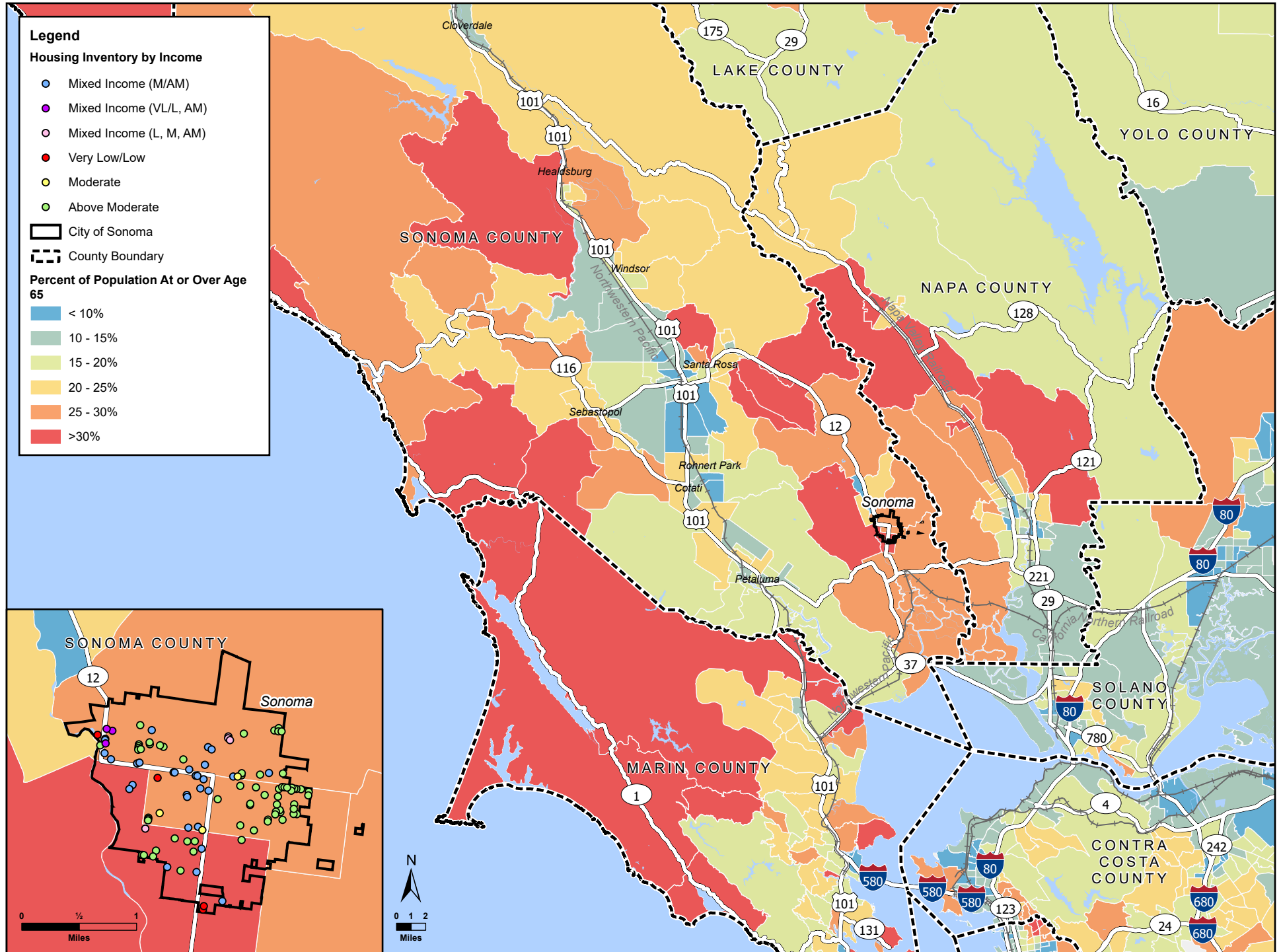
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "FamilyStatus\_Tract\_2015\_19."  
Map date: October 16, 2022.

**FIGURE 14: FEMALE-HEADED HOUSEHOLDS BY PROPORTION OF CHILDREN PRESENT BY CENSUS TRACT**



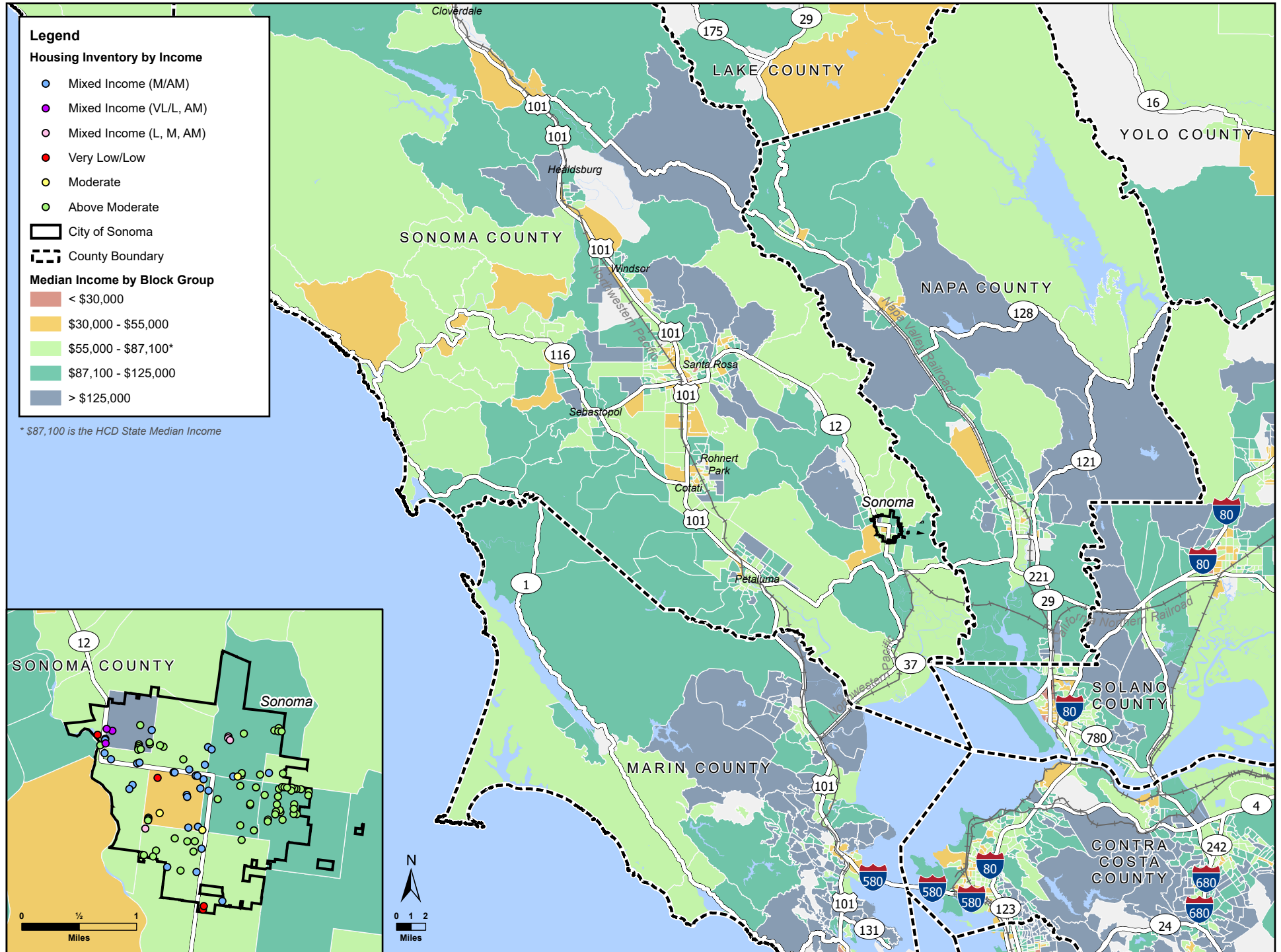
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "FamilyStatus\_Tract\_2015\_19."  
Map date: October 16, 2022.

**FIGURE 15: PROPORTION OF SENIOR RESIDENTS BY CENSUS TRACT**



Sources: U.S. Census Bureau's American Community Survey (ACS) 2015-2019 5-year estimates, Table(s) B01001.  
Map date: October 16, 2022.

**FIGURE 16: MEDIAN HOUSEHOLD INCOME BY BLOCK GROUP**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "MedianIncome\_BlockGrp\_2015\_19."  
Map date: October 16, 2022.

**RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)**

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAPs if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. According to the HCD AFFH Dataset, there is no R/ECAP in Sonoma County. The nearest R/ECAPs are in Marin County and Yolo County and do not have any notable geographical or socioeconomic connection to Sonoma.

Comparing Figure 9 (Diversity Index) to Figure 16 (Median Household Income), it appears that areas of high diversity do not generally correlate with lower incomes and that areas of low diversity reflect a range of income levels. However, this pattern is not consistent and there are several areas ranking in the highest diversity index categories that also have lower median household incomes in the County, including areas along Highway 101 in the vicinity of Windsor and Santa Rosa and one census block group in Sonoma located west and south of Highway 12 (census tract 1502.04, block group 1).

As discussed in the Findings section of this Chapter, the Housing Plan includes programs to encourage increased diversity and housing opportunities throughout the City.

**RACIALLY/CONCENTRATED AREAS OF AFFLUENCE (RCAA)**

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices”. Therefore, both sides of the continuum must be examined. While HCD does not have a standard definition for RCAAs, looking at the percentage of the White population and median household income can provide a good indicator for areas of affluence.

In addition to RECAPs utilized by HUD, scholars at the University of Minnesota Humphrey School of Public Affairs created the Racially Concentrated Areas of Affluence (RCAAs) metric to more fully tell the story of segregation in the United States<sup>5</sup>. RCAAs are defined as census tracts where 1) 80 percent or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016). **Table 68** at the median household incomes of White, non-Hispanic residents in Sonoma, as well as the County as a whole. There is no census block in the City with a median household income of \$125,000 and a population that is 80 percent or more white. As such, there is no census tract in Sonoma that fit these criteria, and as such, the City has no RCAAs. Further, in comparing Figure 9 to Figure 16, the most affluent area of the City (census tract 1502.02, block group 5) is also one of the two most diverse block groups in the City.

Median Household Income	City of Sonoma	Sonoma County
White Households	\$84,277	\$ 84,212
All households	\$84,352	\$81,018
% of White population	73.4%	63.2%

Source: US Census, 2015-2019 ACS

5 Goetz, E. G., Damiano, A., & Williams, R. A. 2019. Racially Concentrated Areas of Affluence: A Preliminary Investigation. Cityscape: A Journal of Policy Development and Research, Volume 21(1) [pages 99–124]. Available at: <https://www.huduser.gov/portal/periodicals/cityscape/vol21num1/ch4.pdf>

**DISPARITIES IN ACCESS TO OPPORTUNITIES**

The Department of Housing and Community Development together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task Force developed the 2021 TCAC/HCD Opportunity Area Maps to understand how public and private resources are spatially distributed. The Task Force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

The opportunity maps are made from composite scores of three different domains made up of a set of indicators. The Task Force analyzed three domains (Economic, Environmental, Education) to establish the resource category for each block group. The Economic Domain (Figure 17) analyzes poverty, level of adult education, employment rates, job proximity, and median home value in each block group, while the Education Domain (Figure 18) analyzes math/reading proficiency, high school graduation rates, and the student poverty rate. The Environmental Domain (Figure 19) looks at the CalEnviroScreen 3.0 Pollution indicators (Exposures and Environmental Effect indicators) and processed values. Each Figure includes the locations of proposed sites to accommodate the 6<sup>th</sup> Cycle RHNA. Table 66 shows the full list of indicators.

Domain	Indicator
Economic	<ul style="list-style-type: none"> <li>• Poverty</li> <li>• Adult education</li> <li>• Employment</li> <li>• Job proximity</li> <li>• Median home value</li> </ul>
Education	<ul style="list-style-type: none"> <li>• Math proficiency</li> <li>• Reading proficiency</li> <li>• High school graduation rates</li> <li>• Student poverty rates</li> </ul>
Environmental	<ul style="list-style-type: none"> <li>• CalEnviroScreen 3.0 pollution indicators and values</li> </ul>

Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.

Based on the domain scores, census tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. According to the Task Force’s methodology, the tool allocates the 20% of the tracts in each region with the highest relative index scores to the “Highest Resource” designation and the next 20% to the “High Resource” designation. Each region then ends up with 40% of its total tracts as “Highest” or “High” resource. These 2 categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. The remaining tracts are then evenly divided into “Low Resources” and “Moderate Resource”.

Figure 20 identifies the final resource categories of each census block group, as identified on the TCAC/HCD Opportunity Map, as well as the locations of the proposed sites to accommodate the 6<sup>th</sup> Cycle RHNA. As shown in Figure 20, no census block groups of the City have the highest levels of opportunity and the proposed sites to accommodate the 6<sup>th</sup> Cycle RHNA are located throughout the City in varying levels of opportunity to the extent feasible, given the City’s existing built-out development pattern. **Table 70** identifies the resources levels by census block group and the corresponding scores for economic, educational and environmental indicators.

Census Tract	Block Group	Resource Level	Economic Score	Environmental Score	Education Score
1502.02	1	Low Resource	0.76	0.24	0.02
1502.02	2	Low Resource	0.42	0.24	0.12
1502.02	3	High Resource	1.00	0.24	0.15
1502.02	5	Low Resource	0.78	0.24	0.12
1502.03	1	Low Resource	0.59	0.20	0.07
1502.03	2	Low Resource	0.38	0.20	0.03
1502.03	3	Low Resource	0.43	0.20	0.07
1502.04	1	Moderate Resource	0.98	0.33	0.02
1502.04	2	Low Resource	0.18	0.33	0.03
1502.04	3	Low Resource	0.74	0.33	0.00

Source: California Department of Housing and Development, Affirmatively Furthering Fair Housing Data and Mapping Resources, accessed May 13, 2022.

The City of Sonoma has one census block group designated as high resource areas on the TCAC/HCD Opportunity Map. However, only a small portion of the census block group is located within the City. The majority of the City is designated as low resource area, including census tracts 1503.03 and 1502.02. The block group 2 of the census tract 1502.04 located in the central portion of the City is moderate resources area.

Sites to accommodate the City's lower-income 6<sup>th</sup> Cycle RHNA are generally located in low resource opportunity tracts, with mixed income sites also located in the moderate and high resource tracts. By promoting new development opportunities in low opportunity areas, it is the City's intent to improve the conditions of these census tracts by providing a boarder range of goods and services, bring new residential development closer to transit and jobs, and support community revitalization. Given that the City does not have any significant high or highest resource areas, the City must look to areas with lower to moderate levels of resources in order to accommodate new development, and the City has distributed these units throughout the resource levels to promote more equal and equitable patterns of opportunity. Moreover, the City's promotion of ADUs and Junior ADUs throughout the community, in all resource levels, further supports the City's commitment to distribute housing available at all income levels in different geographic areas of the City.

### **Economic Opportunity**

The largest industry in Sonoma in 2019 was Educational, Health, and Social Services at 21.3%. This is followed by Arts, Entertainment, Recreation, Accommodation, and Food Services at 11.5% and Manufacturing at 10.6%. As described above, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. As shown in **Table 70** above, the overall economic scores in Sonoma range from 0.18 to 1. The economic scores are inconstant in the City, just like many other Sonoma County jurisdictions. However, the City of Sonoma has more census tracts with higher economic scores. Within Sonoma, block group 2 of census tract 1502.04 has the lowest economic score, which is below 0.25. Block group 2 of census tract 1502.02, block group 3 of census tract 1502.03, and block group 2 of census tract 1502.03 also have relatively lower economic scores, which are between 0.25 and 0.5. Although the predominant racial and ethnic group concentration is similar throughout the City, as shown in Figures 9 and 16, census block groups with lower economic scores are also census block groups are also some of the census block groups with a higher diversity index and a lower median household income. The concentration of low economic opportunity census tracts does not show strong correlations with other protected and sensitive classes.

As shown in Table 70A, the City's older population (60+) has a higher rate of employment per total population than the Countywide cohort and experiences similar unemployment rates (unemployed persons as total of the workforce) as the Countywide, with a higher rate in the 60-64 year raga than in the 65+ ranges. Races in the City that experience significantly lower employment to population ratios than the Countywide average include American Indian and Alaska Native, Native Hawaiian and Other Pacific

Islander, while the Black or African American, some other race, and two or more races experience employment rates that are 17% or higher than the County averages. All race/ethnicities except Asian have a lower unemployment rate than the Countywide average. Females in Sonoma experience less unemployment than the Countywide average, while females with their own children under 18 years of age experience slightly higher employment than the Countywide average. Regarding income levels, the City's percentage of its total working age population that is below the poverty level is lower than the Countywide average and the City's population below the poverty level that is in the labor force and unemployed is also higher than the Countywide rate. Persons with a disability in the City have a higher rate of employment to total working age population than Countywide and the unemployment rate for persons with a disability is also lower than the Countywide rate. Overall, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islanders, and persons below the poverty level have less access to employment in the City and Asians, persons aged 60-64 years, men, and persons below the poverty level experience higher rates of unemployment than the Countywide averages. It is noted that while the difference in employment to population ratio is assumed to result from less access for the purpose of the above discussion, there is also the potential in this category for persons who choose to not be in the labor force. This is different from the unemployment rate which measures persons that are in the labor force but are not employed.

As shown in Figure 21, the job proximity index is generally high in Sonoma. On a scale from zero to 100 where 100 is the closest proximity to jobs, the majority of the City scores above 80, which is higher than scores in other Sonoma County jurisdictions, including Santa Rosa, Sebastopol, Rohnert Park, Petaluma, and Cotati. The Within the City, only block group 5 of census tract 1502.02, areas east of California Route 12 freeway, have a lower job proximity index, which is between 61 and 80. While the concentration of lower job proximity score census tracts does not show clear pattern with any protected and sensitive classes (see Figures 8 through 16 for concentrations of protected classes by area) and does not appear to have a meaningful effect on the ability of protected groups to obtain a job, there are unemployment trends among protected classes as discussed above. The Association of Bay Area Governments (ABAG) local profile of Sonoma lists 8,062 total jobs in Sonoma in 2018, which was a decrease of 20.4% from 2008.

**Table 70A: Employment by Characteristics and Regional (County/City) Comparison**

Characteristic	Sonoma County, California			Sonoma city, California			Difference in Employment/Population Ratio	Difference in Unemployment Rate
	Total	Employment / Population Ratio	Unemployment rate	Total	Employment / Population Ratio	Unemployment rate		
Population 16 years and over	412,126	61.5%	5.1%	9,544	57.3%	4.1%	-4.2%	-1.0%
<b>AGE</b>								
60 to 64 years	37,573	58.5%	4.0%	1,074	71.2%	6.1%	12.7%	2.1%
65 to 74 years	55,520	31.2%	3.6%	1,787	32.5%	2.8%	1.3%	-0.8%
75 years and over	35,577	8.0%	2.5%	1,350	7.0%	0.0%	-1.0%	-2.5%
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>								
White alone	319,992	59.8%	5.1%	8,406	54.2%	4.2%	-5.6%	-0.9%
Black or African American alone	6,697	56.0%	9.1%	37	73.0%	0.0%	17.0%	-9.1%
American Indian and Alaska Native alone	4,096	63.7%	6.8%	6	0.0%	0	-63.7%	-6.8%
Asian alone	17,474	63.4%	3.7%	308	60.4%	13.1%	-3.0%	9.4%
Native Hawaiian and Other Pacific Islander alone	1,507	69.6%	2.1%	0	0	0	-69.6%	-2.1%
Some other race alone	45,284	70.6%	5.0%	474	88.4%	0.0%	17.8%	-5.0%



<a href="#">Two or more races</a>	<a href="#">17,076</a>	<a href="#">67.9%</a>	<a href="#">5.3%</a>	<a href="#">313</a>	<a href="#">87.9%</a>	<a href="#">2.1%</a>	<a href="#">20.0%</a>	<a href="#">-3.2%</a>
<a href="#">Hispanic or Latino origin (of any race)</a>	<a href="#">93,946</a>	<a href="#">68.6%</a>	<a href="#">5.7%</a>	<a href="#">1,298</a>	<a href="#">62.9%</a>	<a href="#">0.0%</a>	<a href="#">-5.7%</a>	<a href="#">-5.7%</a>
<a href="#">White alone, not Hispanic or Latino</a>	<a href="#">279,375</a>	<a href="#">58.8%</a>	<a href="#">4.9%</a>	<a href="#">7,663</a>	<a href="#">55.2%</a>	<a href="#">4.5%</a>	<a href="#">-3.6%</a>	<a href="#">-0.4%</a>
<a href="#">Population 20 to 64 years</a>	<a href="#">297,011</a>	<a href="#">75.5%</a>	<a href="#">4.8%</a>	<a href="#">6,023</a>	<a href="#">77.5%</a>	<a href="#">4.4%</a>	<a href="#">2.0%</a>	<a href="#">-0.4%</a>
<b>SEX</b>								
<a href="#">Male</a>	<a href="#">147,346</a>	<a href="#">79.3%</a>	<a href="#">5.1%</a>	<a href="#">2,919</a>	<a href="#">79.0%</a>	<a href="#">6.7%</a>	<a href="#">-0.3%</a>	<a href="#">1.6%</a>
<a href="#">Female</a>	<a href="#">149,665</a>	<a href="#">71.8%</a>	<a href="#">4.4%</a>	<a href="#">3,104</a>	<a href="#">76.1%</a>	<a href="#">2.1%</a>	<a href="#">4.3%</a>	<a href="#">-2.0%</a>
<a href="#">With own children under 18 years</a>	<a href="#">47,790</a>	<a href="#">70.9%</a>	<a href="#">3.6%</a>	<a href="#">832</a>	<a href="#">68.9%</a>	<a href="#">3.0%</a>	<a href="#">-2.0%</a>	<a href="#">-0.6%</a>
<b>POVERTY STATUS IN THE PAST 12 MONTHS</b>								
<a href="#">Below poverty level</a>	<a href="#">30,669</a>	<a href="#">42.8%</a>	<a href="#">17.3%</a>	<a href="#">629</a>	<a href="#">32.0%</a>	<a href="#">18.3%</a>	<a href="#">-10.8%</a>	<a href="#">1.0%</a>
<a href="#">At or above the poverty level</a>	<a href="#">264,298</a>	<a href="#">79.8%</a>	<a href="#">3.9%</a>	<a href="#">5,327</a>	<a href="#">83.9%</a>	<a href="#">3.7%</a>	<a href="#">4.1%</a>	<a href="#">-0.2%</a>
<b>DISABILITY STATUS</b>								
<a href="#">With any disability</a>	<a href="#">29,471</a>	<a href="#">42.2%</a>	<a href="#">11.1%</a>	<a href="#">526</a>	<a href="#">58.9%</a>	<a href="#">8.3%</a>	<a href="#">16.7%</a>	<a href="#">-2.8%</a>

### Educational Opportunity

[TCAC’s education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate.](#) As shown in **Table 70** above, the overall education opportunity scores in Sonoma range from 0 to 0.15. [All Generally, most census tracts in the City have an educational opportunity score below 0.15 and all census tracts are below 0.25 as shown in Figure 18.](#) As shown in the figure 18, while areas of Sonoma County, including Sebastopol, Healdsburg, Windsor, and Petaluma and portions of unincorporated areas near these cities have higher educational scores, Sonoma has similar scores to the surrounding Sonoma Valley region, portions of Rohnert Park, portions of Santa Rosa, Cloverdale, and is slightly lower than Cotati. Across all tracts in the County, Sonoma’s educational opportunity index scores are generally lower compared to other densely populated areas, particularly Petaluma, Sebastopol, Windsor, and Healdsburg, as well as lower in comparison to areas in Napa County east of the Sonoma County/Napa County boundary.

[While educational opportunity scores are low across the City and the adjacent unincorporated area, there is varied opportunity based on the schools of the Sonoma Valley Unified School District \(SVUSD\).](#) According to the California Department of Education’s California School Dashboard, in 2021 SVUSD had an enrollment of 3,503 students. The ethnic/racial make-up was: 63.1% Hispanic, 1.3% Asian, 31.2% White, 0.4% African American, 0.4% American Indian, and 1.5% two or more races. A total of 56.2% of the District’s students come from socioeconomically disadvantaged backgrounds, 26.3% are English learners and 16.6% are students with disabilities. SVUSD has 9 schools, including 4 located in the City of Sonoma: Prestwood Elementary School (generally east of 1<sup>st</sup> St W north of E. Spain St, east of 2<sup>nd</sup> St W south of E. Spain St. and north of E. MacArthur St, and east of Manor St south of E. MacArthur), Sassarini Elementary School serves the western portion of the City (generally west of 1<sup>st</sup> St W north of E. Spain St, west of 2<sup>nd</sup> St W south of E. Spain St. and north of E. MacArthur St, and west of Manor St south of E. MacArthur), Adele Harrison Middle School, and Sonoma Valley High School. Altimira Middle School (located in the unincorporated area to the northwest) serves the Sassarini Elementary students while Prestwood students are assigned to Adele Harrison. Sonoma Valley High School serves the full SVUSD, including Sonoma and the surrounding unincorporated area. District-wide, SVUSD has low English language arts scores (35.1 points below standard) and low mathematics score (88.2 points below standard). Of the schools serving Sonoma, Sassarini’s scores were below the District-wide average for English language arts (61.1 points below standard) and Altimira’s scores were below the District-wide average (51.2 points below standard for English language arts and 130.3 points below for mathematics). While Prestwood and Adele Harrison also had low English language arts and mathematics scores, the scores were above District-wide averages (Prestwood scored 17.6 points below standard for English language arts

[and 33.1 points below for mathematics and Adele Harrison scored 21.7 points below standard for English language arts and 66.6 points below for mathematics\). Students in the western portion of the City generally have access to lower-scoring schools – this affects the households in two moderately diverse areas \(CT 1502.02 BG 5 and the portion of CT 1502.03 BG 1 west of 2<sup>nd</sup> St W\), affects two of the three block groups \(CT 1502.03 BGs 1 and 3\) with higher concentrations of persons with a disability. Conversely, female-headed households with children present are more concentrated in the higher-scoring school boundaries and concentrations of both the highest and lowest median income levels are located in the lower-scoring school boundaries. It is noted that while the SVUSD has a policy related to equity, the policy addresses nondiscrimination in district programs and activities and education for various protected classes, but does not address reviewing enrollment boundaries in the context of ensuring protected classes have equitable access to higher-scoring and proficient schools and does not address making investments in lower-scoring schools to increase educational opportunities for protected classes or to reduce disparities in access to opportunities.](#)

### **Environmental Opportunity**

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. As shown in **Table 70** above, the overall environmental scores in Sonoma range from 0.20 to 0.33. While the entire community has relatively low environmental scores, central and central/eastern areas of the City have slightly improved scores in comparison with the rest of Sonoma – [a review of predominant racial populations, neighborhood diversity, household types, median income, persons with a disability, and seniors does not indicate that these areas correspond with any concentration of these protected classes in areas with lower scores versus higher scores except that persons with a disability have higher concentrations in the areas with a lower environmental score. As shown in Figure 19, most Sonoma County jurisdictions, such as Santa Rosa, Rohnert Park, Petaluma, and Sebastopol, tend to have higher environmental scores or areas with higher environmental scores, compared to the City of Sonoma and much of the region to the south, east, and southwest of Sonoma. Healdsburg, Windsor, and portions of Petaluma and Sebastopol in the northern portions of the County tend to have lower environmental scores. Comparing the City's environmental scores to the distribution of protected classes, there are no discernible patterns of concentration of protected classes in the City's areas with the less positive environmental outcomes. The City takes a multitude of actions to improve the environment and address sustainability. The City adopted a Climate Action and Environmental Sustainability and Accomplishments and 2020-21021 Work Plan \(Sustainability Accomplishments and Plan\) in 2020. The Sustainability Accomplishments and Plan focuses on environmental sustainability and addressing climate change. The City's investments to address the environment and sustainability that most affect environmental conditions in the City include:](#)

[Energy: In 2013, the City joined Sonoma Clean Power Consortium to reduce the environmental impact of energy production and provide CleanStart and EverGreen options for renewable and low carbon power. The City expedites solar permitting and partners with regional providers to encourage solar installations and reduce energy and water use. The City will continue to take actions to promote clean energy choices, offset local carbon emissions, and improve the community's access to programs that provide solar installation assistance.](#)

[Transportation: The City has enacted multiple programs to promote alternatives to single passenger vehicles and gasoline-fueled vehicles, including subsidizing Fare-Free rides on the Sonoma Shuttle \(Route 32\), increasing electrical vehicle charging stations and capability, and improving the pedestrian and bicycle networks. While the City has promoted safe routes to schools to promote bicycling to school, encouraging safe access to school, the two lower-performing schools serving the City \(Sassarini Elementary School and Altimira Middle School\) are not identified as enrolled in the Safe Routes to School program while the higher-performing Adele Harrison Middle and Prestwood Elementary Schools are enrolled. The City's Anti-Idling Ordinance limits idling of schools when parked within 100 feet of a residential zoning district; it is noted that this requirement does not address the Mixed Use zoning district which allows concentrations of residential uses, including lower income developments.](#)

The City also reviews its water quality on an annual basis, issuing annual reports to ensure the community is aware of any water quality issues and works to ensure its water meets state and federal drinking water standards.

The City's environmental sustainability and clean drinking water efforts have generally benefitted the whole community and do not benefit nonprotected classes more than protected classes as none of the programs are targeted to specific areas or neighborhoods of the City or have requirements that would exclude members of protected classes. However, there is the potential to focus improvements on areas with more environmental concerns and ensuring that improvements, such as pedestrian and bicycle improvements and anti-idling requirements, which promote community health are benefitting areas or neighborhoods with concentrations of protected classes.

A disadvantaged community or environmental justice community ("EJ Community") is identified by the California Environmental Protection Agency ("CalEPA") as "areas that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need. In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25 percent highest score census tracts) are those that have been designated disadvantaged communities under SB 535. Communities that are identified as an EJ Community based on their cumulative pollution exposure score are targeted for investment through the State cap-and-trade program. However, the condition of these communities poses fair housing concerns due to disproportionate exposure to unhealthy living conditions. As shown in CalEPA's Disadvantaged Communities Map, there is no EJ Community in the City of Sonoma.

## **Transportation**

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. Sonoma County Transit (SCT) is a division of the Sonoma County Department of Transportation and Public Works, serving numerous locations across Sonoma County. Sonoma County Transit (SCT) provides local and intercity public transportation throughout most of the major communities in Sonoma County, ~~as well as Novato and San Rafael, in Marin County.~~ Sonoma County Transit's fixed-route network provides intercity transit service traveling north/south between Cloverdale and Petaluma and east/west between Sonoma and Monte Rio. VINE Transit also operates a route between Napa and Sonoma. In addition, local transit services are provided in Rohnert Park, Cotati, Sebastopol, Windsor, Healdsburg, Cloverdale, Sonoma, Sonoma Valley and Guerneville/Monte Rio. ADA Paratransit Service is a shared ride transportation service that is not dependent on trip purpose. Paratransit Service primarily serves origins and destinations within ¾ of a mile from regular fixed-routes at the same hours and days as fixed-route service. Additionally, All Sonoma County Transit buses are wheelchair accessible and can transport two wheelchair passengers at a time. Most buses are low-floor design and use a ramp to provide access to passengers using wheelchairs. On standard-floor buses, a lift is employed to provide access.

All Transit is a data tool that measures access to transit, connectivity, and service availability. The tool analyzes the transit frequency, routes, and access to determine an overall transit score at the city, county, and regional levels. According to All Transit, transit access is greatest in the central portion of the County, especially Santa Rosa, Rohnert Park, and Petaluma. According to All Transit, the City of Sonoma has a transit performance score of 3.3 compared to 4.6 in the City of Santa Rosa, 4.1 in the City of Rohnert Park, and 4.6 in the City of Petaluma. Similarly, the City of Sonoma's transit performance score is slightly lower than the countywide transit performance score of 3.4. Other Sonoma County jurisdictions, and the county as a whole, tend to have lower scores as proximity to Santa Rosa decreases.

The City is served by five Sonoma County Transit routes, including routes 30, 32, 21, 34, and 40. Generally, the western portion of Sonoma, west of Broadway (State Route 12), is better served by Sonoma County Transit routes. In contrast, the eastern portion of the City, including block group 2 of census tract 1502.03, block groups 1 and 3 of census tract 1502.04, and block group 1 of census tract 1502.02 are not covered by any transit stops. The access to transit has no correspondence with the concentration with any protected classes, except that areas with highest diversity scores and the area with the lowest median income in the City

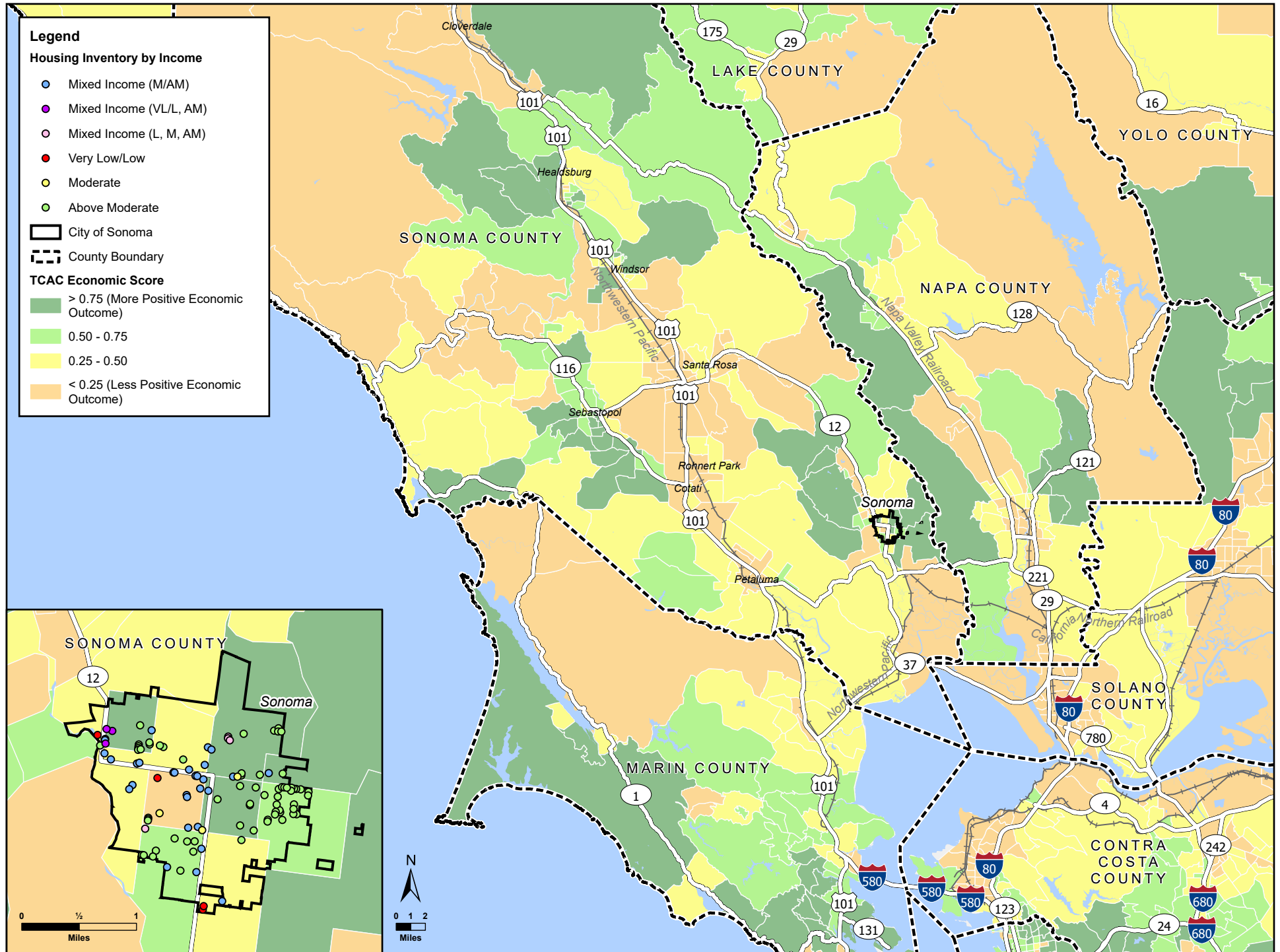
are all on the west side of Broadway and better served by transit than areas with lower diversity scores. There is no discernible connection between access to transit and location and areas with any predominant population by race or ethnicity or with concentrations of seniors and female-headed households with children. The City participates in programs that promote access to free transit (Free Fare on Route 32) and Safe Routes to Schools, but does not participate in other programs that promote transportation access, including transit, to protected classes (e.g., transit on-demand, micro-transit, car or bicycle share programs, etc.). As previously discussed, the Safe Routes to Schools program does not address the elementary and middle schools serving the western side of the City, which disparately affects two protected classes with two moderately diverse areas (CT 1502.02 BG 5 and the portion of CT 1502.03 BG 1 west of 2<sup>nd</sup> St W) and two of the three block groups (CT 1502.03 BGs 1 and 3) with higher concentrations of persons with a disability.

### Findings

Overall, it appears that residents of Sonoma have consistent levels of access to opportunities— Low Resource. As shown in Table 70, the educational and environmental opportunity scores are generally consistent across census tracts in the City, and it is only the economic opportunity score which varies somewhat across census tracts. However, while opportunity scores are generally similar throughout the City, the above analysis indicates that there are discrepancies in employment between races and persons below the poverty level have higher rates of unemployment in Sonoma than Countywide – this is not an area-specific issue, but a Citywide issue. Students in the western portion of the City, which affects concentrations of moderately diverse households and areas with higher concentrations of persons with a disability, generally are served by lower performing schools and have less access to educational opportunity. Similarly, schools serving the west side of the City have not been included in a Safe Routes to Schools program to increase transportation access via bicycle and pedestrian transportation modes. Program 22 works to improve the City's opportunity scores, including employment, to improve Citywide access to employment opportunities. Programs 1, 2, 4, 5, 9, and 22 promote affordable housing opportunities Citywide, including creating a greater variety of housing types and opportunities in existing single family neighborhoods, improving access to better performing schools and better educational opportunities. Program 22 also promotes working with the school district to ensure that enrollment boundaries do not result in inequitable access, including access by protected classes and lower income households, to high-quality schools.

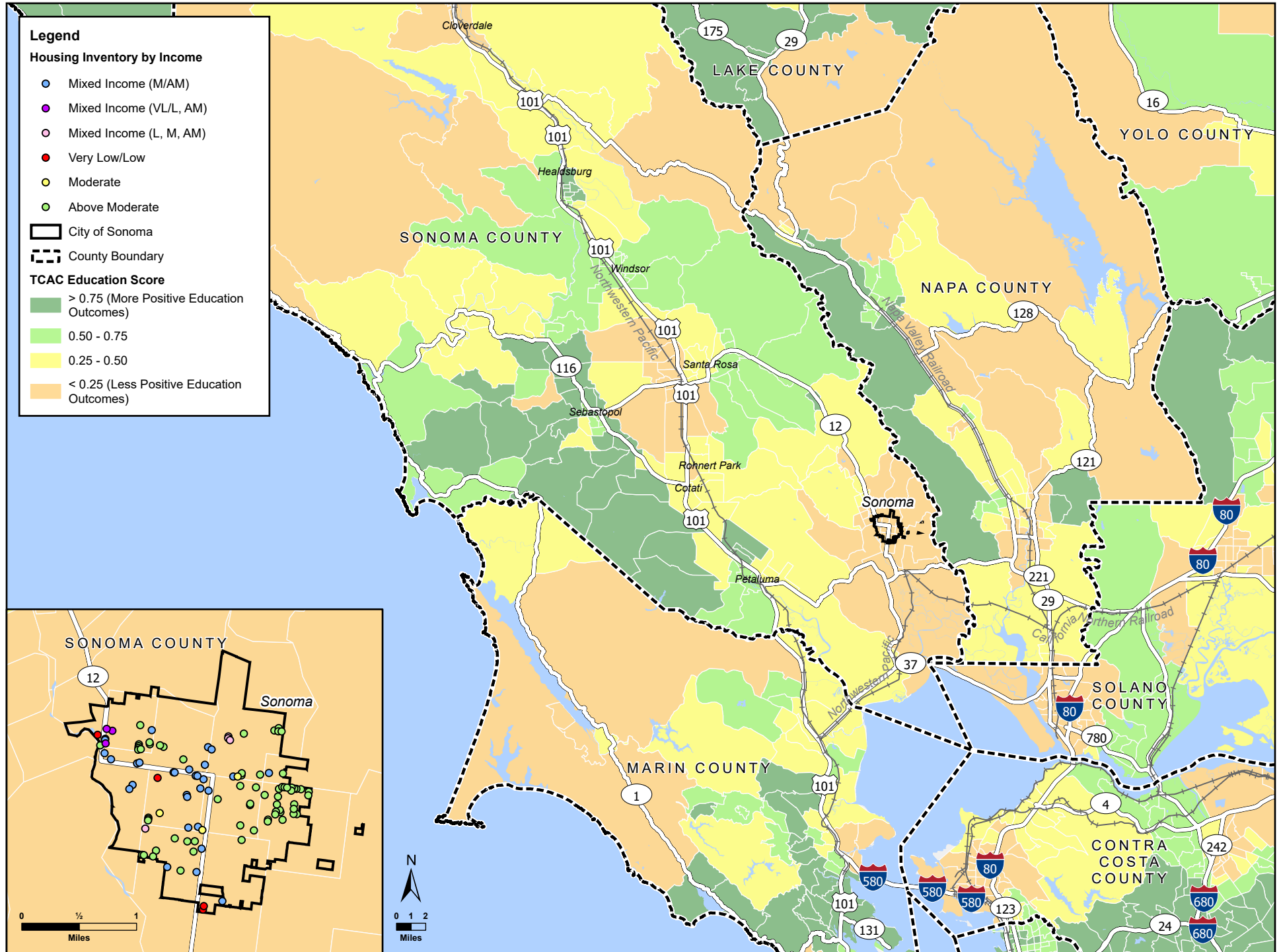
Sites to accommodate the City's 6<sup>th</sup> Cycle RHNA, including its lower-income units, are distributed primarily between low and moderate resource areas. New mixed-use development in the City is envisioned to provide new safe residential housing units, new employment opportunities, and new space for the development of commercial projects offering a variety of goods and services. Moreover, by continuing to improve the ratio of housing to local jobs, the City's contributes to reducing vehicle miles traveled, reducing GHG emissions, and improving regional air quality, thereby working to improve access to higher levels of environmental health.

**FIGURE 17: TCAC ECONOMIC SCORE BY CENSUS TRACT**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "TCAC\_OpportunityAreas\_Tract\_2021." Map date: October 16, 2022.

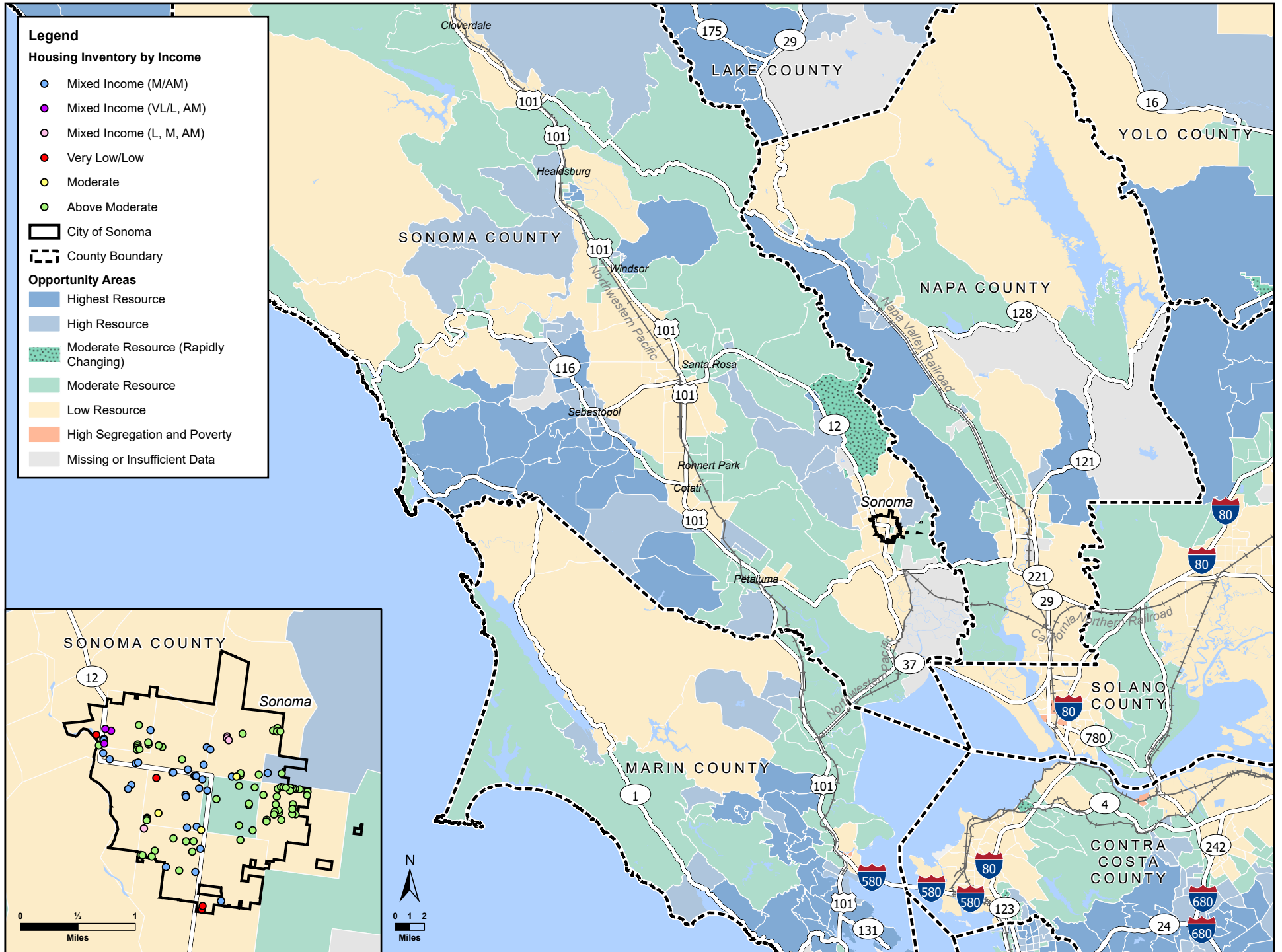
**FIGURE 18: TCAC EDUCATIONAL SCORE BY CENSUS TRACT**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "TCAC\_OpportunityAreas\_Tract\_2021."  
Map date: October 16, 2022.



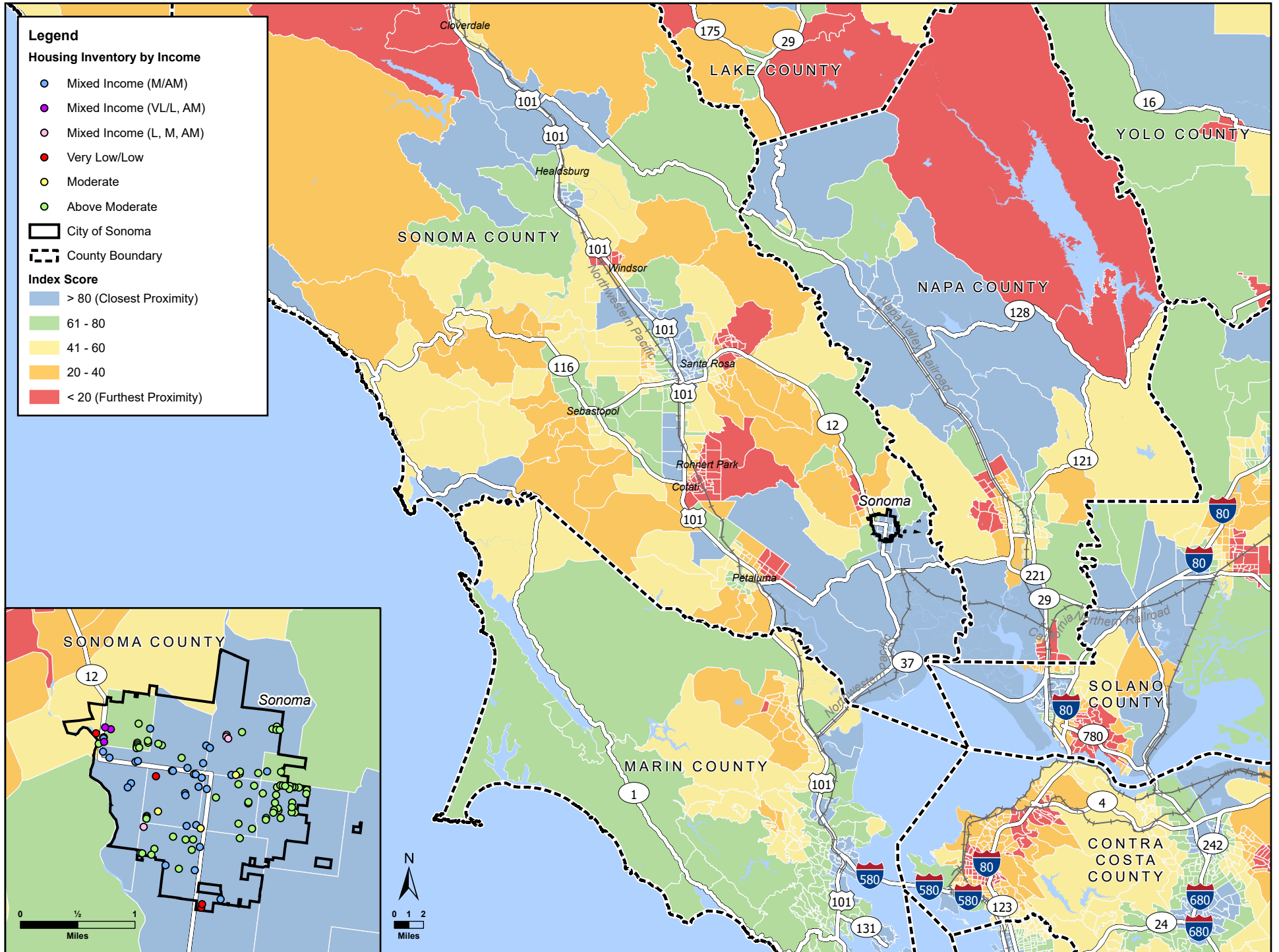
**FIGURE 20: TCAC OPPORTUNITY AREAS BY CENSUS TRACT**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "TCAC\_OpportunityAreas\_Tract\_2021."  
Map date: October 16, 2022.

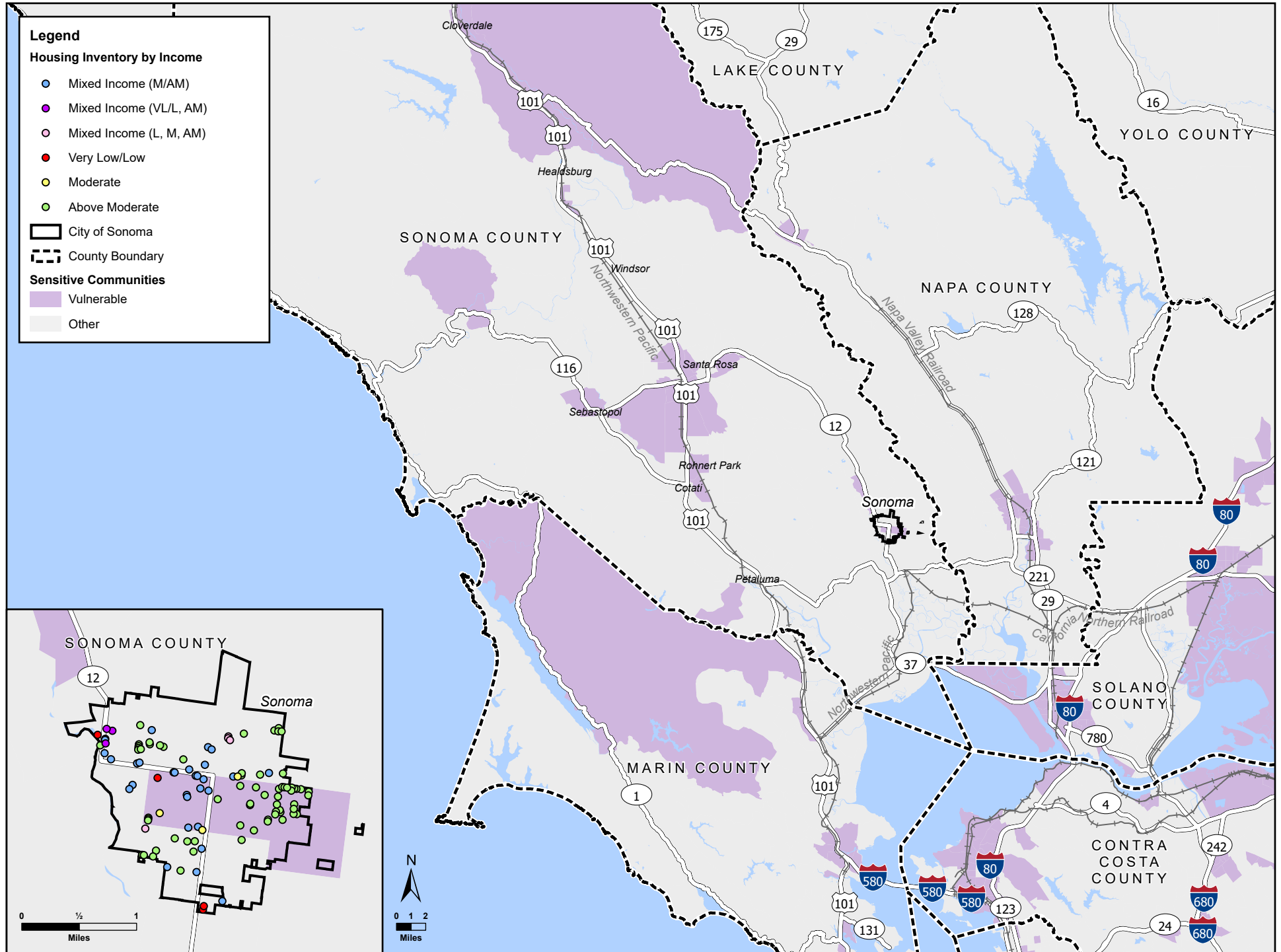


**FIGURE 21: JOB PROXIMITY INDEX BY BLOCK GROUP**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "JobsProximityIndex\_BlockGrp\_2014\_17."  
Map date: October 16, 2022.

**FIGURE 22: SENSITIVE COMMUNITIES**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "SensitiveCommunities\_UrbanDisplacementProject\_Tract"  
Map date: October 16, 2022.

## DISCUSSION OF DISPROPORTIONATE HOUSING NEEDS AND DISPLACEMENT

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. As discussed in the Needs Assessment of the Housing Element, overcrowded households in the City of Sonoma don't appear to be significant compared to Sonoma County with 1.9% of all owner households and 0.9% of renter households living in overcrowded conditions (i.e., more than one person per room). As shown in Table 8 in the Housing Needs Assessment, the average household size in Sonoma was 2.12 persons in 2019. The average household size was lower for renters (2.05 persons); owner households had an average size of 2.16 persons. As Figure 25 indicates, the degree of overcrowding is consistent across the City.

A household is considered cost burdened if the household pays more than 30% of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For homeowners, housing costs include mortgage payment, taxes, insurance, and utilities. Figure 23 and Figure 24 indicates renter households and owner households demonstrate different patterns of overpayment. For renter households, Census Tract 1502.04 and 1503.03 have a percentage of the population overpaying in the 60–80% range. For owner households, Census Tract 1503.03 and 1502.02 have a percentage of the population overpaying in the 40–60% range. Overpayment increases the risk of displacing residents who are no longer able to afford their housing costs. To address displacement risks due to overpayment, the City will provide incentives to encourage affordable development and will develop a targeted program to connect lower income residents with affordable homeownership and rental opportunities within the City (Program 26). Additionally, the City will continue implementing requirements for non-residential development, including hotels, motels, and resort uses, to pay affordable housing impact fees to ensure that the employee and affordable housing needs generated by new development are addressed. This program will benefit lower income employees, including extremely low income employees (Program 7).

### Future Growth Needs

The City's future growth need is based on the RHNA, which allocates production of 83 very-low and 48 low-income, 50 moderate, and 130 above moderate units to the City for the 2023–2031 planning period. Figure 8 shows that proposed affordable units are dispersed throughout the community, to the extent feasible based on the City's existing built-out land uses, and do not present a geographic barrier to obtaining affordable housing. In addition, the City actively promotes the opportunity for residents to develop ADUs and Junior ADUs as a way to accommodate additional development at all income levels throughout the community. Appendix A of this Housing Element shows the City's ability to meet its 2023–2031 RHNA need at all income levels. This demonstrates the City's ability to accommodate the anticipated future affordable housing needs of the community.

### Existing Needs

As described earlier in this Background Report, the City has a history of working with affordable housing developers to help facilitate the development of housing for lower-income households. As shown in Table 39, Sonoma has 146 rent-restricted assisted multifamily units. The City has an additional 293 affordable units, including ownership units assisted by the former redevelopment agency and inclusionary units required through the Inclusionary Housing Program, representing approximately 8% of the City's housing stock. The City actively works with affordable housing developers to identify and evaluate potential sites and to expand opportunities for lower-income households throughout the City.

### Cost Burden

A household is considered cost burdened if the household pays more than 30% of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For homeowners, housing costs include mortgage payment, taxes, insurance, and utilities. As discussed in the Background, as with most communities, the location of the home is one of the biggest factors with regard to price.

Countywide, approximately 50.8% of renters and 30.2% of owners overpaid for housing as shown in Table 10. As discussed previously in the Background Report, 56.7% of renters in Sonoma overpay for housing. Regionally, Sonoma renters have a higher rate of overpayment than Countywide. The majority of renters that overpay are in the lower income groups, with 15.5% in the extremely low-income group severely overpaying for housing (over 50% of their monthly income). As shown in Figure 23, these renters are concentrated in the census tracts located in southern Sonoma.

[Regionally, Sonoma owners have a higher rate of overpayment than Countywide.](#) As shown in Table 10 of the Housing Needs Assessment section of the Housing Element, 30.5% of homeowners overpay for housing with 7.1% in the extremely low-income group severely overpaying for housing (over 50% of their monthly income). Figure 24 shows the concentrations of cost burden for homeowners in the City. There is a concentration of homeowners who overpay located in the census tracts in northern and southern Sonoma.

The median sales price for a single-family home in Sonoma County in 2021 was \$850,000, in which requires an annual household income of over \$158,000 and an average down payment of over \$170,000. Figures 23 and 24 show the concentrations of cost burden by renter and homeowners, with Sonoma having the highest concentrations of cost-burdened renters in the central and southern portions of the City and the highest concentrations of cost-burdened homeowners in the northern, western, and southern portions of the City. As seen in the figures, there are concentrations of cost burdened renters and homeowners located throughout the County.

### Overcrowding

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. As discussed in the Needs Assessment of the Housing Element, overcrowded households in the City of Sonoma don't appear to be significant compared to Sonoma County with 1.9% of all owner households and 0.9% of renter households living in overcrowded conditions (i.e., more than one person per room). As shown in Table 8 in the Housing Needs Assessment, the average household size in Sonoma was 2.12 persons in 2019. The average household size was lower for renters (2.05 persons); owner households had an average size of 2.16 persons. As Figure 25 indicates, the degree of overcrowding is consistent across the City.

A household is considered cost burdened if the household pays more than 30% of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For homeowners, housing costs include mortgage payment, taxes, insurance, and utilities. Figure 23 and Figure 24 indicates renter households and owner households demonstrate different patterns of overpayment. For renter households, Census Tract 1502.04 and 1503.03 have a percentage of the population overpaying in the 60-80% range. For owner households, Census Tract 1503.03 and 1502.02 have a percentage of the population overpaying in the 40-60% range. Overpayment increases the risk of displacing residents who are no longer able to afford their housing costs. To address displacement risks due to overpayment, the City will provide incentives to encourage affordable development and will develop a targeted program to connect lower income residents with affordable homeownership and rental opportunities within the City (Program 26). Additionally, the City will continue implementing requirements for non-residential development, including hotels, motels, and resort uses, to pay affordable housing impact fees to ensure that the employee and affordable housing needs generated by new development are addressed. This program will benefit lower income employees, including extremely low-income employees (Program 7).

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. As described in Table 29 in the Housing Needs Assessment section, 1.9% of owner-occupied homes and 0.9% of renter-occupied homes are overcrowded, and a total of 1.5% of all households in Sonoma are overcrowded. As shown in Table 8 of the Housing Needs Assessment section, the average household size in Sonoma was 2.12 persons in 2019.

### Substandard Housing

As discussed in the Housing Needs Assessment, the 2015-2019 ACS data indicates that 32.5% of the housing in the city is greater than 50 years old (i.e., built before 1970). Another 15.8% of units were built between 1970 and 1979. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include plumbing, roof repairs, electrical repairs, foundation rehabilitation, or other significant improvements. While it is likely that some homeowners have conducted ongoing maintenance to maintain the value of their homes, it is likely that many of these homes need some degree of repairs. In some cases, the cost of repairs can be prohibitive, resulting in the owner or renter living in substandard housing conditions or being displaced if the house is designated as uninhabitable or during rehabilitation. According to CHAS data compiled for the U.S. Department of Housing and Urban Development, approximately 42.6% of Sonoma households have at least one housing problem, which may

include overcrowding, lack of a complete kitchen, lack of complete plumbing, or cost burden. As identified above, many homeowners and renters in Sonoma are cost burdened, and may represent a large portion of the 42.6% of households with a housing problem. To prevent residents occupying or being displaced from substandard housing, the City will continue to participate in SCCDC programs to assist homeowners with rehabilitation costs and to make emergency repairs as described in Program 9 of the Housing Plan and will review the code enforcement process to take steps to prevent displacement or assist with relocation costs for lower income households. Program 9 has been added to the Housing Plan address this issue. [Countywide, housing is generally older and more likely to exhibit substandard conditions, with 54.6% of the housing stock built prior to 1980 compared to 48.2% of the housing stock in the City. Sonoma County has minor substandard housing issues \(units lacking a complete kitchen or complete plumbing\), with less than 1% of renter or owner households experiencing substandard conditions – conditions for owners are similar in the City, however, a higher rate of renter households \(2.6%\) experiences substandard conditions.](#)

### **Homelessness**

[The Sonoma County Community Development Commission \(SCCDC\) is the Countywide collaborative effort representing the homeless services system of care. The SCCDC conducted its 2020 Homeless Count in February 2020. In 2020, approximately 61 homeless persons, including 15 sheltered and 46 unsheltered homeless persons, were counted during a Point in Time \(PIT\) count in Sonoma, approximately 2.2 percent of the total 2,745 homeless individuals counted in Sonoma County. While data regarding the characteristics of the homeless population is not available at the City level, of the 2,745 individuals experiencing homelessness Countywide, 139 were veterans, 648 were over 55 years old, 235 had families with children, and 304 were unaccompanied children and transition-age youth; it is noted that these characteristics are not discrete and there is overlap between these groups. Racial and ethnic groups that experienced a significantly higher rate of homelessness, based on a comparison of percent homeless versus percent of the total population included Black or African American \(7% homeless versus 2% of total persons Countywide\) and American Indian or Alaskan Native \(15% of homeless population versus 2% of Countywide population\) while Hispanic/Latinx, and Native Hawaiian or Pacific Islanders had 2-3% higher homeless population than the Countywide population and Asians had a lower incidence of homelessness \(<1% homeless versus 5% of Countywide population\). Additionally, approximately 508 of the 2,745 individuals experiencing homelessness met the definition of being chronically homeless.](#)

[Access to Countywide services and support is more limited in Sonoma than in Santa Rosa \(County seat where the majority of County services are located\), Petaluma, and the cities along the Highway 101 corridor in the County. However, Sonoma, the County, and regional service providers have coordinated to ensure the homeless population in the Sonoma Valley has access to services and assistance. The Countywide collaborative CoC effort oversees funds for housing and services for the homeless population and develops and implements plans and policies to address homelessness. In particular, Homeless Action Sonoma operates a warming station and navigation center at 867 West Napa Street that provides the unhoused and at-risk population with assistance in locating housing, receiving financial benefits and services, gaining employment, coordinating medical help, and provides for recreation and entertainment. The City is served by multiple transportation routes, including Route 32, which offers free fares and connects the City to services in the broader region and Paratransit service, which provides transit services for persons with a disability and is available within 3/4- of a mile from the fixed transit routes during regular service hours. Additional information regarding resources for the homeless population is provided in Chapter 2.](#)

### **Findings**

“Disproportionate housing needs” generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. Based on input from the community and the County AI, the most disproportionate housing needs in Sonoma includes rehabilitation of the existing housing stock and increased variety of housing types at affordable prices, including housing for lower income households. The City has included Program 9 in the Housing Plan which will identify multifamily projects with the most significant level of deterioration for the purpose of providing loans for rehabilitation of multifamily units and to address health and safety code deficiencies. The programs will include requirements such as having 51% of units receiving rehabilitation assistance be rented to eligible low and moderate income households upon completion of the project.

## DISPLACEMENT RISK

As previously discussed, there are no deed-restricted affordable units currently at-risk of converting to market-rate within the next 30 years. The City also has a number of units which are affordable to lower-income families but are not deed-restricted. As described earlier in this Background Report, the City plans to accommodate its 2023-2031 RHNA allocation on parcels designated for single family, multifamily, and mixed-use development, with vacant sites representing the majority of sites for new housing. Underdeveloped residential sites are also identified as helping to meet a small portion of the City's very low-income units and to provide additional opportunities for lower, moderate- and above-moderate income units; based on the net addition of units at these locations (which currently generally provide units affordable to moderate- and above-moderate income households), there is no a significant displacement risk associated with the City's current affordable housing stock as a result of new development.

The City recognizes that even though it has identified sufficient land to accommodate its RHNA allocation at all income levels, there is still the potential for economic displacement because of new development and investment. This “knock-on” effect can occur at any time, and it can be challenging for the City to predict market changes and development patterns which have the potential to impact rental rates and sales prices for housing available in the marketplace. To date, the City has no evidence that new development (affordable or market-rate) has resulted in economic displacement. However, the City recognizes that economic displacement might occur in the future and has developed an Action under Program 21 to study and address potential issues related to displacement.

Regionally, there are areas vulnerable to displacement located throughout the County. Many vulnerable areas are within or adjacent to a city, including the area north of Sonoma, the area around Cloverdale, which extends extensively to the west and south, areas in the vicinity of Healdsburg, areas in and around Sebastopol, Rohnert Park, and Cotati. It does not appear that any vulnerable areas are identified in Windsor or Petaluma. The vulnerable area within Sonoma is less extensive than some of the areas in the region but does affect approximately 2/3s of the City. As shown in Figure 22, census tract 1502.04 in the City is identified as an area where residents may be particularly vulnerable to displacement in the event of increased redevelopment and shifts in housing costs. Communities were designated sensitive in the HCD AFFH Dataset if they currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. “Vulnerable” indicates a tract with a share of very low-income residents above 20% in 2017 that meets one other criterion related to renters, diversity, and housing burden. There are potential housing sites located in census tracts designated “Vulnerable” that would potentially displace existing residents due to redevelopment.

The City has also considered the risk of displacement specifically for protected classes, including persons with disabilities, female-headed households, seniors, and nonwhite residents (as discussed previously throughout this Background Report). Some future housing sites are located in areas with high levels of female-headed households, senior residents, and lower-income households, and these groups appear to be more vulnerable to potential future displacement. However, these sites continue to represent the most appropriate locations to accommodate future development given their proximity to transit corridors, underdeveloped property conditions, blighted conditions, and opportunity to develop mixed-use projects. As discussed above, Program 21 has been included in the Housing Plan to study and address issues related to future displacement, and the City remains committed to maintaining its existing affordable housing stock, which includes affordable units throughout the City, including in census tracts with high levels of senior residents.

To the extent that future development occurs in areas where there is existing housing, all housing must be replaced according to SB 330's replacement housing provisions (Government Code Section 66300). SB 330 also provides relocation payments to existing low-income tenants. The State has also adopted “just cause” eviction provisions and statewide rent control to protect tenants from displacement.

Research has shown that low-income renter populations are disproportionately exposed to environmental hazards and that housing tenure is a telling determinant of social vulnerability to disasters. Renters bear the brunt of the existing affordable housing shortage, and their adaptive capacity to cope and recover from the impacts of environmental hazards may be reduced due to systemic inequities and limited resources. Environmental hazards affecting residential development in the City primarily include geologic and seismic hazards, flooding and inundation hazards, and hazardous materials release. Development within flood hazard areas is

subject to the Chapter 14.25, Flood Damage Prevention Regulations, of the Municipal Code and Federal Emergency Management Agency (FEMA) standards. Seismic-related issues are addressed by the Title 14, Buildings and Construction, of the Municipal Code, which implements the California Building Standards Code (CBSC). Various State and federal regulations control the use, storage and transportation of hazardous materials.

## Findings

“Disproportionate housing needs” generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. Based on input from the community and the County AI, the most disproportionate housing needs in Sonoma includes rehabilitation of the existing housing stock and increased variety of housing types at affordable prices, including housing for lower income households. The City has included Program 9 in the Housing Plan which will identify multifamily projects with the most significant level of deterioration for the purpose of providing loans for rehabilitation of multifamily units and to address health and safety code deficiencies. The programs will include requirements such as having 51% of units receiving rehabilitation assistance be rented to eligible low- and moderate-income households upon completion of the project.

The City is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement. Program 21 details efforts the City will take to engage these communities during the planning period. [Program 24 \(Homeless Support Program\) of the Housing Plan ensures the City will continue its agreement with Sonoma County SCCDC to provide ongoing homeless services and will continue to participate in the Sonoma County Homeless Plan Executive Commission.](#) Additionally, Programs 10, 11, and 25 enforce the provisions of the Municipal Code addressing Condominiums and Condominium Conversion (Chapter 16.06) and Mobilehome Park Conversions (Chapter 9.82), which will help mitigate displacement due to redevelopment. Program 28 ensures that replacement units are provided for any very low or low income rental housing removed through development of the City’s inventory of sites.

## C. SITES INVENTORY

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification includes not only an analysis of site capacity to accommodate the RHNA (provided in this section), but also considers whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. This section analyzes the role of all sites, regardless of income level, in assisting to affirmatively further fair housing. However, special attention is paid to those sites identified to accommodate a portion of the City’s lower-income RHNA to ensure that the City is carefully considering how the development of new affordable housing options can promote patterns of equality and inclusiveness.

### 1. SEGREGATION/INTEGRATION

The City finds that there are patterns of segregation in Sonoma. As described throughout this Housing Element, the City is committed to supporting the development of housing to promote a balanced and integrated community.

As shown in Figure 7, the predominant population (White) is consistent throughout the City and contrasts with a Census Tract located north of Sonoma which has a Hispanic majority. Figure 8 shows that Latinx-White racial/ethnic concentrations Sonoma are consistent throughout the City’s census tracts. However, Figure 9 shows the sites identified to meet Sonoma’s RHNA allocation in relation to racial/ethnic diversity (2018) and shows that there are areas with more, and less, diversity throughout the City. As shown, proposed sites, including those very low and low-income RHNA sites (i.e. sites allowing for densities of at least 20 du/ac), are located throughout the community and are not concentrated in areas of higher diversity. However, there are areas of lower diversity, particularly in the central east and northeast areas of the City that have less diversity and also have primarily above moderate income sites, which is primarily due to vacant lots located in existing single family subdivisions. The majority of these single family sites are already subdivided and do not meet the minimum size threshold to qualify as very low/low income sites.

Although Sonoma does not have any census block groups with the highest two levels of diversity index scores (above 85 or 70-85), and the City's areas of highest diversity, which evidence moderate diversity scores 55-70 include sites with a variety of incomes, including above moderate, mixed income (moderate/above moderate) and mixed income (above moderate/very low/low income in Block Group 5 of Census Tract 1502.02 and very low/low, moderate, above moderate, and mixed (moderate/above moderate) in Block Group 2 of Census Tract 1502.04.

Figure 11 shows the sites designated to meet Sonoma's RHNA allocation in relation to the concentration of persons with disabilities. As shown, proposed sites, including those very low and low-income sites (sites allowing for densities of at least 20 du/ac), are located throughout the community and are not concentrated in areas with high proportions of persons with disabilities. Sites are divided between census tracts with 10% or less of the population indicating a disability, sites in areas with 10-20% of residents indicating a disability, and sites in areas with 20-30% of residents indicating a disability. As noted earlier, Sonoma is home to higher concentrations of persons with disabilities than other cities and communities in southern Sonoma County, which can be correlated with the community's older resident profile. Although the locations of sites designated to meet the City's RHNA allocation are not expected to contribute to patterns of isolation or segregation for persons with disabilities, the City should still target its AFFH actions to alleviate the concentration of persons with disabilities found in the census tracts with moderate levels of persons with disabilities (20-30%) and to increase access for persons with a disability to areas with low percentages of persons with a disability.

Figure 14 shows the sites designated to meet Sonoma's RHNA allocation in relation to female-headed households. As shown, proposed sites, including very low and low-income sites (sites allowing for densities of at least 20 du/ac), are located throughout the community and are not concentrated in areas with high levels of female-headed households. The locations of sites designated to meet the City's RHNA allocation are not expected to contribute to patterns of isolation or segregation for female-headed households.

Figure 15 shows the sites designated to meet Sonoma's RHNA allocation in relation to concentration of senior residents. As shown, proposed sites, including very low and low-income sites (sites allowing for densities of at least 20 du/ac), are distributed throughout the community; however, all census tracts in the City are comprised of populations with higher concentrations of seniors (25% and above). Nonetheless, the RHNA sites are expected to bring in a diversity of housing types, opportunities, and household make-ups, which should aid in reducing the proportion of seniors in census tracts with existing higher concentrations of persons 65 and older.

Figure 16 shows the sites designated to meet Sonoma's RHNA allocation in relation to median household income. As shown, proposed sites, including very low and low-income RHNA sites (sites allowing for densities of 30 du/ac), are distributed throughout the community with a number of mixed income sites located in areas with high and highest median household incomes. Although a number of lower income sites are in block groups with moderate and low median household incomes, these are also sites that will realistically develop/redevelop over the planning period and which could be transformative projects that assist in improving opportunities and median incomes within these census block groups. It is recognized that the eastern and northeastern areas of the city have the second highest income rankings and also have primarily above moderate income sites. This is due to many vacant lots in this area located in existing single family subdivisions. The majority of these single family sites are already subdivided and do not meet the minimum size threshold to qualify as very low/low income sites. However, these sites do have potential to accommodate ADUs, duplexes, and multi-unit projects under SB 9 which will assist in increasing diversity and income levels in these areas.

## 2. R/ECAPs

There are no racially/ethnically concentrated areas of poverty (R/ECAPs) in Sonoma nor are there any racially concentrated areas of affluence (RCAAs). In fact, in Sonoma it appears that areas of high diversity do not generally correlate with lower incomes and that areas of low diversity reflect a wide range of income levels. The distribution of RHNA sites throughout the City will therefore not exacerbate racially/ethnically concentrated areas of poverty on one side of the spectrum nor racially concentrated areas of affluence on the other side.



### 3. ACCESS TO OPPORTUNITY

Given that Sonoma does not have any high or highest resource areas, and in fact largely consists of census tracts that are considered low resource areas (see Figure 20), the City must look to areas with lower to moderate levels of resources in order to accommodate new development and the City has distributed its RHNA sites throughout these areas. However, new residential and mixed-use development in the identified areas will help to create more housing affordable to households at lower income levels, introduce new residents to the areas which can contribute to greater neighborhood stability, and expand opportunities for people to both live and work in Sonoma. Taken together, new residential and mixed-use development in the identified areas will help to diversify the land use pattern and improve the conditions of these census tracts by providing greater housing choice and a broader range of goods and services, bringing new residential development closer to transit and jobs, and otherwise supporting community revitalization.

As reflected in Figure 17, Sonoma's census tracts include the full range of economic scores, and the RHNA sites are mostly distributed in tracts with moderate to more positive economic outcomes. The City's education scores, however, are particularly low (see Figure 18), and the RHNA sites are all within areas with less positive education outcomes. This is likely due in part to Sonoma Valley Unified School District's students coming from socioeconomically disadvantaged backgrounds, but with the introduction of greater housing choice, a broader cross-section of households will have the opportunity to live in Sonoma, which may ultimately have a positive impact on education scores. [A closer look at educational scores indicates that although all elementary and middle schools serving the City have low standard scores, the scores are worse on the west side of the City than the east. High school-level opportunities are consistent throughout the community, as the City is served by a single high school. While the inventory of sites provides very low, low, and moderate income housing opportunities in both the east and west sides of the City, there are more very low and low opportunities in the west side and this results in a disproportionate amount of lower income housing with less access to educational opportunities. Recognizing that scores are low District-wide and City-wide, Program 22 in the Housing Plan promotes educational scores throughout the City and emphasizes working with SVUSD to modify school enrollment boundaries to ensure comparable rates of income, race/ethnicity, disability, and other protected classes between schools in order to ensure fair access to opportunities. Programs 4, 5, 19, and 22 would expand opportunities for lower income housing in areas with higher access to opportunities, including economic opportunities and educational opportunities.](#)

### 4. DISPROPORTIONATE HOUSING NEEDS

Figures 23 and 24 show the sites designated to meet the RHNA allocation in relation to percent of renter and owner households burdened by housing costs, by census tract. The RHNA sites are split between sites located in census tracts with moderate and high levels of cost-burdened renter households. Likewise, sites are split between census tracts with low and moderate levels of cost-burdened homeowner households. The intent of introducing new residential development in these areas is to add new housing to desirable areas and provide a range of housing choices at different prices to current and future residents. With a broader range of housing options, housing will become more affordable across the community, which should lessen the housing cost burden, particularly for renters.

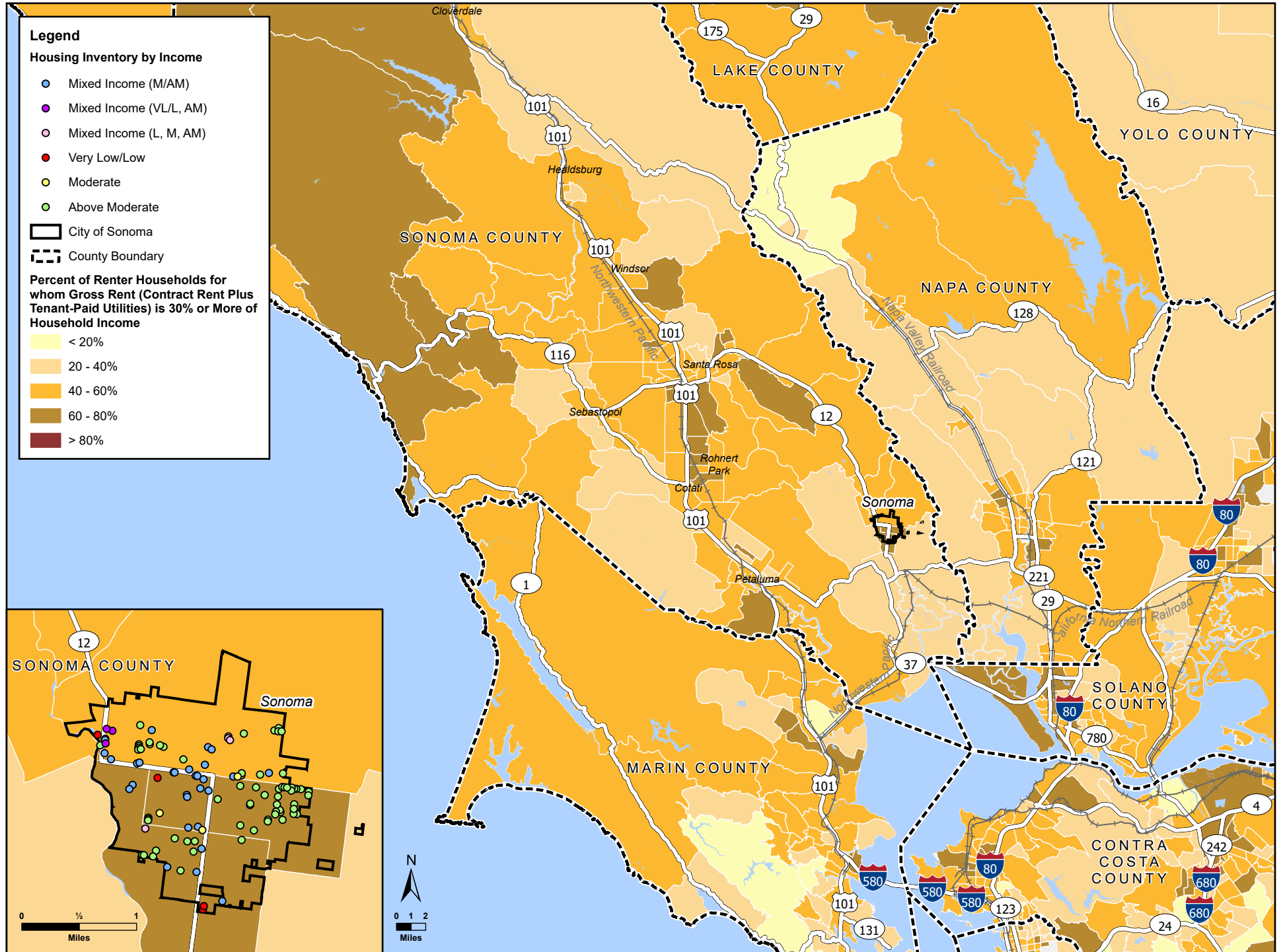
### 5. SITE ANALYSIS FINDINGS

The existing conditions in Sonoma across all fair housing factors are generally mixed, with more positive outcomes for some factors and less positive outcomes for others. Nonetheless, the distribution of RHNA sites across the community without a concentration in any particular census tract or block group will help to improve the opportunities and outcomes throughout the City. Furthermore, the RHNA sites will allow for development at densities needed to stimulate affordable housing development.

The sites identified to meet the City's RHNA at all income levels are generally accommodated throughout Sonoma and are not concentrated in areas with high racial or ethnic populations, persons with disabilities, female-headed households, senior households, or LMI households. For these reasons, the City finds that the sites proposed to accommodate its RHNA allocation do not unduly burden existing areas of concentrated racial or ethnic homogeneity, poverty, or other characteristics. Moreover, the sites affirmatively further fair housing by helping to stimulate investment in areas where additional opportunities are desired, and where new residential and/or mixed-use development can help to improve some of the opportunity level characteristics discussed earlier in this chapter. Further, an emphasis on increasing access in primarily single family neighborhoods through ADUs, SB 9

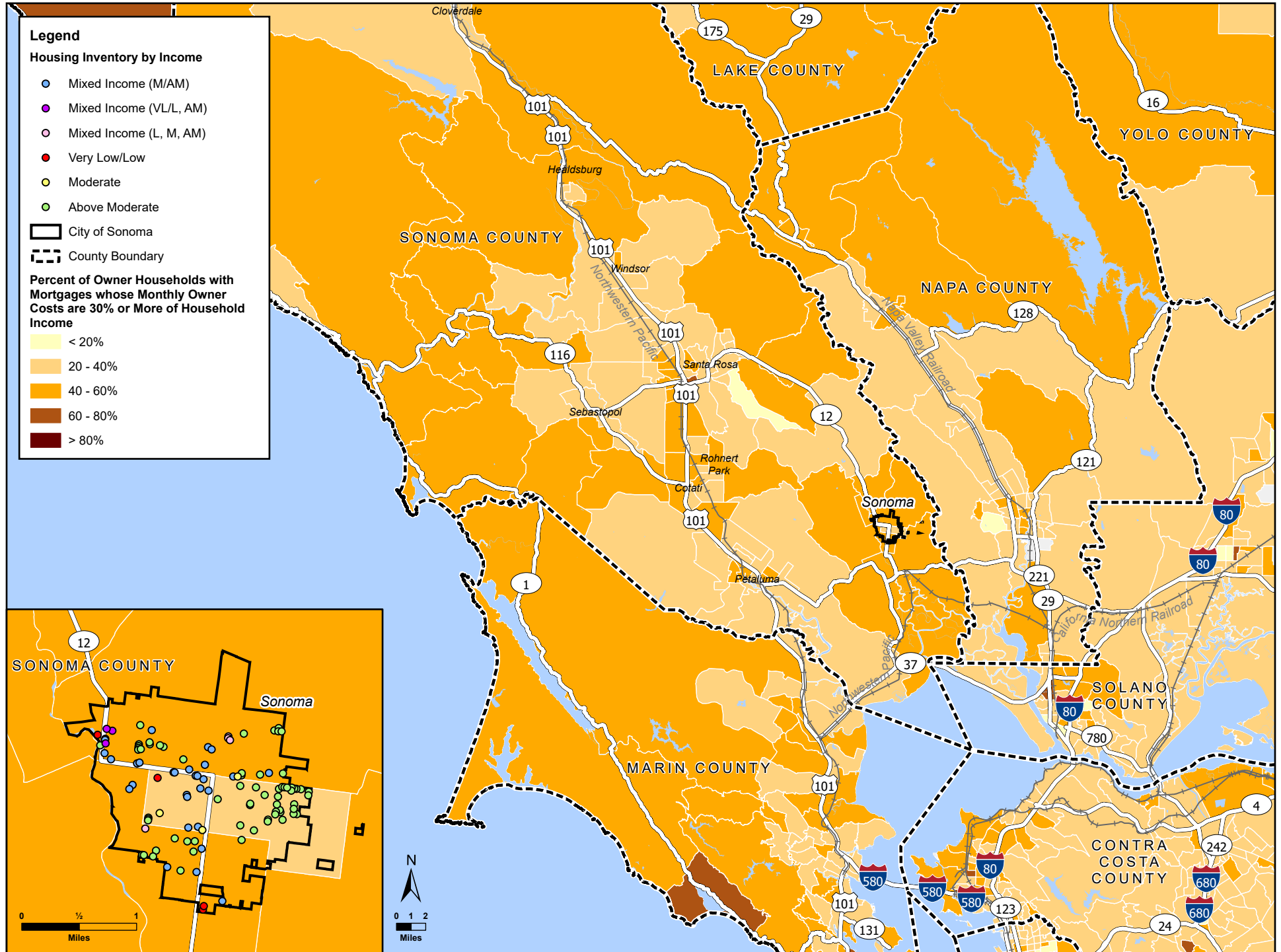
units, and alternative housing types as discussed in the Housing Plan will increase opportunities in areas where single family neighborhoods coincide with higher than average income levels, areas of opportunity, and lower diversity.

**FIGURE 23: COST-BURDENED RENTER HOUSEHOLDS BY CENSUS TRACT**



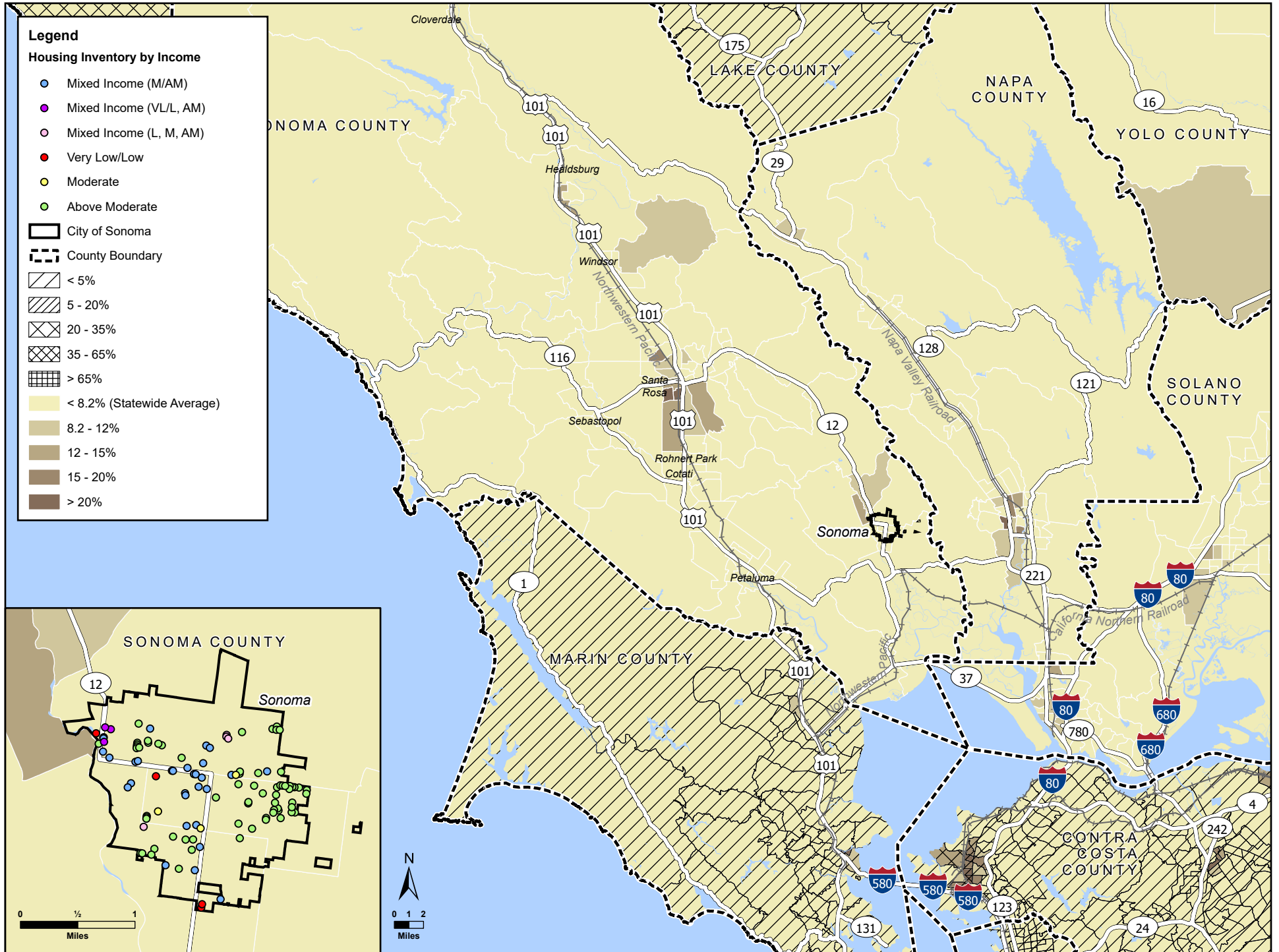
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "Overpayment\_Tract\_2015-19."  
Map date: October 16, 2022.

**FIGURE 24: COST-BURDENED OWNER HOUSEHOLDS BY CENSUS TRACT**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "Overpayment\_Tract\_2015-19."  
Map date: October 16, 2022.

**FIGURE 25: OVERCROWDED HOUSEHOLDS**



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "OvercrowdedHouseholds\_Tract," and "OvercrowdedHouseholds\_Severe\_Tract."  
Map date: October 16, 2022.

**D. ANALYSIS OF CONTRIBUTING FACTORS AND FAIR HOUSING PRIORITIES AND GOALS**

The December 2015 Affirmatively Furthering Fair Housing Rule Guidebook published by HUD identifies examples of contributing factors by each fair housing issue area: outreach, fair housing enforcement and outreach capacity, segregation and integration, racially and ethnically concentrated areas of poverty, disparities in access to opportunity, disparities in access to opportunities for persons with disabilities, disproportionate housing needs, including displacement risks, and sites inventory. Based on the analysis included in this Background Report and the County AI, the City has identified in **Table 71** potential contributing factors to fair housing issues in Sonoma and outlines the meaningful actions to be taken. The meaningful actions listed in the Table relate to the actions identified in the Housing Plan.

<b>Table 71: Fair Housing Issues and Contributing Factors</b>			
<b>Fair Housing Issue</b>	<b>Contributing Factors</b>	<b>Priority</b>	<b>Meaningful Action</b>
Fair Housing Resources, including Enforcement and Outreach, and Reported Levels of Discrimination	<ul style="list-style-type: none"> <li>• Lack of readily available information regarding fair housing resources and assistance to persons in filing a complaint</li> <li>• Lack of education of public and housing providers regarding rights and responsibilities under the AFH and FEHA</li> </ul>	High	<ul style="list-style-type: none"> <li>• Program 20</li> <li>• Program 21</li> </ul>
Lack of Access to Opportunity. Including areas with Low Racial/Ethnic Diversity and Higher Incomes <a href="#">and Lack of Access to Educational Opportunities in Moderately Diverse Areas and Areas with a Higher Rate of Persons with a Disability</a>	<ul style="list-style-type: none"> <li>• Low educational opportunity scores</li> <li>• Low environmental opportunity scores</li> <li>• District-wide <a href="#">and school-specific</a> factors resulting in low educational scores</li> <li>• Regional factors resulting in low environmental scores</li> <li>• Historical racially restrictive covenants</li> <li>• Predominantly single family subdivisions</li> </ul>	High	<ul style="list-style-type: none"> <li>• Program 1</li> <li>• Program 4</li> <li>• Program 5</li> <li>• Program 6</li> <li>• Program 9</li> <li>• Program 19</li> <li>• Program 21</li> <li>• <a href="#">Program 22</a></li> </ul>
Disproportionate Housing Needs, including Overpayment and Substandard Housing	<ul style="list-style-type: none"> <li>• On-going need for affordable housing options</li> <li>• Need for assistance with monthly housing costs</li> <li>• Lack of local information regarding available housing rehabilitation, emergency repair, and weatherization programs</li> <li>• Need for targeted housing revitalization strategies</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• Program 1</li> <li>• Program 8</li> <li>• Program 9</li> <li>• Program 10</li> <li>• Program 12</li> <li>• Program 25</li> <li>• Program 26</li> <li>•</li> </ul>
Displacement Risk	<ul style="list-style-type: none"> <li>• Land use and zoning laws</li> <li>• Displacement of residents due to economic pressures</li> </ul>	Medium/Low	<ul style="list-style-type: none"> <li>• Program 10</li> <li>• Program 11</li> <li>• Program 21</li> <li>• Program 25</li> </ul>

Based on the issues identified in this Background Report, the following are the top three issues to be addressed through the programs in the Housing Plan:

1. Improving access to fair housing information, including education and enforcement assistance for residents and persons interested in renting or purchasing housing in Sonoma and education for property owners, managers, and other housing providers regarding fair housing laws and their responsibilities to ensure fair access to housing opportunities
2. Housing mobility enhancement to increase access to opportunities and improve access to affordable housing throughout the community
3. New housing choices and affordable housing in the City's higher opportunity areas and improving opportunity scores

Moving forward, the City remains committed to providing a diversity of housing options for all income levels, encouraging development throughout the community to help overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The vast majority of the City's Housing Programs designed to address fair housing will be implemented on an ongoing basis, with annual progress reports and programs evaluations to ensure they are achieving the City's objectives. The following list summarizes those programs identified in this Housing Element which affirmatively further fair housing and implement the County AI's recommendations:

- Program 1, to ensure very low, low, and moderate income housing opportunities are made available as part of new development projects throughout the City
- Program 2 and 6, to facilitate affordable housing construction
- Program 5, to encourage the production of accessory dwelling units
- Program 7, to ensure new development not subject to the City's inclusionary requirements funds its fair share of affordable and workforce housing
- Program 15 and 24, to support emergency shelter and transitional housing programs
- Program 27, to replace affordable units
- Program 28, to ensure adequate sites are available throughout the 6<sup>th</sup> Cycle
- Program 19, to promote opportunities for density bonus provisions
- Programs 4 and 15, to accommodate specialized housing types and update the City's policies and procedures regarding low barrier navigation centers, supportive housing, employee housing, and farmworker housing
- Program 20, to continue utilizing FHANC or other qualified fair housing service provider to assist with addressing fair housing issues in Sonoma and to educate the community, especially Sonoma's underserved and underrepresented residents, and affirmatively further fair housing

To the extent that these programs represent ongoing work efforts, these programs are evaluated for effectiveness in Chapter 6 of this Background Report. The City has undertaken a series of proactive amendments to its Zoning Ordinance to address new requirements related to density bonus law and accessory dwelling units, and the City will continue to partner with local and regional stakeholders to affirmatively further fair housing.

## 6. EVALUATION OF THE 2015–2023 HOUSING ELEMENT

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### A. INTRODUCTION

California Government Code 65588(a) requires each jurisdiction to evaluate the effectiveness of the existing Housing Element, the appropriateness of the goals, objectives, and policies, and the progress in implementing the programs over the planning period of the Housing Element. This appendix contains a review of the programs of the previous Housing Element, and evaluates the degree to which these programs have been implemented during the previous planning period. This section also includes a detailed review of the City's progress toward facilitating the production of its share of the regional housing need. The findings from this evaluation have been instrumental in determining the City's 2023 – 2031 Housing Plan.

### B. APPROPRIATENESS AND EFFECTIVENESS OF THE 2015 – 2023 HOUSING ELEMENT

The 2015 – 2023 Housing Element program strategy focused on achieving an adequate supply of safe, decent housing for all residents of Sonoma through maintaining and preserving the existing housing stock, preserving the character of Sonoma's residential neighborhoods, meeting the City's regional housing needs allocations; and providing additional affordable housing. The 2015 – 2023 Housing Element identified goals, policies and programs to address the following themes:

- **Ensuring diversity:** Providing a variety of housing types affordable to all income levels, allowing those who work in Sonoma to also live here.
- **Improving housing affordability:** Encouraging a range of affordable housing options for both renters and homeowners.
- **Preserving housing assets:** Maintaining the condition and affordability of existing housing and ensuring development is consistent with Sonoma's town and neighborhood context.
- **Reducing governmental constraints:** Facilitating the provision of housing and encouraging innovation in design, ownership and living arrangements.
- **Promoting equal housing opportunities:** Ensuring residents can reside in the housing of their choice, including Sonoma's special needs populations.
- **Environmental sustainability:** Ensuring Sonoma grows in a responsible manner, in line with resource limitations, such as water availability.

Since the adoption of the last Housing Element update, the City of Sonoma implemented a number of actions to plan for, accommodate, and facilitate the construction and rehabilitation of housing, including affordable housing and housing for populations with special needs. This section reviews the effectiveness of the 5<sup>th</sup> Cycle Housing Element.

Table 72 identifies the City's 2015 – 2023 RHNA, all residential units that were constructed or permitted during the 2015 – 2023 planning period, and the capacity of the City's inventory of residential sites in accommodating the City's 2015 – 2023 allocation.

As shown in Table 72, 166 housing units were permitted during the planning period, exceeding the 5<sup>th</sup> Cycle RHNA and meeting or exceeding the allocation for each income category. Of these 166 units, 28 are affordable to very low-income households, 21 are affordable to low income households, 41 are affordable to moderate income households, and 76 units are affordable to above moderate-income households. In addition to accommodating a range of incomes, units permitted during the 5<sup>th</sup> Cycle included 37 ADUs, 26 duplex through fourplex units, 67 multifamily units in developments with 5 or more units, 2 attached single family units, and 34 detached single family units.



**Table 72. Regional Housing Needs Allocation (RHNA) 2015 – 2023 – City of Sonoma**

Allocation	Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation – 2013-2021	24	23	27	63	137
<i>Units Constructed/Permitted: Non-Deed Restricted</i>	0	7	36	76	119
<i>Unit Constructed/Permitted: Deed Restricted</i>	28	14	5	0	47
<b>Remaining Need</b>	<b>0 (4 excess units)</b>	<b>0</b>	<b>0 (14 excess units)</b>	<b>0 (13 excess units)</b>	<b>166 (29 excess units)</b>

Source: City of Sonoma, 2015-2021 Reporting Year Annual Element Progress Reports

Overall, the City's housing programs have been effective in removing potential constraints to affordable housing, ensuring coordination between City and County departments, agencies, and providers to plan for affordable housing, including providing financial assistance, and to address programs and services necessary to meet the housing needs of the City's residents, property owners, and other affected parties. Since the adoption of the last Housing Element update, City of Sonoma effectively implemented its Housing Element programs, exceeding the 5<sup>th</sup> Cycle RHNA and supporting the production and rehabilitation of housing and an increase in the variety of housing types in the City. The City's implementation of its housing programs that have helped to achieve the goals and objectives of the 2015 – 2023 Housing Element is described in detail in Table 73. Table 73 also describes programs that will be modified, consolidated into new programs, or omitted because they were implemented or redundant to other programs, as part of the 6<sup>th</sup> Cycle Housing Element.

Of particular noteworthiness during the 2015 – 2023 planning period was the approval of the Altamira project, which consisted of 15 extremely low income units, 23 very low income units, 9 low income units, and 1 moderate income unit, and was developed on a property identified in the 5<sup>th</sup> Cycle Housing Element as an opportunity site.

The City provided ongoing assistance to the unhoused community through assisting Sonoma Overnight Support operation of The Haven, a 10-bed overnight shelter located in a City-owned building and implementing and operating a safe parking program at the police station parking lot.

During the 5<sup>th</sup> Cycle, the City actively promoted accessory dwelling units, including extending fee waivers during 2019 and 2020.

The City's staff regularly coordinated with the Sonoma County Community Development Commission to support funding efforts for projects, including review and completion of Local Agency Review Forms.

In 2019, the City completed two key housing initiatives – a series of three community workshops focused on supporting and encouraging housing production and addressing local housing needs and the creation of a housing trust fund. The City Council adopted the Housing Trust Fund on May 20, 2019 by Resolution 18-2019. Each of the three housing workshop sessions (April 25, May 16, June 20, 2019) was very well attended (about 60 members of the public) and attracted the communities most active members.

The City continues to require new development to address housing needs of all income levels through the Affordable Housing Program, which was updated in 2021 to extend affordability requirements to increase the requirement from 20% to 25% and to address moderate ("missing middle" incomes), to differentiate requirements for rental and ownership developments, to extend the requirement to include developments of 4 units or less, and to allow in lieu fees for additions, remodels, and projects of 4 units or fewer.

During the 5<sup>th</sup> Cycle, the City's efforts assisted a variety of household types and cumulatively contributed to populations with special housing needs as follows:

- 47 very low and low income units in the Altamira project that can benefit all special needs households with lower incomes, including 15 extremely low income housing units, which can assist special needs populations on a fixed or limited income, including seniors and persons with a disability, and 12 3-bedroom units for large families;
- 20 or more homeless persons per night, including 10 beds at The Haven shelter and 10 vehicles at the safe parking site; and
- Preservation of the 34-unit senior affordable Village Green II Apartments, which was transferred from the City to the Sonoma County Community Development Commission following dissolution of its Redevelopment Agency, with the property acquisition completed in 2017. The project has received a preliminary reservation through the LIHTC program for rehabilitation, which will ensure the long-term affordability of the units and the provision of safe and decent housing opportunities for seniors.
- The 2015-2023 Housing Element did not result in any farmworker units or units specifically for persons with a disability, including developmental disability.

While the majority of goals, policies, and programs included in the 2015-2023 Housing Element continue to be appropriate to address the City's housing needs, the Housing Plan will be updated to provide clearer guidance, to remove redundancies, to provide more specific direction to encourage affordable and special needs housing, and to address new requirements of State law. The intent of these programs will be kept in the Housing Plan, with revisions to address identified specific housing needs, constraints, or other concerns identified as part of this update. The 6<sup>th</sup> Cycle Housing Element Housing Plan includes the complete set of the new and/or revised programs for to address the City's housing needs for the 2023 – 2031 period.

**Table 73: Achievements and Implementation of 2015-2023 Housing Element**

Program Title and Objective	Accomplishments and Status
<p><b>1. Inclusionary Housing Ordinance</b>  <i>Re-evaluate City's inclusionary program, and amend the Zoning Ordinance by 2017 to strengthen and improve effectiveness in providing affordable housing.</i></p>	<p><b>Accomplishments:</b> The City has implemented this program, reviewing and updating the Inclusionary Housing Ordinance (Affordable Housing Program) to ensure that the program is effective in addressing the City's housing needs and addressing the recommendations of Program 1 to require units at the low income level, to consider establishing an in lieu fee, and to consider an impact fee for single family homes and 2-4 unit projects. Chapter 19.44 was amended in May 2021 and the inclusionary requirement was increased to 25 percent, revised to address mixed use developments, revised to include requirements for extremely low and low income units in addition to low and moderate, address the impact of developments with 4 or fewer units, to address "missing middle" needs, to allow in lieu fees for additions and small projects, and to increase the affordability term from 55 years to in perpetuity. Consistent with this program, the City commissioned a residential nexus study in 2017 to provide a legal basis for establishing fees to mitigate the impacts of new development on the need for affordable housing and is in the process of establishing an affordable housing in-lieu fee.</p> <p><b>Status:</b>            <input type="checkbox"/> Keep            <input checked="" type="checkbox"/> Modify            <input type="checkbox"/> Remove</p> <p>This program has been mostly implemented and will be updated to ensure that the City establishes in lieu fees to provide an option for smaller projects to address the affordable housing requirement and to ensure that the City regularly evaluates the Affordable Housing Program's inclusionary provisions remain appropriate to ensure that the program is not impeding the development of housing and is effective in ensuring that new development includes an affordable component.</p>
<p><b>2. Land Assembly and Write-Down</b>  <i>Coordinate with County Housing Authority in issuance of RFP for the Broadway site by 2015 with a goal of completing development by 2018; develop with minimum 39 low income rental units.</i></p>	<p><b>Accomplishments:</b> The City successfully implemented this program, with the final development exceeding the objective. The project site at 20269 Broadway was identified in the 5<sup>th</sup> Cycle Housing Element as an important opportunity site. With prior redevelopment funding, the City acquired the property for the affordable housing project that became Altamira. The property was transferred to the Sonoma County Community Development Commission as part of the transition of shifting the Housing Successor Agency role to the County after the dissolution of redevelopment. The City secured \$1.45 million from 2011 redevelopment bond sales to invest in the project and support affordable housing and provided a \$100,000 loan for seed money to assist with up-front costs for the entitlement process. A Use Permit was issued for the project in January 2018 for 48 units of housing (including 47 affordable units and one manager's unit) and building permits were issued in 2019. In 2021, the building permits were finalized and the complex is fully operating. The Altamira development provides 15 extremely low income, 23 very low income, 9 low income, and 1 moderate income units. The project includes 12 3 bedroom units for large families.</p> <p><b>Status:</b>            <input type="checkbox"/> Keep            <input type="checkbox"/> Modify            <input checked="" type="checkbox"/> Remove</p> <p>This program has been completed and will be removed from the Housing Element.</p>

Table 73: Achievements and Implementation of 2015-2023 Housing Element	
Program Title and Objective	Accomplishments and Status
<p><b>3. Partnerships with Affordable Housing Developers</b>  <i>Continue to partner with affordable housing providers through provision of land write-downs, regulatory incentives and/or direct assistance. Annually meet with County representatives to discuss farmworker housing needs and potential applications for funding.</i></p>	<p><b>Accomplishments:</b> The City coordinated with the SCCDC on the Altamira and Village Green II senior housing projects and provided financial assistance for the Altamira project. In 2021 the City collaborated with the Housing Land Trust of Sonoma County, a local non-profit dedicated to providing local affordable housing opportunities, engaged Rise Housing to help manage the City's affordable housing program, and provided assistance to Sonoma Overnight Support for operation of The Haven emergency shelter. The City continues to coordinate with SCCDC as part of the Urban County regarding housing needs of lower income households and special needs populations, including seniors, farmworkers, disabled, homeless, and large households. While the City has coordinated with the Sonoma County Housing Coalition, non-profits and affordable housing developers did not identify interest in partnering with the City to develop farmworker housing during the 5<sup>th</sup> Cycle and this continues to be a local and regional housing need.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been implemented and is effective. This program will be continued in the 6<sup>th</sup> Cycle Housing Plan with modifications to identify specific actions for the City to take to engage non-profits and affordable housing developers to encourage affordable housing and farmworker housing, as well as housing for other special needs groups.</p>
<p><b>4 Adaptive Reuse</b>  <i>Consider elimination of vacation rentals as an adaptive reuse option.</i></p>	<p><b>Accomplishments:</b> In 2017, the City adopted Ordinance 11-2017 to prohibit short term vacation rentals in the city limits. This action encourages the adaptive reuse of vacation rentals as permanent housing by prohibiting transient occupancy for profit. In 2021, the City worked on developing an Urgency Ordinance prohibiting time-shares and fractional ownership uses to further support permanent housing opportunities. A regular ordinance was adopted on June 2, 2022.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been implemented. This program will be modified to identify additional opportunities for adaptive reuse, such as conversion of upper story office and other uses in non-residential buildings to housing units.</p>
<p><b>5. Alternative Housing Models</b>  <i>Evaluate development standards to facilitate the provision of Cottage Housing and Junior Second Units, while addressing issues of neighborhood compatibility. Seek to adopt standards by 2017.</i></p>	<p><b>Accomplishments:</b> In 2016, the City adopted an ordinance adopted providing for ADUS and Junior ADUS in compliance with state law (Ordinance 01-2017). An Urgency Ordinance adopting new standards to address changes in State law was adopted in 2019. In January 2021, the City adopted a new ADU ordinance to align and implement provisions of State law for accommodating ADUs and Junior ADUs and to streamline approvals of ADUs. The City's Zoning Ordinance accommodates cottage housing, including small lot single family units, attached single family units, and clustered housing, as well as duplex through fourplex units. This program has been effective in encouraging a greater variety of housing types and promoting ADU development.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p>

**Table 73: Achievements and Implementation of 2015-2023 Housing Element**

Program Title and Objective	Accomplishments and Status
	<p>This program has been implemented and has been effective. This program will be modified to further encourage ADU development and to identify revisions to the Zoning Code to promote additional alternatives to standard single family housing and to ensure adoption of objective standards for multifamily housing.</p>
<p><b>6. Second Dwelling Units</b>  <i>Make information available to the public via the City website and at City Hall. Evaluate prohibiting use of second units as vacation rentals.</i></p>	<p><b>Accomplishments:</b> As discussed for Program 4, the City has prohibited vacation rentals, which includes short-term or vacation rentals of ADUs. The City provides information regarding ADUs on its website and at City Hall, including a discussion of regulations for the different types of ADUs, information related to free ADU feasibility consultations for Sonoma County homeowners, and answers to frequently asked questions about ADUs.</p> <p><b>Status:</b>            <input type="checkbox"/> Keep            <input type="checkbox"/> Modify            <input checked="" type="checkbox"/> Remove</p> <p>This program has been implemented and will be removed from the Housing Plan. Program 5 will be modified as previously described to encourage ADU development and promote alternatives to standard single family housing.</p>
<p><b>7. Affordable Housing Funding Sources</b>  <i>Actively pursue variety of funding sources for affordable housing. Support developers in securing outside funding.</i></p>	<p><b>Accomplishments:</b> This program has been effective in identifying and developing affordable housing funding sources. The City's Planning staff regularly coordinates with the SCCDC to participate in the Urban County, which accesses CDBG and HOME funding, and to support funding efforts for development, rehabilitation, and preservation projects, including review and completion of Local Agency Review Forms and coordinating with developers to ensure developers have adequate information to complete applications for funding, such as LIHTC funding, in a timely manner.</p> <p>To develop a local source of funding for affordable housing, the City Council adopted the Housing Trust Fund on May 20, 2019 by Resolution 18-2019 and added 1% of the transient occupancy tax to the Housing Trust Fund. The City adopted affordable housing impact fees for non-residential development in 2020; these fees will assist in funding the Housing Trust Fund. The City is in the process of adopting an in-lieu fee for the Affordable Housing Program and has contracted for a Residential Nexus Study (completed in 2018). Staff anticipates completing this effort in 2022.</p> <p><b>Status:</b>            <input type="checkbox"/> Keep            <input checked="" type="checkbox"/> Modify            <input type="checkbox"/> Remove</p> <p>This program has been implemented. While this program has been effective, it will be split into two separate programs: a program that identifies how the City will support developers in obtaining funding for affordable housing and a separate program that evaluates and pursues funding sources to augment the Housing Trust Fund or provide separate funding sources that the City can use directly for affordable housing.</p>

Table 73: Achievements and Implementation of 2015-2023 Housing Element	
Program Title and Objective	Accomplishments and Status
<p><b>8. Affordable Housing Impact Fees</b>  <i>Conduct a nexus study to evaluate the establishment of an affordable housing impact fee on residential and non-residential development.</i></p>	<p><b>Accomplishments:</b> In March 2017, the City hired the consultant team of Keyser-Marston and Karen Warner Associates to prepare the 2018 Draft Residential Nexus Study and the 2018 Draft Non-Residential Nexus Study, providing a legal basis and options for establishing fees to mitigate the impacts of new development on the need for affordable housing. The draft reports were presented to the City Council for review, discussion, and direction in 2018. In 2019, City staff presented recommendations and additional data to the City Council regarding establishment of affordable housing impact fees. In 2020, City Council adopted impact fees for commercial development. City staff has continued to work on the impact fee program for residential development and the City anticipates completing this effort in the 6<sup>th</sup> Cycle.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been partially implemented. This program will be modified in the Housing Plan to address adoption residential impact fees, which would serve as in lieu fees for the Affordable Housing Program.</p>
<p><b>9. Section 8 Rental Assistance</b>  <i>Through the County Housing Authority, the City will continue to provide Section 8 rental assistance to extremely low to very low income residents. The City will encourage landlords to register units with the Housing Authority, and provide a handout for rental property owners for distribution in conjunction with business license applications and renewals.</i></p>	<p><b>Accomplishments:</b> Sonoma County Housing Authority is responsible for implementing the Section 8 Housing Choice Voucher Program, along with several other programs to assist members of the community with special needs. The Housing Authority's program encourages landlords to participate in the program by providing information on available subsidies. The City currently does not provide a handout or information related to this program; as discussed under the Status below, the City will work to provide information related to HCV/Section 8 housing.</p> <p><b>Status:</b> <input checked="" type="checkbox"/> Keep <input type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program will be revised to identify specific actions to be taken by the City to coordinate with the Housing Authority regarding use of HCV/Section 8 vouchers within the City and opportunities for the City to work with the Housing Authority to promote landlord participation in the HCV program and to educate tenants regarding the program.</p>
<p><b>10. Housing Rehabilitation Program</b>  <i>Advertise the availability of the Housing Rehabilitation Program on the City's website and through handouts available at the City Hall public counter and Sonoma Community Center as well as through the local real estate community. Seek to assist a total of 20 lower income households during the planning period.</i></p>	<p><b>Accomplishments:</b> This program was halted in 2017 with loss of redevelopment funding for housing. Housing rehabilitation assistance is available to Sonoma's property owners through the City's participation in the Urban County CDBG and HOME program administered by SCCDC.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program will be revised to promote the SCCDC-administered housing rehabilitation program and to work with the Urban County to ensure that funding remains available for housing rehabilitation activities.</p>

**Table 73: Achievements and Implementation of 2015-2023 Housing Element**

Program Title and Objective	Accomplishments and Status
<p><b>11. Mobile Home Park Rent Stabilization and Conversion Ordinance</b>  <i>Enforce mobile home park rent stabilization and conversion ordinances. Evaluate strengthening the City's existing ordinance.</i></p>	<p><b>Accomplishments:</b> In 2016 the City Council adopted Ordinance No. 02-2016, amending Chapter 9.80 of the City of Sonoma Municipal Code regarding the protection of rents for spaces in mobilehome parks. The ordinance updated some of the 1992 regulations, added additional clarification and eliminated the Mobilehome Park Rent Review Board. Applications for rent increases are now submitted to the City Manager. Appeals of City Manager decisions are heard by a hearing officer selected through the California Office of Administrative Hearings.</p> <p><b>Status:</b>           <input type="checkbox"/> Keep       <input checked="" type="checkbox"/> Modify       <input type="checkbox"/> Remove</p> <p>This program has been implemented and will be kept in the Housing Plan to ensure that the mobile home park stabilization and conversion requirements continue to be enforced. The program will be modified to remove the evaluation of the existing ordinance as that has been completed.</p>
<p><b>12 Mobile Home Park Senior-Only Occupancy Restrictions</b>  <i>Evaluate regulatory mechanisms, such as a senior-only zoning overlay, for mobile home parks to maintain to senior-only occupancy restrictions. Conduct community outreach and adopt an ordinance if deemed appropriate.</i></p>	<p><b>Accomplishments:</b> The City Attorney is the primary point of contact for this initiative and is in the process of researching options for this program.</p> <p><b>Status:</b>           <input checked="" type="checkbox"/> Keep       <input type="checkbox"/> Modify       <input type="checkbox"/> Remove</p> <p>This program is in the process of being implemented. It will be kept in the Housing Plan to ensure that senior-only mobilehome parks can be maintained as a source of housing dedicated to the senior population.</p>
<p><b>13. Condominium Conversion Ordinance</b>  <i>Continue to provide tenant protections through implementation of the City's condominium and mobile home park conversion regulations. Utilize State provisions under SB 510 to ensure that mobile home park residents are afforded all protections specified by law pertaining to park conversions to resident ownership.</i></p>	<p><b>Accomplishments:</b> The City has maintained and enforced the condominium and mobilehome park conversion regulations in the Municipal Code. The City Attorney is the primary point of contact for preparing changes to these regulations and is in the process of researching options for this program.</p> <p><b>Status:</b>           <input checked="" type="checkbox"/> Keep       <input type="checkbox"/> Modify       <input type="checkbox"/> Remove</p> <p>This program is in the process of being implemented. It will be kept in the Housing Plan to ensure that the City's condominium and mobilehome park conversion regulations are maintained, enforced, and updated as necessary to ensure that</p>
<p><b>14. Preservation of Assisted Rental Housing</b>  <i>Initiate discussions with property owners; explore outside funding and preservation options; offer preservation incentives to owners; provide technical assistance and education to affected tenants.</i></p>	<p><b>Accomplishments:</b> This City monitors its assisted multifamily development projects as well as affordable inclusionary housing provided through the City's Affordable Housing Program for the potential to convert to market rate. In 2021, the City updated its Affordable Housing Program to require affordable units to be affordable in perpetuity, eliminating the potential for new inclusionary units to convert to market rate. While the City's local financial resources to preserve affordable housing are limited with loss of redevelopment funding, the City ensures that owners of units that may convert to market rate are aware of funding sources, such as the LIHTC, CDBG, and HOME programs and project-based Housing Choice Vouchers that can be used to maintain affordability and rehabilitate units. The City modified its affordable housing requirement (Chapter 19.44) to require that lower income units receiving financial or other specified concessions and/or incentives maintain the lower income density</p>

Table 73: Achievements and Implementation of 2015-2023 Housing Element	
Program Title and Objective	Accomplishments and Status
	<p>bonus units in perpetuity, which will ensure that assisted lower income units are preserved in perpetuity going forward.</p> <p><b>Status:</b> <input checked="" type="checkbox"/> Keep <input type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been implemented and will be kept in the Housing Plan to ensure that the City continues to monitor units for the potential to convert to market rate and to work to maintain potentially affected properties as affordable housing.</p>
<p><b>15. Affordable Housing Monitoring/ Annual Report</b>  <i>Review the Housing Element on an annual basis, provide opportunities for public participation, and submit annual report to the State.</i></p>	<p><b>Accomplishments:</b> The City has prepared annual progress reports for 2015 through 2021 and provided opportunities for the public to comment on housing programs and plans, including annual hearings to review the annual progress reports, a series of housing workshops conducted in 2019, and housing workshops conducted for this Housing Element Update, in compliance with this program. Additionally, the City engaged Rise Housing to manage and implement the City's affordable housing program and initiate a full audit of the City's units.</p> <p><b>Status:</b> <input checked="" type="checkbox"/> Keep <input type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been implemented and will be kept in the Housing Plan to ensure that the City continues to monitor its affordable housing programs, progress toward the RHNA, and the preservation of affordable housing units.</p>
<p><b>16. Design Guidelines and Design Review</b>  <i>Continue to implement design review to ensure maintenance of Sonoma's architectural character and quality of the built environment as the city continues to grow.</i></p>	<p><b>Accomplishments:</b> In 2021, the City Council initiated a process of evaluating the Design Review process with the intent of streamlining the housing development process. The City Council held a joint meeting with the Design Review and Historic Preservation Commission to discuss roles and responsibilities and opportunities for streamlining. The City anticipates amending the Municipal Code to streamline the design guidelines and design review process and to establish objective standards for multifamily development in the 6<sup>th</sup> Cycle.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been implemented. This program is not necessary to ensure that the Design Guidelines are implemented, but will be modified to ensure that the Design Guidelines, including amendments to the Design Guidelines, and the Design Review process do not constrain housing development.</p>
<p><b>17. Growth Management Ordinance- Exception for Affordable Housing</b>  <i>Annually review effects of GMO on production of affordable housing and modify as necessary to provide adequate incentives consistent with Sonoma's current and future regional housing needs.</i></p>	<p><b>Accomplishments:</b> The Planning Department and City manager prepare an annual Growth Management Ordinance report in August of each year, when the allocations are dispersed by City Council. The City's Growth Management Ordinance has not presented an obstacle to market rate or affordable housing development, as evidenced by the City's achievement of more than the full 5<sup>th</sup> Cycle RHNA prior to the end of the 5<sup>th</sup> Cycle. Based on the Housing Accountability Act, City staff has determined that the ordinance is not currently enforceable and has not been limiting units based on the Growth Management Ordinance.</p>



**Table 73: Achievements and Implementation of 2015-2023 Housing Element**

Program Title and Objective	Accomplishments and Status
	<p><b>Status:</b>      <input checked="" type="checkbox"/> Keep      <input type="checkbox"/> Modify      <input type="checkbox"/> Remove</p> <p>This program has been implemented and continues to be appropriate to ensure that the Growth Management Ordinance, if reactivated, does not constrain housing development, including affordable and special needs housing.</p>
<p><b>18. Parking Incentives and Modified Standards</b>  <i>Provide parking reductions on affordable projects, and other projects which meet community goals. Re-evaluate multi-family parking standards and modify as appropriate.</i></p>	<p><b>Accomplishments:</b> In conjunction with the update of the Housing and Circulation Elements of the General Plan, which occurred over 2015/2016, the City commissioned a downtown parking study. In 2021, the City initiated Zoning Code changes to the parking and loading standards, which are anticipated to occur in 2022. The City continues to provide parking reductions to affordable projects in compliance with State Density Bonus law. The City's parking standards are addressed in the Constraints chapter of this Background Report.</p> <p><b>Status:</b>      <input checked="" type="checkbox"/> Keep      <input type="checkbox"/> Modify      <input type="checkbox"/> Remove</p> <p>This program has been implemented and continues to be appropriate to ensure that the City's parking standards, including the planned revisions to parking requirements, do not constrain housing development.</p>
<p><b>19. Affordable Housing Density Bonus</b>  <i>Implement City's density bonus provisions, advertise on website, and promote in discussions with developers.</i></p>	<p><b>Accomplishments:</b> A density bonus provision added to Sonoma Municipal Code on April 2, 2003 and is implemented through Chapter 19.44 - Affordable Housing and Density Bonuses. Density bonuses are implemented on a project by project basis. The City promotes the density bonus program on its website and ensures developers are aware of the program.</p> <p><b>Status:</b>      <input checked="" type="checkbox"/> Keep      <input type="checkbox"/> Modify      <input type="checkbox"/> Remove</p> <p>This program has been implemented and continues to be appropriate to ensure that density bonuses and incentives are provided consistent with State law and that the City promotes use of the program to encourage very low, low, and moderate income and senior housing.</p>
<p><b>20. Fair Housing Program</b>  <i>Refer fair housing complaints to Fair Housing of Sonoma County. Disseminate fair housing information.</i></p>	<p><b>Accomplishments:</b> Housing complaints are received by the City's Code Enforcement Division and are referred to the FHANC (formerly Fair Housing of Sonoma County) as they are received. The City maintains information regarding fair housing resources at City Hall and provides a link to FHANC on its website.</p> <p><b>Status:</b>      <input type="checkbox"/> Keep      <input checked="" type="checkbox"/> Modify      <input type="checkbox"/> Remove</p> <p>This program has been implemented and continues to be appropriate, but will be modified to include additional steps to ensure the City is affirmatively furthering fair housing through fair housing education, outreach, and additional steps as discussed in the Affirmatively Furthering Fair Housing section of this Background Report.</p>

Table 73: Achievements and Implementation of 2015-2023 Housing Element	
Program Title and Objective	Accomplishments and Status
<p><b>21. Universal Design</b>  <i>Disseminate Universal Design Principles brochure, and inform residential development applicants.</i></p>	<p><b>Accomplishments:</b> This program was not implemented during the 5<sup>th</sup> Cycle.</p> <p><b>Status:</b> <input checked="" type="checkbox"/> Keep <input type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program will be kept, with identification of specific resources available to assist development applicants in understanding and applying universal design principles.</p>
<p><b>22. Reasonable Accommodation Procedures</b>  <i>Facilitate equal access to housing for persons with disabilities, including developmental disabilities, through implementation of the City's reasonable accommodation procedures</i></p>	<p><b>Accomplishments:</b> <b>Section</b> 19.54.100, Request for reasonable accommodation, of the Sonoma Municipal Code provides for reasonable modifications to the City requirements to ensure persons with disabilities, including developmental disabilities, are afforded equal opportunity for the use and enjoyment of their dwelling and establishes a ministerial process for requesting and granting reasonable modifications to zoning and development regulations, building codes and land use. The City imposes no fees for a reasonable accommodation application and applications are reviewed as they are submitted. The City has made reasonable accommodations available as described by this program.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p> <p>This program has been implemented and will be modified to include proactive steps for the City to take, including developing a reasonable accommodation application and informational handout, to assist interested parties with making a request for reasonable accommodation.</p>
<p><b>23. Homeless Services and Shelter</b>  <i>Continue to operate the Sonoma Homeless shelter, support area homeless service providers, and participate in regional efforts to address homelessness.</i></p>	<p><b>Accomplishments:</b> The City assists a local non-profit, Sonoma Overnight Support to operate The Haven, a 10-bed overnight shelter that is located in a City-owned building at 151 1st St. West. Funding for shelter operations is supported under a contractual agreement that was put in place by the Sonoma Community Development Agency prior to its elimination under State law. The City also supports the shelter by paying for utilities and maintenance of the City-owned facility using the General Fund in the amount of \$30,000 a year through 2030 to operate an emergency shelter for the homeless. In FY 21/22, the City provided an additional \$75,000 for capital improvements to the shelter building. In 2021, through Resolution 85-2021, the City established a MOU with Sonoma Overnight Support to continue operating a safe parking program (10 spaces) at the police station parking lot through June 2022. The City also participates in the Sonoma County Task Force for the Homeless and in the Countywide Continuum of Care to promote regional solutions to assist the unhoused population and to ensure that the community of Sonoma is able to access resources for emergency shelter and supportive services. This program has been successful in continuing The Haven as a local emergency shelter and expanding local resources for the unhoused population through the safe parking program.</p> <p><b>Status:</b> <input type="checkbox"/> Keep <input checked="" type="checkbox"/> Modify <input type="checkbox"/> Remove</p>

**Table 73: Achievements and Implementation of 2015-2023 Housing Element**

Program Title and Objective	Accomplishments and Status
	<p>This program will be kept in the Housing Plan, with modifications to address potential regional resources that may be available to assist the City in addressing the needs of homeless persons and families.</p>
<p><b>24. Green Building Program</b>  <i>Promote sustainable and green building design in development.</i></p>	<p><b>Accomplishments:</b> Beginning January 1, 2020, the 2019 California Green Building Standards Code (CALGreen) became effective for new buildings and certain addition or alteration projects throughout California. The City of Sonoma has adopted and amended CALGreen to require CALGreen+Tier 1 level of compliance for all new buildings (except Tier 1 Energy Efficiency measures need not be met). The City of Sonoma requires that project applicants hire a third-party green building special inspector to verify compliance with CALGreen requirements as amended by the City of Sonoma. The City provides a checklist to assist developers with complying with the City's requirements. This program has been effective in promoting sustainable and green design, as well as in encouraging efficient development with reduced energy and water use, which results in lower utility costs to homeowners and renters.</p> <p><b>Status:</b>           <input checked="" type="checkbox"/> Keep       <input type="checkbox"/> Modify       <input type="checkbox"/> Remove</p> <p>This program has been implemented. On-going evaluation of the Affordable Housing Program's inclusionary provisions remain appropriate to ensure that the program is not impeding the development of housing and is effective in ensuring that new development includes an affordable component.</p>
<p><b>25. Energy Conservation Initiatives</b>  <i>Promote the installation of solar systems and water efficient technologies.</i></p>	<p><b>Accomplishments:</b> In addition to implementing CALGreen, the City supports expedited Solar Permitting for One &amp; Two-Family Dwellings. The City's Expedited Solar Permitting Process for One- &amp; Two-Family Dwellings provides an expedited and streamlined permitting process for qualifying small rooftop solar systems for one-and two-family dwellings that are no larger than 10 kilowatts AC nameplate rating or 30 kilowatts thermal. The City also offers expedited permitting for electric vehicle charging stations.</p> <p><b>Status:</b>           <input checked="" type="checkbox"/> Keep       <input type="checkbox"/> Modify       <input type="checkbox"/> Remove</p> <p>This program has been implemented. On-going evaluation of the Affordable Housing Program's inclusionary provisions remain appropriate to ensure that the program is not impeding the development of housing and is effective in ensuring that new development includes an affordable component.</p>

Table 73: Achievements and Implementation of 2015-2023 Housing Element	
Program Title and Objective	Accomplishments and Status
<p><b>26. Sonoma Water Action Plan and Conservation Incentives</b>  <i>Implement Water Action Plan. Conduct periodic reviews and modify as necessary to ensure adequate water supply to meet Sonoma’s regional housing needs (RHNA). Advertise available water conservation programs.</i></p>	<p><b>Accomplishments:</b> The City of Sonoma adopted the 2020 Urban Water Management Plan and is implementing Stage II of the Water Shortage Plan in response to the drought. The City continues to implement water conservation measures and ensures that the Urban Water Management Plan addresses the City’s share of regional housing needs. The Sonoma County Water Agency supplies most of the City’s potable water via connection to their aqueduct and storage system. An agreement between the City and Sonoma County Water Agency establishes a fixed allocation of 3,000 acre feet per year through 2035. Additional potable water supply is available to the City from its municipal wells. Available water supply is adequate to serve current and future demand. The City advertises water conservation tools and actions on its website and at City Hall. This program continues to be effective in ensuring that the City’s water planning efforts address the RHNA and encourage efficient water use.</p> <p><b>Status:</b>           <input checked="" type="checkbox"/> Keep           <input type="checkbox"/> Modify           <input type="checkbox"/> Remove</p> <p>This program has been implemented and will be kept in the Housing Plan to ensure that updates to the Urban Water Management Plan address current and anticipated RHNAs.</p>

## 7. OTHER REQUIREMENTS

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### CONSISTENCY WITH GENERAL PLAN

Government Code Section 65300.5 states: “In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.” Additionally, Government Code Section 65583(c)(7) requires the identification of “means by which consistency will be achieved with other general plan elements and community goals.”

The housing element of a general plan sets out a city’s overall long-range planning strategy for providing housing for all segments of the community. The California Government Code requires general plans to contain an integrated, consistent set of goals and policies. The housing element is, therefore, affected by policies contained in other elements of a general plan. The housing element is most intricately related to the land use element. The land use element establishes the framework for development of housing by laying out the land use designations for residential development and indicating the type and density permitted by a city.

Working within this framework, the City of Sonoma’s Housing Element identifies priority goals, policies, and action programs for the 2023-2031 planning period that directly address the housing needs of Sonoma’s existing and future residents. The policies contained in other elements of the City’s General Plan affect many aspects of life that residents enjoy such as the amount and variety of open space; the preservation of natural, historic, and cultural resources; permitted noise levels in residential areas; and the safety of the residents in the event of a natural or man-made disaster. The Housing Element has been reviewed for consistency with the City’s other General Plan elements and the policies and programs in this Element do not conflict with the policy direction contained in other parts of the General Plan. As portions of the General Plan are amended in the future, the Housing Element will be reviewed to ensure that internal consistency is maintained.

### RELATIONSHIP TO OTHER CITY PLANS AND POLICIES

The Housing Element identifies priority goals, objectives, policies, and action programs for the next eight years that directly address the housing needs of Sonoma. The City’s other plans and policies, including its Municipal Code, Development Code, and Specific Plans must all remain consistent with the Housing Element. As revisions are considered to the City’s Development Code and various plans, each revision will be reviewed to ensure that no conflicts with the Housing Element occur.

### **ENERGY CONSERVATION**

Sonoma’s 2020 General Plan embodies the City’s commitment to sustainability:

*The long-term health of the local and larger natural environment requires the current generation to put into place resource conservation and management practices that will be maintained by future generations. City operations and requirements for private development need to ensure that:*

- *Renewable resources such as groundwater, soil, and fish are not used faster than they can regenerate;*
- *Non-renewable resources such as minerals and fossil fuels are not consumed faster than renewable alternatives can be substituted for them;*
- *Pollution and waste are not emitted faster or in greater volumes than natural systems can absorb, recycle, or render them harmless.*

*The City can play an important role in achieving a sustainable Sonoma by adopting and promoting standards for green building and facility operation that conserve land, materials, water, and energy.*

Local governments are uniquely positioned to have a major impact on the environmental sustainability of a community due to their broad authority on local issues. The City of Sonoma has been proactive in promoting energy and resource conservation in

new housing and in the retrofit of existing housing, as described in the following section. These City- sponsored initiatives are supplemented by a variety of programs offered by other agencies and organizations.

### **GREEN BUILDING PROGRAM**

The City has adopted and amended the 2019 California Green Building Standards Code (CALGreen) to require CALGreen+Tier 1 level of compliance for all new buildings (except Tier 1 Energy Efficiency measures need not be met). The City requires project applicants to hire a third-party green building special inspector to verify compliance with the City's CALGreen requirements and provides customized checklists to assist project applicants with documenting compliance.

### **SONOMA CLEAN POWER**

Sonoma Clean Power (SCP) is a community-owned electricity provider for Sonoma County. SCP sources renewable and local low-carbon electricity at competitive rates and PG&E delivers the electricity through its existing utility lines. PG&E continues to do billing, maintain the power lines, and handle new service requests and emergencies.

### **LOCAL ENERGY CONSERVATION PROGRAMS**

In addition to green building, Sonoma promotes energy conservation by advertising utility rebate programs and energy audits, particularly connected to housing rehabilitation programs. Lower-income households are also eligible for State sponsored energy and weatherization programs.

The City provides information regarding energy conservation resources on its website. Resources include information on various cost-saving programs, PG&E energy savings tips, including clean energy programs, energy efficient lighting upgrades, home energy audits, heat pump water heater installation, energy-efficient appliance upgrades, solar energy assessment, smart thermostats, and calculators to determine carbon footprints and cost savings with conversion to LED lighting. The City also provides links to programs that provide energy conservation assistance, including free home energy audits, free solar consultations, and rebates for smart thermostats and other energy-efficient appliances.

The Sonoma County Energy Independence Program (SCEIP) offers PACE financing for permanent energy, water, wildfire safety, and seismic strengthening improvements through the property tax system. Financing is available for residential, commercial, industrial, agricultural, multifamily and certain non-profit projects. No downpayment or income/credit qualification is required.

SCP offers programs to assist households with energy-related costs, including:

- California Alternate Rates for Energy Program (CARE) provides a monthly discount of 20% or more on gas and electricity charges. Income eligibility is based on current earnings.
- Family Electric Rate Assistance Program (FERA). A monthly discount of 18% on electricity charges. Separate from CARE, income-qualified households of 3 or more persons can apply. Income eligibility is based on current earnings.
- Medical Baseline Program. Provides allowances to customers who personally are, or who live with, someone who is dependent on life-support equipment or have other serious medical conditions which create an added need for electricity. This program allows customers to receive discounted rates for electricity by increasing their allocation of "baseline usage," which is available at lower rates. Income is not a factor in qualifying for this program.

Additional programs administered by governments and non-profits include:

- Relief for Energy Assistance through Community Help Program (REACH). Provides income qualified customers with financial assistance during times of hardship.

- Low Income Home Energy Assistance Program (LIHEAP). LIHEAP is a federally funded assistance program overseen by the California Department of Community Services and Development (CSD) and administered by 42 Action Agencies throughout California. LIHEAP offers the following types of assistance:
  - Help with residential utility bill payment
  - Emergency assistance with residential energy-related crisis (utility shut-off notices and energy-related life-threatening emergency)
  - Home weatherization

## **WATER CONSERVATION PROGRAMS**

In addition to the Green Building Ordinance, Sonoma has been actively pursuing water conservation measures. Most water in the City is purchased from the County Water Agency, with City wells augmenting that supply during periods of peak use. Residential uses account for the majority of water demand in Sonoma. With respect to future development, water supply is a significant potential constraint on growth in and around the City. Conservation is a key element of the City's strategy to meet projected water demand.

Sonoma also has a water efficient landscape ordinance "to assist the City in achieving water conservation through proper plant selection, installation, and maintenance practices" through use of the following xeriscape principles: appropriate planning and design; limiting turf to locations where it provides functional benefits; efficient irrigation systems; the use of soil amendments to improve the structural characteristics of the soil; the use of mulches, where appropriate; the use of drought-tolerant plants; and appropriate and timely maintenance.

The City of Sonoma, in partnership with the Sonoma County Water Agency, offers several other programs and incentives, including rebates, to help reduce water use.

## **WATER AND SEWER PRIORITY**

The City distributed the 5<sup>th</sup> Cycle Housing Element to water and sewer providers, emphasizing requirements to prioritize allocations to lower income housing. Upon adoption of this 6<sup>th</sup> Cycle Element, the City will distribute it to Sonoma County Water Agency, the City's Water Division, and to Sonoma Valley County Sanitation District and will identify the requirements of Government Code Section 65589.7 for water and sewer providers to prioritize water and sewer service for lower income housing.

# **APPENDIX A**

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## Inventory of Residential Sites



Map Label	AFFH	APN	Address	Zoning	General Plan	Minimum Density	Maximum Density	Acres	Public Ownership	Previous Cycle	Site Type	Potential Units	Units by Affordability Level					Project Details	Existing Site Conditions							Planning Area
												Realistic Capacity	Very Low	Low	Moderate	Above Moderate	Existing Use		Existing Units	Built Square Feet	SF (Built) to Land Ratio	Land Value	Improvement Value	Other Value	Improvement to Land Value Ratio	
1	Very Low/Low	127-141-006	19357 HWY 12	MX	Mixed Use	0	20.0	6.084			Underutilized	53	32	21	0	0		Underutilized: Two residences. Assumed 75% of residential capacity on 60% of site to account for stream setback (i.e., . Capacity reduced by 55% to reflect realistic capacity conditions unique to this site).	2	880	0.00	\$ 181,013	\$ 20,099	\$ -	0.11	West Napa/Sonoma Corridor
2	Above Moderate	127-141-005	19380 HWY 12	MX	Mixed Use	0	20.0	0.089			Vacant	1	0	0	0	1		Vacant lot	0	0	0.00	\$ 2,905	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
3	Mixed Income	127-760-001	19366 SONOMA HWY	MX	Mixed Use	0	20.0	0.138			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 139,244	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
3	Mixed Income	127-760-002	19370 SONOMA HWY	MX	Mixed Use	0	20.0	0.157			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 162,452	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
4	Mixed Income	018-442-005	19410 SONOMA HWY	C	Commercial	0	20.0	0.679			Underutilized	8	0	0	4	4		Underutilized: Two single family dwellings.	2	1239	0.04	\$ 1,010,360	\$ 328,367	\$ -	0.33	West Napa/Sonoma Corridor
5	Mixed Income	018-442-016	860 W NAPA ST	C	Commercial	0	20.0	0.197			Vacant	3	0	0	1	2		Vacant lot	0	0	0.00	\$ 82,182	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
6	Above Moderate	127-474-015	BECERRA WAY	R-L	Low Density Res.	2	5.0	0.173			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 105,117	\$ -	\$ -	0.00	Northwest Area
7	Above Moderate	127-204-007	742 W SPAIN ST	R-L	Low Density Res.	2	5.0	0.248			Underutilized	1	0	0	0	1		Underutilized: miscellaneous improvements	0	864	0.08	\$ 177,776	\$ 17,062	\$ -	0.10	Northwest Area
7	Above Moderate	127-204-008	738 W SPAIN ST	R-L	Low Density Res.	2	5.0	0.248			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 151,497	\$ -	\$ -	0.00	Northwest Area
8	Above Moderate	127-204-010	730 W SPAIN ST	R-L	Low Density Res.	2	5.0	0.249			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 151,497	\$ -	\$ -	0.00	Northwest Area
9	Above Moderate	127-204-020	19325 5TH STREET W	R-L	Low Density Res.	2	5.0	0.245			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 14,024	\$ -	\$ -	0.00	Northwest Area
10	Mixed Income	127-221-016	600 W NAPA ST	C	Commercial	0	20.0	0.211			Vacant	3	0	0	1	2		Vacant lot	0	0	0.00	\$ 118,161	\$ 54,583	\$ -	0.46	West Napa/Sonoma Corridor
11	Mixed Income	127-221-033	590 West Napa Street	R-O	Housing Opportunity	15	25.0	0.527		4th, 5th	Underutilized	10	0	0	5	5		Underutilized: Single family dwelling	1	0	0.00	\$ 83,535	\$ 33,493	\$ -	0.40	West Napa/Sonoma Corridor
12	Above Moderate	018-111-076	443 CASABONNE LN	R-M	Medium Density Res.	7	11.0	0.121			Vacant	1	0	0	1	1		Vacant residential lot	0	0	0.00	\$ 412,226	\$ -	\$ -	0.00	Northwest Area
13	Above Moderate	018-111-059	430 W SPAIN ST	R-L	Low Density Res.	2	5.0	1.185			Underutilized	5	0	0	0	5		Underutilized: miscellaneous improvements	0	3240	0.06	\$ 2,798,697	\$ 80,828	\$ -	0.03	Northwest Area
14	Above Moderate	018-201-037	0 W SPAIN ST	R-L	Low Density Res.	2	5.0	0.181			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 334,191	\$ -	\$ -	0.00	Downtown District
15	Mixed Income	018-201-033	222 W NAPA ST	C	Commercial	0	20.0	0.197			Vacant	3	0	0	1	2		Vacant lot	0	0	0.00	\$ 125,020	\$ -	\$ -	0.00	Downtown District
16	Mixed Income	018-202-068	433 1ST ST W	C	Commercial	0	20.0	0.130			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 214,844	\$ -	\$ -	0.00	Downtown District
17	Mixed Income	018-162-023	330 1ST ST W	R-M	Medium Density Res.	7	11.0	0.504			Vacant	5	0	0	3	3		Vacant residential lot	0	0	0.00	\$ 63,019	\$ -	\$ -	0.00	Downtown District
18	Mixed Income	018-221-021	396 E NAPA ST	R-M	Medium Density Res.	7	11.0	0.273			Vacant	3	0	0	1	2		Vacant residential lot	0	0	0.00	\$ 643,768	\$ -	\$ -	0.00	Central-East Area
19	Above Moderate	018-222-026	250 E NAPA ST	R-L	Low Density Res.	2	5.0	0.221			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 554,049	\$ -	\$ -	0.00	Central-East Area
19	Above Moderate	018-222-027	254 E NAPA ST	R-L	Low Density Res.	2	5.0	0.221			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 557,379	\$ -	\$ -	0.00	Central-East Area
20	Above Moderate	018-091-015	0 2ND ST E	R-R	Rural Residential	0	2.0	2.038			Vacant	3	0	0	0	3		Vacant residential lot	0	0	0.00	\$ 1,266,513	\$ -	\$ -	0.00	Northeast Area
21	Above Moderate	018-102-032	138 4TH ST E	R-R	Rural Residential	0	2.0	0.596			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 1,031,462	\$ -	\$ -	0.00	Northeast Area
22	Above Moderate	018-102-035	0 BRAZIL ST	R-R	Rural Residential	0	2.0	0.547			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 10,376	\$ -	\$ -	0.00	Northeast Area
22	Above Moderate	018-102-036	0 BRAZIL ST	R-R	Rural Residential	0	2.0	0.519			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 10,376	\$ -	\$ -	0.00	Northeast Area
22	Above Moderate	018-102-037	0 BRAZIL ST	R-R	Rural Residential	0	2.0	0.590			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 10,376	\$ -	\$ -	0.00	Northeast Area
23	Above Moderate	018-231-060	0 E NAPA ST	R-L	Low Density Res.	2	5.0	0.090			Vacant	1	0	0	0	1		Vacant lot	0	0	0.00	\$ 500	\$ -	\$ -	0.00	Central-East Area
24	Mixed Income	018-860-006	441 SAN LORENZO CT	R-M	Medium Density Res.	7	11.0	0.249			Vacant	2	0	0	1	1		Vacant residential lot	0	0	0.00	\$ 12,951	\$ -	\$ -	0.00	Central-East Area
25	Above Moderate	127-231-031	PLUM TREE CT	R-L	Low Density Res.	2	5.0	0.315			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 21,754	\$ -	\$ -	0.00	Central-East Area
26	Mixed Income	018-540-100	623 IRIS WAY	R-M	Medium Density Res.	7	11.0	0.126			Underutilized	1	0	0	1	1		Vacant residential lot	0	0	0.00	\$ 39,824	\$ -	\$ -	0.00	Central-West Area
27	Mixed Income	018-540-007	583 CURTIN LN	R-M	Medium Density Res.	7	11.0	0.232			Underutilized	2	0	0	1	1		Underutilized: miscellaneous improvements	0	0	0.00	\$ 249,820	\$ 27,755	\$ -	0.11	Central-West Area
28	Very Low/Low	018-241-054	477 W NAPA ST	C	Commercial	0	20.0	2.998		4th, 5th	Vacant	27	16	11	0	0		Vacant lot. Development assumed for 60% of site area due to drainage feature on site (i.e., development potential reduced by 55% to reflect realistic capacity conditions unique to this site).	0	0	0.00	\$ 1,665,483	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
29	Mixed Income	018-241-015	325 W NAPA ST	MX	Mixed Use	0	20.0	0.138			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 164,955	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
29	Mixed Income	018-241-016	315 W NAPA ST	MX	Mixed Use	0	20.0	0.138			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 164,955	\$ -	\$ -	0.00	West Napa/Sonoma Corridor
30	Mixed Income	018-293-009	673/675 SECOND ST W	MX	Mixed Use	0	20.0	0.242			Pending-Vacant	2	0	0	1	1	Pending: SFD + ADU	Vacant residential lot	0	0	0.00	\$ 415,000	\$ -	\$ -	0.00	Downtown District
30	Mixed Income	018-293-010	210 Perkins Street	MX	Mixed Use	0	20.0	0.233			Pending-Vacant	2	0	0	1	1	Pending: SFD + ADU	Vacant residential lot	0	0	0.00	\$ 420,000	\$ -	\$ -	0.00	Downtown District
31	Mixed Income	018-251-014	171 W NAPA ST	C	Commercial	0	20.0	0.138			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 406,344	\$ -	\$ -	0.00	Downtown District
32	Mixed Income	018-251-061	159 W NAPA ST	C	Commercial	0	20.0	0.138			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 20,895	\$ -	\$ -	0.00	Downtown District
33	Mixed Income	018-251-056	539 1ST ST W	C	Commercial	0	20.0	0.209			Vacant	3	0	0	1	2		Vacant lot	0	0	0.00	\$ 327,226	\$ -	\$ -	0.00	Downtown District
34	Mixed Income	018-291-003	599 1ST STREET W	MX	Mixed Use	0	20.0	0.419			Underutilized	5	0	0	2	3		Single family dwelling	1	0	0.00	\$ 25,760	\$ 7,007	\$ -	0.27	Downtown District
35	Mixed Income	018-301-002	0 BROADWAY	C	Commercial	0	20.0	0.160			Vacant	2	0	0	1	1		Vacant lot	0	0	0.00	\$ 247,546	\$ -	\$ -	0.00	Broadway Corridor
36	Above Moderate	018-312-017	0 FRANCE ST	R-L	Low Density Res.	2	5.0	0.286			Underutilized	1	0	0	0	1		Underutilized: miscellaneous improvements	0	0	0.00	\$ 167,547	\$ 28,389	\$ -	0.17	Broadway Corridor
37	Above Moderate	018-262-014	532 2ND ST E	R-L	Low Density Res.	2	5.0	3.128			Underutilized	12	0	0	0	12		Single family dwelling	1	5264	0.04	\$ 3,480,349	\$ 1,209,725	\$ -	0.35	Central-East Area

Map Label	AFFH	APN	Address	Zoning	General Plan	Minimum Density	Maximum Density	Acres	Public Ownership	Previous Cycle	Site Type	Potential Units		Units by Affordability Level					Project Details	Existing Site Conditions							Planning Area
												Realistic Capacity	Very Low	Low	Moderate	Above Moderate	Existing Use	Existing Units		Built Square Feet	SF (Built) to Land Ratio	Land Value	Improvement Value	Other Value	Improvement to Land Value Ratio		
38	Above Moderate	018-271-044	0 E NAPA ST	R-L	Low Density Res.	2	5.0	0.237			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 116,001	\$ -	\$ -	0.00	Central-East Area	
39	Above Moderate	018-670-016	617 OAK LN	R-L	Low Density Res.	2	5.0	0.146			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 176,828	\$ -	\$ -	0.00	Central-East Area	
39	Above Moderate	018-670-017	650 OAK LN	R-L	Low Density Res.	2	5.0	0.148			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 176,828	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-001	695 E NAPA ST	R-L	Low Density Res.	2	5.0	0.463			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-003	675 E NAPA ST	R-L	Low Density Res.	2	5.0	0.464			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-004	655 E NAPA ST	R-L	Low Density Res.	2	5.0	0.461			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-005	510 ARMSTRONG DR	R-L	Low Density Res.	2	5.0	0.497			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-006	530 ARMSTRONG DR	R-L	Low Density Res.	2	5.0	0.459			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-046	534 E 5TH ST	R-L	Low Density Res.	2	5.0	0.460			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-048	535 E NAPA ST	R-L	Low Density Res.	2	5.0	0.473			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-049	555 E NAPA ST	R-L	Low Density Res.	2	5.0	0.464			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
40	Above Moderate	127-700-050	505 ARMSTRONG DR	R-L	Low Density Res.	2	5.0	0.573			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
41	Above Moderate	127-700-043	590 E 5TH ST	R-L	Low Density Res.	2	5.0	0.541			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
42	Above Moderate	127-700-039	640 E 5TH ST	R-L	Low Density Res.	2	5.0	0.459			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
43	Above Moderate	127-700-042	690 E 5TH ST	R-L	Low Density Res.	2	5.0	0.461			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
44	Above Moderate	128-650-017	0 5TH STREET E	R-L	Low Density Res.	2	5.0	0.316			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 20,980	\$ -	\$ -	0.00	Central-East Area	
45	Above Moderate	127-700-033	613 CHARLES VAN DAM	R-L	Low Density Res.	2	5.0	0.459			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
46	Above Moderate	127-700-032	617 CHARLES VAN DAM	R-L	Low Density Res.	2	5.0	0.459			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
47	Above Moderate	127-700-016	630 DANIEL YOUNG DR	R-L	Low Density Res.	2	5.0	0.496			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
48	Above Moderate	127-700-024	647 ALDER CT	R-L	Low Density Res.	2	5.0	0.460			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
49	Above Moderate	127-700-022	667 ALDER CT	R-L	Low Density Res.	2	5.0	0.449			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
50	Above Moderate	127-700-021	660 ALDER CT	R-L	Low Density Res.	2	5.0	0.451			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 91,462	\$ -	\$ -	0.00	Central-East Area	
51	Above Moderate	127-700-078	520 6TH STREET E	R-S	Sonoma Residential	3	8.0	0.383			Underutilized	3	0	0	0	3		Underutilized: miscellaneous improvements	0	0	0.00	\$ 53,457	\$ 4,987	\$ -	0.09	Central-East Area	
52	Above Moderate	127-700-080	540 6TH STREET E	R-S	Sonoma Residential	3	8.0	0.387			Vacant	3	0	0	0	3		Vacant residential lot	0	0	0.00	\$ 50,014	\$ -	\$ -	0.00	Central-East Area	
53	Above Moderate	128-650-005	741 CORDILLERAS DR	R-L	Low Density Res.	2	5.0	0.308			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 765,550	\$ -	\$ -	0.00	Central-East Area	
54	Above Moderate	018-391-016	863 HAYES ST	R-L	Low Density Res.	2	5.0	0.200			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 295,000	\$ -	\$ -	0.00	Central-West Area	
55	Above Moderate	018-391-018	871 HAYES ST	R-L	Low Density Res.	2	5.0	0.200			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 10,925	\$ -	\$ -	0.00	Central-West Area	
56	Above Moderate	018-391-019	879 HAYES ST	R-L	Low Density Res.	2	5.0	0.199			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 10,925	\$ -	\$ -	0.00	Central-West Area	
57	Mixed Income	018-401-010	186 W MACARTHUR ST	R-M	Medium Density Res.	7	11.0	0.177			Underutilized	2	0	0	1	1		Underutilized: miscellaneous improvements	0	0	0.00	\$ 86,343	\$ 12,661	\$ -	0.15	Central-West Area	
58	Mixed Income	018-830-036	0 1ST ST W	R-H	High Density Res.	11	15.0	0.081			Vacant	1	0	0	1	1		Vacant residential lot	0	0	0.00	\$ 120,835	\$ -	\$ -	0.00	Central-West Area	
59	Above Moderate	018-363-004	0 3RD ST E	R-L	Low Density Res.	2	5.0	0.218			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 12,486	\$ -	\$ -	0.00	Central-East Area	
60	Above Moderate	018-373-020	0 OAK LN	R-L	Low Density Res.	2	5.0	0.197			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 26,515	\$ -	\$ -	0.00	Central-East Area	
61	Above Moderate	128-071-019	170 MALET ST	R-R	Rural Residential	0	2.0	0.262			Vacant	0	0	0	0	0		Vacant residential lot	0	0	0.00	\$ 10,442	\$ -	\$ -	0.00	Southwest Area	
62	Mixed Income	128-083-002	BROADWAY	MX	Mixed Use	0	20.0	0.178			Vacant	3	0	0	1	2		Vacant lot	0	0	0.00	\$ 123,773	\$ -	\$ -	0.00	Broadway Corridor	
63	Above Moderate	018-421-006	315 E MACARTHUR ST	R-L	Low Density Res.	2	5.0	0.194			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 383,936	\$ -	\$ -	0.00	Southeast Area	
64	Above Moderate	128-061-032	396 LA QUINTA LN	R-L	Low Density Res.	2	5.0	0.273			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 505,004	\$ -	\$ -	0.00	Central-West Area	
65	Above Moderate	128-162-043	460 HARRINGTON DR	R-L	Low Density Res.	2	5.0	0.277			Vacant	1	0	0	0	1		Vacant residential lot	0	0	0.00	\$ 482,490	\$ -	\$ -	0.00	Southwest Area	
66	Above Moderate	128-162-037	390 HARRINGTON DR	R-L	Low Density Res.	2	5.0	0.356			Vacant	2	0	0	0	2		Vacant residential lot	0	0	0.00	\$ 45,119	\$ -	\$ -	0.00	Southwest Area	
67	Mixed Income	128-580-031	0 FRYER CREEK DR	R-M	Medium Density Res.	7	11.0	0.243	CITY OF SONOMA		Vacant	2	0	0	1	1		Vacant City-owned lot	0	0	0.00	\$ 26,300	\$ -	\$ -	0.00	Southwest Area	
68	Above Moderate	128-172-006	0 COX ST	R-L	Low Density Res.	2	5.0	0.184			Vacant	1	0	0	0	1		Vacant lot	0	0	0.00	\$ 16,984	\$ -	\$ -	0.00	Southwest Area	
69	Mixed Income	128-271-008	250 NAPA RD	R-M	Medium Density Res.	7	11.0	2.280			Vacant	21	0	0	10	11		Vacant residential lot	0	0	0.00	\$ 27,384	\$ -	\$ -	0.00	Southeast Area	
70	Very Low/Low	128-321-032	69 Napa Road	R-O	Housing Opportunity	15	25.0	2.381		4th, 5th	Vacant	51	31	20	0	0		Vacant lot. Included in 5th Cycle for very low/low.	0	0	0.00	\$ 126,821	\$ -	\$ -	0.00	Gateway District	
70	Very Low/Low	128-321-034	45 Napa Road	R-O	Housing Opportunity	15	25.0	0.866		4th, 5th	Vacant	18	11	7	0	0		Vacant residential lot. Included in 5th Cycle for very low/low.	0	0	0.00	\$ 37,351	\$ -	\$ -	0.00	Gateway District	
A	Mixed Income	127-202-006	SONOMA HWY	R-O	Housing Opportunity	15	25.0	1.806		4th, 5th	Pending-Vacant	55	10	4	0	41	Pending: DeNova Homes/Montaldo Apts = 55 units: 3 extremely low, 5 very low, 6 low, remainder market rate	Vacant residential lot	0	0	0.00	\$ 20,838	\$ -	\$ -	0.00	West Napa/Sonoma Corridor	
A	Mixed Income	127-202-007	19320 Sonoma Highway	R-O	Housing Opportunity	15	25.0	0.344		4th, 5th	Pending-Under	0	0	0	0	0	Pending: DeNova Homes/Montaldo Apts	Single family dwelling	1	1843	0.12	\$ 26,038	\$ 38,502	\$ -	1.48	West Napa/Sonoma Corridor	
B	Mixed Income	127-202-013	19380 HWY 12	MX	Mixed Use			1.195			Pending-Under	7	1	1	0	5	Pending: 19380 Sonoma Hwy MF	Underutilized: Cocktail lounge bar	0	1596	0.03	\$ 216,708	\$ 31,321	\$ -	0.14	West Napa/Sonoma Corridor	
C	Above Moderate	127-204-009	734 W SPAIN ST	R-L	Low Density Res.	2	5.0	0.248			Pending-Vacant	2	0	0	0	2	Pending: Sweetwater Spectrum Inc.	Vacant residential lot	0	0	0.00	\$ 151,497	\$ -	\$ -	0.00	Northwest Area	
D	Above Moderate	127-204-011	700 W SPAIN ST	R-L	Low Density Res.	2	5.0	0.272			Approved	2	0	0	0	2	Approved: 2 Single-Family Dwellings	Underutilized: Single family dwelling	1	788	0.05	\$ 525,589	\$ 327,427	\$ -	0.64	Northwest Area	

Map Label	AFFH	APN	Address	Zoning	General Plan	Minimum Density	Maximum Density	Acres	Public Ownership	Previous Cycle	Site Type	Potential Units	Units by Affordability Level					Project Details	Existing Site Conditions							Planning Area			
												Realistic Capacity	Very Low	Low	Moderate	Above Moderate	Existing Use		Existing Units	Built Square Feet	SF (Built) to Land Ratio	Land Value	Improvement Value	Other Value	Improvement to Land Value Ratio				
E	Mixed Income	127-471-038	515 LASUEN ST	R-L	Low Density Res.	2	5.0	0.412			Approved	2	0	0	1	1	Approved: Single Family Dwelling + ADU	Vacant residential lot	0	0	0.00	\$ 229,664	\$ -	\$ -	0.00	Northwest Area			
F	Above Moderate	127-204-021	315 5TH ST W	R-L	Low Density Res.	2	5.0	0.646			Pending-Under	1	0	0	0	1	Pending: Single Family Dwelling	Underutilized: Single family dwelling	1	2660	0.09	\$ 643,320	\$ 1,210,916	\$ -	1.88	Northwest Area			
G	<del>Mixed Income</del>	<del>018-161-017</del>	<del>301 First Street West</del>	<del>R-M</del>	<del>Medium Density Res.</del>	<del>7</del>	<del>11.0</del>	<del>0.173</del>			<del>Approved</del>	<del>2</del>	<del>0</del>	<del>0</del>	<del>1</del>	<del>1</del>	<del>Approved: McQueen - 2 units</del>	<del>Vacant lot</del>	<del>0</del>	<del>0</del>	<del>0.00</del>	<del>\$ -</del>	<del>\$ -</del>	<del>\$ -</del>	<del>0.00</del>	<del>Downtown District</del>			
H	Mixed Income	018-131-012	216 First Street East	MX	Housing Opportunity	15	25.0	0.285		4th, 5th	Pending-Under	0	0	0	0	0	Pending: 1st Street East Townhomes	Underutilized: Single family dwelling	1	1699	0.14	\$ 666,192	\$ 299,783	\$ -	0.45	Northeast Area			
H	Mixed Income	018-131-013	226 First Street East	MX	Housing Opportunity	15	25.0	0.289		4th, 5th	Pending-Under	0	0	0	0	0	Pending: 1st Street East Townhomes	Underutilized: Single family dwelling	1	1699	0.13	\$ 666,192	\$ 299,783	\$ -	0.45	Northeast Area			
H	Mixed Income	018-131-018	254 First Street East	MX	Housing Opportunity	15	25.0	2.028		4th, 5th	Pending-Under	50	0	5	5	40	Pending: 1st Street East Townhomes- 52 units (2 existing, 50 net new units)	Underutilized: Industrial use - 5,000 s.f. structure	0	5000	0.06	\$ 1,554,451	\$ 639,544	\$ -	0.41	Northeast Area			
I	Moderate	018-222-008	214 E NAPA ST	R-L	Low Density Res.	2	5.0	0.256			Pending-Under	1	0	0	1	0	Pending: HSU Residence - ADU	Single family dwelling	1	3173	0.28	\$ 434,505	\$ 662,033	\$ -	1.52	Central-East Area			
J	Above Moderate	018-273-013	420 PATTEN ST	R-L	Low Density Res.	2	5.0	0.235			Pending-Under	1	0	0	0	1	Pending: Single Family Dwelling	Single family dwelling	0	1080	0.11	\$ 545,928	\$ 376,687	\$ -	0.69	Central-East Area			
K	<del>Moderate</del>	<del>018-292-001</del>	<del>292 ARROYO WAY</del>	<del>R-L</del>	<del>Low Density Res.</del>	<del>2</del>	<del>5.0</del>	<del>0.219</del>			<del>Approved</del>	<del>1</del>	<del>0</del>	<del>0</del>	<del>1</del>	<del>0</del>	<del>Approved: Accessory Dwelling Unit</del>	<del>Underutilized: Single family dwelling</del>	<del>1</del>	<del>999</del>	<del>0.10</del>	<del>\$ 385,991</del>	<del>\$ 284,133</del>	<del>\$ -</del>	<del>0.74</del>	<del>Central West Area</del>			
L	Moderate	018-411-012	899 BROADWAY	MX	Mixed Use			0.550			Pending-Under	2	0	0	2	0	Pending: Jacks Diner - Duplex	Underutilized: Full-service station, 960 s.f.	0	960	0.04	\$ 1,125,811	\$ 160,830	\$10	0.14	Broadway Corridor			
M	Moderate	018-382-034	481 York Court	R-L	Low Density Res.	2	5.0	0.278			Approved	1	0	0	0	1	Approved: Klassen Tentative Parcel Map - 1 new single family dwelling	Underutilized: Single family dwelling	1	0	0.00	\$ -	\$ -	\$ -	0.00	Central-East Area			
M		018-382-035	482 York Court	R-L	Low Density Res.	2	5.0	0.224				0	0	0	0	0	Approved: Klassen Tentative Parcel Map	Underutilized: Single family dwelling	1	0	0.00	\$ -	\$ -	\$ -	0.00	Central-East Area			
N	Mixed Income	128-061-001	19910 Fifth Street West	R-O	Housing Opportunity	15	25.0	1.504		5th	Pending-Under	15	0	1	2	12	Hummingbird Cottages - 15 single family attached units	Underutilized: Single family dwelling	1	960	0.01	\$ 29,883	\$ 11,072	\$ -	0.37	Central-West Area			
O	Above Moderate	128-162-042	470 HARRINGTON DR	R-L	Low Density Res.	2	5.0	0.277			Pending-Under	1	0	0	0	1	Pending: Single Family Dwelling	Underutilized: Single family dwelling	1	2868	0.24	\$ 546,612	\$ 419,299	\$ -	0.77	Southwest Area			
P	Above Moderate	128-071-014	234 MALET ST	R-R	Rural Residential			1.358			Pending-Under	1	0	0	0	1	Pending: Single Family Dwelling	Underutilized: Single family dwelling	1	1312	0.02	\$ 900,000	\$ 500,000	\$ -	0.56	Southwest Area			
Q	Above Moderate	128-071-023	114 MALET ST	R-R	Rural Residential	0	2.0	0.498			Pending-Under	1	0	0	0	1	Pending: Single Family Dwelling	Underutilized: Single family dwelling	1	1210	0.06	\$ 368,943	\$ 553,414	\$ -	1.50	Southwest Area			
R	Above Moderate	128-131-016	20029 1ST STREET W	R-R	Rural Residential	0	2.0	0.570			Pending-Under	1	0	0	0	1	Pending: Single Family Dwelling	Underutilized: Single family dwelling	1	2916	0.12	\$ 618,340	\$ 412,226	\$ -	0.67	Southwest Area			
S	Mixed Income	128-181-004	1211 Broadway	MX	Mixed Use	0	20.0	0.340			Pending-Under	5	0	0	2	3	Pending: 1211 Broadway Housing - 5 units	Underutilized: Single family dwelling	1	636	0.04	\$ 488,798	\$ 210,235	\$ -	0.43	Broadway Corridor			
	Mixed Income		525 LASUEN									2	0	0	1	1	Building Permits Pending: Single												
		<b>Not Included in the Inventory (Informational Only)</b>																											
	Mixed Income	128-281-013	20455 Fifth Street East	SOI		0	0.0	2.899			Pending-Under	59	0	0	12	47	Pending Application - DeNova	Underutilized: Single family dwelling	1	2434	0.02	\$ 44,834	\$ 58,430	\$ -	1.30	Southeast Area			

# **APPENDIX B**

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## Balancing Act Submissions

Appendix D - Balancing Act Submissions

Submission ID	Submitted At	Are you happy with the availability of housing in the City of Sonoma?	Are you a resident?	Age Range	Gender	Total RHNA Allocation - Amount	50% Buffer - Amount	1 - Downtown District - Amount	2 - West Napa/Sonoma Corridor - Amount	3 - Northwest Area - Amount	4 - Broadway Corridor - Amount	4 - Broadway Corridor - Comment	5 - Vallejo District - Amount	6 - Central-West Area - Amount	7 - Southwest Area - Amount	7 - Southwest Area - Comment	8 - Gateway District - Amount	9 - Southeast Area - Amount	10 - Central-East Area - Amount	11 - Northeast Area - Amount	Submitter Postal Code	
42764	11/5/2021 21:37	Sonoma	Yes		Male	311	0	75	0	80	0		0	165	0		0	0	0	0	0	95476
51187	2/26/2022 16:18	No	Yes	19 - 39	Male	311	0	40	80	0	40		80	0	0		80	80	0	0	0	95476
51214	2/27/2022 2:28	No	No	60 - 69	Male	311	20	5	25	20	45		10	20	10		20	20	80	80	80	95476
51223	2/27/2022 5:54	Yes	Yes	80 - 89	Male	311	0	0	0	0	0		0	50	80		80	80	50	0	0	95476
51418	3/1/2022 4:42	No	Yes	40 - 59	Male	311	0	50	50	55	80		0	80	0		0	0	0	0	0	95476
51422	3/1/2022 5:50	No	Yes	60 - 69		311	0	25	50	45	20	Density in th	40	20	0	Already to d	0	30	35	50	50	95476
51434	3/1/2022 15:30	No	Yes	60 - 69	Other	311	0	40	0	0	80		20	80	80		80	80	80	80	80	95476
51550	3/2/2022 21:48	Yes	Yes	60 - 69	Male	311	0	0	30	30	30		0	45	40		30	40	30	40	40	95476
51733	3/3/2022 22:57	No	Yes	70 - 79	Male	311	0	50	30	30	30		50	50	20		0	20	20	15	15	95476
52039	3/5/2022 22:22	No	Yes	40 - 59	Female	311	0	10	10	10	45		10	0	65		25	35	60	50	50	95476
54361	3/15/2022 5:05	No	Yes	40 - 59	Male	311	0	15	50	15	25		10	50	20		20	50	30	30	30	95476
54675	3/16/2022 22:02	No	Yes	40 - 59	Male	311	0	20	20	20	30		5	30	30		60	60	30	20	20	95476
55022	3/21/2022 11:16	No	No	60 - 69	Male	311	0	0	0	0	0		0	0	0		80	80	80	80	80	95476
55027	3/21/2022 14:40	No	No	19 - 39	Male	311	0	0	80	0	0		0	0	0		0	80	80	80	80	95404

## **APPENDIX C**

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### Housing Needs and Priorities Survey

## Q1 Do you live in Sonoma?

Answered: 381 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	90.03%	343
No	9.97%	38
TOTAL		381

## Q2 How long have you lived in the City?

Answered: 363 Skipped: 18

ANSWER CHOICES	RESPONSES	
0-2 years	7.99%	29
2-5 years	21.76%	79
5-10 years	19.56%	71
10+ years	36.09%	131
Other (please specify)	14.60%	53
<b>TOTAL</b>		<b>363</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	17	4/15/2022 7:49 PM
2	22	4/15/2022 7:47 PM
3	20 years, 2-3 blocks outside city limit....interested party per your description.	4/15/2022 7:21 PM
4	20 años	4/15/2022 7:17 PM
5	I work here but can't afford to live here.	4/15/2022 2:43 PM
6	22 years	4/15/2022 8:41 AM
7	In Valley	4/15/2022 6:03 AM
8	I live in El Verano, 95476	4/14/2022 8:26 PM
9	i leave in agua caliente	4/14/2022 7:27 PM
10	Do not live in Sonoma	4/14/2022 5:57 PM
11	I live in the valley - so, county land	4/14/2022 5:39 PM
12	35 years	4/14/2022 2:44 PM
13	41 years	4/14/2022 10:04 AM
14	After 50+ years in Sonoma I now live in BHS	4/14/2022 9:04 AM
15	35 years	4/14/2022 8:46 AM
16	I live 4 blocks from the city boundary for 10 years	4/14/2022 8:25 AM
17	32 years	4/13/2022 9:59 PM
18	37 years	4/13/2022 9:27 PM
19	20 years	4/13/2022 8:57 PM
20	46 yrs.	4/13/2022 6:09 PM
21	51 years	4/13/2022 5:40 PM
22	73+ years	4/13/2022 5:38 PM
23	45 years	4/13/2022 5:21 PM
24	All my life	4/13/2022 5:12 PM
25	Santa Rosa 9 years after Sonoma 1 year	4/13/2022 5:00 PM



## Sonoma Housing Needs and Priorities Survey

26	41 years	4/13/2022 4:06 PM
27	43 years	4/13/2022 4:02 PM
28	40 years	4/13/2022 3:37 PM
29	42 years	4/13/2022 3:23 PM
30	40	4/13/2022 3:18 PM
31	70+ years	4/13/2022 3:17 PM
32	Since birth. 1970	4/13/2022 3:16 PM
33	22 years	4/13/2022 3:07 PM
34	27 years	4/13/2022 3:03 PM
35	47 years	4/13/2022 2:46 PM
36	Havelived in Sonoma Valley for 60~ years	4/12/2022 7:51 PM
37	I don't live in the City	4/12/2022 1:28 PM
38	9 years resident in City limits, +_ 12 years 100 yards in Napa Co	4/12/2022 12:05 PM
39	32	4/9/2022 6:28 AM
40	30+	4/9/2022 4:09 AM
41	41 years	4/8/2022 5:59 PM
42	30+	4/8/2022 10:55 AM
43	46 years	4/8/2022 10:36 AM
44	I live in the unincorporated east side, 16 years	4/7/2022 7:10 PM
45	31 years	4/6/2022 4:56 PM
46	Lifelong	4/6/2022 3:21 PM
47	30 years	4/2/2022 6:18 PM
48	Lived in the City for many years, now live in unincorporated for the past 11	3/31/2022 10:51 AM
49	29 years	3/28/2022 3:47 PM
50	I'm living now in BHS	3/26/2022 9:58 AM
51	21 years	3/26/2022 7:38 AM
52	18 years	3/25/2022 5:05 AM
53	Not a resident	2/25/2022 4:24 PM

### Q3 What made you decide to live here? (Select all that apply)

Answered: 363 Skipped: 18

ANSWER CHOICES	RESPONSES	
Proximity to family and/or friends	35.81%	130
Other (please specify)	34.99%	127
Proximity to job/work	34.71%	126
Safety of neighborhood	33.61%	122
Quality of housing stock	19.28%	70
Proximity to shopping and services	14.33%	52
Affordability	13.77%	50
Quality of local school system	9.64%	35
City services and programs	9.64%	35
Total Respondents: 363		

#	OTHER (PLEASE SPECIFY)	DATE
1	able to work from home now and wanted to live in wine country	5/8/2022 8:46 AM
2	Beauty. Of tree lined streets, care of neighborhood	4/23/2022 6:12 PM
3	My family moved here in 1977.	4/21/2022 4:55 PM
4	Found an available house for rent	4/21/2022 12:03 PM
5	Amenities including biking, hiking, urban growth boundary, natural beauty, wildlife, restaurants, and culture. Historic buildings.	4/18/2022 4:05 PM
6	Wanted a small town close to SFO.	4/18/2022 12:09 PM
7	Beauty of City, walkability, variety of outdoor activities and parks. Also the ebb and flow of visitors, which keeps it interesting.	4/18/2022 11:22 AM
8	Accessible to San Francisco, but still removed.	4/16/2022 8:49 AM
9	Lovely area, history, wine country vibe, proximity to major airports, affordable (at that time)	4/15/2022 8:56 PM
10	Marriage	4/15/2022 7:33 PM
11	The area WAS very nice and NOT OVERCROWDED.	4/15/2022 7:21 PM
12	NA	4/15/2022 2:43 PM
13	Lifestyle choice	4/15/2022 9:04 AM
14	22 years ago the rental cost was somewhat reasonable - not now	4/15/2022 8:41 AM
15	Family owned home	4/15/2022 6:03 AM
16	Sense of Community	4/14/2022 8:26 PM
17	The beauty of the area.	4/14/2022 5:48 PM
18	the natural beauty of the biome	4/14/2022 5:39 PM
19	Spectacular small town with great people!!	4/14/2022 5:34 PM

## Sonoma Housing Needs and Priorities Survey

20	Retirement	4/14/2022 5:14 PM
21	Wine country	4/14/2022 3:46 PM
22	Weather, proximity to SF	4/14/2022 3:16 PM
23	Attending college at Sonoma State University	4/14/2022 1:12 PM
24	big city to small town	4/14/2022 11:09 AM
25	Born and Raised	4/14/2022 10:04 AM
26	Beauty of the city	4/14/2022 9:39 AM
27	moved here with my parents after my father retired	4/14/2022 8:46 AM
28	Quality of life	4/14/2022 7:57 AM
29	Beauty, quiet comfortable friendly community	4/14/2022 6:44 AM
30	Loved visiting the town and wanted to leave SF	4/14/2022 6:38 AM
31	It's in the wine country and living close to the plaza	4/13/2022 10:46 PM
32	Just a nice size pleasant neighborhood	4/13/2022 10:41 PM
33	A more rural feeling vs. SF	4/13/2022 9:59 PM
34	Small town, country feel, the Plaza	4/13/2022 9:27 PM
35	Got married to a man with medical practice here 32 years ago	4/13/2022 9:15 PM
36	Beautiful country similar to Tuscany Italy	4/13/2022 8:57 PM
37	Born here. 4th generation in the Sonoma Valley.	4/13/2022 8:23 PM
38	Es un pueblo pequeño y a ese tiempo yo estaba sola en este país	4/13/2022 8:14 PM
39	Home town feeling	4/13/2022 7:50 PM
40	have grown up here, husband born here	4/13/2022 7:21 PM
41	We like a Sonoma life style.. small town.. decent restaurants.. wine country.. good friends and neighbors.. weather b4 many fires	4/13/2022 7:17 PM
42	Kindness and community connection	4/13/2022 7:12 PM
43	It is where I found housing.	4/13/2022 6:57 PM
44	beauty	4/13/2022 6:27 PM
45	open space	4/13/2022 6:09 PM
46	Availability of pretty girls.	4/13/2022 6:04 PM
47	Retirement	4/13/2022 5:40 PM
48	I was accepted at Sonoma State University and had friends in Sonoma.	4/13/2022 5:40 PM
49	proximity to nature, hiking trails, climate (moved before the drought and fires!), low population levels	4/13/2022 5:38 PM
50	born and raised 3rd generation	4/13/2022 5:38 PM
51	loved the beauty of the area	4/13/2022 5:21 PM
52	I was born here and never moved away. My family, children, grand children live here as well	4/13/2022 5:12 PM
53	Couldn't afford to buy in Sonoma, so bought in Santa Rosa	4/13/2022 5:00 PM
54	Beautiful rural feeling	4/13/2022 4:53 PM
55	Proximity to hiking trails and bike path	4/13/2022 4:48 PM
56	Inherited a home	4/13/2022 4:46 PM

## Sonoma Housing Needs and Priorities Survey

57	Affordable mobilehomes available so I could retire in my favorite small town!	4/13/2022 4:38 PM
58	menos congestion, menos gente	4/13/2022 4:35 PM
59	Walkability and beauty of Sonoma	4/13/2022 4:23 PM
60	singe stor	4/13/2022 4:23 PM
61	Affordable housing subsidybecame available.	4/13/2022 4:19 PM
62	Small town setting	4/13/2022 4:06 PM
63	future spouse lived here.	4/13/2022 4:06 PM
64	Nice place to live	4/13/2022 4:04 PM
65	When I relocated to Sonoma I was living in Marin County. A separation and the cost of rent was beyond my means.	4/13/2022 4:02 PM
66	historic charm	4/13/2022 3:51 PM
67	Sonoma is my hometown and i love it here because of the people, the farmer's markets, festivals, parades, and nostalgic reasons. If it weren't for those facts there is no way I'd live here. It doesn't feel safe like it once was, our school system is a joke, it is outrageously expensive and an absurdly competitive job market. There aren't many viable shopping opportunities for locals and most of my services (dry cleaning, hair salon, gym) I get from out of our town. Sonoma is beautiful, sonoma is nostalgic, but sonoma is none of those reasons that you have listed in this question.	4/13/2022 3:44 PM
68	community size and friendliness	4/13/2022 3:41 PM
69	Small Ag town with quality living; climate, cooler than Napa (both ways:); access to city.	4/13/2022 3:32 PM
70	Retiring from City - quality new home in nice neighborhood	4/13/2022 3:31 PM
71	Moved from SF for better weather and at that time, a good place to raise kids	4/13/2022 3:23 PM
72	Entertainment	4/13/2022 3:22 PM
73	I moved here 43 years ago....it was wonderful back then!	4/13/2022 3:20 PM
74	Quality of life and community	4/13/2022 3:19 PM
75	Retired	4/13/2022 3:18 PM
76	The beauty, the feeling of community, being rural with all the ag, the Slonoma vibe	4/13/2022 3:18 PM
77	The semi-rural wine country lifestyle	4/13/2022 3:17 PM
78	Family moved here	4/13/2022 3:17 PM
79	Roots	4/13/2022 3:16 PM
80	Nice city	4/13/2022 3:15 PM
81	Natural beauty and slow pace	4/13/2022 3:07 PM
82	because it's beautiful. semi rural area. small town living	4/13/2022 3:04 PM
83	wanted to get out of SF	4/13/2022 3:02 PM
84	It is my summer and winter home away from Philadelphia snow, ice, humidity.	4/13/2022 2:57 PM
85	Previous visit as tourist	4/13/2022 2:54 PM
86	Grew up here	4/13/2022 2:54 PM
87	1 hr from SF	4/13/2022 2:53 PM
88	All of the factors	4/13/2022 2:50 PM
89	The Beauty, the Wineries, the Social Climate	4/13/2022 2:46 PM
90	Born in Sonoma	4/13/2022 2:40 PM

## Sonoma Housing Needs and Priorities Survey

91	Climate, proximity to SF, friendliness of people, usable family parks	4/13/2022 2:40 PM
92	Grew up here.	4/13/2022 2:39 PM
93	Live in Petaluma	4/13/2022 12:25 PM
94	I was born and raised here	4/13/2022 11:27 AM
95	Came as child in young family, following work opportunity for WWII veteran father	4/12/2022 7:51 PM
96	I don't live here.	4/12/2022 1:28 PM
97	Location, size & quality	4/12/2022 12:05 PM
98	proximity to wineries, small-town feel, outdoor space	4/9/2022 9:00 PM
99	Quality of life and space	4/9/2022 8:38 PM
100	Native of Sonoma	4/9/2022 9:45 AM
101	Born and raised	4/9/2022 4:09 AM
102	Weather and safety	4/8/2022 9:41 PM
103	Small town atmosphere	4/8/2022 8:16 PM
104	The city is not overcrowded and a lot of activities that can do in the cities.	4/8/2022 8:07 PM
105	Raised here	4/8/2022 5:59 PM
106	got a good deal	4/8/2022 5:07 PM
107	Retired here after visiting here my whole life.	4/8/2022 3:21 PM
108	Family	4/8/2022 1:40 PM
109	It's Sonoma... enough said!	4/8/2022 11:39 AM
110	grew up here	4/8/2022 10:55 AM
111	Wanting to leave the big city to raise children in a small community.	4/8/2022 10:36 AM
112	I liked the NorCal climate and geography, we rented a place at a good price and never left	4/7/2022 7:10 PM
113	nature, proximity to SF, mountains, beaches	4/7/2022 11:31 AM
114	I am a 3rd generation Sonoman.	4/6/2022 1:02 PM
115	Quality of life: weather, natural beauty, interesting people, proximity to urban centers, arts	4/3/2022 9:00 AM
116	Small town feel. Not overbuilt like some areas	4/1/2022 10:29 AM
117	family	3/31/2022 10:51 AM
118	Keep in mind I moved here back in 1970, things were a lot different then	3/29/2022 12:46 PM
119	LOVE community feeling and being able to walk to the Square for all events and patronage	3/28/2022 3:47 PM
120	A good place to retire	3/26/2022 8:52 PM
121	Safe small town mentality, friendliness	3/25/2022 4:24 PM
122	Quaint, quality small wine country town close to big city resources & entertainment.	3/25/2022 5:05 AM
123	Husband and I have grown up here, returned after college.	3/24/2022 11:39 PM
124	I liked trhe Bay Area geography anbd climate, we found a decently priced apartment and stayed.	3/24/2022 7:15 PM
125	Slower pace community, but proximity to San Francisco	3/24/2022 4:55 PM
126	Living in wine country and the Plaza in general	3/24/2022 2:40 PM
127	Quality of life	3/23/2022 5:22 PM

## Q4 Do you currently own or rent your home?

Answered: 349 Skipped: 32

ANSWER CHOICES	RESPONSES	
I own my home	61.03%	213
I rent my home	31.23%	109
I rent a room in a home	3.72%	13
I live with extended family or with another household	2.87%	10
I am currently without permanent shelter	1.15%	4
<b>TOTAL</b>	<b>349</b>	

## Q5 Select the type of housing that best describes your current home.

Answered: 349 Skipped: 32

ANSWER CHOICES	RESPONSES	
Single-family home (detached)	59.31%	207
Multi-family home (apartment/condominium)	18.05%	63
Duplex/attached home	11.46%	40
Mobile home	5.73%	20
Accessory Dwelling Unit, granny flat, guest house	3.44%	12
Other (please specify)	1.15%	4
Currently without permanent shelter	0.86%	3
<b>TOTAL</b>		<b>349</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Studio	4/15/2022 7:36 PM
2	Pueblo Serena MHC	4/13/2022 9:31 PM
3	Home plus ADU	4/8/2022 10:37 AM
4	Single family home with guesthouse	3/25/2022 5:09 AM

## Q6 How would you rate the physical condition of the residence you live in?

Answered: 349 Skipped: 32

ANSWER CHOICES	RESPONSES	
Sound: Very good to excellent condition and needs minimal repairs	57.02%	199
Minor : Shows signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, missing shingles, etc.)	22.64%	79
Moderate: Needs one modest rehabilitation improvements (e.g., new roof, new wood siding, replacement of stucco, etc.)	11.17%	39
Substantial: Needs two or more major upgrades (e.g., new foundation, roof replacement, new plumbing, new electrical, etc.)	8.31%	29
Dilapidated: Building appears structurally unsound, unfit for human habitation in its current condition, and demolition or major rehabilitation is required	0.86%	3
<b>TOTAL</b>	<b>349</b>	



## Q7 How satisfied are you with your current housing situation?

Answered: 349 Skipped: 32

ANSWER CHOICES	RESPONSES	
I am very satisfied	51.58%	180
I am somewhat satisfied	27.51%	96
I am somewhat dissatisfied	11.75%	41
I am dissatisfied	4.87%	17
If you answered dissatisfied or somewhat dissatisfied please provide a reason below.	4.30%	15
<b>TOTAL</b>		<b>349</b>

#	IF YOU ANSWERED DISSATISFIED OR SOMEWHAT DISSATISFIED PLEASE PROVIDE A REASON BELOW.	DATE
1	I want to have a home of my own	4/15/2022 7:36 PM
2	interior needs full updated remodeling - appliances, flooring, windows, bathroom vanities - nothing has been upgraded since it was built in 1980's	4/15/2022 8:44 AM
3	It's in need of a ton of work but I can afford it how it is, so not inclined to question it. Also, wish I could buy it but my property manager also wants to buy it and turn it into an airbnb. Not sure if I'll save enough \$ to purchase it before her.	4/14/2022 5:43 PM
4	I never know when I will be evicted.	4/14/2022 8:27 AM
5	Our HOA board violates Davis Stirling law on many issues and retaliates against a senior for citing their violations.	4/13/2022 5:51 PM
6	I would like to own my own place	4/13/2022 5:22 PM
7	The management company is AWFUL!!! And they pay no attention to upkeep or problems.	4/13/2022 4:34 PM
8	We bought our home in 2011 and thought it would be our "starter home," however, once we went to purchase a larger home for our growing family, we couldn't find any affordable houses in the city of Sonoma. We instead had to do an addition which is an expensive endeavor in itself. We have not been pleased with the City building department. We understand why so many families are choosing to leave Sonoma. It's unfortunate	4/13/2022 4:23 PM
9	Housing management maintenance poor	4/13/2022 4:21 PM
10	Our house is smaller than we need as a family of 3 (husband, wife, 10 y/o child) but we cannot afford bigger even though bring in \$6,000/mo after taxes. The house has lots of little things wrong with it but we live in fear of notifying our landlord as we can't afford a rent hike or for him to decide we're too much to deal with.	4/13/2022 3:47 PM
11	I am not supported by the on site mgt	4/13/2022 3:23 PM
12	Crime fastly rising, slumlord, dangerous speeds on st, quality bare minimum for rental	4/12/2022 11:50 PM
13	Unsure how to best modify/expand to accomodate extended family needing home base (in lieu of camping/couch surfing)	4/12/2022 7:55 PM
14	Many neighbors did not follow the noise ordinance.	4/8/2022 8:12 PM
15	We are being made to move because their 94 year old mother is moving in.	4/8/2022 2:48 PM

## Q8 Which of the following housing upgrades or expansions have you considered making on your home?

Answered: 349 Skipped: 32

ANSWER CHOICES	RESPONSES	
Roofing, painting, and general home repairs	35.53%	124
Landscaping	27.22%	95
Does not apply	27.22%	95
HVAC, solar, and electrical	25.50%	89
Room addition	18.05%	63
Accessory dwelling unit	14.90%	52
Other (please specify)	10.03%	35
Total Respondents: 349		

#	OTHER (PLEASE SPECIFY)	DATE
1	Have done all of the above	4/17/2022 6:14 PM
2	Laundry room	4/15/2022 7:36 PM
3	I rent - the owner needs to do the upgrades	4/15/2022 8:44 AM
4	Garage	4/15/2022 6:04 AM
5	energy efficiency/insulating better, and adding a bathtub as we have a young child	4/14/2022 5:43 PM
6	we added a bedroom in 2017-2018 for our son, we remodeled our back yard in 2020 due to rotting decks and fences, remodeled our kitchen in 2021 due to failing appliances and limited space, replaced outdoor siding on 3 of 4 exterior walls and repainted the entire house in 2021-2022, other repairs still pending	4/14/2022 9:24 AM
7	I've already made all the listed improvements over the past 6 years	4/14/2022 6:40 AM
8	None	4/13/2022 7:51 PM
9	Perhaps add a battery	4/13/2022 7:19 PM
10	Everything	4/13/2022 7:13 PM
11	heat pump to replace gas furnace and AC	4/13/2022 5:40 PM
12	Drywall the garage	4/13/2022 5:01 PM
13	We are working to update our home which was built in the 1970's	4/13/2022 4:55 PM
14	After moving to Sonoma and residing here...I cannot own a house or mobile home. My rent has reached it's ceiling for affordability.	4/13/2022 4:05 PM
15	Bath and kitchen updated	4/13/2022 3:53 PM
16	Water Filtering System	4/13/2022 3:46 PM
17	internal cosmetic improvements	4/13/2022 3:43 PM
18	Cannot expand; upgrades as we can	4/13/2022 3:34 PM
19	We already remodeled and don't plan any more changes	4/13/2022 3:25 PM

## Sonoma Housing Needs and Priorities Survey

20	flooring	4/13/2022 3:23 PM
21	We rent	4/13/2022 3:17 PM
22	new windows	4/13/2022 3:16 PM
23	Garage	4/13/2022 3:03 PM
24	Installed solar last year	4/13/2022 2:55 PM
25	New patio cover	4/13/2022 2:55 PM
26	Adding a half bath	4/13/2022 2:51 PM
27	remodel, landscaping	4/13/2022 2:51 PM
28	Chimney repair, new sliding glass doors (more energy efficient)	4/13/2022 2:51 PM
29	Have done siding, painting and electrical updates	4/13/2022 2:51 PM
30	we have 375 sf, if we had one more room that would be great	4/7/2022 7:12 PM
31	None.	4/6/2022 5:30 PM
32	About 10 years ago remodeled the inside, new roof, painting, complete new landscape. Thankfully nothing more is needed now	3/29/2022 12:47 PM
33	Kitchen upgrade	3/26/2022 8:53 PM
34	Get a Cat from Pets Lifeline	3/26/2022 10:00 AM
35	Remodel guesthouse	3/25/2022 5:09 AM

## Q9 Which of the following best describes your household type?

Answered: 349 Skipped: 32

ANSWER CHOICES	RESPONSES
Couple	31.52% 110
Single person household	20.34% 71
Couple with children under 18	16.33% 57
Couple living with roommates	6.30% 22
Multi-generational or extended family household (parents, grandparents, aunts/uncles, children, grandchildren, etc. all under the same roof)	6.02% 21
Single person living with roommates	5.44% 19
Single parent with children under 18	4.01% 14
Single person living with family	3.72% 13
Other (please specify)	3.72% 13
Adult head of household (non-parent) with children under 18	2.58% 9
<b>TOTAL</b>	<b>349</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Couple with adult kids at home temporarily	4/14/2022 8:28 PM
2	Couple living with adult child	4/14/2022 8:28 AM
3	owner + roommate	4/13/2022 8:06 PM
4	Senior couple, kids long gone	4/13/2022 7:19 PM
5	senior housing	4/13/2022 4:21 PM
6	My daughter has been living here for two years as the result of covid..will be moving in the next few months.	4/13/2022 3:23 PM
7	Couple with children between 17-21	4/13/2022 2:51 PM
8	Single, with area for guests and associates	4/13/2022 2:51 PM
9	Single adult with related adult "camping" in back yard	4/12/2022 7:55 PM
10	Couple, her adult child	4/8/2022 10:28 AM
11	Was a single parent, now single household. However, if my landlord raises the rent, I will need to leave Sonoma.	3/28/2022 4:30 PM
12	with Dogs	3/25/2022 5:09 AM
13	Couple with 1 child under 18, 1 child over 18	3/24/2022 11:40 PM

**Q10 If you wish to own a home in Sonoma but do not currently own one, what issues are preventing you from owning a home at this time? (Select all that apply)**

Answered: 319 Skipped: 62

ANSWER CHOICES	RESPONSES	
I cannot find a home within my target price range in Sonoma	31.66%	101
I do not currently have the financial resources for an appropriate down payment	23.82%	76
I do not currently have the financial resources for an adequate monthly mortgage payment	15.99%	51
I cannot find a home that suits my living needs in Sonoma (housing size, disability accommodations)	3.45%	11
I cannot currently find a home that suits my quality standards in Sonoma	5.96%	19
I do not currently wish to own a home in Sonoma	6.27%	20
I already own a home in Sonoma	51.10%	163
Total Respondents: 319		

**Q11 If you wish to rent a home in Sonoma but do not currently rent one, what issues are preventing you from renting a home at this time? (Select all that apply)**

Answered: 292 Skipped: 89

ANSWER CHOICES	RESPONSES	
I do not currently wish to rent a home in Sonoma	42.12%	123
I already rent a home in Sonoma	38.36%	112
I cannot find a home within my target rental cost in Sonoma	13.70%	40
I cannot find a home that suits my living needs in Sonoma (housing size, disability accommodations)	11.64%	34
I cannot currently find a home that suits my quality standards in Sonoma	5.48%	16
Total Respondents: 292		

## Q12 Do you think that the range of housing options currently available in the City of Sonoma meets your needs?

Answered: 324 Skipped: 57

ANSWER CHOICES	RESPONSES	
Yes	56.79%	184
No	43.21%	140
TOTAL		324

### Q13 Do you think that the range of housing options currently available in the City meet the needs of the community?

Answered: 323 Skipped: 58

ANSWER CHOICES	RESPONSES	
Yes	35.29%	114
No	64.71%	209
TOTAL		323



## Q14 What types of housing are most needed in the City of Sonoma? (Select all that apply)

Answered: 322 Skipped: 59

ANSWER CHOICES	RESPONSES
Single family, small (less than 1,600 square foot home)	47.83% 154
Single family, medium to large (1,600 square foot home or larger)	30.43% 98
Duplex, Triplex, and Fourplex	42.24% 136
Townhomes or Condominiums (multi-family ownership homes)	37.89% 122
Apartments (multi-family rental homes)	36.96% 119
Co-housing (individual homes that are part of larger development with shared common space, such as kitchen, living, recreation, and garden areas)	31.06% 100
Accessory Dwelling Unit	19.25% 62
Other (please specify)	14.91% 48
Total Respondents: 322	

#	OTHER (PLEASE SPECIFY)	DATE
1	ADU's can create great problems : noise, density,parking.	4/23/2022 6:23 PM
2	we desperately need affordable housing - not market price - affordable for those making 80% and under of the going market rate	4/19/2022 3:55 PM
3	No new housing or population needed as any population increase will harm our community, environment, and quality of life	4/18/2022 4:12 PM
4	I would only be speculating. I suggest we let the free market decide what housing is needed.	4/18/2022 12:17 PM
5	With the crazy real estate market, possibly it's more lack of affordability rather than lack of availability?	4/18/2022 11:51 AM
6	Tiny house communities for young adults, elderly and low-income folks (similar to cohousing but smaller units with shared gardens, green spaces and common spaces available)	4/15/2022 1:23 PM
7	community developments with small homes surrounding a shared common space for gardening	4/15/2022 8:57 AM
8	low income homes	4/14/2022 11:16 AM
9	Need to update the infrastructure and have clear fire exits before adding housing stock	4/14/2022 7:47 AM
10	Precios más razonables	4/13/2022 9:38 PM
11	Affordable housing	4/13/2022 9:05 PM
12	lower income housing that for instance, teachers could afford	4/13/2022 8:58 PM
13	Low-low income housing (perhaps subsidized) for the under-housed and homeless.	4/13/2022 8:01 PM
14	Not a question for us, it is a City Planning issue. Hopefully plans are to remain relatively small and not Napa-ize Sonoma. If it doesn't come later, would like to note minimize water hook ups until a better water solution is achieved and moratorium on swimming pools.	4/13/2022 7:26 PM
15	Everything for people who are NOT wealthy	4/13/2022 7:21 PM
16	Necesitamos más tipos de vivienda que la gente obrera pueda poder pagar.	4/13/2022 7:06 PM

## Sonoma Housing Needs and Priorities Survey

17	look at East Side of Sonoma to build new cohouses..ENOUGH BUILDING TILL WE BURST ON WEST SIDE ..THE RICH SETTLERS CANT KERP BUYING LAND ON EAST SIDE TO HOLD SO NOT OPEN FOR NEW LOWER INCOME BUILSS.WEST SIDE HAS TAKEN ALL THE NEW AFFPRDABLE SPACE WITH NO STUDY OF INPACT TO ONLY WEST SIDE ..ENOUGH	4/13/2022 6:36 PM
18	low income housing	4/13/2022 5:56 PM
19	Affordable	4/13/2022 5:35 PM
20	More mobile-home parks	4/13/2022 5:08 PM
21	Can we go higher with some condo or apartment complexes to create more housing vertically?	4/13/2022 4:52 PM
22	Supportive housing for individuals with special physical and mental needs	4/13/2022 4:49 PM
23	Affordable single family homes	4/13/2022 4:32 PM
24	affordable Housing desperately needed as well as very low income housing	4/13/2022 4:26 PM
25	Less vacation rentals.	4/13/2022 4:10 PM
26	I'm satisfied with my house	4/13/2022 4:10 PM
27	Affordable homes, like those at mobile/manufactured homes except owning the property under them, too; communal compounds with like-minded people for environmentally sustainable living	4/13/2022 3:49 PM
28	Maybe a definition of accessory dwelling unit could help here	4/13/2022 3:21 PM
29	Anything that's more affordable then what is currently available	4/13/2022 3:20 PM
30	None, It's fine the way it is	4/13/2022 3:12 PM
31	Affordable homes of Quality	4/13/2022 3:02 PM
32	All of the above. As a longtime local Realtor, I can say that there are not enough options for existing members of our community.	4/13/2022 3:00 PM
33	low income housing less then 40K/yr.	4/13/2022 2:54 PM
34	The missing middle. Mixture of business/commercial and residential like many areas in Europe.	4/13/2022 2:51 PM
35	affordable housing	4/13/2022 12:29 PM
36	for homeless and worker housing	4/12/2022 12:13 PM
37	I believe less construction is needed. The city is too crowded as it is.	4/11/2022 8:38 AM
38	Decent homes for those making 100k and under	4/8/2022 6:06 PM
39	modular homes	4/8/2022 5:18 PM
40	Until more water is available we shouldn't be building more.	4/8/2022 3:33 PM
41	None	4/8/2022 11:42 AM
42	50+ unit deed-restricted projects	4/7/2022 7:18 PM
43	I have a house	4/7/2022 8:00 AM
44	tricky question, the number of second homes and inflation of pricing	3/31/2022 10:59 AM
45	Infill, taller than 2 stories, Affordable and missing middle. Build density on empty lots include on the East Side, replace empty single family homes with denser housing.	3/29/2022 2:25 PM
46	It is incredible sad, that renters are expected to live below standards, shoved in small multi unit family dwelling. Repulsive	3/28/2022 4:30 PM
47	People who live in Sonoma don't need homes; they already live here. Additional housing will only swell the population of people from elsewhere who don't live here now. More people means less water for those who live here now. More people only taxes public services and	3/25/2022 5:26 AM

## Sonoma Housing Needs and Priorities Survey

drives mire climate change. Thise who want to live here simply need to buy or rent an existing dwelling from someone who is moving away. "Constant growth" will destroy the Valley as we know it, and the planet as well.

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48

Just want to clarify that I think we could use more medium (approx. 1600-2000 sf) homes but don't think we need to add more inventory of large (2500+ sf) homes.

3/24/2022 2:50 PM

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## Q15 How important are the following housing priorities to you and your family?

Answered: 324 Skipped: 57

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL
Housing affordable to working families	66.04% 212	26.79% 86	6.23% 20	0.93% 3	321
Provide housing to meet Sonoma's social and economic needs, including both existing and future residents, as well as employers	63.44% 203	28.13% 90	7.81% 25	0.63% 2	320
Ensure all persons and households have fair and equitable access to housing and housing opportunities	54.35% 175	30.75% 99	11.80% 38	3.11% 10	322
Promote sustainable, efficient, and fire-safe housing to address safety, energy, and climate change impacts	53.87% 174	38.39% 124	7.12% 23	0.62% 2	323
Ensure that children who grow up in Sonoma can afford to live here	52.96% 170	32.40% 104	12.15% 39	2.49% 8	321
Sustainable, walkable development (housing within walking distance to services, schools, and/or the downtown)	51.40% 165	38.63% 124	9.35% 30	0.62% 2	321
Rehabilitate existing housing	44.27% 139	41.72% 131	9.55% 30	4.46% 14	314
Integrate affordable housing throughout the community to create mixed-income neighborhoods	42.32% 135	35.42% 113	18.81% 60	3.45% 11	319
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs	41.46% 131	40.19% 127	14.56% 46	3.80% 12	316
Support fair/equitable housing opportunities and programs to help maintain and secure neighborhoods that have suffered foreclosures	39.31% 125	39.31% 125	17.92% 57	3.46% 11	318
Lease-to-own housing (condominiums, apartments)	35.44% 112	41.14% 130	18.67% 59	4.75% 15	316
Provide ADA-accessible housing	30.91% 98	47.95% 152	14.51% 46	6.62% 21	317
Create more mixed-use (commercial/office and residential) projects to bring different land uses closer together	28.66% 92	40.81% 131	27.73% 89	2.80% 9	321

## Q16 Are there any populations or persons that need additional housing types or dedicated policies and programs to ensure they can access housing in Sonoma?

Answered: 317 Skipped: 64

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Farmworkers	45.78% 141	36.36% 112	11.04% 34	6.82% 21	308	1.79
Homeless persons or at risk of homelessness	42.04% 132	32.80% 103	15.29% 48	9.87% 31	314	1.93
Seniors	42.48% 130	36.93% 113	11.44% 35	9.15% 28	306	1.87
Persons with a disability, including developmental	42.62% 130	35.74% 109	11.15% 34	10.49% 32	305	1.90
Single Parent Head of Households	41.94% 130	39.03% 121	11.29% 35	7.74% 24	310	1.85
Large families (5 or more persons)	29.84% 91	43.61% 133	15.74% 48	10.82% 33	305	2.08

#	OTHER (PLEASE SPECIFY)	DATE
1	low income wage earners	4/19/2022 3:55 PM
2	Make it easier for homeowners to share their guest rooms and home on Airbnb and other platforms that help all homeowners avoid foreclosure.	4/18/2022 4:12 PM
3	I don't think the government should dictate housing, let the free market dictate the needs.	4/18/2022 12:17 PM
4	I'm not familiar enough with services already provided to those populations to know if they need additional.	4/18/2022 11:51 AM
5	All essential workers: safety, education, retail, hospitality, agricultural	4/15/2022 6:11 AM
6	Teachers, medical personnel first responders	4/14/2022 5:54 PM
7	Qualify Seniors - on limited income - including those that would like to retire and can't afford to	4/13/2022 9:24 PM
8	Young adults. 20 - 40 years of age.	4/13/2022 8:28 PM
9	This and last question seem like "loaded" questions. They are not black and white answers	4/13/2022 7:26 PM
10	No more rich people owning several vacant homes	4/13/2022 7:21 PM
11	All working-class families and individuals, especially Latinx.	4/13/2022 5:08 PM
12	Teachers, City workers including Law Enforcement and Fire Dept.	4/13/2022 4:49 PM
13	I don't think farmworkers actually need to live in the town proper.	4/13/2022 4:31 PM
14	Single elderly retired educators are in need along with veterans! I am a retired educator and Vietnam veteran...where do I belong?	4/13/2022 4:20 PM
15	Be inclusive of all types of people and ensure we have the health/mental health services to care for all before building more.	4/13/2022 3:49 PM
16	Lower middle to Middle class workers in the services industries (restaurants, bars, wineries, retail). Generally younger (20s-40s)	4/13/2022 2:57 PM

## Sonoma Housing Needs and Priorities Survey

17	Workforce	4/13/2022 12:29 PM
18	The gap between current low income eligibility and the market rates. If you make 100,000 you are arguably in a worse position as you aren't eligible for assistance but are still so far from being able to afford a home.	4/8/2022 8:23 PM
19	More people means more water use. Getting infrastructure in place should be priority one!	4/8/2022 3:33 PM
20	Latinos, OPOC abnd seniors in fixed incomes	4/7/2022 7:18 PM
21	Families of public servants, teachers, police, firefighters, etc	3/31/2022 10:59 AM
22	Focus on those historically excluded from Sonoma--Black and Indigenous people. Need to reverse history of exclusion. Think about policies that help bring diversity into Sonoma, not just about maintaining existing mostly, white and aging residences.	3/29/2022 2:25 PM
23	Seniors - are priced out and shoved out away from services	3/28/2022 4:30 PM
24	Agricultural sponsored on site housing	3/25/2022 5:11 PM
25	Working families	3/25/2022 6:45 AM
26	LatinX, 60% AMI and below	3/24/2022 7:22 PM

## Q17 What is your race/ethnicity?

Answered: 322 Skipped: 59

ANSWER CHOICES	RESPONSES	
African American	6.52%	21
Asian	3.73%	12
Hispanic	8.07%	26
Native American	1.55%	5
White/Non-Hispanic	73.29%	236
Other (please specify)	6.83%	22
<b>TOTAL</b>		<b>322</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	Mixed race/Asian	4/21/2022 12:15 PM
2	N/A	4/16/2022 8:59 AM
3	Mixed	4/15/2022 7:14 PM
4	White with hispanic origin	4/15/2022 1:23 PM
5	Hebrew	4/14/2022 9:12 AM
6	Mixed	4/14/2022 8:06 AM
7	Jewish	4/13/2022 9:23 PM
8	doesn't matter	4/13/2022 6:36 PM
9	Middle Eastern	4/13/2022 5:29 PM
10	I will not be defined by my race or ethnicity!	4/13/2022 4:20 PM
11	Should not matter	4/13/2022 3:49 PM
12	na	4/13/2022 3:44 PM
13	bi-racial	4/13/2022 3:26 PM
14	Not a relevant question	4/13/2022 3:12 PM
15	Multiple race	4/13/2022 2:57 PM
16	Ukranian	4/13/2022 2:54 PM
17	don't wish to answer/doesn't play a roll	4/8/2022 2:11 PM
18	Human	4/8/2022 11:15 AM
19	Hispanic/native	4/8/2022 10:35 AM
20	white	4/7/2022 8:00 AM
21	Hebrew	3/26/2022 10:06 AM
22	American	3/25/2022 5:26 AM

**Q18 Do any of the following apply to you or someone in your household  
(check all that apply):**

Answered: 292 Skipped: 89

ANSWER CHOICES	RESPONSES	
Ages 65 or over	43.15%	126
Ages 55 to 64	28.08%	82
Children under 18	25.68%	75
Large family (5 or more people)	16.10%	47
Have a disability (non-developmental)	7.19%	21
A single female head of household with children	5.82%	17
A single male head of household with children	4.11%	12
Farmworker	2.40%	7
Have a developmental disability	2.40%	7
Total Respondents: 292		



## Q19 What housing challenges have you experienced?

Answered: 312 Skipped: 69

	YES	NO	TOTAL
I am concerned about my rent going up to an amount I can't afford.	43.18% 133	56.82% 175	308
I struggle to pay my rent or mortgage payment.	28.90% 89	71.10% 219	308
I am concerned that if I ask my property manager or landlord to repair my home that my rent will go up or I will be evicted.	29.28% 89	70.72% 215	304
My home is in poor condition and needs repair.	26.32% 80	73.68% 224	304
My home is not big enough for my family or household.	25.58% 77	74.42% 224	301
I need assistance with understanding my rights related to fair housing.	21.78% 66	78.22% 237	303
I need assistance finding rental housing.	18.21% 55	81.79% 247	302
I am concerned that I may be evicted.	15.84% 48	84.16% 255	303
I cannot find a place to rent due to bad credit, previous evictions, or foreclosure.	12.58% 38	87.42% 264	302
I have been discriminated against when trying to rent housing.	11.30% 34	88.70% 267	301
There is a lot of crime in my neighborhood.	10.96% 33	89.04% 268	301
I have been discriminated against when trying to purchase housing.	9.90% 30	90.10% 273	303

## Q20 Do you or someone in your family have any of the following specific housing needs? Please check all that apply.

Answered: 172 Skipped: 209

ANSWER CHOICES	RESPONSES	
Senior independent living (senior single family community or senior apartments)	49.42%	85
Assisted living for senior (55 and over) that provides assistance with daily tasks and has increasing levels of care (from assisted living to skilled nursing)	31.98%	55
Supportive services to find and obtain housing.	27.91%	48
Daily living assistance and services to be able to live independently.	22.09%	38
Independent living for someone with a disability	13.95%	24
Supportive or transitional housing that provides services and support to avoid homelessness	13.37%	23
Emergency shelter	8.72%	15
Assisted living for disabled persons that provides assistance with daily tasks and has increasing levels of care (from assisted living to skilled nursing)	8.14%	14
Total Respondents: 172		

## Q21 Have encountered discrimination or other issues that have affected your ability to live in safe, decent housing of your choice? If so, please explain any discrimination or fair housing issues you have encountered.

Answered: 314 Skipped: 67

ANSWER CHOICES	RESPONSES	
No	94.90%	298
Yes (please specify)	5.10%	16
<b>TOTAL</b>		<b>314</b>

#	YES (PLEASE SPECIFY)	DATE
1	Have encountered racism as regards housing in another city ( not Sonoma)	4/23/2022 6:23 PM
2	Pushed out by all cash buyers and corporations.	4/22/2022 7:56 PM
3	I have experienced housing discrimination multiple times when inquiring about housing for a family with young children. I know the occupancy standards and have had multiple different landlords/homeowners renting their house tell me the number of people was "too much for the aging septic" or the structure of the house "wasn't appropriate/was dangerous for children."	4/15/2022 1:23 PM
4	purchasing mobile home in senior park with one adult being over 55 and other 34 and disabled	4/14/2022 9:49 AM
5	low income	4/13/2022 4:26 PM
6	Neighbor thief & vandalism of my real property ignored by system (law enforcement, court)	4/13/2022 3:07 PM
7	my neighbors do not like my friends, simply because they are poor.	4/13/2022 2:54 PM
8	na	4/13/2022 2:01 PM
9	Age discrimination, emotional support animal discrimination & emotional support animal breed discrimination	4/8/2022 10:37 PM
10	Landlord sold home to new investor looking to flip	4/8/2022 8:23 PM
11	Victim of crime because we don't have the infrastructure (enough police funding) to handle increased populations!!!	4/8/2022 3:33 PM
12	everything is easier when you're white, sonoma is pretty racist	4/8/2022 11:15 AM
13	Agent refused to accept a bid/offer from me but accepted from white woman with similar circumstances (single parent)	4/8/2022 10:35 AM
14	Lack of money	4/7/2022 8:49 PM
15	No policy subsidy	4/7/2022 8:48 AM
16	When I rent and buy a house, I encounter discrimination. The owner deliberately raises the price to embarrass me.	4/7/2022 7:21 AM

**Q22 Multifamily. Looking at the map above, please identify your preference for new multifamily housing development in each area.**

Answered: 276 Skipped: 105

	<b>STRONGLY PREFER</b>	<b>PREFER</b>	<b>NEUTRAL</b>	<b>DO NOT PREFER</b>	<b>STRONGLY DO NOT PREFER</b>	<b>TOTAL</b>	<b>WEIGHTED AVERAGE</b>
Maxwell District	28.46% 74	26.54% 69	28.46% 74	9.62% 25	6.92% 18	260	1.20
Broadway Corridor	23.74% 61	30.35% 78	30.35% 78	8.56% 22	7.00% 18	257	1.11
Southeast Area	23.37% 61	21.84% 57	35.63% 93	11.88% 31	7.28% 19	261	0.84
Gateway District	23.35% 60	27.24% 70	36.58% 94	7.00% 18	5.84% 15	257	1.11
Southwest Area	23.05% 59	26.95% 69	37.89% 97	8.98% 23	3.13% 8	256	1.16
West Napa/Sonoma Corridor	21.37% 56	31.68% 83	31.68% 83	8.40% 22	6.87% 18	262	1.05
Northeast Area	21.01% 54	22.57% 58	35.80% 92	14.01% 36	6.61% 17	257	0.75
Central-East Area	19.69% 50	23.62% 60	35.04% 89	13.78% 35	7.87% 20	254	0.67
Downtown District	19.14% 49	21.48% 55	32.03% 82	15.23% 39	12.11% 31	256	0.41
Central-West Area	19.44% 49	20.24% 51	42.86% 108	10.71% 27	6.75% 17	252	0.70
Vallejo District	17.76% 46	22.01% 57	37.84% 98	11.97% 31	10.42% 27	259	0.49
Cemetery District	15.33% 40	16.86% 44	37.16% 97	16.48% 43	14.18% 37	261	0.05
Northwest Area	12.99% 33	24.41% 62	44.88% 114	11.02% 28	6.69% 17	254	0.52

**Q23 Mixed Use. Looking at the map above, please identify your preference for new mixed use development in each area.**

Answered: 263 Skipped: 118

	<b>STRONGLY PREFER</b>	<b>PREFER</b>	<b>NEUTRAL</b>	<b>DO NOT PREFER</b>	<b>STRONGLY DO NOT PREFER</b>	<b>TOTAL</b>	<b>WEIGHTED AVERAGE</b>
Broadway Corridor	25.91% 64	25.10% 62	34.82% 86	5.26% 13	8.91% 22	247	1.08
Maxwell District	22.09% 55	27.31% 68	34.14% 85	7.63% 19	8.84% 22	249	0.92
Downtown District	22.45% 55	27.35% 67	31.02% 76	9.39% 23	9.80% 24	245	0.87
Gateway District	22.54% 55	27.46% 67	38.52% 94	4.51% 11	6.97% 17	244	1.08
Southeast Area	20.25% 49	21.07% 51	41.74% 101	8.68% 21	8.26% 20	242	0.73
West Napa/Sonoma Corridor	17.93% 45	31.87% 80	36.25% 91	7.57% 19	6.37% 16	251	0.95
Southwest Area	17.07% 42	20.33% 50	45.93% 113	10.57% 26	6.10% 15	246	0.63
Central-East Area	16.39% 40	19.26% 47	43.85% 107	10.25% 25	10.25% 25	244	0.43
Vallejo District	14.69% 36	20.00% 49	39.18% 96	14.29% 35	11.84% 29	245	0.23
Northeast Area	15.06% 36	24.69% 59	36.40% 87	12.55% 30	11.30% 27	239	0.39
Central-West Area	13.81% 33	23.85% 57	44.77% 107	10.04% 24	7.53% 18	239	0.53
Northwest Area	11.98% 29	23.55% 57	45.04% 109	10.74% 26	8.68% 21	242	0.39
Cemetery District	10.25% 25	18.03% 44	37.70% 92	15.98% 39	18.03% 44	244	-0.27

Q24 Single Family. Looking at the map above, please identify your preference for new single family housing in each area.

Answered: 260 Skipped: 121

	STRONGLY PREFER	PREFER	NEUTRAL	DO NOT PREFER	STRONGLY DO NOT PREFER	TOTAL	WEIGHTED AVERAGE
Maxwell District	22.22% 54	26.75% 65	34.57% 84	8.64% 21	7.82% 19	243	0.94
Southeast Area	21.90% 53	31.40% 76	32.64% 79	6.61% 16	7.44% 18	242	1.07
Central-East Area	20.90% 51	25.82% 63	36.89% 90	8.20% 20	8.20% 20	244	0.86
West Napa/Sonoma Corridor	18.03% 44	27.46% 67	35.25% 86	10.25% 25	9.02% 22	244	0.70
Northwest Area	17.50% 42	27.08% 65	37.50% 90	10.83% 26	7.08% 17	240	0.74
Downtown District	17.95% 42	18.38% 43	32.48% 76	16.67% 39	14.53% 34	234	0.17
Northeast Area	16.94% 41	29.34% 71	36.78% 89	9.92% 24	7.02% 17	242	0.79
Broadway Corridor	17.45% 41	21.70% 51	36.17% 85	14.04% 33	10.64% 25	235	0.43
Gateway District	17.15% 41	25.52% 61	38.49% 92	9.21% 22	9.62% 23	239	0.63
Cemetery District	16.60% 40	22.41% 54	33.20% 80	13.69% 33	14.11% 34	241	0.27
Central-West Area	16.25% 39	28.75% 69	37.08% 89	10.83% 26	7.08% 17	240	0.72
Southwest Area	16.05% 39	34.98% 85	34.16% 83	8.64% 21	6.17% 15	243	0.92
Vallejo District	14.88% 36	24.79% 60	38.02% 92	12.40% 30	9.92% 24	242	0.45

## Q25 Are there other housing types needed in specific areas of the City? Please describe.

Answered: 132 Skipped: 249

#	RESPONSES	DATE
1	Do not feel am familiar enough to make such decisions	4/23/2022 6:28 PM
2	Sonoma already has enough housing, but we need to do everything we can to preserve neighborhood character and encourage increasing property values. We need fewer renters and multi-family and more prosperous and high quality single-family homes.	4/18/2022 4:19 PM
3	Let the free market determine where what type of housing is needed.	4/18/2022 12:21 PM
4	Viviendas para jóvenes.	4/16/2022 11:45 AM
5	Temporary housing WITH SERVICES for those not housed now	4/15/2022 9:07 PM
6	No	4/15/2022 8:09 PM
7	N/A	4/15/2022 8:05 PM
8	Agua Caliente	4/15/2022 7:32 PM
9	No	4/15/2022 7:19 PM
10	Attractive tiny & very small home single family home communities structured as Community Land Trusts, with stand-alone units sized between 400-1200 sf and with green spaces, community gardens & shared common amenities between them (like larger meeting hall, outdoor play equipment, etc.) We need to get away from the idea of multi-family = apartments & condos, this is why these developments are so resisted as they urbanize the city. Tiny home and small home villages do not, they add charm and everyone loves the look of them and they are affordable and desirable to first time homebuyers, renters, single folks, elderly, etc.	4/15/2022 1:33 PM
11	Emergency and transitional housing in the west napa/sonoma corridor.	4/14/2022 6:05 PM
12	Teacher, Medically Personnel and First Responder housing or programs for low down payments and low interest rates.	4/14/2022 3:07 PM
13	Focus on equality through out the City- The east side should not be favored more then the west	4/14/2022 10:22 AM
14	No	4/14/2022 8:56 AM
15	No	4/14/2022 8:36 AM
16	I am not an expert on land use, nor am I am an engineer. If growth is thoughtful, structure is supported, pot holes filled, water available, fire exits accessible and public schools prioritized, then, YES to smart, thoughtful mixed use development throughout town.	4/14/2022 7:56 AM
17	Not at this time	4/13/2022 10:56 PM
18	N/a	4/13/2022 10:15 PM
19	Senior housing that's affordable for people that don't qualify as low income	4/13/2022 9:32 PM
20	My main priorities are water and access out of the city in the case of fires.	4/13/2022 9:30 PM
21	None come to mind.	4/13/2022 9:25 PM
22	No	4/13/2022 8:19 PM
23	We need low-income housing --it doesn't matter where--we just need it.	4/13/2022 8:05 PM
24	AFFORDABLE..... this town is ONLY viable for wealth	4/13/2022 7:25 PM

## Sonoma Housing Needs and Priorities Survey

25	Appropriate Homeless housing	4/13/2022 7:12 PM
26	small community area with common services .day care,stores,a center	4/13/2022 6:46 PM
27	Accommodations for the homeless, so they don't set up encampments on public or private land.	4/13/2022 6:02 PM
28	Don't know	4/13/2022 6:00 PM
29	I just dont know all these areas that well	4/13/2022 5:52 PM
30	Affordable senior housing within walking distance of grocery shopping as well as senior programs and services.	4/13/2022 5:02 PM
31	More duplex type homes	4/13/2022 4:40 PM
32	Studio type apts. for singles.	4/13/2022 4:39 PM
33	Loft spaces for retried artist/creatives...musicians, writers!	4/13/2022 4:27 PM
34	55+ communities	4/13/2022 4:17 PM
35	Landlords that keep their rents low should be given tax incentives.	4/13/2022 4:16 PM
36	No	4/13/2022 3:46 PM
37	?	4/13/2022 3:45 PM
38	Where can a number of houses that would actually make a difference go?...Mobile home are a good way to provide housing	4/13/2022 3:35 PM
39	Affordable housing for working families	4/13/2022 3:29 PM
40	None that I am aware of	4/13/2022 3:27 PM
41	Affordable without the strict constrains on income	4/13/2022 3:25 PM
42	Affordable for all who work in our City in the Hospitality Industry, our Hospital Workers. Our Teachers, and all services workers for the City.	4/13/2022 3:18 PM
43	No	4/13/2022 3:09 PM
44	very low income housing. section 8 housing.	4/13/2022 2:58 PM
45	No	4/13/2022 2:55 PM
46	don't know just know if two working people that make a good income can't afford a home then something is wrong	4/13/2022 2:45 PM
47	for Homeless - URGENT!	4/12/2022 12:19 PM
48	Affordable apartment	4/9/2022 7:42 AM
49	Even renovating old houses	4/9/2022 6:37 AM
50	To ensure the housing needs of special groups	4/9/2022 5:03 AM
51	Increase the housing demand of specific groups	4/9/2022 2:19 AM
52	Unsure	4/8/2022 9:48 PM
53	Encourage higher income housing on the west side to even out the school district disparities	4/8/2022 8:27 PM
54	Add some specific housing needs	4/8/2022 8:10 PM
55	Housing needs to be built in specific areas	4/8/2022 6:30 PM
56	Small homes with decent yard for families. Teachers and other professionals who grew up here can't afford to buy here.	4/8/2022 6:11 PM
57	Infrastructure should be step number one. We can't handle the population now.	4/8/2022 3:35 PM
58	Yes, but Just start somewhere!	4/8/2022 1:50 PM
59	Our downtown areas need more small mixed use housing (room rentals, kitchen, bath, yard	4/8/2022 1:44 PM



## Sonoma Housing Needs and Priorities Survey

privileges.etc) & studios atop or behind our businesses, while maintaining a aesthetic, historical feel to the buildings.

60	Some special housing needs need to be added	4/8/2022 7:21 AM
61	Apartment lei	4/8/2022 5:46 AM
62	When the government arranges relatively perfect	4/8/2022 5:28 AM
63	Urban housing construction is relatively perfect	4/8/2022 2:28 AM
64	No	4/8/2022 2:06 AM
65	I don't know	4/7/2022 10:44 PM
66	unwanted	4/7/2022 10:44 PM
67	I don't know much about other types of housing	4/7/2022 10:29 PM
68	no	4/7/2022 8:00 PM
69	50+ unit deed-restricted projects on the east side in Opportunity Areas	4/7/2022 7:22 PM
70	I don't feel like it	4/7/2022 6:24 PM
71	There may be a need for small multistory homes	4/7/2022 5:53 PM
72	Don't need	4/7/2022 5:27 PM
73	apartment	4/7/2022 12:40 PM
74	apartment	4/7/2022 12:09 PM
75	apartment	4/7/2022 11:02 AM
76	Yeah, like the elevator for the old people's area	4/7/2022 10:26 AM
77	Yeah, like the elevator for the old people's area	4/7/2022 9:57 AM
78	There is no	4/7/2022 9:53 AM
79	Yeah, like the elevator for the old people's area	4/7/2022 9:37 AM
80	There is no	4/7/2022 9:31 AM
81	It's pretty good.	4/7/2022 9:22 AM
82	no	4/7/2022 9:14 AM
83	Cemetery District mind building a single-family villa.	4/7/2022 8:51 AM
84	High-grade residential area	4/7/2022 8:49 AM
85	There is no	4/7/2022 8:46 AM
86	Yeah, like the elevator for the old people's area	4/7/2022 8:44 AM
87	No, it's very thoughtful	4/7/2022 8:41 AM
88	It takes a lot of houses	4/7/2022 8:31 AM
89	no	4/7/2022 8:31 AM
90	no	4/7/2022 8:31 AM
91	There is no	4/7/2022 8:31 AM
92	N/A	4/7/2022 8:30 AM
93	Yeah, like the elevator for the old people's area	4/7/2022 8:23 AM
94	villa	4/7/2022 8:16 AM
95	NO	4/7/2022 8:12 AM
96	We don't have any other rooms we need	4/7/2022 8:09 AM

## Sonoma Housing Needs and Priorities Survey

97	We don't have any other rooms we need	4/7/2022 8:09 AM
98	We don't have any other rooms we need	4/7/2022 8:09 AM
99	Don't need	4/7/2022 8:03 AM
100	That's enough to meet the demand.	4/7/2022 8:01 AM
101	no	4/7/2022 7:47 AM
102	More houses are needed	4/7/2022 7:45 AM
103	Villa community	4/7/2022 7:31 AM
104	no	4/7/2022 7:31 AM
105	without	4/7/2022 7:31 AM
106	No	4/7/2022 7:25 AM
107	No	4/7/2022 7:03 AM
108	I have no opinion	4/7/2022 6:56 AM
109	Don't like to build any other housing areas, because the city is not suitable for people to live in	4/7/2022 6:49 AM
110	no	4/7/2022 6:45 AM
111	no	4/7/2022 6:42 AM
112	More apartment.	4/7/2022 6:42 AM
113	no	4/7/2022 6:42 AM
114	no	4/7/2022 6:34 AM
115	Enough is good	4/7/2022 6:30 AM
116	We could have lived cheaper or nicer if we were further away from everything, but we chose to be in a denser area, more walkable.	4/7/2022 6:27 AM
117	I think we can add some two-story villas appropriately	4/7/2022 6:26 AM
118	I don't think so	4/7/2022 6:21 AM
119	no	4/7/2022 6:18 AM
120	Yeah, like the elevator for the old people's area	4/7/2022 6:11 AM
121	No special houses are available	4/6/2022 6:00 PM
122	Transitional housing for at risk people is needed in Maxwell District or Downtown district (close to services)	4/2/2022 12:36 PM
123	Luxury condos for those downsizing, but keeping character and scale of Sonoma. Nothing higher than 2 stories.	4/1/2022 10:37 AM
124	no	4/1/2022 6:10 AM
125	All developed areas need to densify and Broadway is a great place to grow taller with mixed use. Eastside especially has mostly single family homes and free market will keep providing them at a price unattainable to people who work in Sonoma. Build dense housing that is more affordable there. Sonoma NEEDS housing for it's workforce and business owners are clear their #1 need housing for their workers. It is not true that densifying will ruin our tourist economy, quite the opposite is true.	3/29/2022 2:33 PM
126	I don't get the point of these questions. As soon as you decide on an area, the people living there will start to complain that they don't want more traffic AND what about water. Do we have enough to support more housing in Sonoma?	3/29/2022 12:54 PM
127	single family homes to rent- so renters dont need to be squished together	3/28/2022 4:32 PM
128	Affordable rental units	3/26/2022 10:09 AM

## Sonoma Housing Needs and Priorities Survey

129	Follow current zoning/planning uses. Plan for safe police patrols and walks throughout the whole area. We need deterrent to crime.	3/25/2022 5:24 PM
130	If any new housing is added anywhere it should be Workforce housing for employees of local employers, and temporary housing for local residents who are rendered homeless by circumstances. Sonoma otherwise does NOT need to increase population by building housing for people who don't live or work here now. That only enriches developers and destroys Sonoma quality of life for existing residents, all of whom can afford to live here or they wouldn't be living here, and who have paid dearly for their housing and want to preserve its resale value.	3/25/2022 5:49 AM
131	Na	3/24/2022 11:48 PM
132	50-unit projects in central, north and south east sides, esp. Opportunity Areas or adjacent to Opportunity Areas	3/24/2022 7:27 PM

## Q26 Housing Rehabilitation. Looking at the map above, please identify areas in need of housing rehabilitation.

Answered: 221 Skipped: 160

	<b>SIGNIFICANT REHABILITATION: SOME OR ALL HOUSING IN THIS AREA IS IN DISREPAIR OR UNSAFE.</b>	<b>MODERATE REHABILITATION: SOME HOUSING IN THIS AREA IS IN DISREPAIR.</b>	<b>MINOR REHABILITATION: MINOR REPAIRS, BUT HOUSING IS GENERALLY IN GOOD CONDITION.</b>	<b>NO REHABILITATION: HOUSING IS IN GOOD CONDITION.</b>	<b>(NO LABEL)</b>	<b>TOTAL</b>	<b>WEIGH AVERA</b>
Maxwell District	15.31% 32	30.14% 63	26.79% 56	11.96% 25	15.79% 33	209	
West Napa/Sonoma Corridor	8.70% 18	28.99% 60	32.85% 68	14.01% 29	15.46% 32	207	
Northwest Area	11.65% 24	26.21% 54	33.01% 68	17.48% 36	11.65% 24	206	
Vallejo District	6.57% 13	21.72% 43	31.31% 62	23.74% 47	16.67% 33	198	
Cemetery District	6.06% 12	16.67% 33	28.28% 56	32.32% 64	16.67% 33	198	
Northeast Area	7.50% 15	21.00% 42	27.50% 55	31.00% 62	13.00% 26	200	
Downtown District	4.93% 10	17.24% 35	36.45% 74	28.08% 57	13.30% 27	203	
Central-West Area	5.85% 12	27.32% 56	33.17% 68	21.95% 45	11.71% 24	205	
Broadway Corridor	10.29% 21	23.53% 48	33.33% 68	21.08% 43	11.76% 24	204	
Central-East Area	8.29% 17	18.54% 38	30.24% 62	31.22% 64	11.71% 24	205	
Southwest Area	9.76% 20	26.34% 54	33.17% 68	16.59% 34	14.15% 29	205	
Southeast Area	5.45% 11	22.28% 45	35.15% 71	24.26% 49	12.87% 26	202	
Gateway District	9.18% 19	23.19% 48	33.82% 70	19.32% 40	14.49% 30	207	

**Q27 Community Investment. Looking at the map above, please identify areas in need of improved access to jobs, services, education, or recreation.**

Answered: 182 Skipped: 199

	<b>JOBS: IMPROVE TRANSIT</b>	<b>JOBS: ADDITIONAL EMPLOYEE-GENERATING DEVELOPMENT (COMMERCIAL, OFFICES, RESEARCH/TECHNOLOGY, ETC.)</b>	<b>SERVICES: INCREASE ACCESS TO HEALTHCARE</b>	<b>SERVICES: INCREASE ACCESS TO DAILY LIVING SERVICES (GROCERY, BANKING, ETC.)</b>	<b>EDUCATION: INCREASE ACCESS TO SCHOOLS</b>	<b>RECREATION: INCREASE ACCESS TO PARKS, RECREATION FACILITIES, AND OPEN SPACE</b>	<b>TO</b>
Maxwell District	34.50% 59	19.30% 33	18.71% 32	7.60% 13	7.02% 12	12.87% 22	
West Napa/Sonoma Corridor	28.66% 47	25.00% 41	16.46% 27	12.20% 20	6.10% 10	11.59% 19	
Northwest Area	22.37% 34	25.00% 38	19.74% 30	13.82% 21	5.92% 9	13.16% 20	
Vallejo District	22.15% 33	14.77% 22	18.79% 28	16.78% 25	9.40% 14	18.12% 27	
Cemetery District	26.71% 39	14.38% 21	16.44% 24	18.49% 27	4.11% 6	19.86% 29	
Northeast Area	22.07% 32	17.93% 26	17.24% 25	22.07% 32	8.28% 12	12.41% 18	
Downtown District	23.03% 35	30.26% 46	14.47% 22	12.50% 19	7.24% 11	12.50% 19	
Central-West Area	22.30% 33	17.57% 26	18.24% 27	17.57% 26	9.46% 14	14.86% 22	
Broadway Corridor	26.97% 41	19.74% 30	17.11% 26	13.16% 20	7.89% 12	15.13% 23	
Central-East Area	27.03% 40	19.59% 29	18.24% 27	18.24% 27	5.41% 8	11.49% 17	
Southwest Area	27.63% 42	19.08% 29	12.50% 19	21.05% 32	9.21% 14	10.53% 16	
Southeast Area	22.67% 34	16.67% 25	24.00% 36	20.67% 31	6.67% 10	9.33% 14	
Gateway District	25.32% 40	25.32% 40	12.66% 20	17.72% 28	3.80% 6	15.19% 24	

## Q28 What age range most accurately describes you?

Answered: 268 Skipped: 113

ANSWER CHOICES	RESPONSES	
0-17 years old	0.37%	1
18-23 years old	2.61%	7
24-39 years old	35.45%	95
40-55 years old	21.64%	58
56-74 years old	29.48%	79
75+ years old	10.45%	28
TOTAL		268

## Q29 Please describe any additional housing comments or concerns you would like to share with the City.

Answered: 150 Skipped: 231

#	RESPONSES	DATE
1	Rent is out of control There are way to many vacation rentals in residential neighborhoods	4/30/2022 7:46 PM
2	We need significantly more affordable housing options in all areas of Sonoma.	4/21/2022 1:51 PM
3	We must ONLY allow housing that does not increase traffic, air pollution, and obesity. We cannot allow car-focused housing or housing that increase driving in any way. No low-income or low quality housing should be allowed and no population increase.	4/18/2022 4:23 PM
4	We appreciate the City of Sonoma taking the time to look into these housing issues.	4/18/2022 2:40 PM
5	City is fairly small so access is good to most services except over on the East side where not much grocery r banking. Vallejo and Cemetery districts are already good access for recreation, hiking, etc, so keep those for that. Take advantage of areas already set up for mixed use and multifamily services and transportation to add more there. I hear that local governments won't necessarily have a say when it comes to additional water, sewer, parking needed, so should save time and costs by adding into areas already set up for them first.	4/18/2022 12:31 PM
6	Government should not try to fix the housing in our area. Look at the unintended consequences rent control has done in almost every market. It leads to less housing. Let the free market adjust.	4/18/2022 12:27 PM
7	Seguridad en general	4/16/2022 11:49 AM
8	Cada vez es más caro vivir en el valle y las rentas siguen aumentando deberían tener un control de renta establecido	4/15/2022 8:15 PM
9	Que no suban mucho la renta	4/15/2022 7:38 PM
10	None	4/15/2022 7:23 PM
11	It would be nice to see more reasonably priced rentals. Also fewer single family homes - we need to also build up.	4/15/2022 6:14 PM
12	Housing discrimination is rampant but underreported by a landslide. I attempted to learn of my rights when facing housing discrimination multiple times and the resources available are severely underfunded and challenging to make use of in a way that was actually effectual. For example, when I was experiencing clear discrimination, I was faced with the untenable decision to either file a laborious and NON-anonymous "report" on my neighbors, or on the friends of friends whom I know in the community, or I could keep my mouth shut and not jettison those relationships I might need to keep intact for my or my family's survival someday. I did the latter, I kept my mouth shut, painfully, each time. Only privileged, wealthy and already well-housed folks can afford to jettison those type of relationships that could lead to possible word-of-mouth (meaning below market rate, as market rate nobody can afford) housing. Also it's clear that if a landlord has the option to AirBnB their modest cottage home for 2 weekends/month and make as much money as they'd make if my family rented it each month for a year, clearly I and other renters like me will continue to be discriminated against for this very reason. It doesn't make economic sense to incentivize vacation rentals for tourists over working class families and citizens, and that's how its set up right now.	4/15/2022 1:45 PM
13	Mandating that business expansion has a residential component on property is ridiculous and unattainable. Allowing more ADUs on property must have an affordable housing clause attached to have any benefit	4/15/2022 9:18 AM
14	east side needs more housing on lots. Plant more trees along bike path and streets to provide shape and beauty	4/15/2022 9:04 AM
15	Do not exacerbate Parking and traffic around plaza	4/15/2022 6:42 AM

## Sonoma Housing Needs and Priorities Survey

16	Las rentas están muy altas y cada día es más difícil de encontrar propiedad que acepten mascotas	4/14/2022 6:36 PM
17	N/A	4/14/2022 3:15 PM
18	Stop putting all of the higher density housing on the west side only. We need locals and diversity to populate the east side also so it isn't a dead zone of vacation homes and rich people. The west side is teeming with family life and people who actually live, work and send their kids to schools in Sonoma. We need to balance out the housing types in town. It's going to be much too dense with traffic on the west side and up Hwy 12!! Balance needed!	4/14/2022 11:53 AM
19	There is a clear division in the City of Sonoma - East compared to the West. Affordable housing should go on the east side to true up the equality between East and West sides.	4/14/2022 10:55 AM
20	I owned a duplex with affordable housing. Did not find that the rents were significantly lower than average rent.	4/14/2022 9:59 AM
21	Traffic issues; speeders in neighborhoods; beggars; people scoping homes to steal deliveries, etc	4/14/2022 9:09 AM
22	Need more availability for housing for disabled and or low income residents without having to wait years to be eligible.	4/14/2022 9:02 AM
23	Large Residential/Mixed use projects should be developed only on main corridors. Adequate parking is essential for any development. Residential neighborhoods should not be impacted.	4/14/2022 8:37 AM
24	Affordable, really, not just government definition	4/13/2022 10:56 PM
25	We moved from near Hwy 12 (lived in a cul de sac) @ downsized. Found Pueblo Serena fit our needs the best.....own the home but pay rent for the space. We could not afford Temelec or other single family homes in the valley. We sold our home..lived there 30 years & were able to buy home ( no mortgage) and put balance in investments. Not putting up a large hotel complex downtown would allow for additional housing assuming the cost is not prohibitive allowing younger people to purchase a small home. Living off of 5th St west I love to walk for my errands.....post office 3 grocery stores, 2 drugstores, clothing store, library and bank!	4/13/2022 10:41 PM
26	N/a	4/13/2022 10:23 PM
27	The cost of rentals is crazy- I am retirement age but can't afford to retire here. So many of our services workers can't afford it here. It's going to become a town with no services if something isn't done.	4/13/2022 9:38 PM
28	Water and access out of the city in the case of fires.	4/13/2022 9:31 PM
29	The residential rents here are ridiculous bordering on criminal.	4/13/2022 9:27 PM
30	The City keeps putting off affordable housing on developments, instead taking \$\$ for the "one-day" project. STOP THAT. REQUIRE any development to INCLUDE AFFORDABLE HOUSING *NOW*! Create more opportunities for our family members to stay in the area or else this will become a ghost town, berift of young people who will get their start working customer service, vocational skills, and service jobs.	4/13/2022 8:42 PM
31	Ninguno	4/13/2022 8:22 PM
32	Being on fixed income,it's very expensive for a single senior to live in this city.	4/13/2022 8:13 PM
33	the city will GROW no matter who or why they don't want it to and denying space to build or house in certain areas and OVERLOADING other areas is not a sustainable GROWTH PLAN..EVERYONE MUST BE PART OF THE NEW SONOMA ..PEACE	4/13/2022 6:53 PM
34	Please do not let homeless encampments take over the city as they have done in other communities.	4/13/2022 6:07 PM
35	I consider myself quite ignorant of the needs in certain areas in Sonoma, so basically I'm just interested in rezoning away from single family housing in favor of multi-family dwelling.	4/13/2022 5:49 PM
36	We need affordable housing for seniors and working class people!!	4/13/2022 5:39 PM
37	Good survey. But later questions (renovation, access) are skewed because metro area's problems are in the more highly populated El Verano and the Springs. Need a one-stop government covering all.	4/13/2022 5:19 PM



## Sonoma Housing Needs and Priorities Survey

38	I am grateful for our City's Mobilehome Rent Stabilization Ordinance as it makes it possible for me to afford living in my home. However escalating sewer rates may change that!	4/13/2022 5:14 PM
39	I very much disagree with putting Apartments, condos, large developments in fully established single home neighborhoods.	4/13/2022 4:43 PM
40	My apartment units are owned by the city. I wish they would come by one day and look at how Burbank is "taking care" of its property. Disgraceful!!!!	4/13/2022 4:41 PM
41	I am a retired senior. I have resided in the Sonoma Valley for 43 years. At the rate of rental increases I will be forced to relocate!	4/13/2022 4:33 PM
42	New housing requires water - we need to save water in the drought	4/13/2022 3:52 PM
43	we don't have water, road space, parking, or room to stay the town we love and paid a lot to live in if we keep increasing the amount of multi family homes! And our children need fresh air and room to excursive not smog and pavement	4/13/2022 3:50 PM
44	None	4/13/2022 3:50 PM
45	The school situation with all of our public schools is a complete disaster. The city should be ashamed of itself. Administrative turnover happened annually and that is not ok.	4/13/2022 3:46 PM
46	The recent addition to low cost housing is helpful but some of the residents still can't afford the rent. Those with jobs in agriculture or the service industry do not have stable job income to seasonal layoffs or reduction of hours in the off season. As a tourist town, it would be helpful to Sonoma to articulate the tradeoffs - high priced housing and service sector jobs leave employees without the ability to live in the area. However, that is true of Marin County - good paying jobs in education but the teachers can't afford the housing prices. Such ethical cross-hairs.	4/13/2022 3:34 PM
47	With all due respect, it seems the City of Sonoma can't get out of its own way and makes it very difficult for projects to get approved. Perhaps I don't have all the information, but this is the sense I get when watching the planning commission and city council meetings, reading the local newspaper, and hearing from folks who have attempted to get projects approved. The Truck & Auto site at the corner of MacArthur and Broadway is a good example - housing should've been built there long ago, but instead it's now a blighted eyesore. I am hopeful things will turn around and we'll soon see progress being made. To offer some perspective, I am a 6th generation resident and the last generation of my family that will be able to live here. My adult children have no plans of returning due to lack of decent jobs and reasonably-priced housing.	4/13/2022 3:33 PM
48	Make use of some of the unused lots that are currently a blight	4/13/2022 3:31 PM
49	Please do not view this as some grand social engineering scheme. It rarely makes for good decisions.	4/13/2022 3:25 PM
50	Need to minimize VRBOs and second and third homes. -This also increases hotel occupancy and associated taxes. So many homes are temporary. Maybe a massive tax when taking on a second mortgage.	4/13/2022 3:24 PM
51	Keep the City out of financial redistribution efforts	4/13/2022 3:21 PM
52	THis entire questionnaire is totally unbalanced. It is only geared to generate more more more housing. What about quality of life issues, water, sustainability etc? Why aren't those issues addressed?	4/13/2022 3:17 PM
53	We need to have empty house taxes in this community. Limit vacation rentals and no Picasso.	4/13/2022 3:02 PM
54	The system is broken. unless you inherit money or property even doctors struggle to buy a home they want to live in. ridiculous. needs to be more supply to lower these prices or laws yes laws in place to prevent highest bidder. even if u get lucky and can find a home u can barely afford someone will come in and out bid u.	4/13/2022 2:48 PM
55	N/A	4/13/2022 4:37 AM
56	CRIME IS INCREASING FAST IN SONOMA AND IT WOULD BE WISE TO DO BETTER SCREENING OF WHO IS MOVING INTO OR VIOLATING CURRENT RENTAL CONTRACTS ETC BECAUSE IT IS GETTING PRETTY SKETCHY AROUND HERE	4/13/2022 12:06 AM
57	Unsheltered folks	4/12/2022 12:22 PM

## Sonoma Housing Needs and Priorities Survey

58	Overcome community resistance to new housing for lower incomes	4/11/2022 9:41 PM
59	Concerned that every lot and parcel of land in the city limits will be filled with too much housing. Not enough water. The city is too crowded as it is, it cannot sustain more.	4/11/2022 8:46 AM
60	As a couple we have good paying jobs and work for large organizations within Sonoma for years yet can't live our dream of being a first time home buyer in the town we love and support. Instead we have to hunt for a 2500 dollars a month run down 1960s rental that's not energy efficient. It will eventually push us out of Sonoma. Sonoma will at some point not have any new or young families to support and grow the town.	4/9/2022 7:19 AM
61	I have lived in this beautiful city for my entire life (32 years). I work at our local Boys & Girls Club and my Fiancé works at Sonoma Raceway. We both make over 65,000 a year and yet we still find it difficult to find a rental that meets our price range (2,400 a month). The rental options in our price range are either small studio apartments or old dilapidated apartments. I would love to continue to live in my hometown of Sonoma, but if this housing trend continues I don't see us being residents here for much longer.	4/9/2022 7:00 AM
62	Fiscal policies to increase the supply of public housing, fiscal policies to support the consumption of public housing,	4/9/2022 6:42 AM
63	We will ensure the housing needs of special groups and strengthen infrastructure	4/9/2022 5:05 AM
64	We will improve residents' housing needs, make good planning, and protect their rights and interests	4/9/2022 2:22 AM
65	Need for more options which are affordable.	4/8/2022 9:51 PM
66	When you build new housings, please provide a safe cross walk for the pedestrians.	4/8/2022 8:47 PM
67	We are rapidly becoming a retirement community and are putting too many barriers in the way of young families who want to build a long term life here. Down payment assistance grants could help ensure that the only young families that are moving here aren't the Uber rich tech families and prevent us from being a community of seniors that are aging out and second home millionaires. While the needs of low income residents are clearly a huge priority, consider how supporting the middle class families would combat some of the boujie second home crowd takeover.	4/8/2022 8:31 PM
68	Increase some specific housing needs to ensure the health of residents	4/8/2022 8:15 PM
69	Specific areas need to build corresponding housing needs, improve and rehabilitate old neighborhoods, to ensure the safety of citizens	4/8/2022 6:34 PM
70	Again- single family homes that local professionals like a teacher can afford.	4/8/2022 6:13 PM
71	We need to address our infrastructure first. Especially water.	4/8/2022 3:37 PM
72	Water!!!! You want to build more housing but what about adding water capacity? Nothing has been added in years and we are expected to save more and more water and the city wants/needs to add more housing, something needs to give.	4/8/2022 2:19 PM
73	Better well paying jobs, as well as entry level, are much needed in SV. Bring back an Adult Learning school. Maintain our historical buildings, & create an 'honest' history museum about the area's past.	4/8/2022 1:56 PM
74	We need to take back housing from the slumlords in this town. no one should have multiple rental properties (commercial or home). Mattsons are looking awful tasty these days...#EATTHE RICH	4/8/2022 11:25 AM
75	More affordable housing and especially more affordable rents.	4/8/2022 10:45 AM
76	Some special housing needs need to be added to ensure the housing needs of citizens	4/8/2022 7:28 AM
77	Increase the apartment	4/8/2022 5:49 AM
78	Ensure the safety of housing construction, increase infrastructure, and make people's lives happier	4/8/2022 5:39 AM
79	We will build more suitable housing for the middle class and reduce housing pressure	4/8/2022 2:37 AM
80	Provide temporary shelter for the homeless	4/7/2022 10:47 PM

## Sonoma Housing Needs and Priorities Survey

81	So that more people who can't afford it can live in a good house	4/7/2022 10:47 PM
82	Establish more suitable low rent housing or preferential conditions for low-income people.	4/7/2022 10:32 PM
83	Build more houses so that more people who don't have houses can have their own.	4/7/2022 8:53 PM
84	ok	4/7/2022 8:01 PM
85	The city can take way more housing than the 6th cycle RHNA, double easily; all new housing needs too be deed-restricted to make up for past displacement of the working class here	4/7/2022 7:31 PM
86	I think part of the house needs waterproof material	4/7/2022 5:55 PM
87	It's too expensive. Some can't afford it	4/7/2022 5:28 PM
88	There is no	4/7/2022 12:41 PM
89	No opinion	4/7/2022 12:10 PM
90	No opinion	4/7/2022 11:04 AM
91	If only the housing allowance were higher	4/7/2022 10:27 AM
92	If only the housing allowance were higher	4/7/2022 9:57 AM
93	No opinion	4/7/2022 9:54 AM
94	If only the housing allowance were higher	4/7/2022 9:39 AM
95	No opinion	4/7/2022 9:32 AM
96	The government has done a very good job.	4/7/2022 9:25 AM
97	no	4/7/2022 9:15 AM
98	I think building schools and shopping malls around the new houses will create jobs and attract people to the area.	4/7/2022 8:57 AM
99	Hope to build more parking lots	4/7/2022 8:51 AM
100	No opinion	4/7/2022 8:48 AM
101	I don't have a problem with the current house	4/7/2022 8:47 AM
102	The above survey is very detailed. There are no necessary questions	4/7/2022 8:47 AM
103	Yeah, like the elevator for the old people's area	4/7/2022 8:45 AM
104	no	4/7/2022 8:36 AM
105	no	4/7/2022 8:36 AM
106	no	4/7/2022 8:36 AM
107	I hope the quality is better	4/7/2022 8:33 AM
108	N/A	4/7/2022 8:33 AM
109	If only the housing allowance were higher	4/7/2022 8:24 AM
110	no	4/7/2022 8:17 AM
111	NO	4/7/2022 8:13 AM
112	There is no	4/7/2022 8:11 AM
113	There is no	4/7/2022 8:11 AM
114	There is no	4/7/2022 8:11 AM
115	Hopefully the infrastructure will be updated	4/7/2022 8:05 AM
116	The government does a very good job.	4/7/2022 8:04 AM
117	I think the city is very well organized	4/7/2022 7:48 AM

## Sonoma Housing Needs and Priorities Survey

118	More houses are needed	4/7/2022 7:47 AM
119	no	4/7/2022 7:36 AM
120	I hope we can speed up the housing plan, sort out the dilapidated houses first, and then build new ones.	4/7/2022 7:35 AM
121	It may be possible to replace the water heater in our house	4/7/2022 7:34 AM
122	Hope to strengthen security	4/7/2022 7:33 AM
123	no	4/7/2022 7:31 AM
124	No	4/7/2022 7:27 AM
125	I have no opinion	4/7/2022 6:57 AM
126	I don't have any other problems and I'm fine with it	4/7/2022 6:52 AM
127	Can appropriately reduce the school district housing prices	4/7/2022 6:48 AM
128	no	4/7/2022 6:46 AM
129	Housing environment is more important.	4/7/2022 6:45 AM
130	I wish more houses could be built	4/7/2022 6:44 AM
131	no	4/7/2022 6:35 AM
132	I have no opinion	4/7/2022 6:33 AM
133	Maybe we need more affordable housing	4/7/2022 6:29 AM
134	I think some of the exterior of the house might need some waterproof paint	4/7/2022 6:29 AM
135	I wish the policy could be relaxed	4/7/2022 6:23 AM
136	no	4/7/2022 6:20 AM
137	If only the housing allowance were higher	4/7/2022 6:13 AM
138	希望政府根据这项调查以及政府给出得规划图更好的施展	4/7/2022 2:16 AM
139	No special houses are available	4/6/2022 6:04 PM
140	Water!! How do we build with shortage of water?? Need to keep some open spaces / green belts between housing clusters. And parks for neighborhood children to play in. And MORE parking allowed for housing and commercial businesses. Over flow parking from employees into neighborhoods is not acceptable!	4/6/2022 5:18 PM
141	Very concerned that both NIMBY happens most on the East side of Sonoma and that the West side gets slammed with congestion. Concerned that we'll simply lose our traditional neighborhoods with the agenda of Gov Newsome and City elects serving that agenda.	4/6/2022 4:11 PM
142	Don't overbuild. There is limited water, we are in a fire zone and there is already lots of traffic.	4/1/2022 10:38 AM
143	Rent control	4/1/2022 6:13 AM
144	it was only through the grace of our friends who rented my mother-in-law a home here in Sonoma for 15 years at a reasonable price so she could live in Sonoma close to us. Once she moved into a residential facility they were able to double the amount of rent for the home she was renting.	3/29/2022 12:59 PM
145	Renters live in fear of their rent being raised and no available affordable properties	3/28/2022 4:36 PM
146	Safety first as that is beginning to factor into land usage	3/25/2022 5:41 PM
147	Additional housing is only needed to the extent it is needed to secure housing for employees of local businesses and entities that service city residents, e.g., the school district, hospital & city govt. More housing is NOT needed simply to add population & enrich developers.	3/25/2022 5:59 AM
148	Appreciate affordable housing programs between companies like denova and the City.	3/24/2022 11:52 PM
149	I'm hoping for some bold, Progressive action that won't cave to rich NIMBYs	3/24/2022 7:35 PM

Sonoma Housing Needs and Priorities Survey

150

We need more of everything except large houses with huge lots.

3/24/2022 3:03 PM

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**Q30 Submit your name and contact information for your chance to win a \$50 Visa gift card!If you would like to be added to the City's contact list for the Housing Element Update, please enter your contact information below.**

**Note: This information will be kept separate from the remainder of the survey responses in order to ensure responses are published anonymously.**

Answered: 200 Skipped: 181

ANSWER CHOICES	RESPONSES	
Name	99.50%	199
Company	0.00%	0
Address	0.00%	0
Address 2	0.00%	0
City/Town	0.00%	0
State/Province	0.00%	0
ZIP/Postal Code	0.00%	0
Country	0.00%	0
Email Address	100.00%	200
Phone Number	0.00%	0



Personal information removed (pages 48-59) to maintain the privacy of respondents.

# **APPENDIX D**

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## Stakeholders Survey

## Q1 Contact Information. Please provide your name, organization you are affiliated with, and contact information.

Answered: 3 Skipped: 0

ANSWER CHOICES	RESPONSES	
Name	100.00%	3
Organization	100.00%	3
Address	100.00%	3
Address 2	0.00%	0
City	100.00%	3
State	100.00%	3
ZIP Code	100.00%	3
Country	0.00%	0
Email Address	100.00%	3
Phone Number	100.00%	3

#	NAME	DATE
1	Laurie Hobbs	4/15/2022 1:47 PM

2	Margaret DeMatteo	4/1/2022 12:32 PM
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3	Jennifer M Montgomery	3/29/2022 8:01 AM
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#	ORGANIZATION	DATE
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1	Morton's Warm Springs	4/15/2022 1:47 PM
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2	Legal Aid of Sonoma County	4/1/2022 12:32 PM
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3	Sonoma Valley Unified	3/29/2022 8:01 AM
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#	ADDRESS	DATE
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1	1651 Warm Springs Road	4/15/2022 1:47 PM
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2	144 South E Street Suite 100	4/1/2022 12:32 PM
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3	419 Moll Ct	3/29/2022 8:01 AM
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#	ADDRESS 2	DATE
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There are no responses.

#	CITY	DATE
---	------	------

1	Glen Ellen	4/15/2022 1:47 PM
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2	Santa Rosa	4/1/2022 12:32 PM
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3	Sonoma	3/29/2022 8:01 AM
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#	STATE	DATE
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1	CA	4/15/2022 1:47 PM
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City of Sonoma Housing Element Community Service Providers, Community-based Organizations,  
and Development Professionals Stakeholders Survey

2	CA	4/1/2022 12:32 PM
3	California	3/29/2022 8:01 AM
#	ZIP CODE	DATE
1	95442	4/15/2022 1:47 PM
2	95404	4/1/2022 12:32 PM
3	95476	3/29/2022 8:01 AM
#	COUNTRY	DATE
There are no responses.		
#	EMAIL ADDRESS	DATE
1	laurie@mortonswarmsprings.com	4/15/2022 1:47 PM
2	mdematteo@legalaidsc.com	4/1/2022 12:32 PM
3	jmontgomery@sonomaschools.org	3/29/2022 8:01 AM
#	PHONE NUMBER	DATE
1	5103665067	4/15/2022 1:47 PM
2	14156906499	4/1/2022 12:32 PM
3	2096170614	3/29/2022 8:01 AM

**Q2 Service Population. Which community population(s) does your organization serve? Please note that the populations identified below are based on populations identified as having special housing needs in State Housing Element Law.**

Answered: 3 Skipped: 0

ANSWER CHOICES	RESPONSES
Seniors	66.67% 2
Disabled	66.67% 2
Developmentally disabled	66.67% 2
Large families (5 or more persons)	100.00% 3
Families with female head of household	100.00% 3
Farmworkers	66.67% 2
Persons in need of emergency shelter	33.33% 1
Homeless	66.67% 2
Persons requesting assistance with fair housing/discrimination issues	33.33% 1
General population	100.00% 3
Other (please specify)	66.67% 2
Total Respondents: 3	

#	OTHER (PLEASE SPECIFY)	DATE
1	Mostly everyone	4/15/2022 1:47 PM
2	low-income persons	4/1/2022 12:32 PM

**Q3 Housing Types.** What are the primary housing types needed by the population your organization services? Please check all that apply.

Answered: 2 Skipped: 1

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	GENERAL POPULATION	SENIORS/ELDERLY	DISABLED	DEVELOPMENTALLY DISABLED	FEMALE HEADS OF HOUSEHOLD WITH FAMILY	FARMWORKER
Single family detached housing	100.00% 2	100.00% 2	50.00% 1	0.00% 0	100.00% 2	100.00%
Single family attached housing (individually-owned townhomes or condominiums)	50.00% 1	50.00% 1	100.00% 2	50.00% 1	50.00% 1	50.00%
Single family housing affordable to low, very low, or extremely low income households	100.00% 2	100.00% 2	50.00% 1	0.00% 0	100.00% 2	100.00%
Duplex, triplex, or fourplex	50.00% 1	100.00% 2	100.00% 2	50.00% 1	100.00% 2	50.00%
Multifamily - market rate	100.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00%
Multifamily housing - affordable to extremely low, very low, and low income households	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00%
Lease-to-own housing (condominiums, townhomes, or single family)	100.00% 1	0.00% 0	100.00% 1	0.00% 0	100.00% 1	100.00%
Senior housing that includes services providing assistance with daily living	0.00% 0	100.00% 2	50.00% 1	50.00% 1	0.00% 0	0.00%
Accessory dwelling unit	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00%
Co-housing (individual homes that are part of larger development with shared common space, such as kitchen, living, recreation, and garden areas)	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00%

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Emergency shelter	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00%
Transitional or supportive housing	0.00% 0	0.00% 0	0.00% 0	50.00% 1	0.00% 0	0.00%
Housing with features for a disabled person (ramp, grab bars, low counters and cabinets, assistive devices for hearing- or visually-impaired persons)	0.00% 0	100.00% 2	100.00% 2	50.00% 1	0.00% 0	0.00%
Housing close to services (grocery stores, financial, personal, and social services, etc.)	50.00% 1	100.00% 2	100.00% 2	50.00% 1	100.00% 2	50.00%
Housing with on-site child daycare	50.00% 1	50.00% 1	50.00% 1	50.00% 1	100.00% 2	50.00%
Permanent farmworker housing	50.00% 1	50.00% 1	0.00% 0	0.00% 0	50.00% 1	100.00%
Seasonal or temporary farmworker housing	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	100.00%

#	OTHER (PLEASE SPECIFY)	DATE
1	Safe, affordable, alternative housing (tiny homes, RV's, etc...)	4/1/2022 12:44 PM

**Q4 Housing Needs and Services.** What are the primary housing needs of the population(s) that your organization serves? Please check all that apply.

Answered: 2 Skipped: 1

City of Sonoma Housing Element Community Service Providers, Community-based Organizations, and Development Professionals Stakeholders Survey

	GENERAL POPULATION	SENIORS/ELDERLY	DISABLED	DEVELOPMENTALLY DISABLED	FEMALE HEADS OF HOUSEHOLD WITH FAMILY	FARMWORKERS
General assistance with renting a home	100.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0
General assistance with purchasing a home	100.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Assistance finding housing affordable to extremely low income (<30% of median income) households	100.00% 2	50.00% 1	50.00% 1	0.00% 0	50.00% 1	50.00% 1
Assistance finding housing affordable to lower income (<80% of median income) households	100.00% 2	50.00% 1	50.00% 1	0.00% 0	50.00% 1	50.00% 1
Assistance with being housed in an emergency shelter	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Assistance with being housed in transitional or supportive housing	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0
Grants or loans to make modifications to make a home accessible to a disabled resident	50.00% 1	50.00% 1	50.00% 1	50.00% 1	0.00% 0	0.00% 0
Occasional financial assistance to pay rent, mortgage, and/or utilities	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00% 2
Housing close	100.00%	100.00%	100.00%	50.00%	100.00%	100.00%

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to public transportation	2	2	2	1	2	2
Housing close to services (grocery stores, financial, personal, and social services, etc.)	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00% 2
Housing close to daycare	50.00% 1	50.00% 1	50.00% 1	50.00% 1	100.00% 2	50.00% 1
Assistance with addressing discrimination, legal rent or mortgage practices, tenant/landlord mediation, or other fair housing issues	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00% 2
Translation assistance for non-english speaking persons	100.00% 2	100.00% 2	100.00% 2	50.00% 1	100.00% 2	100.00% 2



## Q5 What are the primary barriers your organization and/or service population encounter related to finding or staying in housing?

Answered: 2 Skipped: 1

#	RESPONSES	DATE
1	Affordability, gentrification, short term vacation rentals taking the lion's share of the housing stock that would otherwise be available as smaller and affordable units, also the lack of zoning/code to streamline building more affordable cohousing, ADUs, etc. that have a higher quality of life with access to nature and open spaces than condos or apartment complexes	4/15/2022 1:59 PM
2	Affordability. Even once housed, landlords seek to raise the rent each year to the point that tenants cannot afford it. Lack of tenant protections, as many tenants are not covered by the Tenant Protection Act of 2019.	4/1/2022 12:44 PM

## Q6 What services or actions are needed to provide or improve housing or human services in Sonoma?

Answered: 2 Skipped: 1

#	RESPONSES	DATE
1	Better support for housing discrimination, legalizing composting toilets, allowing units on wheels as ADUs, as well as units on foundations under 400 square feet, or whatever that minimum is. More integration of wealthy and low-income areas, services, populations, etc. More mixed use in pocket neighborhoods to improve walkability and move away from car-centric culture	4/15/2022 1:59 PM
2	A local just cause ordinance and local rent control that are more protective than the Tenant Protection Act of 2019. More lower income to extremely low income housing as identified by the regional housing needs assessment.	4/1/2022 12:44 PM

## Q7 What services or actions are needed to improve access to regional services?

Answered: 2 Skipped: 1

#	RESPONSES	DATE
1	Walkability, Bike paths and walking paths off streets, mixed use pocket neighborhoods are key.	4/15/2022 1:59 PM
2	More access to services for non English speaking communities, coordinated outreach in rural areas.	4/1/2022 12:44 PM

## Q8 Are there any other housing priorities, issues, or concerns that you would like to identify to assist the City of Sonoma in identifying housing needs and developing appropriate programs to address housing needs?

Answered: 2 Skipped: 1

#	RESPONSES	DATE
1	Integration culturally with the Springs district	4/15/2022 1:59 PM
2	A local just cause ordinance and local rent control that are more protective than the Tenant Protection Act of 2019 to preserve existing housing stock for tenants. More lower income to extremely low income housing as identified by the regional housing needs assessment. Allowing for alternative housing structures like tiny homes and RV's (with composting toilets). Mobile home tenant protections.	4/1/2022 12:44 PM

## Q9 Does your organization develop housing?

Answered: 2 Skipped: 1

ANSWER CHOICES	RESPONSES	
Yes - we develop housing and have built in Sonoma or are working on/toward a project in Sonoma	0.00%	0
Yes - we develop housing in the region, but do not have direct experience with Sonoma	0.00%	0
No - we provide supportive services, advocacy, or other human services but do not develop housing	100.00%	2
TOTAL		2

**Q10** In your experience, what are typical costs, including land acquisition, site improvements, building construction, and other costs, of single family development in Sonoma or the greater Sonoma County region?

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

**Q11 In your experience, what are typical costs, including land acquisition, site improvements, building construction, and other costs, of multifamily development in Sonoma or the greater Sonoma County region?**

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

**Q12 In your experience, what are typical costs of mixed use development, including land acquisition, site improvements, building construction, and other costs, in Sonoma or the greater region?**

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	



### Q13 What is the preferred parcel size (minimum and maximum) for an affordable (lower income) multifamily development project?

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

## Q14 What is the minimum desirable density (units per acre) for an affordable (lower income) housing development project?

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

## Q15 Have you encountered any specific impediments to developing housing in Sonoma? If yes, please describe.

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

**Q16 Are there specific changes to the City's planning and development process that have a significant effect on the ability to accommodate or develop housing? If yes, please describe.**

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

**Q17 What does it take to produce lower and moderate income housing in Sonoma or the region? Are there additional factors that the City should consider to accommodate and encourage lower and moderate income housing in Sonoma?**

Answered: 0 Skipped: 3

#	RESPONSES	DATE
	There are no responses.	

# **APPENDIX E**

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Public Review Draft Comments and Responses

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COMMENTER	#	SUMMARY OF COMMENTS	RESPONSE TO COMMENTS
Sonoma Valley Collaborative	1.1	Description of <del>SBC</del> -SVC policy platform	SVC's policy platform is noted.
	1.2	Revise objectives to be specific, measurable and occur faster	Objectives have been revised for more specificity. Housing Plan timelines reflect the City's resources and time anticipated to implement various programs.
	1.3	Clarify precedence of city specific commitments in Admiratively Further Fair Housing	The AFFH program matrix as well as complementary programs throughout the Housing Plan have been revised for consistency.
	1.4	Policies lack program implementation measures	Policies do not have individual program implementation measures. Policies establish a standard the City will follow and each policy does not require a program. Programs are designed to achieve overall goals and to address specific constraints and issues where identified in the Background Report. However, where policies would benefit from an implementing action, programs have been added or revised accordingly.
	1.5	Sonoma acknowledge racial history and commit policies to achieve fair housing future	The Affirmatively Furthering Fair Housing (AFFH) analysis has been revised to include additional data and information regarding segregation and the City's racial history, including identification of areas with limited diversity and acknowledgement of past racially exclusive practices in Sonoma. Programs have been revised accordingly to promote diversity, both economic and racial, by increasing access to areas with less diversity.
	1.6	Add a commitment to pursue a Pro-housing Designation from HCD	Program 7 (formerly 6) has been revised to pursue a Pro-housing Designation.
	1.7	Program 1 - add language to inclusionary requirement	Program 1 is revised to ensure that inclusionary units are affordable in perpetuity; the commentor's recommended language regarding location and quality of units is already reflection in Section 19.44.070 of the Municipal Code.
	1.8	Programs 2 and 6 - Add new objectives to affordable housing funding sources	Programs 2 and 6 have been revised to identify specific objectives
	1.9	Program 3 - Add new objectives to produce feasible redevelopment places	Program 3 has been revised to identify potential sites for adaptive reuse by 2026.
	1.10	Program 4 - Objective should include numbers of alternative units	Program 4 is revised to include a quantified objective

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1.11	Program 5 - Address comments from Napa-Sonoma ADU Center	Program 5 Napa-Sonoma ADU Center did not submit a comment on Sonoma’s Draft Housing Element
1.12	Add a program to reduce the number of second or empty homes	Program 6 is added to address second homes, including approaches to reduce second homes and develop funding mechanisms to address the effect second units have on diminishing the housing supply available for year-round occupancy.
1.13	Program 7 – support objective and fast timeline	<a href="#"><u>The City did expedite preparation of its objective design standards for multifamily projects and adopted the standards on June 15, 2022. Programs 14 and 15 ensure the City expands its objective standards to also address mixed use and multi-unit projects and to provide a streamlined ministerial approval process for eligible projects by December 2023.</u></a>
1.14	Add a program to provide tenant protections	Former Programs 10 and 11 are combined into a revised Program 11 to address tenant and resident protections
1.15	Program 12 - Add data addressing the level of risk of conversion for non-multi-family units	Program 12 is revised to address inclusionary and other affordable units at-risk of conversion to market rate
1.16	Program 13 - Include a rental registry	Program 13 is revised to develop a rental, ADU, and SB 9 registry.
1.17	Program 14 - Revise timeline for design guidelines and design review	Program 14 is revised to reflect the City’s adoption of objective design standards for multi-family development on June 15, 2022
1.18	Program 15 – Clarify paragraph A, reduce or eliminate parking requirements, address inclusionary standards	Program 15 – Paragraph A is applicable. The recommendation regarding removal or unbundling of parking requirements is noted. Parking has not been a constraint for development projects in the City, demonstrated by the City exceeding its 5 <sup>th</sup> Cycle RHNA. An amendment is not necessary to address ensuring that inclusionary units are provided in perpetuity as that will be addressed through implementation of Program 1.
1.19	Program 18 – reducing, unbundling, or eliminating parking for new or redeveloped residential projects.	Program 18 - No changes are made related to parking, as previously described.
1.20	Program 19 - Clarify density bonus requirements	Program 19 – clarified to state that density bonuses will be granted to eligible projects consistent with State law
1.21	Program 21 – make smaller multi-unit buildings (duplexes up to 5-plexes) allowable in all residential zones, distribute subsidized units for low and very low-income households fairly across all neighborhoods and residential zones	Program 21 – State ADU law allows 3 units on any property with a single-family residence and allows 2-4 units on lots zoned for single family uses that meet the requirements of SB 9. In combination, these laws provide for 2 to 3 units, which can function as a duplex or triplex or stand-alone units, throughout zones that allow single family residential uses providing for increased density and increased opportunities, similar to the commentor’s recommendation. The City will also implement methods to increase density in residential



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			neighborhoods as described in Program 4, which has been integrated into Program 22, Table 1.
	1.22	Program 22 - Require visitability standards in residential construction	Program 22 is revised to address visitability requirements for new residential construction and multifamily remodels
	1.23	Program 25 - Add objective to integrate closure and conversion protections from AB 2782 into the City's existing ordinance	Program 25 focuses on mobile homes as a source of housing for seniors. Program 11 (formerly 10 and 11) addresses mobile home protections and other renter protections at a broader level and is updated to reflect the statutory requirements of AB 2782.
	1.24	Program 26 – SVC members and other community organizations should be named here; materials and events should be designed from the start in both English and Spanish	Program 26 is revised to identify organizations that provide significant housing resources to Sonoma by name
	1.25	Program 28 - Strengthen draft provisions for displacement protection of lower-cost housing, including below moderate-income units	Program 28 implements the requirements of State law related to replacement units. The suggestion to extent protections to below moderate-income households is noted.
	1.26	Program 29 – Water supply limitations are compatible with new infill affordable housing, across Sonoma County, water consumption per person has dropped while the population has grown	Program 29 – comments regarding benefits of infill affordable housing in terms of water supply are noted.
	1.27	Program 31 – Mistakenly labeled as Program 29	Program 31 – renumbered.
<b>Omar Paz Jr.</b>	2.01	Support for Sonoma Valley Collaborative comment, noting the time has come to provide serious investment in affordability, retention of local community, and leadership for a housing blueprint that promotes equity for workers and families that are the backbone of the community	The commenter identifies their support for the Sonoma Valley Collaborative Comment – please see Response to Comment #1.
<b>Linda Bruce</b>	3.01	Support for Sonoma Valley Collaborative comment	The commenter identifies their support for the Sonoma Valley Collaborative Comment – please see Response to Comment #1.
<b>Bryce Jones</b>	4.01	Support for higher density, mixed-use, missing middle and affordable housing	The commenter's support for higher density, mixed use, missing middle, and affordable housing is noted.
	4.02	Plans falls short of the needs of the community and direction the State is encouraging cities and counties to develop  Plan for needs of young and old; families and singles; workers and students  More inclusive, more effort on creating types, sizes, and price ranges	While the commenter indicates the Housing Element falls short of the needs of the community, the commenter does not recommend any specific programs. A number of revisions have been made to the Housing Element to provide more detail regarding fair housing, including historical practices in the community that resulted in segregation, and includes modifications to programs in the Housing Plan to improve tenant protections, provide for earlier implementation of programs related to promoting affordable housing, and to increase

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			the emphasis on the range of housing types, which would also result in more variety in housing sizes and prices
<b>Anna Colichidas, Sonoma Valley GSMOL</b>	5.01	Support of mobile home communities	The support for mobile home communities and discussion of the costs and concerns related to homeowners is noted.
	5.02	Support rent stabilization, just cause eviction, and establishing a rental registry	Program 10 has been revised to include additional methods to protect tenants, including addressing excessive rent increases and unjust evictions.
	5.03	Consider cost-of-living-adjustment in-leu of rental housing cost increases	Program 13 addresses establishing a rental registry.
	5.04	Requests objective to integrate closure and conversion protections from AB 2782 into the City’s existing ordinance	Program 11 has been updated to reflect AB 2782.
<b>Keith Diggs</b>	6.01	Expresses that the Draft Housing Element fails to remove constraints to the development of housing, indicating that the City must streamline its review process and design standards now not in 2026	The commenter’s concerns are noted. The City did expedite preparation of its objective design standards for multifamily projects and adopted the standards on June 15, 2022. Programs 14 and 15 ensure the City expands its objective standards to also address mixed use and multi-unit projects and to provide a streamlined ministerial approval process for eligible projects by December 2023.
	6.02	Concern over actual production of homes will meet the City’s need without bold reforms	<a href="#">The City accommodated 100% of its RHNA at all income levels in the 5th Cycle.</a>
	6.03	Concern over City’s denial that its land-use restrictions pose a serious constraint to housing, including parking and design review	The commenter’s concerns regarding parking and the City’s design review process are noted. However, the City exceeded its 5th Cycle RHNA and has multiple projects underway with a low income component. The City processes projects expeditiously and the City’s requirements do not impede development at the upper end of allowed densities.
<b>Vic Conforti</b>	7.01	Include under-utilized commercial properties for mixed-use and affordable housing	There are additional development opportunities with the City’s underutilized properties. The inventory of residential sites focuses on higher density and mixed use sites that the City can demonstrate meet HCD’s requirements for lower income housing and on sites that are anticipated to be developed during the 6th Cycle. Program 3 has been amended to identify at least 4 sites for adaptive reuse, which could include sites in the area identified by the commenter, by 2026.
	7.02	Commercial Zoned land is a good location for high density housing	The City continues to promote use of commercial land to accommodate residential uses as described by the commenter, with Program 3 promoting adaptive reuse of commercial and other underutilized sites.

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	7.03	Economics of residential land versus commercial land, noting land in a commercial zone does not have the same demand as residential zoned land.	The comment regarding economics of residential versus commercial zoned land is noted. Many of the small sites included in the Housing Element in existing residential areas are anticipated to accommodate moderate and/or above <del>moderate</del> -moderate-income housing.
<b>Kaitlyn Garfield, Housing Land Trust of Sonoma County</b>	8.01	Renters are disproportionately more cost burdened; owners able to build equity  Support City's goal of ensuring those who work in Sonoma are able to live here  Support for City's inclusionary policy	The comments regarding disproportionate burdens to renters versus homeowners, the commentor's support of the City's goal of ensuring those who work in Sonoma are able to live in the city, and the commentor's support for the City's inclusionary housing policy and commitment to preserving affordability of existing housing stock and conversion of market rate units to long-term affordability are noted.
	8.02	Support for preserving the affordability of existing housing stock  All inclusionary ownership units should be required to be affordable in perpetuity  Inclusionary units comparable to size, finish, construction quality to market rate units	Program 1 is revised to ensure that inclusionary units are affordable in perpetuity; the commentor's recommended language regarding location and quality of units is already reflection in Section 19.44.070 of the Municipal Code.
	8.03	Units converted to affordable units should be affordable in perpetuity	Program 15 is revised to ensure that affordable units are provided in perpetuity.
<b>Collin Thomas, Systems Change Advocate with Disability Services and Legal Center (DSLCL)</b>	9.01	Prioritize removing barriers so it is easier, quicker, and chapter to build affordable housing	Programs 14 and 15 addresses removal of constraints to various types of housing and are both prioritized for completion in the first year of the planning period (by December 2023).
	9.02	Preserving affordable homes from becoming market rate should be a top priority	Preservation of assisted housing is addressed under Program 12 and will be implemented on an on-going basis, with outreach to property owners at least 18 months prior to units potentially converting, throughout the 6th Cycle.
	9.03	Support increased awareness of Section 8 vouchers and City should encourage landlords to accept these vouchers	Program 9 includes annual outreach to property owners to encourage owners to register with the Sonoma County Housing Authority to increase the housing stock that accepts vouchers
	9.04	Transitional and temporary housing is another significant need	Program 15 removes barriers to transitional, supportive, and temporary housing

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	9.05	Review homeless services, including wrap-around services, so people can get and stay housed	Program 24 has been updated to strengthen the approach to ensure adequate services for unhoused persons
	9.06	Barrier to housing is lack of accessible housing for those with mobility, vision, and sight disabilities. Visitability increases accessible housing supply and be aware that certain housing types that require a lift or elevator may be difficult to make accessible	Program 23 provides an administrative (ministerial) process for reasonable accommodation requests. Program 22 is revised to address visitability requirements in the Municipal Code
	9.07	Design neighborhoods that are accessible for all mobility levels with examples provided of sidewalk and transportation features that improve accessibility	An accessible transportation network is recognized as necessary to accommodate persons with a disability. Program 22 is revised to ensure that the City's Circulation Element is updated to ensure that the City's circulation system provides accessibility for all persons, including persons with a disability
<b>David Brigode</b>	10.01	Inventory of sites is exhaustive as to what may potentially become available	The comment regarding the extensiveness of the inventory of sites is noted.
	10.02	Some listed sites are suitable for a single unit and likely won't be affordable	The inventory of sites addresses the need for a range of income levels and is not limited to sites for affordable housing. The inventory of sites identifies the affordability assumptions for each site in Appendix A.
	10.03	The commenter identifies 4 affordable housing opportunity sites and describes characteristics of the sites.	Comments regarding each of the 4 sites are addressed below.
	10.04	19357 Sonoma Highway is up for sale and has a peculiar shape, has floodplain issues, would require curb and sidewalk setbacks, requires hillside construction, a portion is not suitable for housing production, and 2 affordable units would be lost.	19357 Sonoma Highway (57 units) is included as it is available for development. This site is 6.08 acres with a maximum allowed density of 20 units per acre, which would accommodate 120 units. The Housing Element assumes that 50% of the site would develop with residential units, which is backed up by the City's development code which allows the 50% residential requirement to be reduced or waived only in certain instances. This assumption that 50% of the site would develop with residential uses would accommodate a non-residential component as well as site constraints. Program 28 of the Housing Plan addresses replacement of affordable units.
	10.05	477 W Napa is landlocked, it has been argued that a seasonal stream underlies the site, and access may be an issue.	477 W. Napa is not landlocked – this site has access 5th Street W. For example, a reciprocal access agreement with the adjacent Village Green Senior Apartments (owned by Burbank Housing) could provide more convenient pedestrian access to Safeway for the seniors and disabled persons at Village Green while providing the 477 W. Napa site with a second access route.
	10.06	45 Napa Road (18 units) is too small.	State law requires that sites identified for the very low and low income RHNA be at least 0.5 acres and not larger than 10 acres, unless smaller

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		69 Napa Road (51 units) has been complicated by a large number of heirs. If this site is sold to a market rate developer, the City's affordable housing pool vanishes.	<p>or larger sizes are demonstrated to be feasible. This site is 0.87 acres and exceeds the State's 0.5-acre minimum size threshold.</p> <p>The Housing Element cannot guarantee which sites will be sold to whom as the City does not control the affordable housing sites. The identification of sites is based on the density of sites, whether the site is vacant or if existing uses would make development less feasible during the 6th Cycle, and whether the site's density is appropriate for affordable housing.</p>
	10.07	Address prior RHNA allocation shortfalls	The City accommodated 100% of its RHNA at all income levels in the 5th Cycle and does not have a carryover of unaccommodated units to address. The commentor's suggestion that the City offset any overproduction of above-moderate units is noted. This is not a requirement of housing elements.
	10.08	Address restrictions imposed on annexation of suitable land outside Urban Growth Boundary for affordable housing	The Housing Element does not rely on or include any annexations. Information regarding one site that has requested annexation is provided for informational purposes but is not needed for the City's inventory of sites.
	10.09	The four sites listed as suitable for affordable housing are not likely to be so under present market conditions. The assertion that there will be sufficient land is misleading to the public and masks the effects of the existing UGB boundary.	As described in Chapter 4 of the Background Report, the sites meet the criteria for affordable housing sites. There is always the potential that sites will be purchased by a market rate developer and not developed with affordable housing. To reduce this potential, Program 19 is revised to consider an Affordable Housing Overlay to incentivize the development of the sites with affordable housing. It is also noted that there are 4 additional sites included in the inventory of sites that will provide very low and/or low income units.
	10.10	Stating that there is no segregation in Sonoma is untrue.	Chapter 5 has been updated to include additional information regarding race, ethnicity, and segregation and the findings have been updated accordingly to acknowledge segregation and racially exclusive practices affecting the community.
	10.11	The Urban Growth Boundary does the opposite of Policy H-4.2- "Incentivize the production of affordable housing through growth management prioritization"	The Urban Growth Boundary provides a tool for the City to manage the pace and location of development. The City's growth management program, which is the focus of Policy H-4.2 has been placed on hold as discussed under Program 17.
	10.12	Regarding Program 1, why must we sacrifice inclusionary affordable housing to incentivize the takeover of any remaining vacant land for unneeded market rate development?	The inclusionary housing requirement is not implementable if it unduly constrains the development of market rate housing or if it requires a higher rate of inclusionary housing than is justified.
	10.13	Regarding Program 2, the commentor indicates that there is no discussion of the status and capacity of the City's Housing fund,	The City's Housing Trust Fund was added to Program 2 and to Table 41 of the Background Report. The City does not have remaining set-aside

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		or an analysis of where the money went from the proceeds of the former Redevelopment agency set-aside for AH.	funds from the redevelopment agency; all encumbered assets of the City's former redevelopment agency were transferred to the Community Development Commission by operation of law.
	10.14	Program 13 does not mention monitoring, and taking steps to remedy, the loss of any site described as an AH opportunity zone.	Program 27 addresses monitoring and replacement of housing inventory sites to ensure no net loss in accordance with State law.
	10.15	The commenter indicates that the ability of the City Council to exempt projects from the Growth Management Ordinance on a case-by-case basis Introduces arbitrary, non-objective judgement by the City Council on affordable housing development in violation of State law.	The GMO is currently on hold, as previously described. However, the ability of the City Council to exempt projects from the GMO is not a constraint on affordable or other housing as it allows the City Council the opportunity to further incentivize affordable housing projects. However, Program 17 ensures that, should the GMO be reactivated, that it be monitored in conjunction with Program 13 and modified to ensure adequate incentives are provided for affordable housing and fulfillment of regional housing needs.
	10.16	The commenter indicates that the statement that "the city intends to complete the necessary actions to meet the State AFFH requirements." is irrelevant word salad, proposes absolutely nothing, and does not acknowledge the data in Table 1 or offer any remedies to the obvious state of racial and ethnic imbalance currently extant in Sonoma and furthered by the City's housing policies, including the UGB.	This comment is noted. The AFFH analysis has been updated, along with references to Program 22 and other relevant programs to address AFFH issues.
	10.17	The commentor asks once vacant land is used up, what is left to re-zone for affordable housing?	Jurisdictions that do not have adequate vacant land must identify underutilized (nonvacant) sites for reuse or intensification or identify lands for annexation.
	10.18	Adopt moratorium on market rate housing	A moratorium on market rate housing is not necessary and would have a negative effect on the Statewide housing shortage. The City requires market rate housing to provide affordable units through the inclusionary requirement and has identified adequate sites to accommodate the RHNA, including very low, low, and moderate income units.
	10.19	Adopt 50% inclusionary housing requirement for 80% of less AMI populations.	A 50% inclusionary requirement would constrain market rate housing and would not be supportable by a nexus or other study to justify such a high percentage.
	10.20	Institute affordable housing overlay	Program 19 is revised to consider an Affordable Housing Overlay to incentivize the development of the sites with affordable housing.
	10.21	Require residency requirement for new residential construction	Requiring a residency requirement for all new residential construction would severely limit residential development as the City's RHNA is intended to accommodate the City's fair-share of regional housing

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			growth and not solely benefit City residents. This would also perpetuate existing fair housing patterns referenced by the commentor.
	10.22	Require annual tax on unoccupied primary residences	Program 6 is added to address second homes, including approaches to reduce second homes and develop funding mechanisms to address the effect second units have on diminishing the housing supply available for year-round occupancy.
	10.23	Urban Growth Boundary is an impediment to affordable housing creation	The commentor's concern regarding the Urban Growth Boundary is noted. The City has adequate capacity to accommodate its RHNA without annexation.
	10.24	Utilize eminent domain to acquire suitable sites	Eminent domain is a lengthy, costly process that would likely delay the provision of housing. The City has a track record of working successfully with developers and non-profits for the development of affordable housing and will continue to follow its successful approach.
<b>Fred Allebach</b>	11.01	Reference source not found throughout Housing Element  No substantiation of the statements by reference source	This comment was provided during the public review period. The missing references were to 5 of the tables in the document. The references were fixed and an updated version of the Draft Housing Element, with an explanation of the corrections on the cover, was provided to the public on August 29, 2022.
<b>David Eichar</b>	12.01	Consider rezoning vacant lots to higher density would allow for apartment buildings and/or condominiums to be built on the major thoroughfare	This comment is noted. Program 4 promotes development of alternatives to single family units, including duplexes, triplexes, fourplexes, and cottage/courtyard housing. Program 19 was revised to review opportunities to apply an Affordable Housing Overlay to provide for increased densities and a greater variety of housing types on lots with potential for multifamily housing. Program 16 is revised to address two recent bills, Assembly Bill 2011 and Senate Bill 6 that provide for streamlined review and approval of eligible projects.
<b>David Brigode</b>	13.01	Questioned whether certain sites listed as suitable for affordable housing are under legal control by a non-profit developer and the criteria for listing these as affordable housing sites	The referenced sites are not controlled by a non-profit developer dedicated to 100% affordable housing. The sites meet the size and density criteria for affordable housing as described in under Section 3, Realistic Capacity and Affordability, in Chapter 4 of the Background Report.
<b>Fred Allebach (8/18/22 – Armstrong Estates)</b>	14.01	Armstrong Estates <ul style="list-style-type: none"> <li>Armstrong Estates includes 19 vacant lots which are allocated in the 6th Cycle to 37 above-moderate income housing and 0 at moderate-income or below-income. Two</li> </ul>	<a href="#">The inventory of sites allocates affordability of very low and low income units based on sites that meet criteria for size and density discussed in Chapter 4. The Armstrong Estates lots do not meet these criteria. Very low and low income units may be developed on lots identified for above moderate units – however, none of these lots are currently proposed for very low or low income units and the City cannot</a>

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<p><b>Comments within this letter are sorted by topic.</b></p>		<p>lots (590 E. Armstrong and 505 Armstrong) are larger than 0.50 acres. Remaining lots are under 0.50 acres.</p> <ul style="list-style-type: none"> <li>• CC&amp;Rs or Conditions of approval stipulate that lots must be minimum of 20,000 s.f. or 0.459 acres, which leads to underutilized space and questions how optional rules can lock in wasted and inequitable space like this?</li> <li>• Vacant lots fronting Napa Street East are close in size to the 1.9-acre AltaMadrone/Altamira lot on Broadway, where 48.60% of the average median income and lower-income units were allocated.</li> <li>• Suggest that the two big lots on East Napa are divided into parcels smaller than 0.50 acres each except for one (505 Armstrong). If these open spaces were joined, there would be more 0.50 acre lots.</li> </ul>	<p><a href="#">take credit in its inventory for programs in the Housing Element that will increase lower income opportunities in single family areas. To encourage additional lower income and more diverse housing options in the City's neighborhoods that are zoned single family, the Housing Element includes Program 4 – Alternative Housing Models, which supports co-housing, shared housing, and assisted living for seniors, among others. Program 5 – Accessory Dwelling Units and Junior Accessory Dwelling Units (ADUs) also allow 3 units on any property with a single-family residence and allows 2-4 units on lots zoned for single family uses that meet the requirements of SB 9.</a></p> <p><a href="#">Minimum lot size is based on the City's zoning. The City does not prepare or adopt the CC&amp;Rs for a project.</a></p> <p><a href="#">The comment regarding vacant lots fronting Napa Street East is noted.</a></p>
	<p>14.02</p>	<p>R-L Zoning</p> <ul style="list-style-type: none"> <li>• No density bonus, very-low or low-income housing can be applied for and thus the zone is effectively closed off to integration by (arbitrary) city policy to maintain the character of neighborhoods.</li> <li>• The city then identifies land elsewhere, all along Hwy 12, in the worst, densest spots near a state highway. This plan effectively recaps redlining segregation, and Urban Renewal's relocation of the poor to the worst spots, this in modern terms through tacit, neutral-term city zoning, Development Code, and the HE.</li> <li>• Sonoma residential areas includes more than 50% of R-L low density, and single-family zoning, and thus more than 50% of possible residential development excludes very-low and low-income housing units, which results in segregation with protected classes.</li> <li>• Concentrating above-moderate income housing away from very-low and low-income housing units in different zones suggests segregation.</li> <li>• Low density NIMBYism is a known issue, one not admitted by Sonoma.  <a href="https://www.nytimes.com/2022/08/18/opinion/california-housing-unions.html">https://www.nytimes.com/2022/08/18/opinion/california-housing-unions.html</a></li> </ul>	<p><a href="#">Program 19 – Affordable Housing/Access to Opportunities Density Bonus and Incentives: Applicants of residential projects of five or more units in any residential or mixed-zone may apply for a density bonus and additional incentives if the project meets specific requirement. Density bonuses do not exclude very low-, or low-income housing units. Density bonuses can be requested in the R-L zone. A density bonus may be requested for any project that meets State density bonus eligibility criteria.</a></p> <p><a href="#">Sites identified for lower income housing meet size criteria identified by the State. As previously discussed, the Housing Element includes Program 4 – Alternative Housing Models, which supports co-housing, shared housing, and assisted living for seniors, among others. Program 5 – Accessory Dwelling Units and Junior Accessory Dwelling Units (ADUs) also allow 3 units on any property with a single-family residence and allows 2-4 units on lots zoned for single family uses that meet the requirements of SB 9.</a></p> <p><a href="#">Program 1 - Inclusionary Housing: The City's inclusionary housing ordinance ensures that a component of affordable housing is provided with new development, ensuring that future single family subdivisions and other residential projects provide affordable units. This has been successful in the City, with affordable units provided in completed</a></p>



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		<ul style="list-style-type: none"> <li>This all acts to concentrate wealth in the R-L, single family zoned areas, especially the east side, and concentrate poverty on Hwy 12 where the worst air, light and noise pollution is.</li> </ul>	<p><u>subdivisions residential projects and proposed in pending projects. Rental projects require a minimum of 25% of units to be affordable to extremely-, very-, and low-income categories, and ownership projects require at minimum 25% of the total units to be affordable to households in the low-, moderate-, and middle-income categories. An in-lieu fee may also be paid instead of providing affordable units in a residential project of four or fewer units. This program is the City's primary tool to provide affordable housing throughout the community and ensures access to areas of opportunity, amenities, and housing available to a range of income levels. The City will also re-evaluate its current ordinance to ensure that the provisions remain appropriate and do not impede the development of housing and are effective in providing an affordable component to new development.</u></p> <p><u>Program 3 – Adaptive Reuse converts existing buildings, including market-rate housing to provide opportunities for new residential uses and new affordable and special needs housing. The City identifies at least 4 sites for adaptive reuse, which could include sites in the area identified by the commenter, by 2026. As part of considering alternative housing types under Program 4, the City may identify opportunities for lot consolidation in predominantly single family areas to increase potential for very low-, and low-income housing sites.</u></p> <p><u>The City does not select sites that are “the worst” for affordable housing development. Further, the California Environmental Quality Act (CEQA) requires the City to consider and mitigate potentially significant environmental impacts to development projects, including but not limited to vehicle miles traveled (VMT), flood, light and glare, air quality and noise.</u></p> <p><u>Any discretionary project, either affordable or market rate, will be subject to CEQA.</u></p> <p><u>Very low- and low-income housing units do not necessarily correspond to “poverty”, as persons living above the poverty threshold are also eligible for lower income housing.</u></p>
<b>Fred Allebach (8/18/22 –</b>	15.01	Armstrong Estates, additional comments: <ul style="list-style-type: none"> <li>If “realistic development potential” depends on land price and price is lower at city edges, it follows that urban growth</li> </ul>	<p><u>Comments regarding Armstrong Estates and inclusionary housing are addressed above.</u></p>

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<p><b>General Comments)</b></p> <p><i>Comments within this letter are sorted by topic.</i></p>		<p>limit annexations and/or extra-urban growth limit annexations would garner cheaper land and be better for “realistic development potential.”</p> <ul style="list-style-type: none"> <li>The vacant lots meet a current city threshold for very-low and low-income affordable housing units. If other properties in the city can be identified to take excess capacity for very-low and low-income RHNA units, and the east side needs integration, why are Armstrong lots not identified for very-low and low-income potential? Could it be that the Armstrong CC&amp;Rs prohibit development that would result in integration of lower average-median income homes? That would be modern redlining which should be illegal. If land price is prohibitive on the east side, that is evidence that shows a pattern of segregation.</li> </ul>	<p><u><a href="#">Annexations:</a> While “realistic development potential” could involve properties outside the City’s current boundaries, the Housing Element does not rely on or include any annexations.</u></p> <p><u><a href="#">Urban Growth Boundary:</a> The Urban Growth Boundary provides a tool for the City to manage the pace and location of development. The City’s growth management program, which is the focus of Policy H-4.2 has been placed on hold as discussed under Program 17. Further, the ability of the City Council to exempt projects from the growth management ordinance is not a constraint on affordable or other housing as it allows the City Council the opportunity to further incentivize affordable housing projects. Program 17 ensures that, should the GMO be reactivated, that it be monitored in conjunction with Program 13 and modified to ensure adequate incentives are provided for affordable housing and fulfillment of regional housing needs.</u></p>
	15.02	<p>Safeway-adjacent lot:</p> <ul style="list-style-type: none"> <li>The Safeway-adjacent lot counts Affirmatively Furthering Fair Housing (AFFH) very-low and low RHNA from an unproven commercial conversion (the city has no track record of experience to convert commercial property to affordable housing), which jeopardizes the potential development of such affordable housing.</li> </ul>	<p><u><a href="#">Comments regarding Affordable Development Housing Opportunities are discussed above.</a></u></p> <p><u><a href="#">The City will work with the Safeway-adjacent lot project proponent upon submittal of any discretionary development application to address consistency with the General Plan, Zoning Code, Housing Element, and CEQA.</a></u></p>
	15.03	<p>Orchard lot:</p> <ul style="list-style-type: none"> <li>The orchard lot by SPARC puts the lowest-income residents in the 100-year flood danger near Sonoma Creek, and also near a highway, which increases light, noise, and air pollution.</li> </ul>	<p><u><a href="#">The realistic capacity calculation for this site includes setbacks from the riparian corridor and development on the site would be located outside of the 100-year floodplain. Units in proximity to Highway 12 would be reviewed for compliance with the City’s noise standards, which address interior noise. Trip levels along Hwy 12 in that area do not trigger a health risk assessment and development in that location would not be subject to significant impacts associated with toxic air contaminants. Further, any discretionary project, either affordable or market rate, will be subject to CEQA. Additional comments regarding environmental impacts are discussed above.</a></u></p>
	15.04	<p>DeNova Montaldo Apartments and First Street East Townhomes:</p> <ul style="list-style-type: none"> <li>12% (14) of very-low and low-income inclusionary units are from the pending 19320 Hwy 12 DeNova Montaldo Apartments and First Street East Townhomes with 10 low-,</li> </ul>	<p><u><a href="#">The City implemented its housing programs to accommodate affordable housing and fully met its 5th Cycle RHNA. Sites included in the inventory to accommodate the City’s RHNA meet the State requirements to demonstrate that the City can accommodate its very low and low income sites. Program 13 – Housing Element</a></u></p>

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		<p>10 moderate-, and 80 above-moderate income housing units.</p> <ul style="list-style-type: none"> <li>The DeNova Montaldo Apartments and First Street East Townhomes are both examples of City housing opportunity sites that RHNA designated for low-income but then were sold at market rate. This sets a precedent for two thirds of the 88% of the current housing element's AFFH on two housing opportunity sites to go market rate as well, which would leave an inadequate very-low and low-income site inventory buffer.</li> </ul>	<p><a href="#">Monitoring/Annual Reporting</a> in the Housing Plan requires the City to review its inventory throughout the cycle and adjust if sites become unavailable or if the City's remaining inventory cannot be accommodated.</p>
	15.05	<p>St. Francis Preserve (across from Bragg Street):</p> <ul style="list-style-type: none"> <li>The city owns the St. Francis Preserve lot near the Alta Madrone SAHA project (formerly Altimira Apartments).</li> <li>Why isn't the city not using this publicly-owned land in the site inventory?</li> <li>There is no news on what the issues are, or what contacts have been made to address those issues.</li> <li>The city owns this lot and should deal with the issues and put them on the table in this housing element, and then give the land to an affordable housing developer.</li> <li>Missing information: The site is not listed in the Housing Element; it has no lot number or ID on City zoning map. Failure to identify this big, city-owned lot in the site inventory, and to discuss and analyze options in the Housing Element, is an oversight.</li> </ul>	<p><a href="#">This site was not included as a potential housing site because it is a wetland preserve and open space area and is not available for development.</a></p>
	15.06	<p>Sites 1-70:</p> <ul style="list-style-type: none"> <li>363 total sites are vacant and underutilized; 101 very-low income, 66 low-income, 47 moderate-, 149 above-moderate.</li> <li>205 lettered lots A-S are all pending/approved vacant and underutilized; 11 very-low, 16 low, 22 moderate, 155 above-moderate.</li> </ul>	<p><a href="#">This comment is noted.</a></p>
	15.07	<p>Map label # 1 on Excel chart: 19357 Hwy 12 (53 very-low income, low-income and mixed-use housing units; 32 very low-income units, 21 low-income units)</p> <ul style="list-style-type: none"> <li>19357 W. Hwy 12 is an empty lot with an orchard on it behind the SPARC pot store and near Sonoma Creek. Rather than integrate wealthy segregated east side, city is</li> </ul>	<p><a href="#">This comment is noted.</a></p> <p><a href="#">There is no current development application on file for the property at 19357 Highway 12. This site is identified as a site that can accommodate a portion of the City's RHNA during the 6<sup>th</sup> Cycle. As outlined in the Housing Plan, the City will actively support</a></p>

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		<p>sacrificing precious green open space that everyone is always trying to protect.</p> <ul style="list-style-type: none"> <li>• Where is the project?</li> <li>• How will this reasonably go very low- to low-income?</li> <li>• How will “the free market” do this without aid?</li> <li>• What efforts to have an AH developer buy it?</li> <li>• What is the land value?</li> <li>• What appraisals and by who?</li> <li>• Are there metrics to show how the City arrived at “realistic development potential?”</li> </ul>	<p><a href="#">development of the identified lower income sites in the inventory in order to meet the RHNA, as well as engaging in efforts to increase affordable opportunities and diversity throughout the community. <b>Program 2</b> will encourage the City to work with affordable funding developers.</a></p> <p><a href="#">Assessed values for each site are determined by the County Assessor are shown in Appendix A.</a></p> <p><a href="#">The City will work with the project proponent upon submittal of any discretionary development application to address consistency with the General Plan, Zoning Code, Housing Element, and CEQA.</a></p>
15.08		<p>Map label # 2 on Excel chart: 19380 Hwy 12. 1 above moderate-income housing or mixed-use housing unit</p> <ul style="list-style-type: none"> <li>• This is the Starling bar lot on Spain and Hwy 12.</li> <li>• If this is mixed use and above-moderate housing, why is the orchard lot very close by appropriate for mixed use but not very-low and low-income housing?</li> <li>• Can the City just assume mixed use will be whatever average-median income unit it wants for RHNA?</li> <li>• This shows that top-down zoning assumptions are possible.</li> <li>• Zoning has to change through some process and one of those ways is planner tweaking in Housing Elements.</li> <li>• Ultimately, zoning is a shell game that can be played to garner the results desired, to separate discreet land uses or to mix and unite them, to separate people or mix and unite them.</li> <li>• If, in a limited two square mile space, the City has more than half of residential areas at R-L (low-density zoning, single family zoning, exclusionary zoning), and a top City goal is to protect the character (white and wealthy) of that R-L, that leaves fewer and fewer options for space to take very-low and low-income units, i.e. poor people, and thus, R-L protective zoning becomes a tool of segregation.</li> <li>• Segregation is not somehow accidental or non-existent; it’s real and it’s contingent on zoning choices.</li> <li>• R-L protectors like to explain this all (admitting no segregation exists) as simply market forces at work, beyond</li> </ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">Affordability assumptions are based on project-specific details for sites with proposed projects and site criteria described in Chapter 4 of the Background Report. See response to previous comments regarding programs to increase affordable housing in single family zones and high resource areas.</a></p> <p><a href="#">Property zoning (such as R-L) is designated by the zoning map and zoning amendments are approved by the City Council. Single-family zoning does not necessarily exclude very low- and low-income housing categories and therefore does not directly lead to <b>housing segregation</b>.</a></p> <p><a href="#">The City will work with the project proponent upon submittal of any discretionary development application to address consistency with the General Plan, Zoning Code, Housing Element, and CEQA.</a></p>

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		<p>City control, denying a pattern of and responsibility for segregation, blaming 1% Wall Street for cashing out the 10% R-L residents, who see themselves as victims of capitalism on par with VL and L residents as victims of the system. The game of Monopoly laid it out quite well. Park Place is the 1%, Ventnor Ave. is the 10%. Baltic Ave is the BIPOC working class. And as Richard Rothstein proved in his book The Color of Law, the US gov't itself enabled the 1% and the 10% to externalize the BIPOCs. Big fish eat little fish. R-L fish dominate dense VL and L fish.</p>	
15.09	<p>Map label #3 on Excel chart: 19366 and 19370 Hwy 12, mixed use, mixed income</p> <ul style="list-style-type: none"> <li>This is an empty lot on Lyon on the way to SAHA Sonoma Oaks affordable housing development.</li> </ul>	<p><a href="#">The comment is noted.</a></p>	
15.10	<p>Map label # 11 on Excel chart: (590 West Napa, 5th cycle, 5 moderate-income housing and 5 above moderate-income housing)  No comment</p>	<p><a href="#">Noted.</a></p>	
15.11	<p>Map label # 28 on Excel chart: 477 West Napa (, VL. L; Safeway lot, vacant part of lot, commercial. 45 units, 27 VL/ 18L</p> <ul style="list-style-type: none"> <li>This property has a top, center-city valuation yet is used for very-low and low-income housing?</li> <li>Who will pay Safeway top dollar for the land for the very-low and low-income housing?</li> <li>If the land goes for sale, what is stopping DeNova from doing more of the same lion at the water hole behavior?</li> <li>The city needs to show more serious, concerted plans and tactics to see that the very-low and low-income housing goals actually happens here.</li> <li>The problem is wishful thinking with no track record of converting commercial property to affordable housing.</li> <li>Safeway is a vampire squid giant corporation that can't be realistically expected to conform to any benevolent local intentions, and has shown no interest in affordable housing.</li> <li>The City denied Safeway a gas station in Sonoma, now the City wants a favor?</li> </ul>	<p><a href="#">These comments are noted. This site meets the size and density criteria for affordable housing. The Housing Plan presents the City's approach to encouraging affordable housing, including advertisement and outreach related to lower income sites. <b>Program 2</b> will ensure that the City coordinates with local affordable housing developers to explore every opportunity for the development of affordable housing.</a></p> <p><a href="#">The City will work with the project proponent upon submittal of any discretionary development application to encourage affordable units and to address consistency with the General Plan, Zoning Code, Housing Element, and State requirements.</a></p> <p><a href="#">VMTs are calculated through function of traffic impact studies, which are required for large development projects.</a></p> <p><a href="#">The comments regarding future use of the site and speculation regarding future possibilities is noted.</a></p>	

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|  | <ul style="list-style-type: none"><li>• Safeway costs 4x as much as Grocery Outlet for the exact same items, how does this being closer to amenities qualify as possibly boosting access to higher opportunities?</li><li>• Any lower income person with a car will never shop in Sonoma, too many savings elsewhere, this is why the idea of walk and bike to goods and services amenities is false, you need to be able to afford to buy anything, and in Sonoma, prices are laughably high.</li><li>• VMT is going to be wrong in Sonoma Valley if a box is checked as simply being close to a grocery store, and that will somehow lower VMTs. Not if that grocery costs 4x as much as at a Napa Grocery Outlet. Everything in Sonoma Valley costs more; the way to lower costs is to free up infrastructure and development constraints so enough population can justify more discount stores.</li><li>• Here we bump up against the essential trouble of Sonoma Valley, a Sleepy Hollow Stasis protectionism has disallowed big enough transportation arteries so the area can't grow bigger, and this locks in a fundamental segregation and inequity. How to integrate a place where consciously restricted space results in skyrocketing land values? This is Aspen-ization. Do Sonoma essential, workers need to live in barracks 20 miles away?</li><li>• What we really need here is to make a City of Sonoma Valley out of the whole urbanized area and USA from Glen Ellen, SDC, to the Springs, Temelec, Sonoma, 8th East industrial area, east side and Sonoma Mountain TCAC High areas, and down to Vineburg on an axis with the sewage treatment plant. Then there would be space enough to plan to include/enfranchise everyone.</li><li>• As long as Sonoma clings to a defensive Balkanization of its own predominant narrow R-L interests, this will be the poison pill that stops rational, equitable planning for the rest of the contiguous Sonoma Valley area noted above. See the most recent LAFCO MSR where it is recommended, in polite terms, that the City expand its urban growth boundary and annex the Springs.</li></ul> |  |
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15.12	<p>Map labels #35 and #36 on Excel chart: These are lop-sided above-moderate sites in low density zoning</p> <ul style="list-style-type: none"> <li>This indicates lack of effort to integrate wealthy east side and city moderate- to high-income TCAC opportunity areas.</li> </ul>	<p><a href="#">As indicated above, projected income levels are based on site and project characteristics for the purposes of accommodating the RHNA and do not limit future development of a site to specific income levels. The Housing Plan includes programs to evaluate progress on the RHNA and to ensure that adequate sites are available to accommodate the RHNA throughout the planning period. Distribution of sites based on fair housing issues is discussed in Chapter 5 of the Background Report. As previously discussed, the Housing Plan includes programs to increase housing opportunities in single-family and high resource areas.</a></p>
15.13	<p>Map label #37 on Excel chart: 532 2nd St East 12 units Above Mod, underutilized; empty space on a lot</p> <ul style="list-style-type: none"> <li>Why not look for empty space on the east side and up-zone to higher density and aim at very low- and low-income housing inclusion? If land prices are all uniformly high because of a restricted space, pressure-cooker lid effect, then a self-fulfilling prophesy is created. The will to rezone and integrate is negatively impacted by the very zoning and land uses (and resulting high prices) that have been chosen in the first place.</li> </ul>	<p><a href="#">See response to previous comment.</a></p>
15.14	<p>Map label #67 on Excel chart: 0 Fryer Creek Drive, city-owned, .24 acres - 2 moderate-income and above moderate-income housing units</p> <ul style="list-style-type: none"> <li>0 Fryer Creek Dr. is not an address on Google maps.</li> </ul>	<p><a href="#">This comment is noted. Sites with a “0” address have not yet been assigned a street number.</a></p>
15.15	<p>Map label # 69 on Excel chart: 250 Napa Road, just east of Friedman’s, 21 vacant residential units, 10 moderate-income housing units, 11 above moderate-income housing units</p> <ul style="list-style-type: none"> <li>Across the street from Friedman’s to the south calls for very-low income and low-income housing, same area, why the difference in zoning and RHNA average median income? If smaller private parcels will sell for higher prices, and City areas for AFFH and AH are increasingly marginal, something has to give in City land use and zoning so as to meet state AFFH objectives.</li> </ul>	<p><a href="#">This comment is noted. As indicated above, projected income levels are based on site and project characteristics for the purposes of accommodating the RHNA and do not limit future development of a site to specific income levels. The Housing Plan includes programs to evaluate progress on the RHNA and to ensure that adequate sites are available to accommodate the RHNA throughout the planning period. Distribution of sites based on fair housing issues is discussed in Chapter 5 of the Background Report. As previously discussed, the Housing Plan includes programs to increase housing opportunities in single-family and high resource areas.</a></p>

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			<a href="#">Via Program 13, the Housing Element will be regularly monitored and annual reporting will occur to assess affordable housing programs and progress towards RHNA.</a>
15.16	<p>Map label # 70 on Excel chart: 250 Napa Road, just east of Friedman’s, 21 vacant residential units, 10 moderate-income housing units, 11 above moderate-income housing units AND 45 Napa Road (same lot as 69 Napa Road, different part of lot including vacant residential, housing opportunity site; 11 very low-income housing units and 7 low-income housing</p> <ul style="list-style-type: none"> <li>• Both sites will need to be streamlined for development. - This is where there are rumors of a Darius Anderson hotel/affordable housing tradeoff for satisfying the housing requirement for the extreme CEQA-stalled Plaza hotel.</li> <li>• These lots are not listed as pending, but something seems to be pending in this area; maybe a sphere annexation of the Zepponi lot?</li> <li>• 250 Napa Road - This is the back end of the Four Corners auto service station lot.</li> <li>• 250 Napa Road - Where is the Darius Anderson housing trade-off site everyone keeps talking about and why is this site not mentioned in the Housing Element?</li> <li>• 45 Napa Road - Zepponi sphere site is immediately adjacent to the south, that would require annexation.</li> <li>• 45 Napa Road - Growth management ordinance at 122 units from accumulated growth manage ordinance allocation; maybe this is the Darius site?</li> </ul>		<a href="#">Comments regarding location and uses of sites is located. As indicated above, projected income levels are based on site and project characteristics for the purposes of accommodating the RHNA and do not limit future development of a site to specific income levels. The Housing Plan includes programs to evaluate progress on the RHNA and to ensure that adequate sites are available to accommodate the RHNA throughout the planning period. Distribution of sites based on fair housing issues is discussed in Chapter 5 of the Background Report. As previously discussed, the Housing Plan includes programs to increase housing opportunities in single-family and high resource areas.</a>
15.17	<p>RHNA Allocation</p> <ul style="list-style-type: none"> <li>• If total RHNA allocation is 311, there is a discrepancy with the city is listing of 568 units on the Excel site inventory chart. It is not clear what the reserve is for.</li> <li>• Of 311 total RHNA units, half (155 units) has to be low-income and very-low income.</li> <li>• East side land valuations are much higher than the west side. The city needs to show a track record that development of certain sites will be possible. On the east side there is a much higher likelihood of above-moderate</li> </ul>		<a href="#">The City is listing sites that are anticipated to be available to accommodate the RHNA during the 6<sup>th</sup> Cycle. As shown throughout the Housing Plan, the City has identified many programs to support and further affordable housing, including programs that provide for integration of affordability into high resource areas. As discussed in Chapter 4, there is excess capacity. <b>Program 2 - Partnerships with Affordable Housing Developers:</b> Vacant parcels are not necessarily controlled by non-profit developers who dedicate 100% of their units to affordable housing. Program 2 encourages creative approaches to finance, build, and rehabilitate affordable and special needs housing.</a>



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	<p>housing being developed than anything below-moderate, that is the track record.</p> <ul style="list-style-type: none"> <li>• If segregation is not to simply be a default outcome of city land use policy, the city needs to show active plans to integrate the east side despite higher land values.</li> <li>• East side plans missing from Housing Element; east side integration is totally eluded in the Housing Element, and zoning is not identified as a constraint.</li> <li>• RHNA 2000-2020 identifies 236 moderate- and below-income housing units and 293 above-moderate income housing units, which indicates that affordable housing production is what's needed most in Sonoma and the Housing Element should bend over backwards with assertive, bold programs and policies to realize that goal.</li> <li>• 88% of all affirmatively furthering fair housing, very-low, and low RHNA units are located on three sites along Highway 12 with no guarantee that affordable housing developers will purchase these sites. Sites are individually owned and will be developed as the market dictates.</li> <li>• City staff indicates that opportunity sites are not owned by a non-profit developer dedicated to 100% affordability.</li> <li>• Sites are individually owned and will be developed as the market dictates.</li> <li>• The criteria used to determine opportunity sites was based on lot size, realistic development potential, and location. Each site has its own realistic capacity column and the potential number of affordable units and affordability level. Only a percentage of the sites on the opportunity sites list have the potential to be developed with affordable housing.”</li> <li>• This puts the AFFH buffer at risk with no backup because the city has few two-acre minimum sites for realistic affordable housing development capacity left.</li> <li>• What about collaboration plans with the County to address super high County RHNA in Rezoning sites at Merlo by Broadway Market?</li> </ul>	<p><a href="#">The City has partnered with several different non-profit developers in the provision of affordable ownership and rental housing. Additionally, the City will work with the project proponent upon submittal of any discretionary development application to address consistency with the General Plan, Zoning Code, Housing Element, and CEQA.</a></p> <p><a href="#">The City will work with the project proponent upon submittal of any discretionary development application to address consistency with the General Plan, Zoning Code, Housing Element, and CEQA.</a></p> <p><a href="#">Affordability of sites is based on the characteristics of proposed and approved projects, deed restriction, past performance of similar projects or units, and site criteria assumptions for affordability, as discussed in the Inventory of Residential Sites in the Background Report.</a></p>
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	<ul style="list-style-type: none"> <li>Why list Doyle as all Above Mod and Mod when it could be top-down zoned as an Opportunity Site for very-low and low-income housing just like 69 Napa Road?</li> <li>If annexed sites would count toward RHNA, why no plans for the 182 accumulated GMO units at Merlo and Zepponi?</li> </ul>	
15.18	<p>R-L Zoning, additional comments:</p> <ul style="list-style-type: none"> <li>The City modus operandi now is to use zoning to protect R-L “character”, to play as many “historic” cards as possible so as to limit density in single family home areas; no one ever mentions the increased property values that come with such protection.</li> </ul>	<p><a href="#">Chapter 4 of the Background Report provides metrics for realistic capacity. See response to previous comments regarding increasing affordable housing opportunities in high resource and single family zones.</a></p> <p><a href="#">Program 14 – Design Guidelines and Design Review: Development Standards: The City uses design review to ensure development embodies excellence in architectural design and complements the scale, character, and rich history of the community. Such standards are applied City-wide, not just R-L zoned properties.</a></p>
15.19	<p>Segregation:</p> <ul style="list-style-type: none"> <li>The city needs to provide metrics for “realistic capacity.” “Potential” is also constrained by voluntary city zoning and code choices that force affordable housing projects out of R-L and R-M zones, thereby creating and maintaining pattern of segregation.</li> <li>In a way, control of City zoning and the City Municipal, Code can be seen as a racket by the predominantly single-family home owners (and their enablers) who dominate and who have dominated City government, that protects their vested stake in increasing property values and in a status quo that denies any culpability for segregation. This Housing Element seems like an extension of the priorities of that racket, or regime of power and control.</li> <li>The city cannot satisfy AFFH and integrate the predominantly white, wealthy east side with just ADUs that will likely all rent above average median income.</li> </ul>	<p><a href="#">Chapter 4 of the Background Report provides metrics for realistic capacity. See response to previous comments regarding increasing affordable housing opportunities in high resource and single family zones.</a></p> <p><a href="#">See discussion of fair housing issues in Chapter 5 of the Background Report. Program 21 – Affirmatively Further Fair Housing (AFFH): The AFFH includes data and information regarding segregation and the City’s racial history, including identification of areas with limited diversity and acknowledgement of past racially exclusive practices in Sonoma. Programs have been revised accordingly to promote diversity, both economic and racial, by increasing access to areas with less diversity.</a></p> <p><a href="#">Program 15 – Development Code Amendments – Housing Constraints: This program minimizes governmental constraints under the City’s control to facilitate the provision of housing and encourages innovation in design, ownership, and living arrangements.</a></p>
15.20	<p>Market rate housing:</p> <ul style="list-style-type: none"> <li>DeNova Homes has been buying available land in the City for market rate projects, with as high a price point as possible (as evidenced by the Mockingbird Lane R-O site project where prices ended up being up to \$500,000 more than DeNova said, because the market went up). DeNova is like lions waiting at the watering hole, they are killing the</li> </ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">Any developer, including DeNova Homes, has the right to purchase available land to develop homes for sale at market rate. The City’s inclusionary housing requirement and Program 1 require such developers to set aside a percentage of both rental and ownership units for affordable housing.</a></p>

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		<p>City on a glut of market rate housing. If the City’s plan is basically to be a deer in the headlights for the market, and surrender to market forces, then the Housing Element will basically just continue the pattern of overproduction of above-moderate income housing.</p> <ul style="list-style-type: none"> <li>• No annexation plans appear except for possibly the 20455 5th East, the Doyle lot (DeNova Homes). The site inventory says this will be 59 units total, 47 above-moderate income housing and 12 moderate-income housing.</li> <li>• The Housing Element says, “if annexed, development would count towards RHNA.” Is the same true for other possible sphere annexations on the Merlo, Zepponi, and Serafini lots? This counts towards RHNA at what average median income? More market rate glut?</li> <li>• DeNova advertised this in an initial presentation as “attainable housing” but refused to give a price point. This refusal to be specific is kind of like the current City HE, say whatever you need to say to get what you want.</li> <li>• The city should actively and aggressively counteract the market by considering the suggestions of David Brigode and David Eichar, whose housing element public comments needs to be considered, as opposed to excuses and denial.</li> </ul>	<p><a href="#">Comments regarding development partnerships with affordable housing developers, annexation, and feedback from David Brigode and David Eichar are discussed above.</a></p>
	15.21	<p>ADUs:</p> <ul style="list-style-type: none"> <li>• ADUs are all classed as moderate-income for the site inventory, and 64 ADU units are expected through the whole 6th cycle.</li> <li>• People rent ADUs, not buy them.</li> <li>• ADUs are in the same size as SB-9 units, 700-800 sf.</li> <li>• If rental ADUs and rental SB-9 units are essentially the same size, why can one be forced to be deed-restricted as low-income housing (top end 80% AMI) and the other counted as moderate-income housing (top end 120% AMI)? Landlords routinely maximize the allowable rent, so top end is a reasonable expectation.</li> <li>• ADU policy will need clear, enforceable parameters to measure if any are actually rented at moderate, very-low, or low-income. A potential ADU tenant needs to know if the</li> </ul>	<p><a href="#">ADUs are classed as moderate income based on the City’s 5<sup>th</sup> Cycle reporting of ADU units. This is not a limitation that restricts ADUs to only being affordable to moderate income households. Program 5 provides for affordability of ADUs to be tracked and it is anticipated that a number of ADUs will be affordable to very low and low income units based on Bay Area data collected for ADUs.</a></p> <p><a href="#">Deed-restriction requirements for ADUs are based on State law.</a></p>

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		<p>unit is ear-marked as affordable at some level, and what rights they have.</p> <ul style="list-style-type: none"> <li>Can only locate five ADUs on the site inventory Excel chart.</li> </ul>	
15.22	<p>Additional constraints to affordable housing:</p> <ul style="list-style-type: none"> <li>This AFFH site location potentially concentrates poverty, not integrating any into east side tax credit allocation committee (TCAC) moderate- and high-opportunity areas. This also puts actual construction up to a wing and prayer.</li> <li>Where are the lower-average median price developers who will build?</li> <li>Where are the plans and affordable housing developer relationships to be ensuring that these sites do not go market rate?</li> <li>What evidence is there that Safeway will do anything? The city has no track record of a conversion of a commercial property like Safeway to affordable housing; this should be questioned by HCD.</li> <li>The zoning at 20455 5th East is classed as “sphere.” What will that City zone be? Can the County help out and rezone/up-zone ahead of time? What productive, cooperative relations with the County have set the table to meet the needs of both City and County RHNA? An R-O site? R-H High density? This Doyle lot has City high density on one side and City medium on the other and no neighbors want high density no matter what the AMI range; this possible project will be NIMBY WW3.</li> <li><b>[How to answer this?]</b> For the vacant and underutilized and 6th cycle AFFH, we see the city under pressure to show better lower AMI #s, but without specific plans to recruit non-profit developers, which there have been none in public nor in any public meetings, it appears the city is just saying stuff here to pass the HE. See David Brigode’s site inventory public comments.</li> </ul>	<p><a href="#">See response to previous comments. As previously discussed, the AFFH includes data and information regarding segregation and the City’s racial history, including identification of areas with limited diversity and acknowledgement of past racially exclusive practices in Sonoma. Programs have been revised accordingly to promote diversity, both economic and racial, by increasing access to areas with less diversity.</a></p> <p><a href="#">Affordable housing developers may build in any residential or mixed-use zone and include affordable housing provisions via <b>Program 1</b>.</a></p> <p><a href="#">The City will work with the project proponent of the Safeway lot upon submittal of any discretionary development application to address consistency with the General Plan, Zoning Code, Housing Element, and CEQA. <b>Program 2</b> will ensure that the City coordinates with local affordable housing developers to explore every opportunity for the development of affordable housing.</a></p> <p><a href="#">Comments regarding AFFH, development partnerships with affordable housing developers, annexation, and feedback from David Brigode are discussed above.</a></p>	
15.23	<p>Missing information:</p> <ul style="list-style-type: none"> <li>Unable to find or access site inventory in two online Housing Element documents given by the city; the digital copy is very cumbersome.</li> </ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">The site inventory is located in Appendix A and is discussed in Chapter 4 of the Background Report. Land values and existing development information is based on County Assessor data.</a></p>	

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	<ul style="list-style-type: none"> <li>• Unable to find a text explanation of the Excel chart because the massive Adobe .pdf document is too complicated, not user friendly; page numbers do not work or are not numbered in logical fashion.</li> <li>• This Housing Element is particularly inscrutable. This site inventory chart needs a short explanation of what it is and how it's laid out.</li> <li>• Unable to see that any specifically reserve sites are laid out; will the city outline the 311 RHNA allocation and have a dedicated reserve buffer, or mix them all together?</li> <li>• If mixed, will they all be counted as 6th cycle units?</li> <li>• The Excel site inventory chart does not total to 311 anywhere, have to manually add up all the numbers.</li> <li>• The land value and improvement value categories fail to explain the metrics, is it by square foot, by the acre, what? What is the rationale here? Improvement to land value ratio is unexplained, there is no basis given to believe this or not.</li> <li>• If there are lower land values on the edge and just outside the City, and the City is very small, two square miles, this gives a rationale to expand the UGB to gain access to appropriately sized and priced lots for AH.</li> <li>• If the City wants to find every reason why not to have new land for AH, but then not have realistic AFFH/ AH land capacity in the City, then HCD will start to see a glimmer of Sonoma's Green Checkmate, NIMBY land management pattern.</li> <li>• Possible SB-9 units are not identified as part of inventory. If only 5.4% of all units are expected to go SB-9, that would be at 16 of all of Sonoma's 311 6th Cycle RHNA.</li> <li>• This is important because the city SB-9 ordinance says all SB-9 units for renters have to be deed-restricted to Low AMI (Mod for ownership), so the public has to be able to see which units the city expects to go SB-9 and then to count them to the proper RHNA AMI category. Why are possible SB-9 units not identified in the site inventory?</li> <li>• If any rental SB-9 units count as moderate or above-moderate income housing, this won't be consistent with city SB-9 ordinance, or if any are classed as very low-income</li> </ul>	<p><a href="#"><u>Program 17 speaks to the growth management ordinance, which manages increases in service and infrastructure demand from development consistent with available water supplies and sewer treatment capacities. This ordinance limits the City to a development average of 65 units per year. If implemented, this number is sufficient to accommodate Sonoma's regional housing needs, defined as 311 units for the 6<sup>th</sup> cycle.</u></a></p> <p><a href="#"><u>The approach to SB 9 sites is discussed in Chapter 4 of the Background Report.</u></a></p>
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		<p>housing, that would be inconsistent as well. The City has boxed itself in with ADU, SB-9 and affordable by design inconsistencies. The City SB-9 ordinance assumes affordable by design is impossible in Sonoma in single family zoned/ R-L areas, therefore if the city counts any market rate Mod rental units in SFZ areas to 6th cycle RHNA, this goes against its SB-9 ordinance rationale to deed restrict all SB-9 units. To be consistent, all rental moderate-income and below housing units in the city's 6th cycle RHNA need to be deed-restricted, or the SB-9 deed-restriction needs to be lifted.</p>	
	15.24	<p>A few Ta-Nahisi Coates quotes:</p> <ul style="list-style-type: none"> <li>• "... 'gentrification' is but a more pleasing name for white supremacy, is the interest on enslavement, the interest on Jim Crow, the interest on redlining, compounding across the years, and these new urbanites living off of that interest are, all of them, exulting in a crime. To speak the word gentrification is to immediately lie... white people are, in some profound way, trapped; it took generations to make them white, and it will take more to unmake them."</li> <li>• "To ignore the fact that one of the oldest republics in the world was erected on a foundation of white supremacy, to pretend the problems of dual society are the same as the problems of unregulated capitalism, is to cover the sin of national plunder with the sin of national lying."</li> <li>• "White America" is a syndicate arrayed to protect its exclusive power to dominate and control (Black) bodies. Sometimes this power is direct (lynching), and sometimes it is insidious (redlining)."</li> </ul>	<p><a href="#">Noted. See AFFH analysis in the Background Report.</a></p>
<p><b>Fred Allebach        (8/22/22 – Site Inventory)</b></p> <p><i>Comments within this letter are sorted by page number.</i></p>	16.01	<p>Page 95</p> <ul style="list-style-type: none"> <li>• Table 61 shows that 6th cycle pending and approved above moderate-income housing units (113) is outstripping moderate- and below (39) by far. This is the same pattern as 2000- 2020 RHNA performance, where the city had an above moderate-income housing unit overproduction of 293, and a 236 underproduction of moderate-income housing and below. Throughout the Housing Element the city emphasizes having met 5th cycle RHNA targets but ignores aggregate performance from 2000-2020.</li> </ul>	<p><a href="#">Aggregate 2000-2009 reporting is outside the scope of this Housing Element.</a></p> <p><a href="#">Comments regarding housing segregation and underutilized properties are addressed above.</a></p>

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		<ul style="list-style-type: none"> <li>There are 91 above moderate-income housing units in vacant areas not allowed for very low- and low-income housing and 22 above moderate-income housing for underutilized areas not allowed for very low- and low-income housing. Therefore, 111 sites in the city, for above moderate-income housing are closed off from very low- and low-income housing, mostly low and medium density areas; is this a pattern of segregation?</li> </ul>	
	16.02	<p>Page 96</p> <ul style="list-style-type: none"> <li>There 64 ADUs for the 6th cycle, all at the moderate average median income (AMI) level. There is no requirement for this, it's a guess and a hope. Moderate-income housing is 80-120% AMI. Rents almost always go to maximum level possible. With no deed restriction, ADUs can be expected to rent for whatever the market will bear and in Sonoma, that is a LOT, most likely higher than 120% AMI. ADUs will thus only reasonably be affordable to the above moderate-income AMI class. It is extremely likely that no low -or very low-income renters will be able to afford 6th cycle ADU rents and moderate-income housing may be priced out too, even as the city counts all ADUs as moderate-income for RHNA.</li> <li>The city assumes some ADUs will be affordable to low-income and very low-income AMI. HCD should require that the city show proof that ADUs are renting at the moderate-income level, and require the city to undertake enforceable actions and trackable programs to ensure that ADUs rent at that level.</li> <li><i>Note, the City SB-9 process and ordinance, where "affordable by design" housing is assumed to be impossible in Sonoma at any square foot level and therefore the City size and deed-restricted SB-9 units to 800 sf and Low AMI for rentals and Mod AMI for ownership.</i></li> <li>This deed restriction is an impediment, deterrent, and constraint to housing construction because owners will be less able to recoup construction costs from low- and moderate-income housing rents. As Planning Commissioner Steve Barbose said, "If you require on a single-family lot in town that people build an affordable housing unit, with</li> </ul>	<p><a href="#">These comments have been shared above, and are noted again here.</a></p> <p><a href="#">Comments relating to ADUs and affordable housing development opportunities are addressed above. In summary, ADUs are governed by State law; where they are permitted and developed are driven by residential property owners.</a></p>

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	<p>building costs what they are, effectively what you're going to do is keep that house from being built... Because the person who's thinking about building is not going to be able to afford it."</p> <ul style="list-style-type: none"> <li>• Critical info for the reader on why VL and L sites are all on Hwy 12: 20 units per acre is state "default density" for VL and L This is cited in the HE</li> <li>• City sites for VL and L are zoned C (commercial), MX (mixed use) and R-O (housing opportunity site) from .5 - 10 acres. Why a default density of 20? bc VL and L can't be produced at a one-off level, larger scale and numbers are needed to make affordable unit production pencil. AH developers need two acres and at least 50 units to make a lower AMI affordability project pencil.</li> <li>• However, in Sonoma R-O sites are routinely bought by market rate developers (DeNova) and made into market rate projects.</li> <li>• Sites anticipated to accommodate VL and L: There are WAY too many typos and errors here, very hard to navigate, took me 40 minutes to decipher, very poor proof reading, so many typos and errors wastes the public's time.</li> <li>• The pending 1st St East townhomes (Listed as site J in HE, is actually site H; listed as 50 units, 0 VL, 10 L, 10 Mod and 80 Above Mod</li> <li>• Site 38 typo, 38 is Above Mod, maybe site 28 477 W. Napa St/ Safeway?</li> <li>• Site 80, there is none on site inventory, only goes up to #70 is this 19357 Hwy 12? The behind SPARC orchard site?</li> <li>• Site C is a typo, this is site B, only one VL and L each anyway</li> <li>• Site A is correct, 10 VL, 4 L, 41 Above Mod</li> <li>• The huge bulk, 88%, of the VL (101) and L (66) units for 6th cycle RHNA are in three locations along Hwy 12: Napa Rd/ Hwy 12 and Broadway, the Safeway vacant lot on Hwy 12/ Napa St. and an old orchard site behind SPARC on Hwy 12. Addresses for the above: 19357 Hwy 12, 45 &amp; 69 W. Napa Rd., 477 W. Napa St.</li> <li>• Aside from the above, the 12% other VL and L in the HE are 10 VL and 13 L. Of these, 10 VL and 4 L are at DeNova's</li> </ul>	
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		<p>Montaldo Apts. on Hwy 12, and then 9 L at First St. East townhomes</p> <ul style="list-style-type: none"> <li>Hwy 12: 167 VL and L units, 88%, Montaldo and First St East Townhomes: 23 VL and L units, 12%</li> </ul>	
	16.03	<p>Page 97</p> <ul style="list-style-type: none"> <li>R-M zoning (moderate) can go 10 per acre density in R-M, moderate density can also go on R-H (high density), C and MX zoning</li> <li><b>This is telling:</b> “The City has used these default density thresholds as a guide in allocating its sites inventory by income category, as presented in Table 61 and detailed by site in Appendix A.”</li> <li>What this says is that the City makes zoning rules to protect R-L and R-M from VL and L integration and then turns around and says “we are only obeying and being consistent with the rules.” This is the Plato’s Cave shadow of exclusionary zoning.</li> <li>East side lots of smaller size had to be subdivided at some point. Lots of size in Armstrong could be reaggregated to make sizes sufficient for AH projects. Land cost would be similar to the Safeway vacant lot the City is calling for all VL and L. My thought process here is how to get east land for AFFH? One way would to get the size and the AFFH/ TCAC location would be to annex east side sphere parcels 885 and 905.</li> <li>“... development trends in the City indicate strong support for redeveloping sites with more intense residential uses.” Why not redevelop and rezone the east side? Why all on Hwy 12?</li> </ul>	<p><a href="#">These comments related to inclusionary housing, Armstrong Estates, and housing segregation have been shared above, and are noted again here.</a></p>
	16.04	<p>Page 98</p> <ul style="list-style-type: none"> <li><b>Development trends</b> in Sonoma have been demonstrably, predominantly market rate, and Above Mod. ABAG RHNA performance website: 2000 -2020, Sonoma underproduced Mod and below by 236 units and overproduced Above Mod by 293; this is the actual lay of the land, yet City keeps saying “we met 5th cycle RHNA, everything is great.” This is like having had cancer but then never mentioning it to the doctor bc you didn’t have it in the last eight years.</li> </ul>	<p><a href="#">These comments related to housing segregation have been shared above, and are noted again here. See response to previous comments.</a></p>

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		<ul style="list-style-type: none"> <li>• <b>Market conditions:</b> no mention of 2000- 2020 RHNA performance, a performance that led to and maintains current R-L and R-M segregation.</li> </ul>	
	16.05	<p>Page 99</p> <ul style="list-style-type: none"> <li>• <b>Projects with entitlements; Pending projects:</b> all Above Mod. BAU in Sonoma is Above Mod. Above Mod is what drives all prices up and what is predominantly on the east side. Important to note that <i>there are no</i> 100% AH/ 60% AMI and below projects pending. SAHA (AltaMadrone Apts) on Broadway was the last 100% AH project for many years before and after. The City has all manner of excuses why not. This while the Springs (contiguous unincorporated area right next to Sonoma) has 170 60% AMI and below units pending in two big projects. Sonoma has no big projects pending and there is no guarantee that the three Hwy 12 locations ID'd for VL and L units will not go market rate. This shows Sonoma is just not creating the conditions, "setting the table", to have AH here and it is really only the HE process that is forcing the City to even talk about it.</li> <li>• City 6th cycle RHNA for VL is 83 and for L is 48, 131 total for VL and L. On the three Hwy 12 sites noted above that are planned to take 88% of 6th cycle VL and L, there is a 36-unit excess VL and L capacity. Since these sites are in no way guaranteed to not go market rate, and no plans or projects are lined up, one would have to conclude that the City has put almost all, except for 12%, its VL and L eggs in one unsure basket, and therefore there is not a reasonable, planned-for excess capacity for VL and L in the site inventory. If any of these three Hwy 12 sites do not pan out, that leaves only the 23 at Montaldo and First St East townhomes as back-up, to make up the 6th cycle 131 for VL and L. My impression is that current site inventory is not a very sure or assertive way to go about meeting the VL and L RHNA requirements. Maybe rezoning R-L exclusionary zoning at the two .5+ acre lots at Armstrong estates should be added as options?</li> <li>• I suggest VL and L site option #1 should be to annex the east side sphere parcels; that would be way more like meeting the intentions of AFFH.</li> </ul>	<p><a href="#">Noted. The SAHA project was completed during the 5<sup>th</sup> Cycle. The City has had multiple projects with affordable components in recent years (5<sup>th</sup> Cycle) as discussed in Chapter 6 of the Background Report.</a></p> <p><a href="#">Commenters concerns regarding potential market rate development of sites identifies as having capacity to accommodate lower income housing are noted and have been addressed previously.</a></p>

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	<p>16.06 Page 100 - <b>ADUs</b></p> <ul style="list-style-type: none"> <li>• 64 ADUs over the whole 6th cycle. "...it is anticipated that a portion of ADUs will be affordable to VL and L income households." What is "a portion?" How many? How? Under what magical spell?</li> <li>• All ADUs in the HE however, will be classed as Mod. This is troubling bc in the City's SB-9 ordinance it is assumed that nothing below market rate can be affordable by design in Sonoma, that's why the City deed-restricted all SB-9 rental (800 sf max) to Low and ownership to Mod.</li> <li>• If ADUs at 700-1200 sf can be assumed to go Mod, why not SB-9 units too? Seems like the city is speaking with a forked tongue here; on one hand 700 sf ADUs are affordable by design to "a portion" of VL and L residents but an 800 sf SB-9 unit cannot be affordable by design and needs to be deed restricted to L for renters?</li> <li>• Upshot: SB-9 units should be consistent with ADU assumptions on attainability and have the City SB-9 deed restriction changed to 80-120% AMI for renters, otherwise there are two diff objective standards at play for the same square foot units. If nothing in Sonoma can be affordable by design, then all site inventory at Mod and below should be required to be deed-restricted.</li> <li>• <b>Table 62</b> <ul style="list-style-type: none"> <li>○ For .5 and more acres, vacant sites: there are 23 vacant R-L sites and one R-M site in the City; these are all closed to VL and L by default density assumptions that R-L and R-M will not be rezoned in the 6th cycle HE, bc as the City lays out, there are adequate sites elsewhere. To this, I counter that there is an existing pattern of east side segregation that needs to be addressed, and that all HE VL and L site eggs are in one basket leaving an uncertain buffer.</li> <li>○ For 1 to 2.5 acres vacant, for R-L and R-M there are five more sites. These should be, with R-L first, ID'd for multi-family units of four or more each.</li> </ul> </li> </ul>	<p><a href="#">These comments related to ADUs have been shared above, and are noted again here.</a></p>
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16.07	<p>Page 101</p> <ul style="list-style-type: none"> <li>• For <i>underutilized</i> there is one R-L site at five acres. Upshot, there are plenty of .5 – 10 acre sites in R-L and R-M zoned areas, it is only an arbitrary zoning classification that keeps poor, BIPOC people, VL, L, out; this can be seen as <b>modern redlining, exclusionary zoning</b> without the overt racial terminology. The five acre R-L siter should be ID'd for VL and L in the site inventory.</li> <li>• See my SB-9 objective language analysis essay where the true intentions behind City Dev. Code objective language are revealed by Planning Commissioners and later voted for by the City Council.</li> <li>• That nearly All VL and L are going on or right near Hwy 12, recaps redlining and Urban Renewal's poor relocation record of putting poor people in the worst locations; this is framed by the City as an improvement to "revitalize" these Lower Resource TCAC areas. This "revitalization" seems like a pure fantasy, pulling the wool over the public's eyes with a nebulous term that practically has low chances of succeeding without more assertive, honest and meaningful guardrails than Program 21 set by the city to make sure the ideas come to fruition and that actual patterns of segregation are addressed.</li> <li>• The HE site inventory as a whole could just as easily be seen as furthering intentional segregation by protecting the "character" of low density, single family-zoned areas, under the guise that higher density is more appropriate elsewhere, for a variety of optional, not necessary assumptions about land use and use-compatibility.</li> <li>• The Figure 2 aerial map of inventory, is very hard to read. This should be worked on to make it easier to see, lighten the background, make ID colors and markings clear and distinct, double the size and make a foldout.</li> </ul>	<p><a href="#">These comments related to housing segregation and underutilization of sites have been shared above, and are noted again here.</a></p>
16.08	<p>Page 105</p> <ul style="list-style-type: none"> <li>• <b>AFFH:</b> "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."</li> </ul>	<p><a href="#">These comments related to fair housing and segregation have been shared above, and are noted again here.</a></p>

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		<p>(Race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability)</p> <ul style="list-style-type: none"> <li>• Meaningful actions, discrimination, access to opportunity, patterns of segregation, barriers that restrict access to opportunity... What would not undertaking any HE rezoning and keeping VL and L out of R-L and R-M zoning be then if not discrimination, denying access to opportunity, patterns of segregation, and barriers that restrict access to opportunity?</li> <li>• I have to conclude that the city is avoiding naming and being responsible for segregation and not taking meaningful actions bc a segregation problem is refused to be admitted to. Sonoma and the consultant have adopted a willfully ignorant, partial view that seeks to spin the facts of Sonoma to be different than clear patterns of segregation, that can be seen and demonstrated with the data in this HE, esp. from the AFFH data viewer.</li> <li>• AFFH analysis avoids key zoning and segregation Census Block Group data, denies visible, demonstrable trends and patterns of segregation, allows segregated near-RCAAs to stand, doesn't address already-externalized regional minorities and protected classes, does not utilize the three east side Block Groups to give higher VL and L AMI protected classes access to opportunity; keeps disparities going by restricting VL and L income access to R-L and R-M zoning areas and the HE fails to have a reference section that shows what research the City did to arrive at its conclusion that there is no pattern of segregation, or to show what materials were <i>not</i> cited.</li> <li>• <b>Outreach</b> - Is the full HE translated to Spanish?</li> </ul>	
	16.09	<p>Page 106</p> <ul style="list-style-type: none"> <li>• <b>Workshops and Public Hearings</b> - Some Planning Commission members are hostile and unresponsive to housing advocate's points, esp. in the recent SB-9 process. City Council is unresponsive. It is routine for the public to get no response to communications or public comments. What good is public involvement if it's not accounted for in any policy or action?</li> </ul>	<p><a href="#">Comment noted. The City is required to accommodate the RHNA as allocated by ABAG.</a></p>

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		<ul style="list-style-type: none"> <li>• <b>Balancing Act online engagement tool</b> - This was a good idea but I found the software difficult to use and to do a thoughtful site distribution. The options did not let me slice and dice like I wanted. There was a paltry response (14 responses) from the public, making results inconclusive. Outreach was maybe not that strong, and/or is representative of a disengaged citizenry. Putting announcements on the City website is not enough outreach.</li> <li>• The citizenry that did show up for the City’s 2019 Housing Our Community (HOC) series made a public recommendation of 725 new units for the 6th cycle, half deed-restricted, yet the City acted to reduce its initial RHNA from 480 to 311. The HOC materials are very difficult to find on the City website, took me 10-15 mins and there is no summary of findings.</li> </ul>	
	16.10	<p>Page 107</p> <ul style="list-style-type: none"> <li>• <b>Housing Survey</b> 381 responses, 343 from city Responses were mostly how great it is in Sonoma, which for people for whom money is no object would say. And, all of Coastal Cal is a very nice place to live climatically and geographically, regardless of jurisdiction.</li> <li>• The survey showed signs of trouble too: 43% concerned about unaffordable rent, 29% struggle to pay rent or mortgage, 30% are intimidated to ask for repairs by property manager or landlord.</li> <li>• <b>Stakeholder Input</b> - Sonoma Valley Housing Group, SVHG, a left of center group of which I am a member, a group well known and among the few who show up to comment on housing issues, was not asked to participate in stakeholder input. This was disrespectful for a group that shows up way more than others, but the ultra-Right Farm Bureau was asked to comment, and they never show up to anything here.</li> </ul>	<p><a href="#">Noted. The City will add SVHG to the stakeholder list for future projects.</a></p>
	16.11	<p>Page 108</p> <ul style="list-style-type: none"> <li>• <b>Assessment of Fair Housing Issues</b> - Key data and background info is from a 2012 county study. 10 years old. This study is said to be: “the most recent comprehensive regional analysis of fair housing issues.” This is</li> </ul>	<p><a href="#">These comments related to fair housing and segregation have been shared above, and are noted again here.</a></p>

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	<p>preposterous! 2012?!Q%#@# With so many newer studies it is inexplicable why a 2012 study would be relied on.</p> <ul style="list-style-type: none"><li>• What about UC Berkeley Otherling and Belonging regional segregation studies? What about numerous local studies I shared with the City and the consultant? Since there is no references section or citations for many items, it's impossible to see what the consultant did or do not consider for data. No reference section or textual citations makes it easy to see why the HE comes off as rosy colored sunglasses spin; the City wants to pass the HE and not make waves by drawing attention to local segregation and inequity, the more problems ID'd, the more work and responsibility would be entailed.</li><li>• This HE draft almost seems like a calculated test to see how little can stick with HCD. I hope that when the City gets its first rejection letter from HCD, that the next draft will have a redline version so the public will not have to wade through all of this again to see that all details, comments, suggestions, and questions have been addressed.</li><li>• Indeed, an off the record staff comment, about why the City would not take any of the county's huge RHNA to further "smart" city-centered growth, or to offset the proposed 1000 units at SDC, staff said in effect, the higher the City RHNA obligation, the more chance to fail... why would the City take on more risk?</li><li>• The City is more concerned to check easy boxes and pass the HE then to honestly address patterns if segregation and Valley housing issues in a bold way, would rather play it safe and pass than to address patterns of segregation and fail.</li><li>• "The unexamined life is not worth living." Socrates</li><li>• I sent the following links to the City and to HE consultant Beth Thompson and never had a response and was told by City staff I should not contact the consultant without city staff present. My sense is that the HE is spun away from grappling with real Valley/ regional disparity issues and is narrowly focused on Sonoma as a fantasy island of privilege, where housing equity problems are framed as only applying within city boundaries. Since the poor and BIPOC have largely been externalized from Sonoma, there's no</li></ul>	
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		<p>problems! A larger view would dig deeper into why the City TCAC Education score was so low. Why? Bc the Valley socioeconomically disadvantaged who have been displaced from Sonoma are counted in City school/ TCAC education scores. This is just the tip of an inter-related Valley housing iceberg not even hinted at in the City HE.</p> <ul style="list-style-type: none"> <li>○ District R maps 2020 Census-based, from Sonoma county Redistricting process; you can get really granular with these in any county areas</li> <li>○ DWR DAC mapping tool</li> <li>○ Hidden in Plain Sight study 2017, Sonoma Valley Fund</li> <li>○ County EDB studies, EDB Hispanic Demographic Trends 10/22/20</li> <li>○ Hanna Fortulezas/ Latinos in Sonoma Valley study, 2020</li> <li>○ Los Cien’s Latino Scorecard and United Way Real Cost presentations, 10/22/20</li> <li>○ Sonoma Valley Collaborative’s Homes for a Sustainable Sonoma Valley, 2020</li> <li>○ The State of Working Sonoma, Fall 2018, Jesus Guzman (I can produce the report for you)</li> <li>○ Generation Housing State of Sonoma County Housing 2022</li> <li>○ Measure of American Portraits, Sonoma County/ Springs, 2010, 2020 HDI scores</li> <li>○ Urban Displacement Project shows Sonoma and Springs areas as “becoming exclusive” and “early ongoing gentrification”</li> </ul>	
	16.12	<p>Page 109</p> <ul style="list-style-type: none"> <li>● <b>Fair Housing Enforcement and Outreach Capacity</b> - Pretty weak, landlords and property manager agents have all the cards, tenants have a seriously over-burdened Legal Aid and few rights, and very low ability to undertake any legal proceedings with City Code enforcement already stretched too thin to enforce Sonoma’s many rules and regulations, it’s doubtful that fair housing enforcement will be apt in any meaningful way.</li> </ul>	<p><a href="#">These comments related to fair housing have been shared above, and are noted again here.</a></p> <p><u>Also:</u></p> <p><a href="#">Program 20 – Fair Housing Services: Fair Housing Advocates of Northern California is the designated provider of fair housing and tenant-landlord information throughout the County. This agency</a></p>



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	16.13	Page 110	<a href="#">provides fair housing investigation and coordinates referral services to assist individuals who may have been victims of discrimination.</a>
		<ul style="list-style-type: none"> <li>• <b>Compliance with Fair Housing Laws</b> - Density bonus law: If VL and L are not allowed in R-L and R-R zoned areas, to keep the density low and protect the “character”, then a density bonus does nothing to integrate these areas.</li> <li>• Housing Accountability Act: the City has done an end-run on the HAA having a VL, L and Mod- restrictive zoning code, and by loading up City Development Code objective language to reflect low density protectionist values. Dense infill with VL, L, and Mod units, in R-L and R-R areas are already, <i>a priori</i> disapproved.</li> <li>• An excessive historic preservation pattern in Sonoma further restricts development.</li> <li>• Least Cost Zoning Law: here the City shows circular justifications for maintaining segregation of near-RCAA areas; all income categories need to be covered in the HE, compliance is achieved through implementing the GP and HE, “consistent with” a zoning code that perpetuates segregation and denies VL, L, and Mod access to higher opportunity east side Block Group areas.</li> <li>• Excessive Subdivision Standards: “Refrain from imposing criteria for design or improvements for the purpose of rendering infeasible the development of housing for any and all economic segments of the community.” This is exactly what the City did with its SB-9 and UGB ordinances, inserted poison pill language “for the purpose of rendering infeasible the development of housing.”</li> <li>• This may also apply to Armstrong Estates, no study has been done on Sonoma CC&amp;Rs to show how subdivision standards plus zoning may chill neighborhood inclusion of VL, L and Mod housing.</li> <li>• The state has already called out Sonoma on its SB-9 poison pills, the City UGB has the same exact poison pill pattern: rendering infeasible any extra-UGB annexation with excessive deed-restriction, lot size limits, and a clause that there can be no extra-sphere annexation if there is vacant</li> </ul>	<a href="#">These comments related to housing segregation, fair housing, and fair housing services have been shared above, and are noted again here.</a>

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		<p>or underutilized land in the city without defining what the economic feasibility of such vacant and underutilized land is.</p> <ul style="list-style-type: none"> <li>The pattern here is that the City uses the letter of the law, that it creates in secret-to-99% Development Code language, to minimize integration potentials, rather than take a more assertive, proactive course for AFFH; this is Miles' Law, the people in power at the City are protecting their low density, single family home-zoned character, this is the primary value when it comes to housing. The dominant view since Mayor Harvey left, is of low-density protectionism.</li> </ul>	
	16.14	<p>Page 111</p> <ul style="list-style-type: none"> <li><b>Housing Element Law</b> - Ditto above comments on a GP and HE system primarily designed to protect and preserve low density, single family zoning which has the effect of modern redlining of three east side Block Group areas.</li> <li>The HE here cites the 2012 study (when many more recent studies are available) and seeks to proscribe the discussion of AFFH to avoid addressing segregation, specifically impediment #2: ethnic segregation and lack of AH.</li> <li>If the City has externalized BIOPOC protected classes through conscious, triple bottom line unsustainable economic and tourism policy, then outreach to these classes is not necessary, even as such BIPOC people live right next to the City in unincorporated, racially concentrated areas of poverty, specifically Census Tract 1503.05.</li> <li>If the City has already externalized BIPOC and concentrated wealthy whites in \$800,000 to \$2 million east side homes, can the City then claim there is no segregation in town? This is disingenuous. If the whole HE is avoiding Sonoma accountability for actual patterns of segregation, and regional segregation in Sonoma Valley is not even mentioned, a picture is given of a place that is just OK, as if it can live in a self-satisfied bubble and not account for its relation to the rest of Sonoma Valley or account for past behavior and lack of action and policy that caused such displacement.</li> </ul>	<p><a href="#">These comments related to fair housing have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>• The presumption seems to be that such displacement and segregation is accidental and therefore no one's responsibility.</li> <li>• The whole HE can be seen as an effort to underplay the true scope of Sonoma AFFH issues; serious partial spin is in play with the Sonoma HE. References to UC Berkeley Othering and Belonging 2019 and 2021 regional segregation studies are conspicuously lacking, one reason possibly being that the city power is more ideologically aligned with the NIMBY think tank Embarcadero Institute, as said in-effect, by the HE consultant in the 8/18 Planning Commission HE presentation. Yes, state housing laws are onerous, is the assumption.</li> <li>• Lack of City info on AFFH and of prioritizing AH as the crisis that it is shows that the City is eliding that it is the 18th most segregated city Bay Area; do you get to be the 18th most segregated city in the Bay Area by accident? No one knew? This is merely a matter of people's choices? Better read <i>The Color of Law</i> by Richard Rothstein and think again.</li> <li>• Upshot: the City needs to take AFFH outreach and enforcement way more seriously, but this can only realistically happen if the City first admits there are segregation problems that need more urgency to address</li> </ul>	
	16.15	<p>Pages 115-116 - <b>Analysis of available Fed, State, and local data and knowledge</b></p> <ul style="list-style-type: none"> <li>• <b>Integration and segregation patterns and trends -</b> Segregation is RCAA and RE/CAPs, concentrated areas of affluence or poverty. The City says there are none. What if it is close and there are substantial similarities? Just bc the threshold is not crossed patterns can be ignored?</li> <li>• Lack of references indicates that spin is at play and data contradicting the rosy colored picture view has been left out. You are not going to find what you are not looking for; Sonoma has not had a strong AH policy presence and this weak direction from electeds that tends by default to favor single family home, low density residents, signals to staff and consultant that a weak tea, just check the boxes approach to AFFH is OK.</li> </ul>	<p><a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a></p>

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	<ul style="list-style-type: none"> <li>• <b>Diversity Index:</b> According to 2021 UC Berkeley <a href="https://belonging.berkeley.edu/roots-structural-racism">https://belonging.berkeley.edu/roots-structural-racism</a>, Sonoma is in a larger area of low to moderate segregation. The same source fingers Sonoma as the 18th most segregated city in the Bay Area, right in there with Marin County.</li> <li>• One thing that happens with selective data slicing and dicing in the HE is that Census Tract areas get averaged across jurisdictional boundaries, and pockets of more concentrated segregation get minimized. This is the case for the three east side Block Groups that have a clear RCAA-type segregation pattern, and also for Tract 1503.05 in the unincorporated Springs with a clear poverty pattern.</li> <li>• In Table 1 Demographic Trends, Sonoma as a whole is listed but not the highly RCAA-type segregated east side Block Groups. In some sense, there has to be the will to want to look for something and prove it. Who is the consultant working for? Every stakeholder group? Just some? Just the City as directed by a few people?</li> <li>• Table 1 mentions that the west side is more diverse, but no analysis of the east side like I have done. Why not? One thing that has happened in Sonoma is that a racially, and wealth-segregated community has come to believe this is normal, by accident, attributable to “the market”, and not connected to past antecedents, and therefore no inequity problems or responsibilities are admitted; this is a highly bubbled, covert segregationist view characteristic of the modern, post redlining approach to maintaining segregation.</li> <li>• Ta-Nahisi Coates: “To ignore the fact that one of the oldest republics in the world was erected on a foundation of white supremacy, to pretend the problems of dual society are the same as the problems of unregulated capitalism, is to cover the sin of national plunder with the sin of national lying. The lie ignores the fact that closing the “achievement gap” will do nothing to close the “injury gap” in which black college graduates still suffer higher unemployment rates than white college graduates, and black job applicants without criminal</li> </ul>	
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		records enjoy roughly the same chance of getting hired as white applicants with criminal records.”	
16.16	Pages 116-117 - <b>Mapped patterns of integration and segregation</b>	<ul style="list-style-type: none"> <li>This does not mention race and ethnicity but does mention wealth/ income group. In 3rd paragraph, says “looking beyond Sonoma’s boundaries...” but only refers to disabilities/ seniors, married couples, female-headed households. Why not “look beyond Sonoma’s boundaries” for the bigger picture of a local Plantation economy? Look how Sonoma’s equity issues have been externalized to the unincorporated Springs, specifically Tract 1503.05.</li> </ul>	<a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a>
16.17	Page 117	<ul style="list-style-type: none"> <li>“Patterns of moderately segregated wealth, as indicated by median income, do exist in Sonoma.” refers to east <i>and</i> west sides here, but, east side is \$55-87,000 and east side is \$87-125,000, not the same, there is more white- segregated wealth on the east side.</li> <li>The latter assertion belies the clear wealth and race RCAA-type segregation pattern in three east side Block Groups.</li> <li>Lower AMI communities in Sonoma County “are somewhat more likely to be located in the more racially and ethnically diverse portions of the county”; this is BS, not “somewhat”, Tract 1503.05, the Latino Springs, directory adjacent to Sonoma, shows significant disparities with Sonoma along a clear range of documented indicators; what I see here is an intentional underplaying of local disparity in the HE. Roseland and Moorland along Hwy 101 are even worse concentrations of poverty. Hardly “somewhat.”</li> <li>“As described throughout this HE, the City is committed to supporting the development of housing affordable to lower income households in locations throughout the city...”; this statement stands contrary to how the east side has no VL and L units in the HE. “throughout the City” seems to really mean on Hwy 12 only.</li> <li><b>Findings</b> <ul style="list-style-type: none"> <li>“There are some patterns of isolation and segregation apparent when considering certain</li> </ul> </li> </ul>	<a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a>

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		<p>characteristics (apparently not wealth, race, and ethnicity in Sonoma Valley and in the City) ...the City will continue to...reduce patterns of isolation and segregation and increase access to housing-related and other resources in these areas in order to effect change from current conditions.”</p> <ul style="list-style-type: none"> <li>○ Words here say segregation will be addressed. The site inventory tells another story, with overwhelming majority of VL and L all being put in existing areas of VL and L, and all on unproven sites on Hwy 12. Above Mod in Sonoma is left segregated as default areas of R-L affluence.</li> <li>○ I have to conclude that the City is intentionally not taking the City and Valley segregation bull by the horns, has a HE of minimizing issues, just checking the boxes and doing the least or nothing, as in the case of east side -near RCAA/ white segregation. It seems from the Whittier CA HCD HE rejection letter, that most of points I am making here are validated by HCD’s critique of Whittier’s weak HE showing. Hopefully the City will not just ratchet up to the next weak level and see what flies.</li> </ul> <ul style="list-style-type: none"> <li>● <b>Figure 8 race ethnic neighborhood concentration</b> <ul style="list-style-type: none"> <li>○ This map shows Sonoma as “LatinX-white”, omitting 80-85% east side white/wealthy and omitting Tract 1503.05 as majority Latino, lack of a studied, granular view presents a false view of what is really on the ground here. The fact Tract 1503.05 is 50+% Latino does not show on this map.</li> <li>○ Tract 1503.05 shows up time and again as an area of great disparity with Sonoma, yet the HE gives no indication of this, this has to be an intentional omission bc the data clearly shows the disparity with Sonoma, esp with the three east side Block Groups. 1503.05 is the source</li> </ul> </li> </ul>	
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		<p>of low City TCAC Education scores, the data and stats and indicators from 1503.05, combined with the disparity with Sonoma east side Block Groups, tell the real story of Valley patterns of segregation, why does the City HE just confine this analysis to City TCAC Ed scores?</p> <ul style="list-style-type: none"> <li>○ As HCD can see, I sent plenty of Valley-level segregation resources up front to the consultant.</li> <li>● <b>Figure 9 diversity index by Block Group 2018</b> <ul style="list-style-type: none"> <li>○ East side clearly has lower diversity. 1503.05 shows up as highest diversity, and the Valley as more diverse than 2010</li> <li>○ Maybe the Trump undocumented exodus, plus fire effects on rent prices and displacement had not registered by 2018, bc many undocumented Latinos have left the Valley bc of 2017 fires and Trump ICE oppression...</li> <li>○ A better attempt at more current Valley and City demographic info is warranted, but with no text citations and a reference section, can't tell at a glance what info is from what date.</li> </ul> </li> <li>● <b>Fig 15 proportion of senior by Census tract</b> <ul style="list-style-type: none"> <li>○ Seniors are clearly concentrated in assisted living facilities on south and west sides. Need data on rental costs here, do seniors need to be wealthy to be housed in Sonoma? How much do local senior housing and assisted living facilities charge?</li> </ul> </li> <li>● <b>Fig 16 median household income by Block Group</b> <ul style="list-style-type: none"> <li>○ East side is clearly the wealthy area, my Block Group analysis shows this, and this correlates with racial segregation.</li> </ul> </li> </ul>	
	16.18	<p>Page 127</p> <ul style="list-style-type: none"> <li>● <b>Racially or ethnically concentrated areas of poverty (R/ECAP)</b> - Must have a non-white pop. of 50% or more, i.e. Tract 1503.05 in the Springs does. My EnviroScreen 4.0</li> </ul>	<p><a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a></p>

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	<p>analysis of this Tract shows that the population metrics have not been calculated by the CA EPA and/or by the State.</p> <ul style="list-style-type: none"> <li>• Look at DWRs DAC tool for a breakdown of Valley Block Groups and annual incomes. There are “no R/ECAPs in Sonoma County...” Are HUD metrics being used here to elide local poverty? That Measure of America’s Portrait data show on very low HDI scores for Roseland, Mooreland and the Springs? This has been a game played by the powers that be, to not address Springs poverty issues, to say there is less of a problem there than there really is; The Springs 1503.05 is a mini-Roseland; these are not fundamentally R/ECAP patterns?</li> <li>• “Comparing Figure 9 (Diversity Index) to Fig 16 (median household income), the HE says <i>it appears that areas of high diversity do not generally correlate with lower incomes and that areas of low diversity reflect a range of income levels.</i></li> <li>• This totally misses 1503.05 as an area with high diversity and lower income, similar to Roseland and Moorland. And, the HE says that far east side, 1502.04 Block Group 1 as high diversity and lower income, this seems total wrong from my analysis of the latter Block Group. I live in this area. The 1502.04 Block Group 1 analysis suffers from averaging the city portion with non-city portion of the Block. I have to conclude that a deep analysis of east side wealth was not done; what took so long to get the HE out if not to research these topics more thoroughly?</li> <li>• <b>Racially/ concentrated areas of affluence (RCAA)</b> - The HE admits that white race can correlate with affluence. An RCAA is: 80% or more white, median household income \$125,000 or greater. No RCAAs in Sonoma, <i>but it is close</i>, % white is there, home value is there, near east side TCAC high area median income is \$101,000-\$105,000. The TCAC Education score brings in non-City, non-east side residents and this then lowers the east side score, making east side Block Groups appear to be something they are not.</li> <li>• For a matter of \$20,000 a year income and an inaccurate TCAC Ed score, the near east side would be an RCAA area, therefore there is no white affluence concentration issue?</li> </ul>	
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16.19	<p>Page 128</p> <ul style="list-style-type: none"> <li>• Table 2 does not examine east side Block Group stats.</li> <li>• <b>Disparities in access to opportunities</b> - Which areas offer low-income better chances? Clearly from TCAC scores and Census Block Group data, the east side. The HE uses CalEnviroScreen 3.0 4.0 is out now. The HE can use 4.0, not 3.0 As noted, in my analysis, Springs population data is missing in EnviroScreen 4.0, and TCAC website that conclusions can be affected by lack of data.</li> <li>• No census block groups have the Highest TCAC score, but one east Block has High and one has Medium.</li> <li>• "...the proposed sites to accommodate the 6th cycle RHNA are located throughout the City in varying levels of opportunity to the extent feasible, given the City's exiting built-out development pattern." "Throughout" apparently doesn't mean VL or L sites in the City TCAC High and Medium areas.</li> <li>• What does "to the extent feasible given the City's exiting built-out development pattern" mean? Does it mean the R-L and R-R are immune from integration? No rezoning to combat east side segregation? "Built out" would mean all areas get to high density or R-O density, that's why they have rezoning, things change. Exclusionary zoning is not right nor adaptive, it's an old segregated suburban residence pattern than needs to change. "Built out" here seems to mean nothing can change in segregated R-L areas.</li> <li>• The R-L development pattern itself is against AFFH, it lets stand white, wealthy plunder while other areas are integrated.</li> </ul>	<p><a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a></p>
16.20	<p>Page 129</p> <ul style="list-style-type: none"> <li>• <b>Table 67 TCAC Opportunity resource levels by Tract</b> - By promoting Low TCAC areas, the City intends to <i>improve</i> these areas with more goods and services, access to transit, jobs. The HE says "the City must look to Low/ Moderate resource areas to accommodate new development"; why <i>must</i>? While ignoring segregation and not rezoning the east side?</li> </ul>	<p><a href="#">These comments related to fair housing, ADUs and housing segregation have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>• HE says “the city has distributed these units <i>throughout</i> the resource levels to promote more equal and equitable patterns of opportunity? The is BS, not true, east side is decidedly not taking any VL and L, this is not <i>throughout</i> resource level areas, it’s 88% on Hwy 12 in Low Resource areas.</li> <li>• The HE claims that ADUs in all areas represents a commitment to equity, to “all income levels in diff geographic areas of the city”; more BS, all ADUs are Mod (120% AMI) for RHNA and SB-9 ordinance sets precedent that affordable by design is not possible in the city; to say that ADUs will cover all income levels is not even consistent with what is said earlier in the HE about ADUs. And, ADUs, without some controls, will all go market rate anyway.</li> <li>• <b>Economic Opportunity</b> - The HE Says econ scores are “inconstant in the city.” Areas east of 12 have a lower job proximity index; what about the type of low paying tourism hospitality jobs? People with million+ dollar houses are going to work in tourism, hotels, and hospitality? Where is any analysis of the actual, specific jobs available here and that the people who have them can’t afford to live in Sonoma? This section needs to be beefed up to show types of jobs, the pay etc.</li> </ul>	
	16.21	<p>Pages 129-130</p> <ul style="list-style-type: none"> <li>• <b>Educational Opportunity</b> - SVUSD is 63.1% Hispanic, 56.2% of students come from socioeconomically disadvantaged backgrounds. The HE has no analysis of how this data here represents Valley-level segregation, only how it effects the City’s TCAC Ed score, this is a paltry and blindered view.</li> <li>• The HE might look at:             <ul style="list-style-type: none"> <li>○ SVUSD Student Population Forecast By Residence</li> <li>○ School Year 2021-2022 Report</li> <li>○ Forecast 2022-23 to 2028-29</li> <li>○ Davis Demographics 2/16/22</li> </ul> </li> <li>• Sonoma’s scores are lower than other county Tracts and then in Napa County, this points to serious trouble here in Sonoma Valley with Census Tract 1503.05, which is a mini-</li> </ul>	<p><a href="#">These comments are noted.</a></p>

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		<p>Roseland next to affluent Sonoma. These education data points are the tip of the iceberg of a HE, un-analyzed Valley segregation and major disparity with the east side and 1503.05</p>	
	<p>16.22</p>	<p>Page 130</p> <ul style="list-style-type: none"> <li>• <b>Env Opportunity</b> - CA EnviroScreen socio-econ scores are lacking for Tract 1503.05.       <ul style="list-style-type: none"> <li>○ The east side has better environmental scores but whole city is good for green scores.</li> </ul> </li> <li>• <b>Transportation</b> - No mention of bus headway times. Sonoma is more isolated in the county, it is well known that public transit headway times are bad.</li> <li>• The fact is the Valley has fought urbanization since the 1960s and made sure there are no big roads in and out, so as to protect rural character; this is the Sleepy Hollow Stasis and the Green Checkmate, a corollary effect of which is wealthy, white segregation and a high housing cost burden for anyone (poor whites included) who is not a wealthy white</li> <li>• <b>Findings</b> <ul style="list-style-type: none"> <li>○ The fact that Education scores are impacted by out-of-city factors which reduce City TCAC scores shows the inter-relatedness of Sonoma to the surrounding unincorporated areas. Econ scores are admitted to vary (only “somewhat”, which is disputable), east side Block Group analysis shows affluent racial segregation. Then HE says that sites to accommodate lower AMI units are “distributed between (TCAC) Low and Mod resource areas” but this is false bc <i>none</i> are in the near east side Mod area, 88% of VL and L eggs are in the Hwy 12 Low basket</li> <li>○ City says new MX development will provide jobs and commercial opportunities to provide goods and services, without any breakdown of the type of jobs or the cost of goods; what if there is a good chance the jobs are low paying and the goods overpriced? City HE needs some analysis of what kind of jobs people might have</li> </ul> </li> </ul>	<p><a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a></p> <p><a href="#">Programs 29, 30, and 31 address environmental sustainability and ensures that Sonoma grows in a responsible manner.</a></p> <p><a href="#">The comments regarding transportation, economic and education scores, and sensitive communities are noted.</a></p>

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		<p>given the local economy, with citations, from county EDB for example.</p> <ul style="list-style-type: none"> <li>○ The spin here is that Low areas will be brought up rather than High and Medium areas rezoned and integrated, this allows affluent areas to remain segregated and lock in an unsustainable status quo.</li> <li>○ City then trumpets boilerplate about improving ratio of jobs to housing with a 311 RHNA that is not even half what the public asked for in the 2019 City Housing Our Community series. The city is not leading the Valley in smart growth infill to protect SDC, even as city council members protest density at SDC.</li> </ul> <ul style="list-style-type: none"> <li>● <b>Fig 17 TCAC Econ score</b> <ul style="list-style-type: none"> <li>○ Shows Block Group 2 of 1504.02, the near west side, is City’s poor area, while lumping known low/ fixed-income Mobile Home Park areas into a “more positive” econ area. Far east side Block Group is lumped with 8th East, dilutes, makes a lower rating of a fundamentally Med-High area, The high concentration of Above Mod housing inventory by income on the far east side shows that this is not a low opportunity area.</li> </ul> </li> <li>● <b>Fig 18 TCAC Ed score</b> <ul style="list-style-type: none"> <li>○ Shows how City is inter-related with and affected by Latino Springs. SVUSD and Santa Rosa school districts have lowest scores, SR annexed Roseland and will annex Moorland; Sonoma keeps Springs as unincorporated and denies/ ignores issues; this Ed score shows how Springs is economically disadvantaged and segregated as well</li> <li>○ Why did SR step up to address unincorporated inequity issues but Sonoma is not? Do wealthy white cities get to play segregated fantasy island and then make all the rules the preserve that? Sonoma sets rules to maintain</li> </ul> </li> </ul>	
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		<p>segregation and then claims to be too small to do anything about it, a Catch-22.</p> <ul style="list-style-type: none"> <li>• <b>Fig 19 TCAC Env score</b> <ul style="list-style-type: none"> <li>○ Text on p. 130 says the whole city is good, is OK, and east side has better Env scores.</li> <li>○ This map shows the bulk of the City as “less positive” with the whole 1502.02 Tract with slightly better scores. It’s likely that heavy traffic on Hwy 12 and 8th East causes air pollution as well and lots of leaf blowing negatively affects air quality.</li> <li>○ The huge bulk of VL and L City RHNA is set for the areas with the worst Env score, along Hwy 12. General impression, HE analysis is shallow and designed to try and pass HCD, rather than to dig into real issues and unmask and address them, the consultant is working for the City, not for equity and justice; the City wants to pass the HE more than it wants to address real inequity and segregation issues.</li> </ul> </li> <li>• <b>Fig 20 TCAC Opportunity Areas</b> <ul style="list-style-type: none"> <li>○ The near and north east side High and Moderate areas correlate exactly with the City’s high concentration of Above Mod housing inventory by income. Census data also shows how the far east side has the same high concentration of Above Mod housing inventory by income, even as this map has the far east side as TCAC Low.</li> <li>○ The legend shows a category for high segregation, but apparently UC Berkeley segregation studies have not been included, that have Sonoma as the 18th most segregated city in the Bay Area.</li> </ul> </li> <li>• <b>Fig 21 Job proximity</b> <ul style="list-style-type: none"> <li>○ The City is two square miles, everything is close to everything.</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>• <b>Fig 22 Sensitive communities</b> (this is “sensitive” for <i>disproportionate housing</i> needs but the map only says “sensitive”)           <ul style="list-style-type: none"> <li>○ Something is counter-intuitive here as the near and far east side are listed as the same level of <i>sensitive</i> as the Latino Springs and as the City’s near west side Block Group 2 of Tract 1502.02</li> <li>○ What is happening here is that in Tract 1502.02 as a whole, which the map shows as all sensitive, the west side of 1502.02 is being conflated with the east side; in reality, it is the west side that is sensitive, as shown clearly by the TCAC Econ score map. In no way is the east side equivalent in AFFH sensitivity to the LatinX Springs. That the level of analysis here is so shallow and goes against all the other data about the east side, shows that the whole HE maybe has or could have the same level of diffuse, shallow analysis, it took them years to make the HE, and in two weeks I see problems?</li> <li>○ It could be that this “sensitive” for <i>disproportionate housing</i> needs means the east side is too cloistered, but if so, that would support my whole analysis of east side segregation.</li> </ul> </li> </ul>	
	16.23	<p>Page 137</p> <ul style="list-style-type: none"> <li>• <b>Discussion of disproportionate housing needs</b> <ul style="list-style-type: none"> <li>○ Overcrowded households are not significant in the city, but <i>are</i> significant in the Springs Tract 1503.05. Why account for disadvantaged unincorporated in the TCAC Ed. score but not make any analysis of the other local unincorporated indicators? The Latino Springs has a high concentration of over-crowding and of multi-family units, all this and more can all be seen by using layers of the county’s DistrictR mapping tool.</li> </ul> </li> <li>• <b>Figs 23-24</b></li> </ul>	<p><a href="#">These comments related to partnerships with affordable housing developers, fair housing and housing segregation have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>○ Renter cost burdened households: the whole City south of Napa Street is 60-80% cost burdened <i>bc of the proximity to the wealthy east side</i>, this is an inflation infection stemming from an inordinate east side wealth concentration. Landlords are charging as high rent as they can get and people who want to stay in their community have to pay or be displaced or find a studio-efficiency unit for the same price they were paying for two bedrooms.</li> <li>○ Owner cost burden has the same conflation of west and east sides as the sensitive communities, showing the east side as equivalent to the west when in fact, the west side is more cost burdened and likely the same as the rest of the City at a 40-60% cost burden range. A more detailed reading of Census Block Group and the AFFH data viewer map layers is called for in the HE, by someone who is not scared to see issues that may cause meaningful action problems for the City.</li> <li>○ The text says: “Overpayment increases the risk of displacing residents who are no longer able to afford their housing costs.” Where is any data on displacement rate? How many people have been displaced in Sonoma since 2008 Great Recession, the fires, Covid-19, and current increased inflation? How many second home owners and wealthy Silicon Valley amenity migrants have come in?</li> <li>○ For displacement, more and better data needed: The Urban Displacement Project shows parts of Sonoma as “becoming exclusive.” Look at net migration by county maps. Lack of data and analysis here, for trends City officials speak about, underplays the seriousness of this displacement and cost burden issue.</li> </ul>	
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		<ul style="list-style-type: none"> <li>○ Then, the HE gives a paltry mitigation of “incentives to encourage affordable development ... and a targeted program to connect lower income residents ... with affordable opportunities.” With a city that constantly says there is not enough staff, and with a track record of doing basically nothing for new AH development since SAHA’s AltaMadrone Apts. on Broadway (that took 10-15 years to come to fruition in early 2021) I can only conclude that what the City is proposing is largely words and in not “meaningful actions” to address the scope of the housing crisis here.</li> <li>○ If segregation problems are denied, then no meaningful actions are needed to solve them, this seems to me to be a core fault of the HE, not seeing and eliding the actual for AFFH.</li> <li>○ The HE says commercial in lieu fees will cover new AH unit costs, but the city council recently diluted an aggressive Planning Commission effort to make such fees actually cover the costs.</li> <li>○ Also note that City Sustainable Tourism web page has NOTHING about living wages or labor equity and makes equity policy all a matter of voluntary business choices, in fact, the page has nothing about labor at all; tenant and labor issues come up short in Sonoma.</li> </ul> <ul style="list-style-type: none"> <li>● <b>Future Growth Needs</b> <ul style="list-style-type: none"> <li>○ “The City’s future growth need is based on the (311) RHNA..” For the 6th cycle HE; in a city that has become progressively more east side class and race segregated, what about based on reality? As lower income residents are displaced, and the City sorts to higher wealth, “growth”, for VL and L cohorts, is more at displacement mitigation, clawing back the displaced working class that has been lost through unsustainable tourism policy that only</li> </ul> </li> </ul>	
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		<p>serves the visitors and hoteliers and hospitality sector, and does not account for the social aspects of the sustainability triple bottom line.</p> <ul style="list-style-type: none"> <li>○ "... proposed affordable units are dispersed throughout the community, to the extent feasible based on the city's existing built-out land uses, and do not present a geographic barrier to obtaining affordable housing." This phrase is LOADED with assumptions; AH units are only dispersed throughout insofar as they don't impinge on exclusionary zoned R-L and R-R areas. Feasible means that R-L and R-R cannot be rezoned bc they are supposedly built out at low density. This basically says that for half the City residential area, low density is enshrined as an immutable characteristic, which is false bc all zoning is subject to change based on societal needs and change. R-L and R-R <i>are</i> barriers to AH bc they close off more than half the City's residential area to AH and VL and L units. This might as well be a mountain lion habitat-type of equity avoidance program, coupled with historic barriers. City low density protectionism as embodied in City zoning Code, <i>is clearly an administrative, elective</i> barrier to integration and AH based on enshrining the economic and social advantages of R-L/ R-R property owners.</li> <li>○ The City is "accommodating" its 6th cycle RHNA by failing to address and by preserving east side class and racial segregation, and by putting the huge bulk AH and VL and L units in the worst environmental locations in an exact recap of the worst relocation failings of 1970s Urban Renewal relocation and of redlining.</li> </ul> <ul style="list-style-type: none"> <li>● <b>Existing Needs</b> <ul style="list-style-type: none"> <li>○ The City does have a history of working with AH developers, but since the whole SAHA/ AltaMadrone process, there has been nada,</li> </ul> </li> </ul>	
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		<p>nothing, no public evidence of work to recruit a project and in fact, the City has developed a line of denial that it is not the City's responsibility to facilitate anything, it is only a matter of money, and loss of Redevelopment money, and the City's recent AH fund is not big enough. Equity as a housing concern is mocked by City low density protectors.</p> <ul style="list-style-type: none"> <li>○ Since loss of Redevelopment money the City has been like a deer in the headlights, paralyzed AH advocates are supposed to trust single family home, low density property owners who dominate City government, to have their best interests in mind, kind of like trusting foxes who are guarding the henhouse</li> <li>○ Out of 5778 total City housing units, 439 are AH, 7.5% of City housing is AH. Is that OK? Seems pretty small... Renters make up near half the population, many of whom are cost burdened. Seem like the City needs to aim at 50% AH to really serve the populace's housing needs. David Brigode's bold housing policy ideas should be tried on for size.</li> <li>○ "The City actively works with affordable housing developers..." When? Who? Where is there any public record of this or of council direction? This almost seems like a lie. In the last 20 years, the neighboring Springs has hosted four large AH projects, two finished and two entitled for near 400 units. In the same time frame the City has done one 48 unit AH project. The county is killing the City in local AH production in Sonoma Valley. I can only conclude that inflated City land prices and City zoning protectionism are the causes for the lack of City AH progress. If the City wanted more action, it could get it. The City could also address land availability by rezoning and relaxing its sphere and UGB hard lines, take the</li> </ul>	
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		<p>pressure cooker lid off the space so prices can go down</p> <ul style="list-style-type: none"> <li>• <b>Cost Burden</b> <ul style="list-style-type: none"> <li>○ Location is one of the biggest factors for price: <i>east side is a high dollar location</i>. 56.7% of renters overpay, the majority in lower income groups. HE says the majority are on south side, but Fig 23 shows everything south of Napa St east as “the south side, which conflates the east and west sides as the “south side”; local sense has the south side starting at MacArthur, not Napa St. East, who proof-read this?</li> </ul> </li> </ul>	
	16.24	<p>Page 138</p> <ul style="list-style-type: none"> <li>• <b>Cost Burden, cont’d</b> <ul style="list-style-type: none"> <li>○ 30.5% of homeowners overpay, most in southern Sonoma, which Fig 28 has as a more accurate representation. In fact the cost burden here is so great that displaced people routinely are unable to find a place to live, and with City SB-9 ordinance, deed-restriction was required bc the City felt affordable by design was simply not possible, even for an 800 sf duplex on a small lot; this is not just in various City locations but in all zones where R-L is allowed, well more than half the residential areas.</li> </ul> </li> <li>• <b>Findings</b> <ul style="list-style-type: none"> <li>○ “Based on input from the community and the County AI (what is county AI? HE needs an acronym list), the most disproportionate housing needs includes rehab of existing housing stock and increased variety of housing types at affordable prices, including housing for lower income households.”</li> <li>○ <b>But</b>, the substandard housing section above this said that <i>cost burden was likely the greatest problem, not rehab problems</i>. It is surprising that the consultant would fall back on a weasel word phrase like a general,</li> </ul> </li> </ul>	<p><a href="#">These comments related to fair housing and Armstrong Estates have been shared above, and are noted again here.</a></p>

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		<p>undefined “affordable prices.” In Sonoma we can assume that anything below market rate would have to be “for lower income households” and be deed-restricted or be very small like a JADU to be “affordable”; the HE needs to define the need by AMI range, and since only 7.5% of Sonoma housing stock is AH, i.e. deed-restricted but the cost burden is 56.7% for renters and 30.5% for owners, it follows that for “increased variety of housing types at affordable prices”, the percent of AH needs to be increased to a level of 56.7% for renters and 30.5% for owners, not merely 7.5% and not merely rehabbing an undefined number of multi-family homes, 50.1% which would be for L and Mod.</p> <ul style="list-style-type: none"> <li>○ Need to know how many units this MFH program would project? It sounds good, what are the number of units for RHNA?</li> <li>○ City needs to be bolder and call for multiple 100s of AH units at 60% AMI and below, and that these units go not just on Hwy 12 but also on the two TCAC Moderate and High Areas on the east side, specifically the two .5+ acres lots at Armstrong Estates. If Armstrong has CC&amp;Rs that prohibit high density or MFHs, this needs to be called out in HE subdivision constraints as modern redlining. Also, annex the far east side sphere areas as #1 AFFH AH area, a perfect place to line up a 100% AH project.</li> </ul>	
	16.25	<p>Pages 138-139</p> <ul style="list-style-type: none"> <li>● <b>Displacement Risk</b> <ul style="list-style-type: none"> <li>○ Vacant sites represent the majority of site for new housing (and AH.) Two Armstrong lots at .5+ acres each on far east side, in an obvious High/ Moderate TCAC area, not “Low”, if these lots are vacant, there is no good reason I can think of to not ID these for VL and L, if not for Ledson CC&amp;Rs?</li> </ul> </li> </ul>	<p><a href="#">These comments related to fair housing, displacement, and Armstrong Estates have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>○ The .5+ acre Sebastiani parking lot, lot #324 MX zoning is in a TCAC High area. Of lot #324 total: the big lot is 14000 sq ft and the small one is 8300 so the total is about 1/2 acre (0.51); 0.3 acres and 0.2 acres respectively, as per a local surveyor.</li> <li>○ The ag zoning next to this lot # 324 could be rezoned and voila, a nice big parcel for VL and L RHNA in a TCAC High area. If AFFH and integration are priorities, this kind of rezoning should be looked at, there are no crops next to lot #324, just grass and picnic tables; this is not even Sebastiani, it's some faceless corporation with no production facilities any longer on site bc labor cost too much.</li> </ul>	
	16.26	<p>Page 139</p> <ul style="list-style-type: none"> <li>● <b>“To date, the City has no evidence that new development (affordable or market rate) has resulted in economic displacement.”</b> This seems on par with the no segregation assertion. We need serious research to show unequivocally where displacement is at, in the City and the Valley, and the Bay Area.</li> <li>● However, the HE says, <i>if displacement might occur, see Action Program 21</i>; this see Action Program 21 needs to be cross-referenced with page # so the reader does not have to fumble through the whole HE to find it. It seems like the City has <i>no evidence</i> about displacement period, there being no reference here, its' hard to check what the city's evidence is?</li> <li>● What about the Urban Displacement Project that shows Sonoma and Springs areas as “becoming exclusive” and “early ongoing gentrification.”</li> <li>● What about RHNA performance from 2000- 2020 that shows a City 293 over-production of market rate and 236 underproduction of Mod and below; does not citing data make it go away?</li> <li>● The above coupled with high east side concentration of Above Mod home prices shows that the east side is the driver of high inflation. East side R-L home price inflation is</li> </ul>	<p><a href="#">These comments related to fair housing and displacement have been shared above, and are noted again here.</a></p>

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		<p>driving City cost burden and displacement, while east side property values are protected and grow to benefit homeowners who dominate city government.</p> <ul style="list-style-type: none"> <li>• I might be getting carried away, but it seems like a protection racket, what Ta-Nahisi Coates says is a white syndicate. What about Mockingbird Lane and Oliva Apts and other DeNova projects where the price points ended up being substantially higher than advertised? Affects displacement? If prices were 4 to \$500,000 more than promised, “bc of market conditions”, doesn’t that displace locals who can’t afford that?</li> <li>• We are in a regime now where home offers have been 100s of 1000’s over asking prices, in cash, new development is not part of that? What qualifies as evidence here? With no index, the reader can’t find <i>displacement</i> in the HE and check all the assumptions and refs given, the HE seems intentionally obscure, hard to navigate and lacks evidence to prove points made</li> </ul>	
	16.27	<p>Page HP 18, Program 21</p> <ul style="list-style-type: none"> <li>• I have to conclude Program 21 is NOT meaningful action and is in fact very weak tea, the words belie a do-as-little-as-possible approach that fundamentally, a priori, denies serious housing issues in the City, and then proposes to do very little about it; this is NOT an activist document that shows the City determined to address the housing crisis for lower AMI residents, but rather a slick, boilerplate effort at minimization, denial, and minimal commitment to address a housing crisis. Program 21 is not convincing as a serious effort.</li> <li>• <b>Program 21</b> immediately refers to an impediments analysis in another section, it should re-state the core impediments here in the text, don’t give the runaround. Segregation and displacement are already not defined as impediments.</li> <li>• In order to show meaningful action to address AFFH, Program 21 proposes: to put something on the City website and do two events a year in lieu of outreach, offer FHANC services, acronym not spelled out, Legal Aid is not referred to; rely on ADUs “at all income levels” even though ADUs will likely be market rate; and ADU’s RHNA AMI price points</li> </ul>	<p><a href="#">These comments related to fair housing, displacement, and housing segregation have been shared above, and are noted again here.</a></p> <p><a href="#">Comments related to Program 21 are noted.</a></p> <p><a href="#">Program 13 monitors the Housing Element on an annual basis to ensure that the City continues to assess its affordable housing programs.</a></p>

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		<p>are inconsistent with City SB-9 assumptions that affordable by design at any size is not possible in Sonoma.</p> <ul style="list-style-type: none"> <li>• Program 21 will rely on Section 8 vouchers which are about impossible to get and to realize.</li> <li>• Program 21 will re-evaluate 25% inclusionary ordinance to see it is not an impediment, even as the 25% is used to show the city being a good actor with AFFH.</li> <li>• Program 21 will provide housing opportunities in TCAC High and Mod areas “for all members of the community” by having ONE annual meeting with AH developers to ID opportunities; NO mention here that city zoning does not allow VL and L in the R-L TCAC High and Mod areas anyway and that to develop AH here there would need to be scale of at least 50 units per project, which R-L would not allow; why not do this upfront with rezoning the east side in the HE rather than put all the poor people on Hwy 12?</li> <li>• Program 21 will improve City TCAC scores by doing at least two projects (no scale mentioned, could be a duplex) that improve any one of the three (Econ, Ed. Env) TCAC scores: the Ed. score can only be improved by the City engaging with the county on Springs disparities, an action and policy the City has avoided, see my Grand Jury comments about the City having a myopic focus on itself to the exclusion of regional Valley issues; this item does not even get close to how to introduce any numbers and scale of AH units into TCAC High and Mod areas, this is simply not a serious effort.</li> <li>• Program 21 makes housing rehab an item when the HE later states that cost burden (low wages/ high prices for everything here, local inflation airport effect) is the most serious housing issue, not rehab.</li> <li>• Program 21 will reduce discrimination by landlords by having ONE annual meeting, this won’t do shit without any legal rights for tenants, of which I see about ZERO in the HE, need to contact Margaret DeMatteo of Legal Aid and get tenant protections into the HE.</li> <li>• Program 21 will conduct an annual displacement analysis: the fact that no existing displacement analysis can be cited to continue upon shows that there is no current</li> </ul>	
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		<p>displacement research and thus the later HE assertion that there is no evidence for econ displacement (coupled with lack of systemic document references) can be suspected as an unsupported statement.</p> <ul style="list-style-type: none"> <li>• Tract 1502.04 is cited as an area of displacement susceptibility, yet without specifying the Block Group at stake this conflates the west side with the east side Block Groups, resulting in an inaccurate statement.</li> <li>• What is really happening here is that east side super home price inflation (based on protective, segregatory R-L zoning that is not even acknowledged in the HE) is making the west side Block Group 2 “sensitive” to displacement; this is “vulnerable to displacement” even without the effect of new housing causing it.</li> <li>• A look at the AFFH Viewer maps clearly shows a west side Block Group 2 difference and a consistent affinity of east side Block Groups 1 and 3 with higher wealth, higher home values and higher internal Block Group Education ranks, and higher white % demographics, the HE does not dig into this and in fact, elides it by continuing to conflate the east side with west side.</li> <li>• <b>Conclusion on displacement and Program 21:</b> the City is not looking to dig any deeper and is content to stay on the surface and make a weak tea HE based on superficial analysis that intentionally does not recognize patterns of segregation and displacement and then makes weak meaningful actions like Program 21 to not address AFFH problems that are not seen.</li> </ul>	
	<p>16.28</p>	<p>Page 139</p> <ul style="list-style-type: none"> <li>• <b>Critical point</b> <ul style="list-style-type: none"> <li>○ The City is justifying putting all VL and L on Low Resource areas along Hwy 12 as “most appropriate” on the basis of access to transit, lower real estate values, curing supposed blight, and MX zoning. This then makes these rationales, in aggregate, a higher value than AFFH and integrating lower AMI residents into City segregated TCAC High and Mod areas.</li> </ul> </li> </ul>	<p><a href="#">These comments related to fair housing, displacement, and housing segregation have been shared above, and are noted again here.</a></p>



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		<ul style="list-style-type: none"> <li>○ In a two square mile City, everyone as good access to transit, in all areas.</li> <li>○ Access of AH developers to lower real estate values are a reason to make extra-UGB annexations, but these have been put off limits by UGB poison pill language.</li> <li>○ One person’s “blight” is another’s “character”, what blight are we talking about? Where? Broadway Market? 4 Corners auto shop? That is the kind of rural character place people supposedly value.</li> <li>○ MX zoning on Hwy 12 as “most appropriate” for VL and L RHNA is a choice that will not necessarily yield the most social goods bc for many, proximity to jobs means proximity to wealthy east side home owners who need: yard work, home health care, house cleaning, construction/ maintenance etc. Many City jobs are for worker bees at the wealthy, Above Mod homes. This is a good rationale for an east side sphere annexation, closer to work, could walk or bike to work.</li> <li>○ No <i>proximity to goods</i> will serve VL and L income residents anyway, bc if they have a car, they will never shop in Sonoma anyway bc so much better prices are to be had in Napa and the 101 Corridor</li> <li>○ The City should layer its own Ellis Act reform, just cause and rent stabilization onto whatever state “just cause” laws are cited in the HE.</li> </ul>	
16.29	Page 139	<ul style="list-style-type: none"> <li>• “Research has shown...” what research? Citation?</li> </ul>	<p><a href="#">This is based on the impetus to address fair housing, including exposure to environmental issues and access to high-performing environmental area. Access to environmental opportunity is discussed in Chapter 5 of the Background Report.</a></p>
16.30	Pages 139-140	<ul style="list-style-type: none"> <li>• <b>Findings</b></li> </ul>	<p><a href="#">These comments related to displacement and Program 21 have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>○ “The City is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement.” Why doesn’t it seem that way? Program 21 is cited again, how “diligent” is that, to have weak tea annual meetings and rely on ADUs no lower-AMI residents can afford anyway? This seems like words only, no sense of real purpose and desire to address deep issues.</li> </ul>	
	16.31	<p>Page 140</p> <ul style="list-style-type: none"> <li>● For Mobile Home park conversions, the City HE should adopt a law that gives MHP residents the right of first purchase should the property come up for sale.</li> <li>● <b>C. Sites Inventory</b> <ul style="list-style-type: none"> <li>○ Site inventory “considers whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.”</li> <li>○ How does putting basically all the RHNA VL and L units on Hwy 12 in three locations and none on the Central-East Planning Area demonstrate that the City is “carefully considering how the development of new affordable housing options can promote patterns of equality and inclusiveness”?</li> <li>○ A look at AFFH Data viewer maps, DAC tool maps, Measure of America maps, DistrictR map tools, and local studies cited in hyperlink above shows that one, the Sonoma Valley USA is highly segregated, and two that Sonoma’s east side is segregated from not only the rest of the Valley USA but also from the rest of Sonoma.</li> <li>○ All these sources were shared with Beth Thompson of DeNovo.</li> </ul> </li> </ul>	<p><a href="#">These comments related to fair housing and housing segregation have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>○ It sure looks like the City is fueling and supporting a thesis to put all “inclusiveness” in already Low TCAC opportunity areas and none in TCAC Mod and High areas. This does not seem in any way like <i>promoting patterns of equality and inclusiveness</i> and rather seems like a convoluted set of rationales to protect east side R-L zoning from increased density and inclusion; part of the rationale is to not have any HE rezoning and assume that R-L and R-R residential patterns are “built out”, permanent, and not subject to upzoning for integration. See my SB-9 Objective language review for a show of underlying City R-L protectionism values.</li> <li>● <b>C.1. Segregation/ Integration</b> <ul style="list-style-type: none"> <li>○ Here is the zinger of the whole HE: “The City finds there are no known historic patterns of segregation by race and ethnicity, persons with disabilities, familial status, age, or income.” “Nevertheless, as described throughout this HE, the City is committed to supporting the development of housing to promote a balanced and integrated community.”</li> <li>○ A balanced and integrated community seems to be seen by the HE as at the level of the whole City and not at the level of challenging the status existing R-L segregated neighborhoods (half the City residential area) that are also High and Medium TCAC areas, and also not at the level of comparing the City to the Latino Springs.</li> <li>○ Why is the City claiming not, when strong evidence says there are patterns of segregation, esp. the east side? Sonoma is the 18th most segregated city in the Bay Area. <a href="https://belonging.berkeley.edu/most-segregated-and-integrated-cities-sf-bay-area">https://belonging.berkeley.edu/most-segregated-and-integrated-cities-sf-bay-area</a></li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>○ The top tax credit Resource Opportunity Areas in the City: Census Tract 1502.04 Block Group 1, and Census Tract 1502.02 Block Group 3, the Central-East Planning Area, are 80% - 85% white respectively, with home values reaching to \$2 million with 80+% white ownership. Technically, the Block Groups noted above are not RCAs but they are close enough to see a clear RCA pattern. The low TCAC Ed. score was explained above as not representing the actual educational attainment of these latter east side Block Groups. Census data does give ed. attainment by Block Group.</li> <li>○ Census Tract 1502.04, Block Group 3 is in the middle of Mod and High TCAC areas but the wealthy white signal is diluted by being lumped in geographically with the 8th East industrial area. This Block Group has two .5+ acre, appropriate for VL and L AH, lots at Ledson’s Armstrong Estates.</li> <li>○ These above Block Groups are also heavily if not 100% single family zoned, low density areas which are known indicators of high segregation.</li> <li>○ I would have to say the HE consultant and the City are trying to pull the wool over the public’s eyes by one, denying obvious segregation, and two, failing to recognize and admit that zoning is not a government constraint on fair, affordable housing. R-L exclusionary zoning is the new redlining, and three, denying that displacement is an issue.</li> <li>○ The HE site inventory has almost all VL and L RHNA units in three vacant lot locations (Napa Rd. and Broadway, Safeway, and on an orchard behind SPARC, <i>all</i> on Hwy 12, none integrated into the Block Groups noted above. <b>All eggs are in this basket, with little buffer back up should any of these sites go market rate.</b> This</li> </ul>	
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		allows a clear east side, affluent, white, segregated pattern to stand, which is consistent with Sonoma’s, on the record stated values of preserving and protecting the historic character of low density, single family zoned areas as its top housing priority.	
	16.32	<p>Page 140</p> <ul style="list-style-type: none"> <li>The HE goes on to say that the VL and L sites “...are located throughout the community and are not concentrated in areas of lower diversity...” This seems like a stretch bordering on a false statement. “Throughout the community” is actually all on Hwy 12, and avoiding “areas of lower diversity”, i.e. the east side, means no VL and L at all on the east side where more diversity is called for by AFFH by not concentrating whites and wealth.</li> <li>Note that Sonoma is already substantially less diverse than the Springs, where overall Valley segregation between the City and Springs can be seen. If the City was being honest, a substantially-similar-to-RCAA-pattern on the east side should be acknowledged and mitigated, and rezoning should be done to address de facto east side zoning redlining, and annexing the far east side sphere lots should be the #1 AFFH option.</li> </ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">These comments related to fair housing and diversity have been shared above, and are noted again here.</a></p>
	16.33	<p>Page 141</p> <ul style="list-style-type: none"> <li>“proposed sites, including VL and L RHNA sites are distributed throughout the community with a number (how many? see below) of sites located in areas with high and highest median household incomes.” This is a big, non-specific stretch, the bulk of VL and L are not on the east side, the area with the highest incomes, the huge, overwhelming bulk, 88% of VL and L are on Hwy 12 in Low TCAC areas. If the City keeps saying this in the HE, I have to repeat myself as well.</li> <li>There are only 10 L and no VL on the 1st Street East townhome project, 5 Mod and 41 Above Mod; is this what we get for “including VL and L RHNA sites are “distributed throughout the community”, on a Housing Opportunity Site? This account for VL and L units: “distributed throughout the community” besides on Hwy 12?</li> </ul>	<p><a href="#">These comments related to fair housing and diversity have been shared above, and are noted again here.</a></p>

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		<ul style="list-style-type: none"> <li>• I'd have to say that the HE is vastly overstating any efforts at real integration of lower AMI residents with higher TCAC areas, to the point of being mostly false.</li> <li>• The City's rationale for not integrating the east side is to improve opportunities and incomes in Low TCAC areas, bc these projects "may be transformative." This would be more believable if the City was actually showing interest in socioeconomic transformation, but the fact that the city has no equity platform at all shows there is little track record of interest in equity. The City has an economic department it pays for with the Chamber, and a Climate Action Commission and an Environmental Sustainability Coordinator, but no equity pillar to be seen.</li> <li>• <b>R/CAPS, RCAAs</b> <ul style="list-style-type: none"> <li>○ Recognizable Valley and City concentrations and patterns of wealth and poverty are being spun by the HE to avoid coming to grips with Sonoma's larger segregation from the Springs and to downplay clear patterns of wealth disparity within Sonoma between the east and west sides.</li> <li>○ Sonoma is internally segregated by class and racial diversity has been externalized to the Springs.</li> <li>○ If a HE consultant was instructed by the City to play up patterned segregation and wealth concentrations, to make an activist HE, it could easily be done, but none of that shows</li> <li>○ Conclusion: status quo low density, R-L protectionism is the highest City housing ideal but that is kept covert in the HE. Problems like segregation and displacement are minimized and elided and hence Goals, Programs and Policies appear as weak tea. It's a minimal, non-assertive, hands-off program.</li> <li>○ The R/CAPS, RCAAs section says: "areas of low diversity reflect a wide range of income levels ", but an analysis of east side Block Groups show this to not be true in these locations. The</li> </ul> </li> </ul>	
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		<p>City appears to be trying, when convenient, to collapse the east side into the rest of the City, to hide a wealth concentration issue, so that VL and L RHNA will not have to go there and mess up the “character of the neighborhood.”</p> <ul style="list-style-type: none"><li>• <b>3. Access to Opportunity</b><ul style="list-style-type: none"><li>○ The HE says Sonoma doesn’t not have any High Resource areas, wrong, it does, with a .5+ acres MX-zoned parking lot and an empty “ag” area that is not used for ag purposes. This ag lot could be another prime AFFH 100% AH project spot, along with the east side sphere lots.</li><li>○ The City does admit it has a TCAC moderate/ medium resource area (near east side) but this area has not been ID’d to accommodate <i>any</i> of the lower AMI RHNA. Therefore, the statement that the RHNA is “distributed throughout these areas” is wrong.</li><li>○ A rationale follows for putting all VL and L on Hwy 12: “help to create more lower AMI housing in those areas, that new residents will create more neighborhood stability” there, and “expand opportunities for people to both live and work in Sonoma.” The exact same general rationales can easily apply to the near east side.</li><li>○ The paragraph goes on, in planning-speak, with more of the same rationale: “help diversify the land use pattern”, “improve conditions by providing greater housing choice and a broader range of goods and services”, bring new residential development closer to transit and jobs”, and “otherwise support community revitalization.”</li><li>○ As long as Sonoma Valley as a whole has a Plantation economy arrangement with the Springs, and east side wealth infects the rest of the city with overall unsupportable high prices,</li></ul></li></ul>	
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		<p>Sonoma goods are services will tip to the highest possible price points, and a low-wage, unsustainable jobs profile is more likely given existing conditions.</p> <ul style="list-style-type: none"> <li>○ A commitment by the city to foster a more just, equitable economy would be more important here than nebulous planning claims, that somehow a non-idealistic, bland social engineering “revitalization” based on weak tea HE analysis and Program 21 plans will bring transformational social goods. If the City was actually interested in revitalization and transformational planning, this HE would look A LOT different; revitalize what? How?</li> <li>○ The City’s basic plan seems to be a deer in the headlights and to let the market take care of things, with the minimum HE necessary to pass HCD. The City could direct its “Sustainable Tourism” policy to direct more benefits to workers, “so they can work and live here.” There could be an equity pillar of City planning policy. Staff could be hired and the council say: we want activist, progressive housing policy now. Instead of treading water and playing it safe.</li> <li>○ In Access to Opportunity, zoning is not ID’d as a constraint to AFFH and integration.</li> <li>○ “RHNA sites are mostly distributed in tracts with moderate to more positive outcomes”, wait a minute! Moderate what? Cumulative TCAC score? This is an intentionally vague statement that is not true, bc the near east side TCAC Block Group is the only Medium resource area, and there are no VL or L RHNA sites there.</li> <li>○ “Greater housing choice in Sonoma” is imagined to effect and fix current low TCAC Ed. scores in the future, housing choice of a presumably VL and L variety; what kind of</li> </ul>	
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		<p>proof of cause and effect is at play here? An invisible hand?</p> <ul style="list-style-type: none"> <li>○ If people are locked into needing to keep low annual earnings in order to keep low rent units, then they will be trapped by a self-reinforcing low-income, low standards of life conditions loop, and this will not somehow magically “revitalize” and make “more positive economic outcomes.”</li> <li>○ All the City’s plans will do here is allow low-wage workers to tread water with locked-in low AMI rent without fear of displacement, as long as they keep annual earnings low to qualify for low rents. That can work to keep essential workers stuck in low wage jobs in the community, but it’s not transformational.</li> <li>○ Somehow, a nebulous “opportunity”, of putting all VL and L units in Hwy 12, will help to raise TCAC educational scores; this is such a weak tea assertion it is unbelievable. What is the source here? There is no attempt in this HE to engage the structural, systemic Valley issues that make for the socioeconomic disadvantage that is cited for low Ed scores; in fact low Ed scores are only the tip of the iceberg of what is being elided by the City here, which is whole-Valley segregation in which Sonoma’s east side is one fundamental polarity.</li> <li>○ Since affordable by design is assumed by the City to not be possible, the best any essential worker or missing middle can hope for in terms of econ/ housing advancement would be to get one of the few ADUs that would rent for below 120% AMI.</li> <li>○ ADUs can be expected to rent at the top level of Mod income, or 120% AMI and into Above Mod levels; landlords as a whole have shown they will max prices as much as possible, there may be a few altruistic situations, but very few</li> </ul>	
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		<p>since the common experience of people losing a rental is that they can't find anything affordable and they are then displaced, and displacement is not tracked. New professionals in town cannot find place to live.</p> <ul style="list-style-type: none"> <li>○ In order to track displacement, the NBOP tenant's union should be engaged in the HE and a renter/ tenant registry established.</li> </ul> <ul style="list-style-type: none"> <li>● <b>4. Disproportionate housing needs</b> <ul style="list-style-type: none"> <li>○ The intent of the City putting almost all VL and L RHNA on Hwy 12 is to "add housing to desirable areas and provide a range of housing choices at diff prices to current and future residents. With a broader range of options, housing will become more affordable across the community, which should lessen the housing cost burden, particularly for renters."</li> <li>○ Hwy 12 at 4 Corners with 24 iour traffic is a "desirable area"? The HE seems to be in a <i>Through the Looking Glass</i> space of narrative creation.</li> <li>○ City makes an assumption that more supply, and a "broader range of housing choices", specifically 311 choices at the RHNA AMI spread over 8 years, will lower prices and ease renter housing cost burden. This is a rosy, market-based assumption, when in fact, all the market has done is rip people off, and the city has tried and limit supply as much as possible by UGB, SB-9 poison pills and by restrictive zoning that locks in low density for more than half the possible residential areas, in two square mile area.</li> <li>○ Why did the City resist the initial 480 RHNA allocation, have it reduced to 311, not cooperate with the county on a RHNA subregion to address systemic housing disparity issues in the Valley, and not pursue the 725 units/ half deed restricted,</li> </ul> </li> </ul>	
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		<p>recommended by the 2019 Housing Our Community series?</p> <ul style="list-style-type: none"> <li>○ LAFCO has recommended the City look to expand its UGB and sphere to encompass the Springs area; the Grand Jury housing report took county cities and Sonoma to task for being too passive and inward-looking on housing (see my Grand Jury and LAFCO MSR wrote ups.)</li> <li>○ This in spite of a severely constraining UGB that primarily seeks to protect Green values and open space, the authors of which assume, in circular reasoning, that no amount of new supply will lower prices bc demand for Sonoma’s elite environment is so strong, but demand is strong bc of limited supply...</li> <li>○ If new supply at the level of only 311 units will make a diff in cost burden, imagine what extra-UGB annexations and expanding the sphere, and opening up land on Napa Rd (recall the 285 Napa Rd Habitat project that the City UGB made sure would fail) would do for supply and lowering prices?</li> <li>○ In fact, the City is defined by a protect small town character ideology which is fundamentally at odds with being inclusive in meaningful ways and at odds with housing equity, and the HE is a transparent effort to paper over the City Code rules and regs that act counter to many of these above HE assertions about revitalization and transformation etc. The real bull, of low density land use protectionism, is not being taken by the horns by the HE.</li> <li>○ Like other Coastal Cal protectors, the City says, “we’re for AH, just an appropriate scale so it doesn’t mess up our character”, i.e. at a scale where no meaningful AH can be produced, i.e The Green Checkmate.</li> </ul>	
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	<ul style="list-style-type: none"><li>• <b>Site analysis findings</b><ul style="list-style-type: none"><li>○ There are two vacant lots (Armstrong Estates) on the far east side that will allow development at densities that can foster AH, why are these not considered for HE equity social engineering? By failing to ID these two sites, the HE allows concentrated wealth and white segregation to continue unabated.</li><li>○ There is a Sebastiani ag lot and east side sphere parcels both big enough for 50-unit, east side projects. These should be top VL and L unit priority in a re-worked site inventory.</li><li>○ The City avoids addressing clear east side patterns of wealth and white concentrations and says these are not issues. RHNA sites avoid addressing east side econ and racial segregation and give the east side a get out of jail free card on AFFH.</li><li>○ The City says RHNA site inventory does not burden existing sites of racial and econ homogeneity and that is right, east side gets a pass on integration, and this seems about as far from AFFH as you can get.</li><li>○ Invisible hand investment on Hwy 12 will somehow magically create opportunities and social goods will be created out of selfishness, bc there is no plan or guarantee that the VL and L sites will be taken up by AH developers, and Program 21 is a weak tea, minimal commitment to see that any AFFH will actually be done.</li><li>○ The HE thesis denies AFFH issues, denies segregation, denies displacement, underplays and mis-represents east side affluence and white racial concentration. A blindered view is presented that seeks to minimally address HE requirements and not engage the regional and state housing crisis at the level that HCD is hoping for. The Sonoma HE is sophisticated</li></ul></li></ul>	
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		<p>version of the mountain lion habitat SB-9 defense scheme, basically finding all the reasons why not to address housing constraints of R-L, low density zoning in service of more integration and more AFFH.</p>	
	<p>16.34</p>	<p>Page 146</p> <ul style="list-style-type: none"> <li>• <b>D. Analysis of contributing factors and fair housing priorities and goals</b> - In Table 68, displacement risk is ID'd as a fair housing issue; contributing factors are: land use and zoning laws and economic pressure (i.e. UGB, SB-9, R-L and R-R zoning, gentrification and elite tourism economy price inflation. The latter should be ID'd as impediments and constraints to housing.</li> <li>• <b>City priority for displacement risk? Medium/ Low</b>, cites Progs 10,11, 21 and 25; <b>none of these address low density zoning as exclusionary</b>, nor UGB, SB-9 undue constraints to City housing supply. If zoning and land use are not seen as constraints and high priority problems, then they don't have to be fixed, this is maybe willful denial?</li> <li>• Program 10 is a mitigation, mobile home park rent stabilization and conversion       <ul style="list-style-type: none"> <li>○ City doing well here, make sure all MHPs are covered and zoned in the city</li> <li>○ formally add a MHP resident's right of first purchase if park comes up for sale, not just for cionid conversions</li> </ul> </li> <li>• Program 11 condo conversion       <ul style="list-style-type: none"> <li>○ looks like City is doing OK here</li> </ul> </li> <li>• Program 21 already critiqued that as fundamentally weak tea</li> <li>• Program 25 MHP senior only occupancy, go for it</li> <li>• <b>Top Three Issues to be addressed in Housing Plan</b> <ul style="list-style-type: none"> <li>○ ONE, basically outlines Program 21, relies in info and education and enforcement, which the City is not strong on and proposes only annual meeting work, hardly seems like "meaningful actions"</li> </ul> </li> </ul>	<p><a href="#">These comments related to fair housing, displacement, and diversity have been shared above, and are noted again here.</a></p>

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16.35	Page 147	<ul style="list-style-type: none"> <li>○ TWO, “Housing mobility enhancement to increase access to opportunities and improve access to AH throughout the community.” This is a diffuse, meaning-devoid statement.</li> <li>○ THREE, “New housing choices and AH in the City’s higher opportunity areas and improving opportunity scores.”</li> <li>○ Well, if this is a top issue, why such a paucity of VL and L in R-L and R-R areas?</li> <li>○ Improving TCAC scores will require engaging with the Springs and addressing the City’s externalized and disadvantaged workforce and their educational and other equity issues, which the HE gives no indication of any effort towards.</li> </ul>	<p><a href="#">These comments related to Program 21, fair housing and diversity have been shared above, and are noted again here.</a></p>
16.36	Page 148	<ul style="list-style-type: none"> <li>● The HE continues to say, against actual plans, the City will combat patterns of segregation, will be inclusive, reduce barriers to opportunity for protected characteristics, and do this through a weak effort of passive outreach, low enforcement capability, and infrequent meetings.</li> <li>● City SB-9 ordinance represents a transparent effort to subvert state housing laws to make it more difficult to do lot splits and slightly upzone R-L areas. Given the City’s behavior here and stated intents, HCD should suspect and be alert for other City housing law subversion.</li> <li>● <b>AFFH HE Programs</b> <ul style="list-style-type: none"> <li>○ <b>Program 1: VL, L and Mod opportunities “throughout the city”;</b> not born out by RHNA site inventory</li> <li>○ <b>Programs 2, 6: facilitate AH construction;</b> no public display of this since SAHA/ AltaMadrone which itself took more than 10 years to come to fruition, yearly meetings with AH developers not near enough, VL and L sites could just as well go market rate, no active plans known</li> <li>○ <b>Program 5: encourage ADUs;</b> ADUs are all at Mod for site inventory and will likely all be</li> </ul> </li> </ul>	<p><a href="#">These comments related to Housing Programs, fair housing, density bonuses, and ADUs have been shared above, and are noted again here.</a></p>

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		<p>market rate AMI bc landlords have a pattern to max the rent, SB-9 says attainable housing is not possible in Sonoma but wishful ADU policy says it is?; this is not AFFH, it's a high-rent wolf in sheep's clothing. HCD should call out the City for an over-reliance on ADUs to mitigate high price points when no evidence shows they will.</p> <ul style="list-style-type: none"> <li>○ <b>Program 7: ensure commercial development pays a fair share of in lieu fees;</b> city council dialed back assertive Planning Commission effort to make commercial development pay full cost of a unit</li> <li>○ <b>Programs 15, 24: support homeless shelters and transitional housing;</b> city efforts have centered on getting the one shelter as far away from the center of town as possible and even out of town into the Springs; City says the shelter has 10 beds but they are not in use bc of a use permit complaint by a citizen who doesn't want homeless near his kids; if homelessness is a Valley issue that the City can farm out, need to make other equally critical socioeconomic disparity issues Valley-wide efforts too</li> <li>○ <b>Program 27: replace AH units;</b> remains to be seen if the City can do this, an accountability and tracking process for AH units has recently (under heat from HE process) been set in motion, but chronic staff shortage and lack of enforcement capability; the City needs to make AH a top priority</li> <li>○ <b>Program 28: make sure adequate sites available through 6th cycle;</b> the City apparently has a plenty of sites, only problem, none of the VL and L are in R-L/ R-R areas, site inventory puts huge bulk of VL and L on Hwy 12 and leaves econ and race segregated east side with no changes, all VL and L eggs are in</li> </ul>	
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		<p>one basket, of one or two of these sites fail to produce VL and L there's no VL and L buffer</p> <ul style="list-style-type: none"> <li>○ <b>Program 19: promote density bonus;</b> this is fine, but don't use exclusionary zoning R-L and R-R as de facto redlining, putting all density on Hwy 12 recaps the worst aspects of redlining and 1970s Urban Renewal relocation, if lower income BIPOC are to be included, dense AH unit projects need to be put into R-L and R-R zones, an equity formula can be devised: one 50-unit project for every 500 people-area</li> <li>○ <b>Programs 4-15: accommodate specialized housing types;</b> again, R-L and R-R areas need to be opened up, in a two-square mile city, accommodation for farm workers etc. can't be off limits in more than half of residential areas; in a stunning lack of creativity and urgency, <i>any</i> effort at farmworker or employee housing has not even been seen, why all these plans all of a sudden if not forced by the state? Will the City view HE and AFFH laws as they do SB-9 etc, as Sacto overreach to be subverted?</li> <li>○ <b>Program 20: educate the underserved;</b> if this will amount to only a largely unseen posting on the City website, what diff will it make? In fact, the underserved have largely been externalized already, necessitating a displacement mitigation program to claw back the displaced and their place in the community, and not call it "growth"; make a tenant registry to track displacement</li> </ul>	
<p><b>Fred Allebach (8/29/22 – Zoning)</b></p> <p><i>Comments within this letter are sorted by topic.</i></p>	<p>17.01</p>	<p>Armstrong Estates, additional comments:</p> <ul style="list-style-type: none"> <li>• The future development of the parcels east of Armstrong Estates will lead to the extension of Charles Van Damme Way and William Cunningham Avenue, and perhaps to the connection of Appleton Way with East Napa Street. This area, portions of which are currently outside of city limits, has an R-S designation, which calls for somewhat higher densities and a greater variety in lot sizes than what is found</li> </ul>	<p><a href="#">These comments related to Armstrong Estates have been shared above, and are noted again here.</a></p>



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		<p>in the development to the west (Armstrong Estates), which features lots having a minimum area of 20,000 square feet. (Ord. 2003-02 § 3, 2003).”</p> <ul style="list-style-type: none"> <li>• Here we see code relating to Armstrong Estates, there has to be a minimum lot size of 20,000 sf.</li> <li>• What other code might there be about Armstrong Estates that keeps it as the top ostentatious wealth area in town?</li> <li>• The Armstrong area is in a Tax Credit, Low Resource Area directly adjacent to TCAC High and Medium Opportunity Areas, this in the R-L low density east side of Sonoma that has zero very-low and low-income integration in the 6th cycle site inventory. Something is wrong with this picture if the base zoning allows for about 100% segregation, and zoning is not identified as a governmental constraint.</li> <li>• Here at Armstrong, there are lots of open land that could integrate the east side but city zoning and possibly also Armstrong CC&amp;Rs are stopping it.</li> <li>• Also stopping integration: Is the city denying there is any pattern of segregation and, that the east side is already essentially an RCAA? More analysis will likely bump east side TCAC scores up, can the city pretend the substance of an RCAA is not there?</li> </ul>	
	17.02	<p>Central East Planning Area:</p> <ul style="list-style-type: none"> <li>• A look at Sonoma’s Central-East Planning Area as described in the Sonoma Municipal Code. How such Code prevents the area from addressing patterns of segregation:</li> <li>• None of the City’s 6th cycle Housing Element’s very-low income and low-income housing site inventory is slated to go in this area, despite the higher TCAC scores that make such areas more desirable for integration of socioeconomically disadvantaged and protected classes.</li> <li>• This area consists of most of Census Tract 1502.04 Block Group 1 (near east side), a TCAC Medium Opportunity Area and Census Tract 1502.04 Block Group 3 (far east side), a TCAC Low Opportunity Area, and a small piece of Census Tract 1502.02 Block Group 3 (east side north/ Sebastiani area) a TCAC High Opportunity Area. Tract 1502.04 Block Group 2 is the near west side with much lower scores and</li> </ul>	<p><a href="#">These comments are noted.</a></p>

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		<p>indicators. If Tract 1502.04 is considered as a whole, Block Group 2 will drag the scores down.</p> <ul style="list-style-type: none"> <li>• The City’s Central-East Planning Area is essentially the same as the area of the above three hyperlinked Block Groups. From Census Block Group data, this area is 80-95% white, with home values from \$800,000 to \$2 million, with high levels of educational attainment, equally good TCAC Environmental scores and marginally different economically. The far east side is mixed with out-of-city data that goes out to 8th St. East, this mixing lowers its economic score. TCAC Education scores are lower in the three hyperlinked Block Groups bc out-of-City socio-economically disadvantaged students for the local school system are mixed into the City’s east side.</li> <li>• Closer analysis would maybe show that higher east side TCAC score is likely, even to the point of all east side Block Groups being an RCAA and TCAC High Resource Area. This might depend on whether one was trying to prove it or not.</li> <li>• From the Municipal Code: Central-East Planning Area “Existing land uses include: 1. Low density single-family homes; 2. Four neighborhood parks; 3. The Sonoma Community Center; 4. Undeveloped, Sonoma residential property in the sphere of influence; and 5. A cemetery.”</li> </ul>	
	17.03	<p>R-L Zoning, additional comments:</p> <ul style="list-style-type: none"> <li>• Default R-L zoning does not allow density above R-L, single-family zoning. Why does Chapter 19.44 SMC indicate that "densities do not include density bonuses?"</li> <li>• No density higher than single-family zoning is allowed, and thus, no affordable housing projects can be allowed because by definition, 50-some units and more than 0.50 acres but less than 10 acres are necessary for an affordable housing project to be allowed in Sonoma, and to pencil.</li> <li>• However, no density bonus can maybe be waived, and large affordable housing projects be allowed in Armstrong Estates:</li> <li>• “19.44.050 Types of bonuses and incentives allowed. A qualifying residential development project shall be entitled to the following density bonus and other incentives. If a</li> </ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">Comments related to density bonuses, housing segregation and preservation of housing character have been shared above, and are noted again here. .</a></p>

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		<p>density bonus and/or other incentives cannot be accommodated on a parcel due to strict compliance with the provisions of this development code, the planning commission is authorized to waive or modify development standards as necessary to accommodate all bonus units and other incentives to which the development is entitled.”</p> <ul style="list-style-type: none"> <li>• Preservation of low-density R-L character is ultimately a subjective choice by the City and this is only in force because three City Council votes agree to it. Very few even think to address Sonoma segregation by looking at the Municipal Code and then wonder why the Housing Element has no very low- and low-income units on the east side referred to above?</li> <li>• There really is no good reason other than to preserve and maintain the white, wealthy status quo that has been advantaged through segregation. There are plenty of working class whites in Sonoma, not many on the east side.</li> <li>• The only difference now between this and overt redlining, is that this Central-East Planning Area has covertly staked out segregatory boundaries through visual, spatial/ design prohibitions and through zoning.</li> </ul>	
	17.04	<p>Segregation, additional comments:</p> <ul style="list-style-type: none"> <li>• It’s clear why the SB-9 lot-split/ duplex bill was so strenuously undermined by the City:</li> <li>• By-right lot splits that ended up with two duplexes and two ADUs “could affect efforts to maintain the character of the area” through significant subdivision of lots.</li> <li>• "Maintaining the character of the area” is a top Sonoma priority, even to the point of denying obvious patterns of segregation.</li> <li>• The desired future has nothing about integration and is all about visual compatibility and maintaining low density suburbia. This sounds like subjective language: “preserve the existing quality and fabric of residential neighborhoods.”</li> <li>• If multi-family units, “Multifamily developments shall require screening and buffering of parking and driveway areas, and noise and light sources.”</li> </ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">Comments related to ADUs have been shared above, and are noted again here.</a></p>

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	17.05	<p>Additional constraints to affordable housing:</p> <ul style="list-style-type: none"><li>• The general objective for this area, as expressed in SMC 19.20.020, Project planning and design, is to preserve the existing quality and fabric of residential neighborhoods in the Central-East planning area.</li><li>• Two key issues that could affect efforts to maintain the character of the area include a significant number of parcels that could be subdivided as infill lots, and the site planning and building design techniques employed in their development. Development of the potential infill parcels will mainly need to focus on visual compatibility with the adjacent patterns of site design, building scale, and architectural context.</li></ul>	<p><a href="#">These comments are noted.</a></p> <p><a href="#">Comments related to affordable housing have been shared above, and are noted again here.</a></p>
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**HCD Findings on Draft City of Sonoma 6<sup>th</sup> Cycle Housing Element**

Finding	Interpretation	How the Comment Was Addressed	P. #
<b>A. Housing Needs Resources and Constraints</b>			
<i>1. Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)</i>			
<p><u>Fair Housing Enforcement and Outreach Capacity:</u> The element should include findings, lawsuits, enforcement actions, settlements, or judgments related to fair housing or civil rights.</p>	<ul style="list-style-type: none"> <li>• Add information regarding findings, fair housing and civil rights lawsuits, enforcement actions, settlements, or judgements.</li> </ul>	<p>Additional information has been added to the Fair Housing Enforcement and Outreach Capacity discussion.</p>	<p>HBR-115</p>
<p><u>Disparities in Access to Opportunity:</u> The housing element must identify and analyze significant disparities in access to opportunity. A complete analysis should include the locally and regional disparities of economic, education, environmental, and transportation opportunities through local, federal, and/or state data. The element should be revised as follows:</p> <ul style="list-style-type: none"> <li>• For economic the element includes some information on economic scores from the California Fair Task Force; however, it should also describe any disparities in access to jobs by protected groups, address where protected groups live and how that affects their ability to obtain a job; and evaluate employment trends by protected groups. Trends should then be compared to the region.</li> <li>• For education the element includes some information on student enrollment and the ethnic/racial make-up; however, the element should also describe any differences amongst schools within the City and whether access to more proficient schools has any patterns across protected characteristics (e.g., race and ethnicity, familial status, persons with disabilities); analyze the proximity of proficient and less proficient schools to areas of segregation and racial and ethnic concentrated areas of poverty; and evaluate the presence or lack of policies, practices, and investment to promote access to more proficient schools or that contribute to a disparity in access to opportunity.</li> <li>• While the element includes environmental scores within the City for environment, the element should also describe any disparities in access to environmentally healthy neighborhoods by protected class groups and discuss policies, practices and</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Economic:</b> <ul style="list-style-type: none"> <li>- Describe disparities in access to jobs by protected groups, address where protected groups live, and how that affects their ability to obtain a job, and evaluate employment trends by protected groups and provide a regional comparison of trends.</li> </ul> </li> <li>• <b>Education:</b> <ul style="list-style-type: none"> <li>- Describe differences amongst school and whether access to proficient schools has patterns across protected characteristics.</li> <li>- Address policies, practices, and investment (or lack of) to promote access to more proficient schools and contribute to disparity in access to opportunity.</li> </ul> </li> <li>• <b>Environmental:</b> <ul style="list-style-type: none"> <li>- Describe disparities in access to environmentally healthy neighborhoods by protected class groups and discuss policies, practices, and investments that impact access to environmentally healthy neighborhoods.</li> </ul> </li> <li>• <b>Transportation</b> <ul style="list-style-type: none"> <li>- Compare concentrations of protected groups with access to transportation options and assess any</li> </ul> </li> </ul>	<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Updated to address economic scores in the City versus region and comparison of scores within the City.</li> <li>• Where protected groups live is discussed in the Integration/ Segregation section of the AFFH analysis and the discussion was updated to reference this and the ability of protected groups to obtain a job.</li> <li>• Added Table 70A addressing City versus County employment trends for protected classes, where data is available.</li> </ul> <p><b>Educational</b></p> <ul style="list-style-type: none"> <li>• Information regarding educational opportunity scores was discussed at a regional level.</li> <li>• Proficiency scores of schools serving the City were discussed, along with analysis of access to higher scoring schools by protected classes.</li> <li>• SVUSD’s equity policy was reviewed and discussed as it relates to policies, practices, and investment to promote access to more</li> </ul>	<p>HBR-140 to HBR-145</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
<p>investments that impact access to environmentally healthy neighborhoods.</p> <ul style="list-style-type: none"> <li>For transportation opportunities, the analysis should, compare concentrations of protected groups with access to transportation options and assess any disproportionate transportation needs for members of protected classes.</li> </ul>	<p>disproportionate transportation needs for members of protected classes</p>	<p>proficient schools or to address disparities in access to opportunity.</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Revised to compare regional conditions.</li> <li>Discussion of environmental scores and correspondence to concentrations of protected classes is added.</li> <li>Discussion of policies and programs addressing environmental issues added.</li> <li>Discussed disparities in access to environmentally healthy neighborhoods.</li> </ul> <p><b>Transportation</b></p> <ul style="list-style-type: none"> <li>Access to transportation options, such as transit and safe routes to schools, for protected classes is added along with discussion of disparate access to transportation options.</li> <li>Transit scores for the City and region are discussed.</li> <li>Discussion of transportation-oriented programs is provided, along with a discussion of disparate access by protected classes.</li> </ul>	
<p><u>Integration and Segregation:</u> The element includes data on integration and segregation at the local and regional level for race and familial status; however, it does not include sufficient regional information to adequately compare income and disability to the City. The element must include additional information related to income and disability on a regional level.</p>	<ul style="list-style-type: none"> <li>Revise income discussion to compare City to regional conditions</li> <li>Revise disability discussion to compare City to regional conditions</li> </ul>	<ul style="list-style-type: none"> <li>The household income discussion has been updated to compare Sonoma to regional conditions.</li> <li>Updated the disability discussion to provide a comparison of income levels to the region and to discuss income group isolation in the City versus the Bay Area.</li> </ul>	<p>HBR-125 to HBR-126</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
<p><u>Disproportionate Housing Needs, Including Displacement:</u> The element does not include sufficient regional information to adequately compare cost burden, substandard housing and displacement to the City. The element must include additional information related cost burden, substandard housing and displacement on a regional level. In addition, for homeless the element should examine disproportionate impacts on protected characteristics (e.g., race, disability) and patterns of need, including access to transportation and services.</p>	<ul style="list-style-type: none"> <li>• Provide regional information and comparison related to cost burden, substandard housing, and displacement.</li> <li>• For homeless, examine disproportionate impacts on protected characteristics (e.g., race, disability) and patterns of need, including access to transportation and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Updated discussion to provide regional comparisons of cost burden, substandard housing, and displacement.</li> <li>• Information on the City’s homeless population is not available at the local level, but protected characteristics of the homeless are examined on the Countywide basis to the extent information is available. A discussion of access to transportation and services has been added.</li> </ul>	<p>HBR-152 to HBR-158</p>
<p><u>Site Inventory and AFFH:</u> The element must include an analysis demonstrating whether sites identified to meet the regional housing needs allocation (RHNA) improves or exacerbates conditions. HCD recognizes that the majority of the City is considered low resourced and therefore, while the sites are distributed throughout the City, sites to accommodate the lower-income are all located within these areas. While the element states that by promoting new development opportunities in low opportunity areas, the City intends to improve the conditions of these census tracts by providing a boarder range of goods and services, bring new residential development closer to transit and jobs, and support community revitalization, it must substantiate this claim with evidence. For example, the analysis could describe the disparities in access to opportunities for these sites and how the City is addressing these disparities. The element must have commensurate programs with place-based strategies for community revitalization and new opportunities in higher opportunity areas to result in an equitable quality of life and (AFFH) throughout the City.</p>	<ul style="list-style-type: none"> <li>• Address how the City will improve conditions of Census Tracts.</li> </ul>	<p>Table 1: Program 22 Fair Housing Program Action Items in the Housing Plan has been revised to include additional actions under the fair housing issue Place-Based Strategies for Community Preservation and Revitalization that are intended to improve the conditions in low resource census tracts.</p>	<p>HBR-157 Housing Plan Prog 22</p>
<p><u>Contributing Factors to Fair Housing Issues:</u> The element lists contributing factors on Table 71, such as “Lack of Access to Opportunity, including areas with Low Racial/Ethnic Diversity and Higher Incomes”; however, it is unclear the relationship between</p>	<ul style="list-style-type: none"> <li>• Demonstrate relationship between contributing factors to fair housing issues and corresponding meaningful actions.</li> </ul>	<p>Table 71 in the Housing Element Background Report identifies the fair housing issues facing the City and the contributing factors to the issues. This</p>	<p>See previous revisions to</p>

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<p>those contributing factors and their corresponding meaningful actions address those factors. For example, it is not clear how contributing factors such as low educational opportunity scores and low environmental opportunity scores were addressed by any of the meaningful action programs that were included in the Table. The element should reevaluate actions provided to ensure strategic approaches to mitigate contributing factors to lack of fair housing choice and address AFFH.</p>		<p>is based on the analysis provided in the previous sections. Table 71 then connects the contributing factors to the meaningful actions under the Housing Plan (i.e. the housing programs) that will mitigate the contributing factors. Table 71 was updated to address school district issues impacting access to educational opportunities. Furthermore, Program 22 provides a matrix of fair housing program action items that neatly summarizes how the programs in the Housing Plan address the fair housing issues and contributing factors with specific commitments, timeframes, geographic targeting, and metrics and has been updated to include additional measures to address access to opportunity.</p>	<p>Background Report for AFFH issues.  HBR-163  Housing Plan Program 22</p>
<p><i>2. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)</i></p>			
<p><u>Approved/Pending Sites:</u> The housing element relies on approved/pending projects to accommodate the City's regional housing need for lower-income households. The element should describe the status of the project, including any necessary approvals or steps prior to development, development agreements, conditions, or requirements such as phasing or timing requirements that impact development in the planning period, and the affordability of the project's units based on anticipated rents, sales prices or other mechanisms (e.g., financing, affordability restrictions) ensuring their affordability.</p> <p>In addition, the element states on page HBR-9 that there are no known site-specific environmental constraints that would substantially impact development on the identified Housing</p>	<ul style="list-style-type: none"> <li>For approved/pending projects, describe the status of the project, including any necessary approvals or steps prior to development, development agreements, conditions, or requirements such as phasing or timing requirements that impact development in the planning period, and the affordability of the project's units based on anticipated rents, sales prices or other mechanisms (e.g., financing, affordability restrictions) ensuring their affordability.</li> <li>Address the status of the Montaldo Apartments project, including whether an</li> </ul>	<ul style="list-style-type: none"> <li>Pending and approved projects have been updated to: <ul style="list-style-type: none"> <li>Identify the remaining steps in the entitlement/approval process and anticipated timing, including any phasing, conditions, or other requirements that would impact developing during the planning period.</li> <li>Identify the basis for the affordability assumptions of each project.</li> <li>Address whether an EIR is anticipated to be required for the</li> </ul> </li> </ul>	<p>HBR-104 to HBR-106</p>



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Finding	Interpretation	How the Comment Was Addressed	P. #
<p>Opportunity sites; however, HCD received public comments regarding the Montaldo Apartments project which is included as a pending project in the sites inventory that a full new EIR is required to develop this housing opportunity site because the City considers there to be a CEQA issue not “addressed... in the prior General Plan EIR.” The element should clarify the status of this project and clarify whether there are any known environmental issues that would render the project infeasible.</p>	<p>EIR is being required and whether any known environmental issues would render the project infeasible.</p>	<p>Montaldo Apartments and whether there are any known environmental issues that would render the project infeasible.</p>	
<p><u>Realistic Capacity:</u> While the element provides assumptions of realistic capacity of 85 percent for residential zoning districts and 75 percent for commercial and mixed- use districts that allow residential development, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in the City, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element includes several projects on Table 60; however, it is unclear if those projects represent a trend for all developments at similar affordability levels in the City.</p>	<ul style="list-style-type: none"> <li>• The element must provide support for the realistic capacity assumptions of 85% for residential zoning districts and 75% for commercial and mixed-use districts that allow residential development, including trends, factors, and other evidence that led to these assumptions. Elements must be adjusted for typical densities of existing or approved residential developments at a similar affordability level and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.</li> <li>• It is unclear if the projects in Table 60 represent a trend for all developments at similar affordability levels in the City.</li> </ul>	<ul style="list-style-type: none"> <li>• The discussion of approved and built densities has been updated to reflect the average densities of projects on sites zoned for residential and on sites zoned for commercial and mixed use, and to discuss densities relative to income levels for sites. The Background Report has been revised to clarify that built densities in the City average higher than the assumptions used, so no reduction in unit counts is necessary.</li> <li>• The Background Report has been updated to clarify that all sites have or are planned to have sufficient water, sewer, and dry utilities, so no adjustments are needed to reflect availability of infrastructure and utilities during the planning period.</li> <li>• The discussion of projects provided in Table 60 has been updated to identify that these are representative of typical projects in the City and the project types, zoning, and densities anticipated for the 6<sup>th</sup> Cycle.</li> </ul>	<p>HBR-91 to HBR-95</p> <p>Table 60</p> <p>HBR-101</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
		<ul style="list-style-type: none"> <li>The Realistic Capacity discussion has been updated in Chapter 4 to reference the City’s evidence supporting the realistic capacity assumptions.</li> </ul>	
<p><u>Sites Identified in Prior Planning Periods:</u> While the sites inventory in Appendix A indicate if vacant and nonvacant sites were identified in the 5th cycle planning period, the element must also indicate which vacant sites were identified in the 4th cycle planning period. Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households (Gov. Code, § 65583.2, subd. (c)). The element must clarify if vacant sites were used to accommodate the housing need for lower-income households in the 4th cycle planning period and include or modify programs as appropriate.</p>	<ul style="list-style-type: none"> <li>Sites inventory must identify vacant sites identified in the 4<sup>th</sup> Cycle planning period.</li> <li>Sites identified in prior planning periods must meet statutory requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Appendix A has been updated to identify vacant and underutilized sites identified in the 4<sup>th</sup> Cycle.</li> <li>Program 20 has been added to the Housing Plan to address rezoning pursuant to Government Code Section 65583.2(i).</li> </ul>	Appx A Prog 20
<p><u>Infrastructure:</u> While the element describes water and sewer infrastructure, it must also demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the city’s regional housing need for the planning period (Gov. Code, § 65583.2, subd. (b)).</p>	<ul style="list-style-type: none"> <li>Demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the city’s regional housing need for the planning period.</li> </ul>	<ul style="list-style-type: none"> <li>A discussion of dry utilities has been added to the Background Report, including demonstration of adequate capacity for service providers to accommodate the City’s regional housing need for the planning period.</li> </ul>	HBR-98
<p><u>Zoning for a Variety of Housing Types:</u> The element must demonstrate zoning to encourage and facilitate a variety of housing types, as follows:</p> <ul style="list-style-type: none"> <li>Emergency Shelter: The element states emergency shelters are permitted by-right in the Public Facilities zoning district; however, emergency shelters with 16 or more beds require a use permit. The element must analyze the use permit process as a potential constraint on housing supply and affordability. The analysis should identify findings of approval for the use permit and their potential</li> </ul>	<ul style="list-style-type: none"> <li>Address the requirement that emergency shelters with 16 or more beds require a use permit, including analyzing the use permit process as a potential constraint on housing supply and affordability. Address findings of approval for the use permit and their potential impact on development approval certainty, timing, and cost. Either must demonstrate this</li> </ul>	<ul style="list-style-type: none"> <li>The Emergency Shelters analysis has been updated to address the use permit requirement.</li> <li>Program 15 in the Housing Plan has been revised to remove constraints to emergency shelters, including addressing use permit findings and allowing emergency shelters up to 30 beds without a use permit.</li> </ul>	HBR-66 HBR-64  Housing Plan Program 15

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Finding	Interpretation	How the Comment Was Addressed	P. #
<p>impact on development approval certainty, timing, and cost. The element must demonstrate this process is not a constraint or it must include a program to address and remove or mitigate the use permit requirement.</p> <ul style="list-style-type: none"> <li>Employee Housing: The element should clarify if there are any zones that allow agriculture uses. If there are zones that allow agriculture uses, then the City must comply with California Health and Safety Code Section 17021.6. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.</li> </ul>	<p>process is not a constraint or include a program to address and remove or mitigate the use permit requirement.</p> <ul style="list-style-type: none"> <li>Clarify if there are any zones that allow agriculture uses. If there are zones that allow agriculture uses, then the City must comply with California Health and Safety Code Section 17021.6. Section 17021.6 requiring employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.</li> </ul>	<ul style="list-style-type: none"> <li>The Agricultural (Farmworker) and Employee Housing discussion has been updated to identify districts that allow agricultural uses and to identify how the Development Code permits agricultural employee and employee housing.</li> <li>Program 15 in the Housing Plan has been updated to ensure employee housing, including agricultural housing, is permitted in compliance with State law.</li> </ul>	
<p><i>3. An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)</i></p>			
<p><u>Land-Use Controls:</u> The element must analyze the height requirement (p. 58) of only allowing two stories in zones that allow multifamily for its impact as a potential constraint on housing, including the ability to achieve maximum densities and cost and supply of housing. Should the analysis determine the height requirement is a constraint on residential development, it must include a program to address or remove any identified constraints.</p>	<ul style="list-style-type: none"> <li>Analyze the height requirement of only allowing two stories in zones that allow multifamily and address whether the requirement is a potential constraint on housing, including the ability to achieve maximum densities and the cost and supply of housing.</li> <li>Should the analysis determine the height requirement is a constraint on residential development, it must include a program to address or remove any identified constraints.</li> </ul>	<ul style="list-style-type: none"> <li>The height analysis has been updated to address the two-story limit as a potential constraint.</li> <li>Program 15 in the Housing Plan has been updated to address the constraint associated with the two-story height limit.</li> </ul>	<p>HBR-59 Housing Plan Prog 15</p>
<p><u>Codes and Enforcement:</u> The element states the City enforces the 2019 California Building Code (CBC) for existing units, new construction, and residential rehabilitation; however, it should also discuss the type (e.g., compliant based) and degree of enforcement.</p>	<ul style="list-style-type: none"> <li>Discuss the type and degree of code enforcement.</li> </ul>	<p>The analysis on Building Codes and Enforcement has been updated to reflect the approach to code enforcement.</p>	<p>HBR-74</p>
<p><u>On/Off-Site Improvements:</u> The element must identify subdivision level improvement requirements (e.g., curbing requirements, circulation improvements, minimum street widths) and analyze</p>	<ul style="list-style-type: none"> <li>Identify subdivision improvement requirements and analyze their impact as</li> </ul>	<p>The analysis has been updated to address subdivision improvement requirements and to address whether</p>	<p>HBR-95</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
<p>their impact as potential constraints on housing supply and affordability.</p>	<p>potential constraints on housing supply and affordability.</p>	<p>the requirements constrain housing supply and affordability.</p>	
<p><u>Growth Control:</u> The City must evaluate against SB 330 requirements and whether the growth cap is consistent with 66300 (b)(1)(D)(i) and (ii). Which prohibits establishing or implementing any provision that:</p> <ul style="list-style-type: none"> <li>• Limits the number of land use approvals or permits necessary for the approval and construction of housing that will be issued or allocated within all or a portion of the affected county or affected city, as applicable.</li> <li>• Acts as a cap on the number of housing units that can be approved or constructed either annually or for some other time period.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The discussion on Growth Controls/ Growth Management has been revised to further analyze consistency with SB 330. As well, Program 17 has been modified to commit the City to annually review the Growth Management Ordinance to ensure that it does not conflict with SB 330 or any other provisions of State law.</p>	<p>HBR-74 Prog 17</p>
<p><u>Processing and Permit Procedures:</u> The element includes Table 56 (Page HBR-78) that has estimated total processing procedures by type; however, the element should clarify if these are the typical total permit and entitlement process for a typical single-family unit, subdivision, and multifamily project. In addition, while the element describes the design review findings and process; it must analyze the finding, “the project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features,” as a potential constraint on housing supply and affordability. The element must demonstrate the finding is not a constraint and add or modify programs to address and remove or mitigate the constraint.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• As indicated on p. HBR-79, the processing procedures outlined in Table 56 are typical approval requirements for a single-family infill project, a subdivision, and a multifamily project, assuming that the land is zoned appropriately.</li> <li>• Under the discussion Site Design and Architectural Review (Design Review) Process, the subjective language contained in certain design review findings is identified and Program 15 has been revised to ensure that subjective language is removed or clarified.</li> </ul>	<p>HBR-79 HBR-83  Housing Plan Prog 15</p>
<p><u>SB 35 Streamlined Ministerial Approval Process:</u> It appears the City does not have a streamline, ministerial approval process for SB 35. While Program 15 is included to streamline ministerial review for eligible affordable housing projects, it is not clear if the City is committing to include a streamline, ministerial approval process. The element must describe the availability of written procedures for the SB 35 streamlined, ministerial approval process or include a program as appropriate.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Program 15 has been revised to clearly commit the City to streamlined and ministerial review for eligible affordable housing projects as well as to preparing application materials and written procedures for eligible projects.</p>	<p>HBR-71 to HBR-72  Housing Plan Prog 15</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
<p><u>Inclusionary Housing</u>: While the element describes the framework of inclusionary requirements and available alternatives, it must also include the amount of in lieu fees instead of providing affordable units in a residential project of four or fewer units that a developer would pay if this option were chosen.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The City is currently in the process of determining and establishing an in-lieu fee to be paid instead of providing affordable units in a residential project of four or fewer units. Nonetheless, Program 1 in the Housing Plan commits the City to adopting an in-lieu fee by December 2023. The in-lieu fee will be supported by a study to ensure the fee does not make residential projects economically infeasible.</p>	<p>HBR-68  Housing Plan Prog 1</p>
<p><u>Housing for Persons with Disabilities</u>: The element states the City provides reasonable accommodation for persons with disabilities; however, it should include the procedure and the review findings. In addition, the element should clarify if the City has a definition of family and include a program if necessary.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• The discussion on Persons with Disabilities (Reasonable Accommodation) has been revised to include the procedure for requesting such. The review findings are also described and do not include any subjective language.</li> <li>• The City’s Development Code does not define “family” or “household”, so there are no constraints regarding how households are treated (see p. HBR-70).</li> </ul>	<p>HBR-70</p>
<p><i>4. An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality’s share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality’s planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)</i></p>			
<p><u>Requests for Lesser Densities and Approval Times</u>: The element must include the length of time between receiving approval for housing development and submittal of application for building permits. The analysis must address any hinderances on housing development and programs should be added as appropriate.</p>	<ul style="list-style-type: none"> <li>• Identify the length of time between project approvals and submittal of building permit applications.</li> <li>• Address any hinderances of housing development and add programs, if needed.</li> </ul>	<p>The Building Permit Timing discussion (p. HBR-91) has been updated to further describe the types of projects addressed in Table 60 and to identify the timing between project approvals and building permit applications. The</p>	<p>HBR-91  Table 60</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
		Building Permit Timing and Approved and Built Densities discussions have also been updated to address whether building permit timing or approval densities hinder housing development. No hinderances on housing development are apparent; no programs are necessary to address this topic.	
<b>B. Housing Programs</b>			
<p><i>1. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)</i></p>			
<p>As noted in Finding A2, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.</p>	<ul style="list-style-type: none"> <li>• Add or revise programs if necessary to address a shortfall of sites or zoning to encourage a variety of housing types.</li> </ul>	<p>Please refer to responses under Finding A2 for Approved/Pending Sites, Realistic Capacity, etc. A complete site analysis has been performed. No rezoning is needed; however, changes were made to the Housing Plan to further encourage a variety of housing types and increase opportunities.</p>	
<p><i>2. Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of January 18, 2022 housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)</i></p>			
<p>As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<ul style="list-style-type: none"> <li>• Add or revise programs if necessary to address governmental constraints.</li> </ul>	<p>Please refer to responses under Finding A3 for Land Use Controls, Processing and Permit Procedures, etc. A complete analysis of governmental and nongovernmental constraints has been performed. For any constraints identified, a corresponding program in</p>	

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Finding	Interpretation	How the Comment Was Addressed	P. #
		the Housing Plan is included to address the constraint.	
<p><i>3. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, City of Sonoma’s 6th Cycle (2023-2031) Draft Housing Element Page 7 January 24, 2023 marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)</i></p>			
<p>As noted in Finding A1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends.</p>	<ul style="list-style-type: none"> <li></li> </ul>	<p>Revisions to the AFFH chapter were made as discussed above under Finding A1 to complete the analysis of fair housing, including revisions to Program 22: Affirmatively Further Fair Housing.</p>	<p>HBR – Chapter 5 Housing Plan Prog 22</p>
<p><b>C. Public Participation</b></p>			
<p><i>Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)</i></p>			
<p>Please note HCD received public comments that the City did not consider all comments from the public in the revision that was sent to HCD. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD’s future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City’s consideration of public comments must not be limited by HCD’s findings in this review letter.</p>	<ul style="list-style-type: none"> <li>Address the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element.</li> </ul>	<p>Multiple letters from one individual were overlooked in the preparation of Appendix E. Appendix E has been updated to address those comments.</p>	<p>Appendix E</p>
<p><b>D. Consistency with General Plan</b></p>			
<p><i>The Housing Element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)</i></p>			
<p>The housing element affects a locality’s policies for growth and residential land uses. The goals, policies and objectives of an updated housing element may conflict with those of the land-use, circulation, open space elements as well as zoning and redevelopment plans. The general plan is required to be “internally consistent.” As part of the housing element update, the City should</p>	<ul style="list-style-type: none"> <li>As part of the Housing Element Update, review the General Plan to ensure internal consistency is maintained.</li> </ul>	<p>Chapter 7 of the Housing Element Background Report has been amended and addresses internal consistency between the elements of the General Plan, including the Housing Element. The chapter also discusses how the</p>	<p>HBR-178</p>

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<b>Finding</b>	<b>Interpretation</b>	<b>How the Comment Was Addressed</b>	<b>P. #</b>
review the general plan to ensure internal consistency is maintained. In addition, the City should consider an internal consistency review as part of its annual general plan implementation report required under Government Code section 65400.		City's other plans and policies, including its Municipal Code, Development Code, and Specific Plans must all remain consistent with the Housing Element.	