

From: [Frederick Allebach](#)
To: [Doug Bush](#); [Ross Markey](#); [Haleigh Frve](#)
Cc: [Scott Orr](#)
Subject: Public comment #2 on Sonoma County (SoCo) General Plan (GP) kickoff and vision
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Fred Allebach

3/22/26

Public comment #2 on Sonoma County (SoCo) General Plan (GP) kickoff and vision

2,200 words, five pages, long-winded but hopefully an interesting read at least

My impression from the 3/19/26 SoCo Planning Commission kickoff meeting was that status quo land use protectors are ready and eager to fight to preserve the advantages I described in my 3/19 SoCo GP comment. A well-developed anti-growth and anti-development narrative appears ready to be leveraged against any language or land use that might impinge on the status quo county landscape.

My take: Green Checkmate NIMBYism rules in SoCo

The Green Checkmate is when there are UGBs and green separators all around but city-centered/ urbanized-area growth is foiled by NIMBYs who prevent dense infill by all means possible.

In SoCo, the more elite the demographics and concomitant land use/ zoning maps, the higher the prices and the less chance any but white and wealthy cohorts can live there. This top-dog cohort is powerful, is registered to vote at very high percentages, has a majority of electeds, and a majority on most boards and commissions, and dominates local policy. In aggregate this local power map is what has stalled and prevented housing production of all types and why new Cal state housing laws have increasingly been rolled out. Ironically, blue state regions like the Bay Area are also among the most unaffordable and segregated in the country.

As AFFH and state housing laws take on more force to address the negative externalities of green-centered liberalism, local governments have adapted with work-arounds: making more historical overlays, mountain lion habitat overlays, crafting ordinance and policy language to minimize density, upzoning, and hard protections, slow-walking, stalling, suing, and doing the absolute minimum.

As a social justice advocate, I see inclusivity and exclusivity, segregation and integration as valid core issues. I see these core issues elided by status quo-protecting cohorts who instead only address environmental and neighborhood character issues. This is a case of Miles' Law, you stand where you sit, people who have turf try to protect it, people outside the castle gates try to get in to gain a seat at the table, a voice, and a measure of security.

AFFH is a serious fact on the policy ground

In the SoCo GP, there is an objective need to meet and account for AFFH state law. Many state housing laws now stand in support of AFFH. Reasons given to not include and upzone must come to grips with AFFH.

Affirmatively Furthering Fair Housing (AFFH) in California is mandated by state law (AB 686) to combat housing discrimination, overcome historic patterns of segregation, and eliminate racial/economic disparities in housing access. It requires public agencies to take "meaningful actions" to foster inclusive communities and increase access to opportunity.

- **Legal Mandate (AB 686):** Passed in 2018, this law requires all state and local public agencies to go beyond simply not discriminating, forcing them to proactively take actions that foster inclusive communities.
- **Addressing Segregation:** The goal is to bridge the gap between high-opportunity areas and disadvantaged neighborhoods by promoting housing choices for all, regardless of race, income, or background. This is where small time and rural character modern redlining through zoning rubs up against AFFH
- **Data-Driven Approach:** California's approach mirrors federal guidelines, requiring local governments to use data to analyze and overcome systemic imbalances in housing, such as concentrated poverty.

- **Fair Housing Choice:** A key rationale is ensuring that individuals have the opportunity, information, and options to live where they choose without unlawful barriers.
- **Community Investment:** AFFH aims to improve infrastructure and housing quality in under-resourced areas.

These requirements are enforced through a city or county's Housing Element (HE), which must demonstrate how these fair housing goals will be met.

The HE must be consistent with the rest of the GP and AFFH is in the HE. *For consistency, AFFH must be a critical piece in creating and formulating the GP land use map.* Small-town and rural character protectors who try to work around and ignore AFFH are promulgating a false zero-sum game frame that does not have triple bottom line, full cost accounting that includes social equity, integration, and AFFH. They are putting forth a partial argument.

My arguments are partial too, but my cohort is outside the castle gates. We are trying to find room at the inn. Society-wise, harm and fairness arguments are at stake here, versus hoarding and failure to share. AFFH addresses this exact moral issue.

It's Permit Sonoma's and elected's job to comply with the law and finesse all the interests at stake, and to make sure all constituents and their interests get to the table. This is how managers of all types must juggle the muddy water and paradoxes of competing priorities and goals. The following reference illustrates how some methods are more apt than others. (1)

In terms of outreach, with the GP, the HE, Land Use, none of this should be seen as a winner take all, zero-sum game process. If a win-win frame can be adopted among the players where all acknowledge the validity of each other's points, that would be a start. At least Permit Sonoma could give a frank assessment of who and what the primary interests at stake are; make a flow chart of interests and laws.

GP outreach should not be seen as a majority vote process or a popularity contest where the loudest voices try to stack the deck to prevail but rather as an assessment of how the County is going to fairly meet its objective demographic needs. If it's known that 40% of the County is at or near DAC (disadvantaged community) status, and that this cohort tends to be segregated people of color and/or low-income and that land use and ordinances are in place to maintain this segregation, is the County really going to say, "Most people responded saying they want to keep (segregated) neighborhood character, so that's what the public wants and that's what will be in the Land Use Element?"

That there are approximately 40% DACs in SoCo is a serious problem calling to be addressed in the GP. AFFH is designed to level the playing field from past unfair land use and planning practices. AFFH needs to have a remedial boost from the County, not a minimization or an elidement.

In a far-flung county where a lot of driving is called for, VMT (vehicle miles traveled) and GHG (greenhouse gas) impacts are a given. Driving can't just be a privilege for wealthy tourists and segregated, low-density locales. We can't sanction segregation and inequity based on a VMT and GHG argument, can we? All poor people get packed onto strips and take the bus while low-density home owners with Lexuses and Audis drive everywhere?

High-VMT, high MHI (median household income), low-density, high-fire hazard areas block dense urbanized infill because it might impede their evac routes? Checkmate!

From a GHG impact standpoint, single family homes are the most wasteful of all, and the higher the MHI the higher the GHG footprint. The GP should be looking at ways to discourage this type of unsustainable land use but the fact is market rate RHNA production far outstrips lower income housing production. In the US just as we need

to use less resources and energy, we get bigger and bigger cars and double down on single family home production?

The GP should not end up being a way to make lower income people subsidize the GHG and VMT waste of higher income cohorts. Green Checkmate advocates should not block and stand in the way of real adaptation.

Obviously, these topics are complex and there are no simple answers. The GP process is a good opportunity for the County to try and change the channel from a lot of maladaptive, unjust and unsustainable practices.

Points that need to be accounted for in General Plan vision, Land Use Element and consequent County zoning map

-AFFH has to be complied with. In any overall GP policy formula, AFFH mandates have to take equal or even top billing along with VMT/ GHG impacts, fire evac fears, and efforts to protect small town and rural character. Systemically segregated land use and zoning goes against AFFH and preserves the privilege and advantage of middle and upper middle-class whites.

-In the GP vision, city-centered growth language or not does not absolve the County of meeting its own RHNA obligation, of which 40+ percent is for Very Low and Low income housing units. Long-term RHNA under-production of Very Low, Low and Mod units calls for a remedy, and a County-level municipal socialism tack a la AOC and Mamdani, especially for affordable housing, is called for.

-Housing is the top aggregating indicator from which all other indicators of health and well-being stem from. If the County can't or won't mandate a living wage ordinance so households can be housed at 30% and less of their MHI, then the County needs to use its powers to see that enough 100% Affordable housing gets produced proportionate to the need.

-County RHNA needs to primarily go in the 12 County USAs: Airport, Forestville, Geyserville, Graton, Guerneville, Larkfield/ Wickiup, Monte Rio, Occidental, Penn Grove, Sea Ranch, Sonoma Valley (Springs area to Glen Ellen.) However, places like Kenwood may also need upzoning to address local AFFH workforce and service needs.

-Where USAs are adjacent to cities, as with Sonoma Valley, Larkfield/ Wickiup, Penn Grove, and Graton, annexation to the adjacent city should be a top land use priority.

-DACs and working class need to be figured into any economic analysis and considerations. The economy is made up of all pieces; a business as usual concept that maintains inequitable privilege and poverty, should by no means be our baseline.

-Local economies need workers to live near jobs and services to lower VMT and GHG. If workers can't live near jobs and services, then the whole VMT/ GHG impacts argument has a major blind spot. If the rural and small town economies need workers, then they must shoulder the burden of meeting those needs.

-Working class service jobs examples: home health care, yard work/ gardening, restaurant, hospitality, construction, home repair and maintenance, farm, vineyard, retail, gas station, convenience store.

-Mid-level jobs: teacher, physical therapy, nurse, social worker, fire, police.

-As figured in my [Substack](#), for who can afford what housing in SoCo, only those in the top 10% of US earners can afford to buy a median-priced home in SoCo or Santa Rosa. This means that across the County there is a large need for a whole range of Affordable housing to meet reality and to meet RHNA.

-Local economies need retail and public services for the range of workers who live there. If residential occupancy and retail is of a certain small scale, all prices will likely be at an elite tourist level. This will require the local working class to use more VMT and have more GHG impacts when they have to drive to seek affordable prices.

-Upzoning to foster all types of Affordable housing needs to happen in the County, especially in higher resource opportunity areas, which can easily be identified by the Block Group (BG) and not just Tract. For example, a Tract may have an ag BG, an upper MHI/ white BG, and two lower MHI/ POC BGs. This segregation is not erased just because the demographic detail is below the Tract level. Permit Sonoma can do a more fine-grained local analysis when called for. Let's say Monte Rio or Geyserville have many households with a high MHI that call for a lot of home and personal services, and there is tourism there; these are not USAs but a local 50-unit Affordable housing project could be justified.

-Zoning is a well-known modern redlining tool. This needs to be addressed in the Land Use Element. Interest

groups all bring their own sets of data and sources, character protectors use the League of Cities and the Embarcadero Institute for sources. Equity advocates use UC Berkeley Turner Center, Haas Institute, Othering and Belonging Institute, and the Bay Area Equity Atlas, also used by ABAG. When all blind men keep calling the elephant different things, all the local arguments and narrative competitions have to come out in the wash of state housing laws and AFFH.

-Permit Sonoma needs to make a flow chart of which laws take precedence in a Land Use Element, and then how that will be consistent with AFFH, VMT etc.

-The equity/ AFFH narrative is up against, economic and environmental narratives, all of which are siloed and metaphorically feeling parts of the GP elephant and not seeing the whole. Who sees the whole? Who ever sees out of Plato's Cave? If we are all blinded by our maps and narratives and we'll never get to the truth because we all always just find what we are looking for, then is it the strong with the most resources who always prevail?

-In socially constructed reality, which is what this planning is all about, there is no Truth with a capital T. If that's the case, then the merits are all of our own making and we are all competing to have our ideals be represented in County plans. To the extent that anyone's arguments are persuasive, they may get a BOS vote or two. In the case of housing, land use, RHNA, and AFFH, there are state law baselines that have to be adhered to.

(1) https://www.nytimes.com/athletic/7125163/2026/03/20/nba-leadership-culture-mistakes-warriors/?unlocked_article_code=1.U1A.KWw1.UO266DEbDlI3&source=athletic_user_shared_gift_article_copylink&smid=url-share-ta

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"We don't know where we're going but we have to stick together in case somebody gets there." Ken Kesey

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