

Fred Allebach

8/9/22

Public comment on BOS meeting, Agenda Item #43

Permit Sonoma's Housing Strategy

ADU rental income category fairness

Permit Sonoma surveys, "housing affordability and housing availability were identified by the community as the greatest needs."

How will anyone know if ADUs are actually affordable to Extremely Low, Very Low-, Low-, and Moderate-income cohorts? Are ABAGs "Safe Harbor" assumptions on ADUs accurate compared to a tally of prevailing Sonoma county ADU rents?

Permit Sonoma shows ADUs counted for 6th cycle RHNA at 176 ea for VLI, L, and Mod; with 58 for Above Mod. This assumes ADUs will be attainable or affordable by design for the VLI, L and Mod cohorts.

[ADU California](#) says: "The median rental price of an ADU in California is \$2,000, ranging from \$1,925 in the Central Coast region to \$2,200 in the San Francisco Bay Area." This is hardly affordable to ELI, VLI and L income cohorts and guarantees a high rent/ housing cost burden on ADUs.

How can ABAG play a shell game like this, to say ADUs will rent for way lower than objective facts on the ground in the county say? Where is any proof that ADUs in the county do not as a whole rent for what the market will bear? If there is no proof other than ABAG's Safe Harbor "assumptions", then I submit that this is an inaccurate and unfair basis to be planning for actual units for actual poor people.

"...housing affordability and housing availability were identified by the community as the greatest needs."

I have a suggestion, if ADUs are to be counted for county RHNA, there be a stipulation that for ELI, VLI, and L, half of the RHNA ADU numbers be required to participate in Napa Sonoma ADU's [Home Match program](#).

In this program, ADU landlords agree to:

- A minimum 1-year lease agreement; and
- Rent the ADU at an affordable rate for a local tenant who is at 65% of Area Median Income or below. This means for example renting your ADU to a local preschool teacher, dental assistant, mail carrier, healthcare support worker, or social worker who makes between \$40,000 - \$60,000 per year at about the following (rental costs may differ from these ranges depending on factors such as location, quality, amenities, etc.):

- Studio: ~\$950 - \$1,200
- One-Bedroom: ~\$1,000 - \$1,300
- Two-Bedroom: ~\$1,200 - \$1,600

This will mean that ADUs rents will be quantified so that 50% of ELI, VLI, and L income categories actually have a chance to get those ADUs at a price they can afford.

If no mitigations for high ADU rents are made, then the county will not really be serving the people most in need. Yes, the high RHNA allocation presents problems, but the reason it is even there is bc there is a serious affordability and supply problem.

The BOS and county should see this human, high housing cost burden problem as primary. The Housing Element and RHNA are just props where we all work together to tackle the number one goal: reduce disparities, inequity, and suffering and increase housing fairness for the essential workers of the county.

Thanks for your consideration.

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Member, Sonoma Valley Housing Group

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Agenda Item #43 Housing Element Strategy

Fairness issues concerning Tax Credit High Opportunity Areas in USAs that seek to avoid integration and dense infill

Statement of interests

I'm an advocate for Census Tract 1503.05, the incorporated "Latino Springs" in Sonoma Valley (Verano Ave to Madrone Rd between Hwy 12 and Arnold Drive) which is basically Roseland Jr. I'd like to put this 6,183, DAC population area on the mental map of BOS members.

De facto segregation of wealth and poverty in Sonoma Valley

High tax credit Opportunity Areas (Glen Ellen, Castle Rd., Lovall Valley, Sonoma Mtn. foothills west of Arnold for example) are ones where AFFH-based integration fits best but are also areas of fire risk and danger, on the edges of county USAs farther from transit and services, and possibly outside USAs.

This sets up a tension where wealthy High Opportunity Areas are seemingly inoculated against integration based on rural character, fire danger and non-USA arguments. Cohorts (Glen Ellen/SDC/ Sonoma east siders) then lobby for less density and infill even as they are in High Opportunity USA areas that need by AFFH law, to take the county's high RHNA allocation. Meanwhile, poverty is concentrated in the unincorporated Latino Springs.

Sonoma Valley is structurally segregated. How will the Housing Element, with its provisions for AFFH and Rezoning in USAs finesse a problem where all parties seem to have good excuses to maintain segregation and avoid integration?

IMO these equity issues need to be resolved *in* the Sonoma Valley USA and not externalized to the 1010 Corridor. Sonoma Valley's unincorporated area need to take their fair share of AFFH and account for existing displacement.

Redistricting context and incorporated/ unincorporated county tensions

The BOS Redistricting process showed unresolved BOS tensions between incorporated and unincorporated-area representation, about fairness issues on allocation of funds and resources.

The Housing Element is *all unincorporated areas*.

If BOS members have built-up animosities regarding which county cohorts get represented more, and these perhaps prevent county-wide cooperation, I suggest getting over it bc the people in need here expect the BOS to be working for the benefit of all. As an advocate for Census Tract 1503.05 in Sonoma Valley, an area clearly in need of as many county resources as

possible, I ask you to keep this area in mind as you think of Housing Element policy as it pertains to Sonoma Valley.

Sonoma Valley context

All things being equal, what we need to see in Sonoma Valley for Housing Strategy is that High Opportunity Areas in and directly adjacent to the core USA (served by VOMWD and Sanitation District) get rezoned and used to meet the county's lower-AMI RHNA objectives. As noted, wealth and poverty are already concentrated and segregated in Sonoma Valley, with the Springs and Tract 1503.05 already taking an over-burden of dense, low-income infill.

The county is trapped by a Green Checkmate dynamic. Smart, city-centered growth and dense infill are shunted away from Sonoma and its edges by a combo of UGB and open space protection/ buffer protections while dense infill is resisted by NIMBYs. Checkmate. This leads development to be dumped on the unincorporated Springs, as the tax credit High Opportunity Areas on the edges vehemently avoid their fair share of infill and density, and Sonoma avoids being a whole-Valley player.

Suggestions: make a fairness-based fee/ tax assessment to equalize disparate Sonoma Valley locales

One:

If Sonoma is not cooperating with county/ regional planning and the Springs already has concentrated poverty and the USA edges already have concentrated wealth, an obvious solution is to assess the concentrated High Opportunity Area wealth to pay for the AFFH equity these areas are avoiding. If unincorporated USA High Opportunity Areas want to beg out, they should pay an in lieu cost to get out of AFFH. This TBD cost should legitimately cover the creation of the number of lower-income units that RHNA and AFFH would allocate to the High Opportunity Areas.

Two:

County GSA fees and endangered salamander habitat permitting have had policy and fee fairness considerations enacted by the county. We also need a rent-fairness/ tenant protection doctrine in DAC areas with high housing cost burden.

FYI Census tract 1503.05 Housing Burden (as per SB-1000, CA EPA EnviroScreen 4.0 data)
Census tract 1503.05 has 6,183 people.

“The housing burden indicator measures the percent of households in a census tract that are both low income (making less than 80% its county median family income) and severely burdened by housing costs (paying greater than 50% of their income to housing costs). The data are from 2013 - 2017.”

This data has surely worsened since 2017 due to essential worker annual income impacts from fires, C-19 and now inflation.

“27 percent of people in this census tract are housing burdened low-income households. The percentile for this tract is 86, meaning the percent housing burdened is higher than 86% of the rest of the state.”

“There are about 1830 housing units in this tract. About 1010 of them are considered low income. Of these low-income households, about 500 are considered housing burdened.”

Tract 1503.05, by many provable, reputable objective measures, has half of its population in DAC status. Tract 1503.05 is included in the Bay Area Segregation study cited by Permit Sonoma in this packet.

Any AFFH strategy and policy in Sonoma Valley needs to account for strong disparities between Tract 1503.05 and tax credit High Opportunity Areas, and resolve those issues here.