

Sonoma County



Housing Element

Technical Background Report

Board of Supervisors Adoption Draft

August 2023

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Section IV: Technical Background Report

4.1 INTRODUCTION

This Technical Background Report includes both census data and locally acquired information and data, including but not limited to areas of economic and ethnic segregation, special needs, local knowledge of the housing stock, local housing resources, and an analysis of housing constraints. It meets all statutory requirements in Government Code § 65583(a) (1 and 2) related to quantification and analysis of existing housing needs. Key information from this analysis is summarized earlier in sections 1.9 and 1.10 of the Housing Element.

4.2 HOUSING NEEDS DATA

The Technical Background Report makes use of the Housing Needs Data Report provided by the Association of Bay Area Governments (ABAG) and pre-certified by the California Department of Housing and Community Development (HCD) in March 2021, including the following:

- population, employment trends and existing and projected housing needs for all income levels,
- household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding (e.g., existing households, existing extremely low-income households, total, lower and extremely low-income households overpaying, overcrowded households); and
- special housing needs (e.g., number of persons with disabilities, number of persons with developmental disabilities, elderly households by tenure, large households by tenure, farmworkers and female headed households).

The Housing Needs Data Report is included in Appendix C and contains a list of housing terms, RHNA methodology, household characteristics, demographics of housing stock, and data on special needs populations.

While this Housing Element addresses the housing needs of Unincorporated Sonoma County, much of the available data from the U.S. Census Bureau is at the County level and includes city data. Where data is available specifically for the Unincorporated County, it is used and so indicated. Otherwise, references to data for Sonoma County refer to data for the County and its cities.

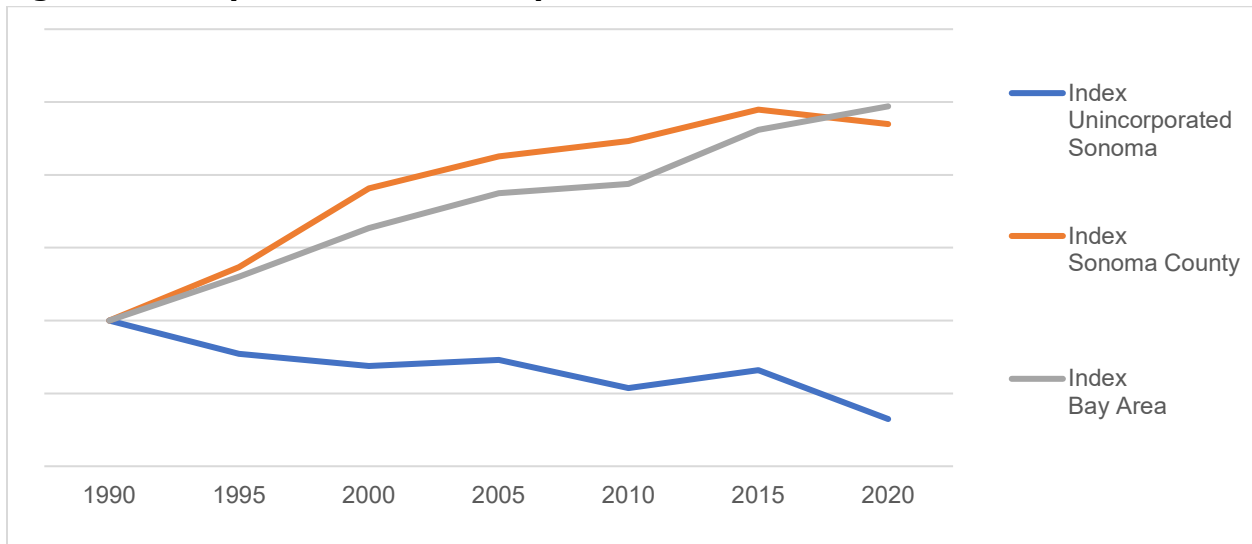
4.2.1 Population and Housing Data

Sonoma County population growth trends provide insight into existing and future needs. Information from this analysis is also summarized in Section I of the Housing Element.

Population Growth and Projections

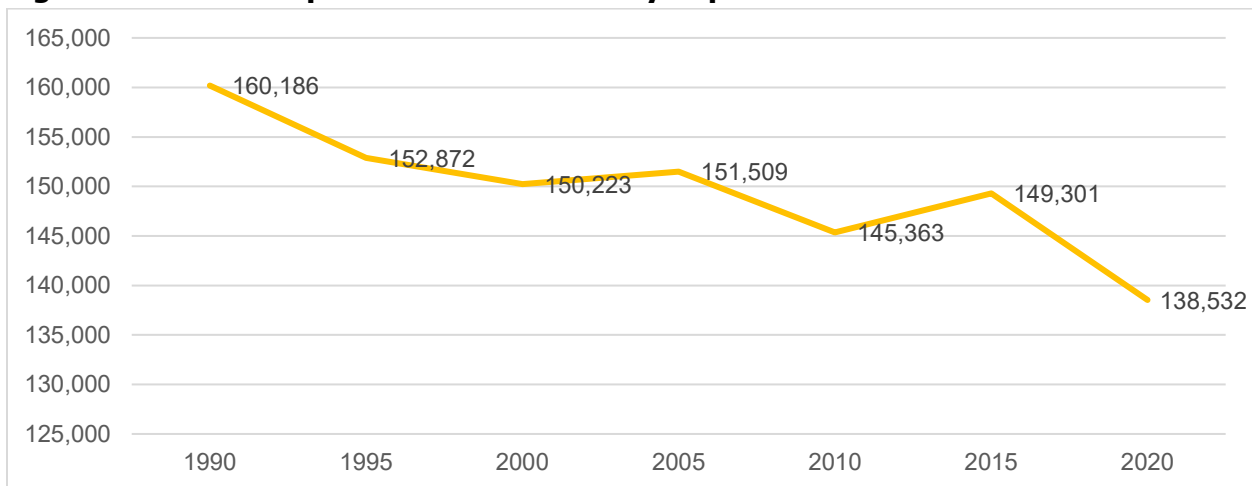
While the population of Sonoma County has grown steadily over the years, largely in tandem with the Bay Area region (Figure 1), the Unincorporated County population has experienced a slight decline in the past 30 years due to annexations, fires, and other factors (Figure 2).

Figure 1: Population Trends Comparison



Source: California Department of Finance, E-5 Series

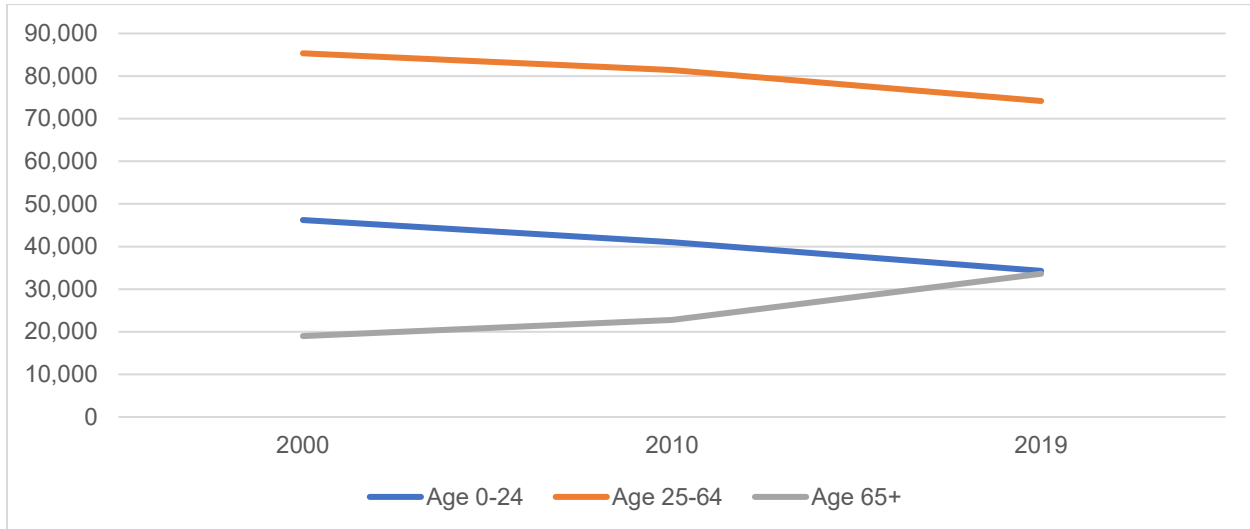
Figure 2: Unincorporated Sonoma County Population



Source: California Department of Finance, E-5 Series

The number of people aged 65-74 increased significantly in the last ten years, and as this population aged, the percentage of children declined as seen in Figure 3.

Figure 3: Population by Age



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

While the Unincorporated County population remains primarily white, its Latino population has grown steadily and significantly since 2000 (Table 1).

Table 1: Population by Race

	2000	2010	2020
Asian/Pacific Islander	1.8%	2.8%	3.4%
Black or African American, Non-Hispanic	0.9%	0.8%	0.8%
White	77.1%	71.1%	65.6%
Other Race or Multiple Races	3.6%	3.2%	6.0%
Hispanic or Latino	16.6%	22.0%	24.2%

Source: U.S. Census Bureau, Census 2000, Census 2010, American Community Survey 5-Year Estimates, 2019

Housing Costs

Rental costs in Unincorporated Sonoma County vary widely based on location. The communities with the highest rental costs are Glen Ellen, Kenwood, and Penngrove, and the communities with the lowest rental costs are Guerneville, Rio Nido, and Fulton. The median rental cost for all Unincorporated Sonoma County communities was \$2,960 in early 2023 (Table 2).

Table 2: Median Rental Costs in Unincorporated Sonoma County Communities

	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Median Rental Cost	\$1,400	\$2,215	\$2,775	\$4,300	\$6,750

Source: Zillow.com, Rental costs in Forestville, Fulton, Glen Ellen, Guerneville, Rio Nido, Kenwood, Larkfield-Wikiup, Monte Rio, Occidental, Penngrove, Salmon Creek, Bodega Bay, Sea Ranch, and Sonoma Valley, Accessed 2/23/2023

4.2.2 Special Needs Housing Analysis

This section includes data and analysis of the jurisdiction’s projected housing needs for populations that have special housing needs populations including elderly; persons with disabilities, including developmental disabilities; large households; female-headed households; homeless families and persons in need of emergency shelter; and agricultural workers. In identifying and analyzing these special housing needs, the County is able to provide resources and actions to accommodate and address its diverse housing needs. The Assessment of Fair Housing (AFH) later in this report will identify and evaluate barriers to fair housing choice and contributing factors that exist within the County.

Household income levels are defined in guidelines from HCD to evaluate housing affordability, housing need, and eligibility for housing assistance. According to HCD’s 2022 State Income Limits, the area median income (AMI) for a family of four in Sonoma County in 2022 is \$78,950 for an individual and \$112,800 for a family of four (Table 2). Table 3 provides a sample of wages in Sonoma County.

Table 3: Area Median Income, Sonoma County

Size of Household	Annual Area Median Income
One-person household	\$78,950
Two-person household	\$90,250
Three-person household	\$101,500
Four-person household	\$112,800

Source: CA Department of Housing and Community Development, State Income Limits for 2022

Extremely Low-Income Housing

Extremely low-income (ELI) is defined as a household income at or below 30 percent of the area median income, adjusted for household size. In Sonoma County, an individual with an income of \$24,450 or less or a family of four with a household income of \$35,650 or less is considered extremely low-income.¹ These incomes are equivalent to working 30 hours per week at minimum wage and working full time with an hourly wage less than \$17.46, respectively. Table 4 shows wages for a selection of common professions held by those in extremely low-income households.

Table 4: Median Income by Occupation in California

Occupation	Median Hourly Wage	Median Annual Wage
Home Health and Personal Care Aides	\$15.26	\$31,740
Farmworkers and Laborers, Crop, Nursery, and Greenhouse	\$15.28	\$31,770
Cashiers	\$15.70	\$32,650
Laundry and Dry-Cleaning Worker	\$16.32	\$33,950
Childcare Workers	\$17.02	\$35,390
Waiters and Waitresses	\$17.35	\$36,090
Retail Salesperson	\$17.46	\$36,310
Janitors and Cleaners (except Maids and Housekeepers)	\$17.99	\$33,120
Cooks, Restaurant	\$18.26	\$37,980

Source: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages (QCEW), 2021 first quarter industry employment <https://www.bls.gov/oes/current/oes353031.htm>

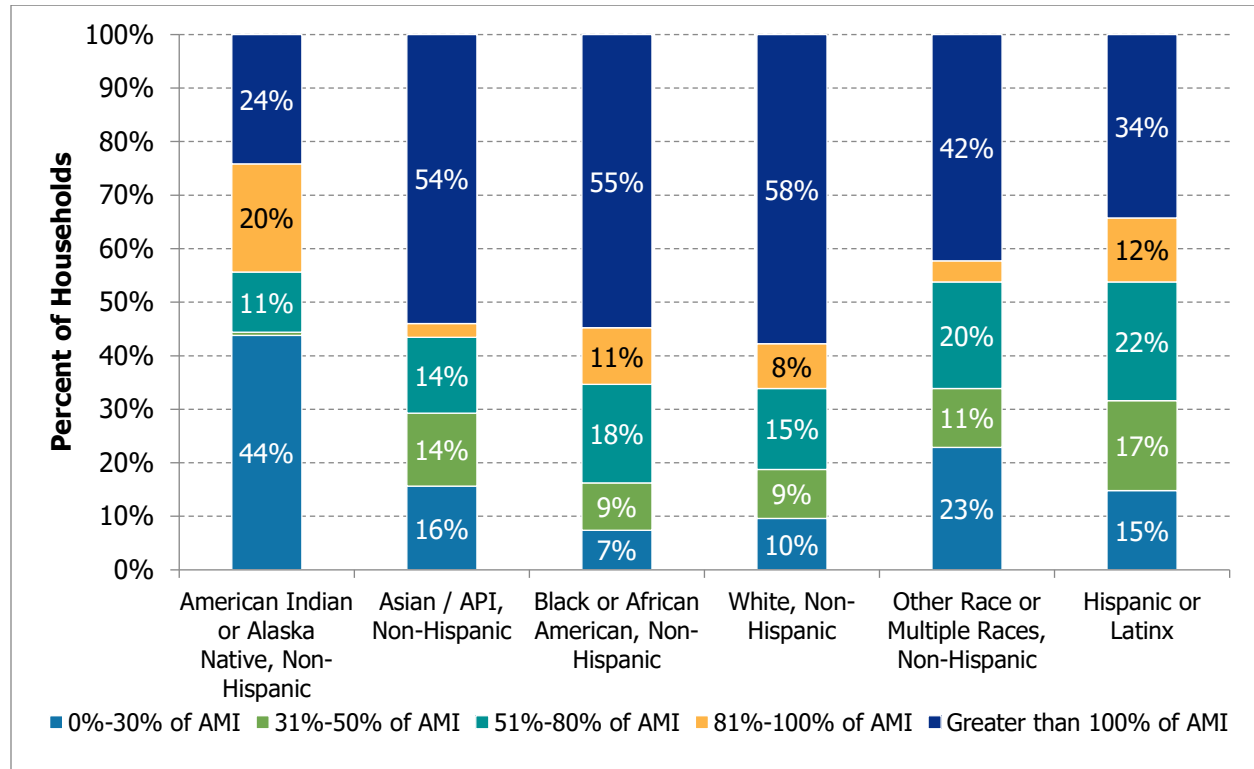
An estimated 6,354 Unincorporated Sonoma County households are considered extremely low-income, representing 11% of total unincorporated households. This is similar to the percentage of extremely low-income households in the greater Sonoma County including its cities, but lower than the percentage of extremely low-income households in the greater Bay Area.⁴

In the Unincorporated County, extremely low-income households are disproportionately American Indian or Alaskan Native, Asian/API, Hispanic or Latino, Multiple Races, or other Races except Black or African American and white (Figure 4).

¹ HCD, State Income Limits for 2022

⁴ HUD, Comprehensive Housing Affordability Strategy (CHAS) ACS Tabulation, 2013-2017

Figure 4: Household Income Distribution by Race, Unincorporated Sonoma County



Source: HUD, Comprehensive Housing Affordability Strategy (CHAS) ACS Tabulation, 2013-2017

Note: American Indian or Alaska Native, Non-Hispanic and Black or African American, Non-Hispanic individuals make up less than 1% of the total population.

Households that pay more than 30% of their monthly income on housing are considered cost-burdened and those that pay more than 50% are considered “severely cost-burdened.” The U.S. Census Bureau defines an overcrowded household as one with more than one person per room (rooms exclude bathrooms and kitchens). Severe overcrowding is more than 1.5 occupants to a room.

Table 5 below describes the level of cost burden and housing problems experienced by extremely low-income households in Unincorporated Sonoma County. Extremely Low-Income households are disproportionately likely to rent, be severely cost-burdened, and experience overcrowding or severe overcrowding. These housing problems and others are discussed for all income groups in Section 4.5.5 Disproportionate Housing Needs, Including Displacement.

Table 5: Unincorporated Sonoma County Cost Burden and Housing Problems by Tenure

	ELI Households	% ELI Households	Total Households	% Total Households
Tenure				
Rent	3,388	53.3%	19,622	33.3%
Own	2,966	46.7%	39,294	66.7%

Overpayment				
0%-30% of Income Used for Housing	862	14.5%	35,784	61.1%
30%-50% of Income Used for Housing	624	10.5%	11,705	20.0%
50%+ of Income Used for Housing	4,456	75.0%	11,074	18.9%
Overcrowding				
1.0 Occupants per room or less	5,986	94.2%	53,238	95.4%
1.01 to 1.5 Occupants per Room	273	4.3%	1,980	3.5%
1.5+ Occupants per Room	95	1.5%	604	1.1%

Source: Comprehensive Housing Affordability Strategy (CHAS) 2013-2017 ACS Tabulation

Note: Total households for each separate data set may not be the same due to the CHAS methodology and data availability.

Programs and Resources

Housing available or suitable for ELI households include mobile homes, studios, one-bedroom units, shared multi-bedroom homes, accessory dwelling units (ADUs), and single-room occupancy (SROs) units. During the 5th Cycle, 33 new units of extremely low-income multifamily housing were developed within the Unincorporated County, mainly within two affordable projects in the Sonoma Valley. Additional projects serving ELI populations during the 5th cycle included Veteran’s Village, a tiny homes project on County land providing 10 self-contained units for homeless veterans; Los Guilicos, a 60 unit tiny home transitional shelter project at the former juvenile detention facility on County land (Figure 5); and the Palms Inn, a 104-unit motel conversion to SRO units serving formerly homeless individuals, including homeless veterans, on private land in unincorporated Santa Rosa. In 2018, the County updated its Zoning Code for ADUs and SROs to allow SROs in more zones, allow larger ADUs, and reduce impact fees for ADUs. This was done to reduce constraints to the development of these housing types and encourage more variety of ADUs and SROs to better serve special housing needs. ADUs are allowed in all residential zones and some commercial zones where existing residences exist. The Zoning Code allows for an increase in ADU sizes while reducing impact fees to encourage ADU construction.

Figure 5: Los Guilicos Transitional Shelter Units



Financial resources to assist extremely low-income households include the Housing Choice Voucher Program (Section 8), funded by the Department of Housing and Urban Development (HUD) and administered by the Sonoma County Community Development Commission (CDC). This program provides rental assistance, allowing the voucher holder to pay an affordable percentage of their income towards rent with the voucher covering the balance of the cost. There is a waiting list for this program, which opens approximately every three to five years. Locally, the County requires 30% of units receiving assistance through the Low- and Moderate-Income Housing Asset Fund (LMIHAF) to be affordable to extremely low-income households. (Program HE-1a)

Despite the County's successes in providing for these extremely low-income households during the planning cycle, there remain over 5,000 cost-burdened extremely low-income households in the Unincorporated County and current programs and resources are not sufficient to meet this need. Programs and policies included in the Housing Element to address this need include the following:

- **Policy HE-1b:** Continue the County's existing housing programs, including its state and County Supplemental Density Bonus Program, which provide a greater density bonus if deeper levels of affordability are provided. Continue to evaluate these programs in view of changing housing needs and policies and expand or modify as needed to increase opportunities and further incentivize affordable housing.

- **Policy HE-4b:** Continue using County Fund for Housing (CFH) monies to subsidize development fees for multifamily housing projects where the units are affordable to extremely low, very-low- and low-income households.
- **Policy HE-4c:** Consider fee waivers/subsidies for multifamily housing projects where the units are affordable to extremely low-, very low- and low-income households. Ensure consistency State Government Code
- **Policy HE-1b:** Continue the County’s existing housing programs, including its state and County Supplemental Density Bonus Programs as well as the Rental Housing Opportunity Area Program and the Ownership Housing Opportunity Area Program. Continue to evaluate these programs in view of changing housing needs and policies and expand or modify as needed to increase opportunities and further incentivize affordable housing.
- **Policy HE-5g:** Continue to encourage the retention and further construction of small rental units such as accessory dwelling units, studios, and single-room occupancy (SRO) units.
- **Program 9:** No Net Loss of Residential Capacity to Accommodate RHNA- Track the remaining unmet RHNA by income category throughout the planning period and update the Sites Inventory if needed to ensure there is remaining capacity properly zoned to meet the need.
- **Program 16:** Expand AH Combining District – Expand the AH Combining District, which provides allowances for 100% affordable housing with at least 30% of units affordable to extremely low-income households and provide an “Enhanced Affordable” option that provides more concessions and higher densities for developments with at least 20% of units affordable to acutely low-income households.
- **Program 25:** Incentivize and Promote ADU and JADU Development -Program Description: Incentivize and promote the development of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) by providing technical assistance and resources.

Senior Households

The Unincorporated County’s population is slightly older than that of the county as a whole and older than it was in 2010 (Table 6). Based on current age cohorts, the size of the senior population is likely to increase during this planning period.

Table 6: Population Age Distribution, Unincorporated Sonoma County

Age Group	Sonoma County and its Cities		Unincorporated Sonoma County	
	2010	2019	2010	2019
Under 25	28%	24%	29%	24%
25-44	22%	21%	22%	22%
45-64	34%	30%	35%	31%
65+	16%	23%	16%	24%
Total	100%	100%	100%	100%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2019

There are 23,368 senior households in Unincorporated Sonoma County, defined as households with a householder aged 62 or older. Of these, 83% were owner-occupied and 17% were renter-occupied by senior households. Senior households are more likely to own their home across all income groups, but there is a higher rental rate among extremely low- and very low-income senior households (Table 7).

Table 7: Senior Households by Income and Tenure, Unincorporated Sonoma County

Income Group	Number of Occupied Households	Percent of Occupied Households	Number of Owner-Occupied Households	Percent of Owner-Occupied Households	Number of Renter-Occupied Households	Percent of Renter-Occupied Households
Extremely Low-Income 0%-30% of AMI	2,368	10.2%	1,697	8.8%	671	16.7%
Very Low-Income 31%-50% of AMI	2,591	11.1%	1,714	8.9%	877	21.9%
Low-Income 51%-80% of AMI	3,985	17.1%	3,036	15.8%	949	23.7%
81%-100% of AMI	2,007	8.6%	1,582	8.2%	425	10.6%
Greater than 100% of AMI	12,317	52.9%	11,232	58.3%	1,085	27.1%
Total	23,268	100.0%	19,261	100.0%	4,007	100.0%

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release

Senior or elderly individuals often have fixed incomes and may have additional special needs related to access or care that require physical improvements to their homes. This may include the addition of ramps, handrails, lower cupboards and counters, creation of a downstairs bedroom, or other modifications to enable them to remain in their homes.

Programs and Resources

Depending on the type of subsidy and community services, some senior living facilities throughout the county target low and very low-income senior renters. According to Sonoma County CDC’s

affordable housing inventory, there were 2,734 restricted affordable senior housing units within Sonoma County,⁶ with another 90 units anticipated to be available for occupancy in Summer 2023.

Additionally, CDBG dollars financed rehabilitation or accessibility modifications for over 250 low-income and senior homeowners and renters. Other types of housing that may be utilized by seniors include residential community care facilities, multifamily complexes, manufactured homes, cottage housing, ADUs, and SROs.

Petaluma Ecumenical Properties (PEP) Housing is an organization that provides access to affordable housing for seniors with fixed incomes. Share Sonoma County is an organization that provides a matching service for low-income individuals who need housing with seniors who need caretaking services in their home.

The County's Human Services Department provides adult and aging support services to jurisdictions (including the Unincorporated County). Resources include direct contact with a social services worker, an in-home supportive services directory, and in-home/ community-based visits to homes that provide on-going support.

Programs and Policies to further address the special housing needs of senior households include the following:

- Policy HE-5d: Strive to provide for senior housing needs. Focus senior housing projects in areas well-served by transit, accessible sidewalks, and amenities. Consider adoption of a Senior Housing (SH) Combining district with additional incentives. Promote Universal Design principles in new residential construction.
- Housing Element Program 18b: Housing Land Trust Model - Continue to collaborate with local housing land trust organizations to expand opportunities to use the Housing Land Trust model, including the retained life estate model, in which a homeowner would receive a financial benefit, stay in their home throughout their life, and the land trust would acquire a property that can be provided as deed-restricted affordable ownership housing in the future.
- Program 26: Incentivizing Senior Housing - Provide development incentives and allowances for housing suitable for seniors. Consider adoption of a Senior Housing Combining district and promote principles of Universal Design.

Persons with Disabilities, including Developmental Disabilities

State law defines disability as a "physical or mental impairment that makes performance of a major life activity difficult."⁷ Physical and mental impairments can include chronic or episodic conditions such as HIV/AIDS, hepatitis, epilepsy, seizure disorder, multiple sclerosis, heart disease, and other similar conditions. The level of difficulty means that any limitation to a major

⁶ County of Sonoma Community Development Commission, Housing and Neighborhood Investment, Affordable Housing Inventory, <https://sonomacounty.ca.gov/development-services/community-development-commission/divisions/housing-and-neighborhood-investment/affordable-housing-inventory>, accessed March 2022.

⁷ California Civil Rights Department – <https://calcivilrights.ca.gov/peoplewithdisabilities/>

life activity is protected under State law such as the Prudence K. Poppink Act and Fair Employment and Housing Act.

Often on fixed monthly incomes, disabled individuals need safe and affordable housing near services and/or family members to meet their daily needs. Individuals may also be at increased risk of losing a familiar living space if an aging parent or guardian is no longer able to aid the individual.

A developmental disability is defined in the Lanterman Act as an impairment that “originates before an individual attains 18 years of age, continues or may continue indefinitely, and constitutes a substantial disability for that individual” and includes mental retardation, cerebral palsy, epilepsy, and autism.

According to the 2019 5-year ACS estimates, roughly 58,940 individuals or 11.8% of the total county population is experiencing a form of sensory or cognitive difficulty or both and are not admitted to any institutional facility.⁸ Few (1.3%) of those individuals are under 5 years old whereas 15,636 or 43.6% are 75 years or older and represent the largest share within the total age group who experience disabilities. This includes hearing and vision difficulties, cognitive or ambulatory difficulties, and self-care or independent living difficulties. Ambulatory difficulties can be experienced by all age groups, as shown in Table 8 below.

Table 8: Disability Type per Age Group in Sonoma County

Disability Type	Under 5 years	5-17 years	18-34 years	35-64 years	65-74 years	75+ years	Total
Hearing difficulty	151	351	1,169	4,840	4,577	7,189	18,277
Vision difficulty	234	682	1,137	3,663	1,381	2,171	9,268
Cognitive difficulty	2,633*		3,929	8,919	2,149	4,095	21,725
Ambulatory difficulty	313*		1,063	10,773	5,804	10,303	28,256
Self-care difficulty	879*		792	4,096	1,667	4,487	11,921
Independent living difficulty	n/a	n/a	2,450	7,345	2,934	8,289	21,018

* The number of individuals experiencing cognitive, ambulatory, and self-care difficulties represent age groups 17 and younger.

Source: US Census Bureau (2021) American Communities Survey 1-Year Estimates, S1810 Disability Characteristics <https://data.census.gov/cedsci/table?q=S1810>

Programs and Resources

The Department of Developmental Services manages a statewide network of 21 community-based non-profit regional centers to plan for and deliver services. North Bay Regional Center (NBRC) is a private organization that partners with community-based organizations and agencies to serve developmentally disabled residents in the Napa, Sonoma, and Solano County areas. Sweetwater Spectrum is a local non-profit that manages a 16-bedroom housing development for individuals with autism and other developmental disabilities. First 5 Sonoma County, a State

⁸ US Census Bureau, American Community Survey 5-Year Estimates, 2019

funded organization to support an integrated system of care for children and their families, provides special needs services for children experiencing developmental disabilities.

The County CDC provides rental assistance to disabled households within the Urban County (Unincorporated County and all of its non-entitlement jurisdictions) (Petaluma and Santa Rosa not included), including HIV/AIDS and other disabilities. Additionally, during the last Consolidated Plan period, July 2015 to June 2020, ADA project funds in an aggregate amount of nearly \$3.5M were awarded to 36 different projects sponsored by the eight participating jurisdictions. These projects include sidewalk "curb cuts" and other path-of-travel retrofit projects along roadsides; library, park, and community center restroom ADA renovations; creation of bike paths; and community facility ADA retrofit upgrades.

Under the recently adopted Sonoma Development Center Specific Plan, the continuation of the 150 year history of the SDC providing services to persons with developmental disabilities is memorialized in the document's guiding principles and its programs. Specifically, five parcels within the SDC project site are reserved for projects that serve people with developmental disabilities, prioritizing sites close to the preserved open space and ensuring a continuation of providing a welcoming community for people of all ages and abilities. These parcels are exempt from parcel size maximums specified in the Plan.

Services to disabled residents of the county are available and easily accessible; however, not all qualifying households may be aware of available services and resources. Program 32 (Proactive Outreach Program) will include outreach about available services and resources to address this need.

Large Households

Large households have a unique need compared to smaller households and typically comprise of five (5) or more persons residing together under one roof. Multiple generations including a young family, grandparents, and extended family members may be living in overcrowded conditions due to high cost of living, disability, religious or cultural practices, and other personal reasons. Housing units with three (3) or more bedrooms are residential types that serve large households and are mainly renter-occupied.

In Sonoma County, large households represent 7.7% (8,920) of owner-occupied units and 11.8% (8,634) of renter-occupied units.⁹ Housing with 2-3 bedrooms represent 68.1% (128,997) of total housing units and represent the largest share of housing type.¹⁰ Housing with four or more bedrooms represent 18.4% of total occupied units, of which 25.6% are owner-occupied and 7.0% are renter-occupied, as shown in Table 9 below.

⁹ US Census Bureau (2020) Table B25009 Tenure by Household Size, American Communities Survey
<https://data.census.gov/cedsci/table?q=B25009&tid=ACSDT5Y2020.B25009>

¹⁰ US Census Bureau (2020) Table DP04 Selected Housing Characteristics, American Communities Survey
<https://data.census.gov/cedsci/table?q=DP04>

Table 9: Household Size by Tenure, Unincorporated Sonoma County

Group	Owner Occupied	Renter Occupied
1-Person Household	9,235	6,462
2-Person Household	17,516	4,284
3-Person Household	5,279	2,425
4-Person Household	3,739	2,316
5 or More Person Household	2,609	1,957
Total	38,378	17,444

Housing costs are high in Sonoma County, especially for larger homes. A search for a typical four-bedroom house on the website Zillow.com showed the purchase price to range from \$720,000 to over \$2 million.¹¹ If large rental households are living on incomes below the AMI, they would be more likely to face housing insecurities due to the lack of affordable homes with 4 or more bedrooms.

Programs and Resources

There are approximately 227 existing units targeting low-income family households within the county and 276 proposed units targeting low-income family households that are anticipated to complete construction within the 2023-2031 housing cycle. Other housing programs, including the Community Development Commission’s rental subsidy program and homelessness shelter and assistance programs, serve large households.

Programs and Policies to further address the special housing needs of farmworker households include the following:

- **Policy HE-5a:** Review and revise zoning regulations for a variety of housing types, including special needs housing, programs, and facilities to encourage additional use of residences or construction of new facilities for these purposes and to ensure compliance with State law.
- **Policy HE-5g:** Continue to encourage the retention and further construction of small rental units such as accessory dwelling units, studios, and single-room occupancy (SRO) units. Encourage and facilitate the development of large rental units with more than 3 bedrooms to meet local housing needs for families.
- **Program 15c:** Modify the Density Unit Equivalent provision in its Zoning Code to better encourage the provision of units suitable for large families.
- **Program 16b:** Provide an “Enhanced Affordability” option within the AH Combining district that allows a higher density of up to 30 units per acre and offer 2 additional concessions or incentives for developments within the AH Combining district that meet the base requirements for the AH and also provide 30% of units to special needs households (including large households)

¹¹ Zillow.com for 4-bedroom home on March 13, 2022.

Farmworkers

Statewide, farmworker housing is of unique concern and importance. The 2019 ACS 5-Year Estimate identified approximately 7,333 Sonoma County residents employed in farming, fishing, and forestry occupations, representing 2.4% of the county workforce and 1.47% of its residents.

According to the U.S. Department of Agriculture 2017 Census of Agriculture, of the county's 3,594 farms:

- 48% used hired farm labor
- 93% were considered family farms
- 44% of farms were smaller than 10 acres
- 18% of farmworkers in the whole of Sonoma County are migrant workers
- 82% of farmworkers considered settled and working farm(s) within 75 miles of their residences.

Farmworkers face many of the challenges described in Low-Income and Large Households sections above. Local stakeholders indicate that farm workers live in cramped conditions with poor facilities.

Regional efforts have detailed anecdotal accounts of farmworker housing need in Sonoma County. The Napa Sonoma Collaborative's Equity Working Group identified an overarching change in the composition of farmworker communities over time, moving from a more transitory labor force to a farmworker community comprised of more permanent residents. Bunkhouses are a continuing need, yet the increasing prevalence of families and female-headed farmworker households present a challenge for housing types that have historically served single males. Furthermore, the formalization of the cannabis industry continues to shift the composition of labor and goods in Sonoma County's agricultural industry.

While most agricultural work occurs in the Unincorporated County, the Napa Sonoma Collaborative Equity Working Group noted that farmworkers increasingly live in cities. This was described as due in part to the cost and availability of housing, along with greater proximity to jobs, schools, and services accessed by the entirety of the household. This trend increases distance from residences to workplaces, and some farmworkers are reliant on employer-organized vans to support commutes to agricultural job sites.

Programs and Resources

Various programs are available in the region to meet the needs of farmworkers. These include:

- California Coalition for Rural Housing (CCRH), providing affordable housing opportunities for low-income and rural households
- California Human Development Corporation (CHDC), servicing offices, training centers, and day labor centers

- California Rural Legal Assistance, providing legal aid with civil cases for low-income people, farmworkers, and migrant communities
- Graton Day Labor Center, organizing with domestic workers and day laborers in West Sonoma County for the advancement of their rights and dignity as workers
- La Luz Center, providing rental assistance, tenant support, and access to food, counseling, education, and health resources to eligible residents
- North Bay Jobs for Justice, organizing coalitions for worker rights including farmworkers
- UndocuFund, providing direct assistance to undocumented victims of wildfires in Sonoma County
- United Farm Workers, organizing for a safe and just food supply

The Unincorporated County includes 194 units of existing deed-restricted affordable housing for farmworkers and their families (Table 10).

Table 10: Farmworker Housing Developments in Unincorporated Sonoma County

Project Name	Tenure	Units	Community
Esmond Place	Owner	27	
Green Valley	Owner	14	Graton
Quarry Ridge	Owner	20	
Schoolhouse Ridge	Owner	24	
Twin Oaks Townhomes	Owner	27	
Villa Hermosa	Owner	22	Sonoma
Sonoma Valley Apartments	Rental	16	Sonoma
Larkfield Oaks	Rental	19	Santa Rosa
Springs Village	Rental	25	Sonoma
Total		194	

Source: Sonoma County Community Development Commission

Programs and Policies to further address the special housing needs of farmworker households include the following:

- **Policy HE-5e:** Encourage construction of new ownership and rental farmworker housing, including housing for farmworker families, year-round housing for unaccompanied farmworkers and other migrant workers, and seasonal housing for unaccompanied farmworkers. Assist housing developers in seeking funding, including grants, loans, and Joe Serna funds, for various types of farmworker housing.
- **Policy HE-5f:** Provide additional on-farm housing opportunities where appropriate, especially for small-scale farmers.

- **Policy HE-6i:** Focus affordable and farmworker housing code enforcement activities on the abatement of unsafe conditions and to expedite, where practicable, the rehabilitation and continued availability of housing units.
- **Program 15b:** Amend the Zoning Code to clarify that employee housing for 6 or fewer people, as provided in the State law Employee Housing Act (Health & Safety Code § 17000 et seq.) is treated like a single-family structure with a residential land use designation.
- **Program 15g:** Modify the Section 26-24-040(B)(1) of the Zoning Ordinance Code to reduce acreage and agricultural activity thresholds to qualify for agricultural employee housing units.
- **Program 16b:** Provide an “Enhanced Affordability” option within the AH Combining district that allows a higher density of up to 30 units per acre and offer 2 additional concessions or incentives for developments within the AH Combining district that meet the base requirements for the AH and also provide 30% of units to special needs households (including farmworkers)
- **Program 18b:** Continue to collaborate with local housing land trust organizations to expand opportunities to use the Housing Land Trust model, including opportunities for farmworker ownership housing.
- **Program 25c:** In partnership with regional organizations, promote and publicize new allowances for ADUs and JADUs to the public, including bilingual place-based promotion for low resource areas that have higher income eligibility limits for the CalHFA ADU grant program.

Female Headed Households

Female-headed (FH) households often rely on a single income and can experience increased cost burden due to high cost of living and childcare. Additionally, lack of resources needed for childcare or job training services may exacerbate housing cost burdens and increase the risk of homelessness.

Table 11 below shows that FH households with no spouse or parent present make up 27% of total households in Sonoma County. Families that live below the poverty level represent 3.4% of total households, and 44.7% of the total number of families living below poverty are single-parent females.

Table 11: Female-Headed Households in Sonoma County

Household type	Number	Percent of Total Households
Total households	189,374	100.0%
Total FH households, no spouse	51,567	27.2%
FH households living alone	20,228	10.7%
FH households w. children under 18	6,467	3.4%
Total families under the poverty level	6,369	3.4%
FH households under the poverty level	2,848	1.5%
No child	593	<1.0%
1 or 2 children	1,873	1.0%
3 or 4 children	382	<1.0%

Source: US Census Bureau (2020) American Communities Survey, Poverty Status in the Past 12 Months by Living Arrangement Table B170712 & Occupancy Status Table DP02

Programs and Resources

Female headed households both with and without children need housing that is appropriately sized and affordable. Housing types suitable for this demographic include traditional single-family and multifamily homes as well as transitional or shared housing, ADUs/JADUs, and mobile homes that allow for long-term residency. Helpful services may include fixed-term affordability provisions, a matching service that connects low-income FH households to affordable units throughout the region, and others depending on local needs. The County’s rental assistance programs list priority groups, including low-income female headed households with children, that aims to reduce the cost burden of housing. The housing choice voucher program provides assistance for up to 3,343 units that would otherwise be unaffordable for low- and very low-income families, as further discussed in Section 4.3.1 Resources: Housing Assistance Programs.

The county has a robust inventory of affordable housing suitable for low-income female-headed households. For families at risk of homelessness, the Community Development Commission website contains a list of resources, including the following:

- 2-1-1 is a local hotline that provides information about a variety of services in Sonoma County, including housing, shelter, and food.
- SHARE Sonoma County is a local service provider that matches home-seekers who are either homeless or at-risk of homelessness with home-providers that have an extra room in their house.

Female-headed households may need additional resources related to job training, childcare, and health care coverage. State and County programs are available to assist low-income families and single-parent families, including the following:

- SonomaWORKS provides temporary help for families with children who have little or no money. This may include housing, food, utilities payments, childcare or medical care, job training, legal services, and mental health services.

- Medi-Cal and the County Medical Services Program provide health care coverage for eligible residents.
- CalFresh and WIC help eligible residents afford food and access information about nutrition and health.

Programs and Policies to further address the special housing needs of female-headed households include the following:

- **Policy HE-1a:** Continue to use these funding sources for financing of predevelopment activities for affordable or special needs housing projects.
- **Program 16b:** Provide an “Enhanced Affordability” option within the AH Combining district that allows a higher density of up to 30 units per acre and offer 2 additional concessions or incentives for developments within the AH Combining district that meet the base requirements for the AH and provide 30% of units to special needs households (including female-headed households)

Homelessness

Homeless individuals and families have perhaps the most immediate housing need of any group. They also have one of the most difficult sets of housing needs to meet, due to both the diversity and the complexity of factors that lead to homelessness. HUD defines homelessness as “living in a supervised...shelter...to provide temporary living arrangement” or an individual whose “primary nighttime residence [is] not designed for or ordinarily used as a regular sleeping accommodation...including a car, park, abandoned building, bus or train station, airport, or camping ground.”

According to the 2022 Sonoma County Point-In-Time survey, 2,893 unsheltered and sheltered individuals were observed in Sonoma County and its Cities on February 25th, 2022, by survey staff. Of these, 161 were located in Unincorporated Sonoma County.

The number of individuals has generally decreased since 2011, however, the number of unsheltered individuals has increased.

The most common forms of informal housing observed were outdoors (46%), in tents (19%) vehicles (18%), or in emergency shelter (9%). Approximately 75% of homeless individuals were white whereas Hispanic/Latino individuals consistently represent about a quarter of Sonoma County’s homeless population.

California law requires that Housing Elements estimate the need for emergency shelter or other types of viable shelters for individuals experiencing homelessness. An analysis of existing needs, projected needs, and resources is available in the Assessment of Fair Housing (Section 4.5.5).

Programs and Resources

The County receives funding from CoC program to provide rental assistance for permanent supportive housing and other homelessness services. Within the last cycle, 100 total units were

provided with rental assistance, including 29 SROs, 14 studios, 53 one-bedrooms, and 4 two-bedroom units.

Programs and Policies to further address the special housing needs of people experiencing homelessness include the following:

- **Program 16b:** Provide an “Enhanced Affordability” option within the AH Combining district that allows a higher density of up to 30 units per acre and offer 2 additional concessions or incentives for developments within the AH Combining district that meet the base requirements for the AH and provide 15% of units available to individuals and families exiting homelessness.
- **Program 27:** The County will continue to support and participate in the interjurisdictional housing coordinating committee. This effort facilitates planning and funding for affordable and special needs housing projects, including homeless shelters which serve both the county and cities.
- **Program 31:** The Housing Element Implementation Group will develop a Housing Equity and Action Plan (HEAP) to ensure that program implementation effectively addresses the tenets of Affirmatively Furthering Fair Housing and makes a meaningful difference in the community. This plan will address ongoing public involvement, protections for tenants, monitoring the success of Housing Element programs, and identification and prioritization of fair housing issues that arise during the planning period. This group’s efforts will be focused especially on meeting the housing needs of vulnerable and marginalized residents, including special needs populations, veterans, and communities of color.

4.3 HOUSING ASSISTANCE PROGRAMS

The following programs include Federal, State, and locally run programs providing funding for construction, rehabilitation, or rental assistance for very low-, low-, and moderate-income households. This section describes programs utilized by the County and those that may be locally available and potentially applicable within the jurisdiction.

The Sonoma County Community Development Commission (CDC) is the primary authority to administer affordable housing programs and funding in the county. The CDC also administers the federal HOME and Community Development Block Grant (CDBG) funds to acquire, construct, and/or rehabilitate affordable housing for lower-income families in unincorporated areas, to non-profit organizations, and to designated Urban County areas. The designated Urban County areas are comprised of eight participating jurisdictions: Cloverdale, Cotati, Healdsburg, Rohnert Park, Sonoma, Sebastopol, and Windsor. The funds also allow the CDC to conduct infrastructure improvements, public services, accessibility modifications, and provide homeless shelters and services. Several plans and reports are conducted by the CDC to implement these goals such as the 2020 Consolidated Plan, FY 2021-22 Consolidated Annual Performance Evaluation Report (CAPER) and FY 2021-22 Action Plan Draft. All information regarding the CDC and the Sonoma County Housing Authority (SCHA) may be found at the Sonoma County CDC website: <https://sonomacounty.ca.gov/development-services/community-development-commission>

4.3.1 Federal Assistance Programs

The **Community Development Block Grant (CDBG)** Program funds a wide variety of local housing and community development projects that improve the quality of living for lower-income residents whose incomes are less than 80 percent the Area Median Incomes as established by the U.S. Department of Housing and Urban Development (HUD).

Sonoma County receives approximately \$1.8 million annually in CDBG funds. The Sonoma County Board of Supervisors makes the final decision regarding how the funds are distributed locally. The Cities & Towns Advisory Committee administers CDBG funding to participating cities. Cities may apply directly to the Sonoma County CDC to obtain CDBG funds for designated projects; however, the County does not guarantee any minimum allocation.

CDBG funds can be used for activities that meet one of the following National Objectives:

- Benefits low- and moderate-income persons
- Aids in the prevention or elimination of blight
- Meets a need from having a particular urgency (e.g., disasters)

Examples of such activities include the following:

- Housing rehabilitation
- Community and Senior Centers
- Acquisition of real property for affordable housing
- Infrastructure improvements
- Public and planning/ technical assistance services
- Accessibility modifications
- Permanent Supportive Housing for people experiencing homelessness
- Homeless Shelters

Home Investment Partnerships (HOME) grants are provided by HUD to fund a wide variety of projects that implement local housing strategies and create affordable housing for low-income households including building, buying, rehabilitating affordable housing, or providing direct rental assistance.¹² The County receives approximately \$650,000 in HOME funds annually. Cities or nonprofit developers can apply to the Urban County/Sonoma County Development Commission to obtain HOME funds. Funds are competitive and there is no minimum amount guaranteed to projects in local jurisdictions and encourages local jurisdictions to work with affordable housing developers to support applications for these funds that can be used for all aspects of affordable housing development.

¹² U.S. Department of Housing and Urban Planning, Home Investment Partnerships
https://www.hud.gov/program_offices/comm_planning/home

Housing Choice Voucher Section 8 (HCV Program) is a rent subsidy program that assists eligible low-income persons and their families in obtaining affordable, decent, and safe housing by paying a portion of their rent. Eligible applicants locate a unit in the private rental market. Rent must be within the current allowed Payment Standards. The CDC administers a Housing Choice Voucher program, a Mainstream Voucher program, an Emergency Housing Voucher program, a Veterans Affairs Supportive Housing program, a HOME tenant based rental assistance program, and four Special Needs Assistance programs funded through the Continuum of Care. All programs, except the Housing Choice Voucher program, are administered countywide.

The Emergency Shelter Grant (ESG) Program is administered by Sonoma County CDC to designated Urban County areas, and provides HUD funds to rehabilitate and operate emergency shelters and transitional shelters to jurisdictions located within the Urban County area, and provide essential social services, permanent housing solutions and prevent homelessness

Continuum of Care Program (CoC) is managed by Sonoma County CDC and administered by HUD to address homelessness. McKinney-Vento Homeless Assistance Act funds support the County's homeless services and housing efforts such as the Point-In-Time Census counts and surveys, maintenance of the Homeless Management Information Systems (HMIS) database and managing the annual project review process for funding allocation.

HUD Section 811/202 Programs provide critical affordable housing to elderly and persons who experience disabilities. The Section 202 program funds development and operation of affordable housing for very low-income elderly households. The Section 811 program provides non-profits with funding to provide develop and operate supportive housing for disabled, very- and extremely-low-income persons.

Low-Income Housing Tax Credits (LIHTC) provide State and Local LIHTC- allocating agencies the equivalent of approximately \$8 billion in annual budget authority to issue tax credits based on population for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households.

The **National Housing Trust Fund (NHTF)** is a federal program administered in California by HCD whereby funds can be used to increase and preserve the supply of affordable housing, with an emphasis on permanent housing for extremely low-income households. Previously, NHTF funding was allocated through the Housing for a Healthy California Program. Beginning in Fiscal Year 2022, the NHTF will be aligned with federal regulations. HCD is currently in the process of developing guidelines for the 2022 allocation of NHTF funds.

4.3.2 State Assistance Programs

The **California Emergency Solutions and Housing (CESH) Program** is administered by HCD and provides grants to fund a variety of activities to assist persons experiencing or at risk of homelessness. Local governments, non-profit organizations, or designated unified funding agencies can apply for funding to use for housing relocation and stabilization services, operating subsidies for permanent housing, flexible housing subsidy funds, operating support for emergency housing interventions, and systems support for homelessness services and housing delivery systems. Requests for proposals were received on the September 1st, 2021, deadline.

The **California Housing Accelerator Program** is a new HCD program to reduce the backlog of shovel-ready housing projects that have been funded under other HCD programs and have not been able to access low-income housing tax credits.

Community Placement Plan (CPP) and Community Resource Development Plan (CRDP) funds used by the California Department of Developmental Services in collaboration with the regional center to develop safe, affordable, and sustainable homes as a residential option for individuals with intellectual and developmental disabilities.

Project Homekey, administered by HCD, provides grants to local entities to acquire and rehabilitate a variety of housing types to sustain and expand housing for people experiencing homelessness or are at risk of experiencing homelessness and provides additional funding for wrap-around supportive services.

The **Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program**, administered by HCD to finance the new construction, rehabilitation, and acquisition of owner-occupied and rental units for agricultural workers, with a priority for lower-income households.

4.3.3 Local Assistance Programs

The **County Fund for Housing (CFH)** provides financial assistance for the development and preservation of affordable housing located in Sonoma County. Funding sources include:

- County of Sonoma General Fund
- County of Sonoma Reinvestment and Revitalization Funds
- Developer In-Lieu Fees
- Transient Occupancy Tax
- CFH loan processing fees, interest, and loan repayments

CFH is used to develop, preserve, and accelerate the pace of development of below market-rate housing for low-, very low-, and extremely low-income households.

First-Time Homebuyer Assistance for Low-Income Buyers. The CDC subsidizes the construction of affordable ownership housing developments by making low-interest loans to finance land acquisition, predevelopment, and construction costs. This cash-based financing is made available from different funding sources including CFH (local), CDBG (Federal), and Building Equity and Growth in Neighborhoods (State) funds.

When new homes are initially sold at a subsidized development's completion, the cash-based development subsidy loans are converted to cash-based low-interest deferred-payment subordinate mortgages to income-eligible first-time homebuyers. Affordability restrictions remain in place for 30 years or longer, depending on the funding source, by means of an option agreement.

Currently, the County also provides cashless financing to income-eligible first-time homebuyers as a subsidy to recapture certain incentives granted to developers for development of

homeownership projects. In exchange for the incentives granted to a development, developers allocate a percentage of their units for sale to income-eligible first-time homebuyers at prices determined by the CDC to be affordable. The developer receives the Affordable Sales Price (ASP) for the initial sale of the new home, but the buyer purchases the new home for its Fair Market Value (FMV). The funding gap between the ASP and FMV is bridged with a cashless deferred payment subordinate loan. At the request of some affordable housing developers, the County is currently considering moving away from this model in favor of a Below Market Rate (BMR) model of financing for affordable homeownership units.

No Place Like Home (NPLH) Program. The NPLH program utilizes \$2 billion in revenue bonds to invest in permanent supportive housing and mental health services for those experiencing homelessness or are at risk of chronic homelessness. The County of Sonoma is utilizing these funds to produce permanent supportive housing units targeted for very- and extremely low-income households.

Renovation and Rehabilitation Programs. The CDC provides assistance to a variety of home rehabilitation or "preservation" programs that enable low-income owner occupants and landlords as well as other eligible property owners to make necessary improvements and repairs to their residential properties to preserve the existing housing stock in Sonoma County.

4.3.2 At-Risk Assisted Housing Developments

Pursuant to Government Code § 65583, at-risk assisted housing developments refer to any existing multifamily, rental housing complexes which receive funding under public programs and are at risk of being converted from low-income housing to market rate housing within ten years of the housing element planning period. The conversions can occur due to termination and opting out of programs such as rental subsidies, mortgage repayment, expiration of restricted uses or direct loans. There are a total of 687 low-income units in the Urban County (excluding City of Santa Rosa and Petaluma), five of which are at risk of being converting to market rate units.

Within the Unincorporated County, there are no assisted projects containing units that are at risk of conversion within 10 years from the start of the planning period.¹³ One project, the Sonoma Valley Apartments, was recently approaching the end of its affordability agreement. This project, owned by the nonprofit organization Burbank Housing, extended the affordability agreement for another 55-year period in December 2022.¹⁴

However, there are two privately-owned projects containing affordable housing units with 30-year regulatory restrictions that will end within the next 10 years if not renewed (Table 12).

¹³ State records indicate that the Sonoma Village Apartments appear to be at risk of conversion. Local records show that this project had a density bonus agreement with the Community Development Commission/Sonoma County Housing Authority with an affordability term of 15 years, which expired in 2004.

¹⁴ Community Sonoma County Community Development Commission, 2023

Table 12: Affordable Projects and Risk of Conversion within 10 years

Project Name	Address	Tenant Type	# Low-Income Units	Funding or Incentive Program	Earliest Conversion Date
Feeney Apartments (built 1964)	38 Lark Center Drive, Larkfield	Elderly	0	Density Bonus	2024
		Non-Elderly	4 (LI)		
Faught Court Townhomes (built 1994)	151 Faught Court, Larkfield	Elderly	0	Density Bonus	2024
		Non-Elderly	1 (VLI)		
Total		Elderly	0		
		Non-Elderly	5		

Feeney Apartments and Faught Court Townhomes utilized the State density bonus program to provide affordable units. Affordable units are subject to income restrictions and allows continued affordability to be considered during the end of affordability terms and agreements.

Due to the high demand for rental units, property owners may experience added pressure to convert low-income units to market rate units to maintain relatively profitable margins for owners. Although there are multiple efforts to increase new affordable housing stock, preserving existing affordable units is equally important and is typically less expensive and faster than construction of new units. There are publicly funded incentives to maintain such units and streamline permit application processes, as further discussed below.

Comparison of Replacement Costs vs. Preservation Costs

Using estimates provided by local non-profit developers, a comparison of the cost of replacement and preservation shows that the cost of acquiring and preserving the affordability of at-risk units is cheaper than the replacement of units (Table 13).

Table 13: Replacement Costs vs Preservation Costs

Fee/Cost Type	Cost per Unit
Preservation	
Acquisition	\$293,486.00
Financing/Other	\$44,022.90
Total Estimated Cost per Unit	\$337,508.90
Replacement	
Land Acquisition	\$34,504.75
Construction	\$320,000.00
Financing	\$53,175.71
Total Estimated Cost per Unit	\$407,680.46

Property Acquisition Costs based on per unit estimates provided by local nonprofit for a project that does not need rehabilitation; Financing and other costs are assumed to be 15 percent of acquisition and rehabilitation cost; Land Acquisition Cost based on CA CTAC Tax-Exempt Bond Project Staff Report for CA-18-601 in Rohnert Park, 2018; Construction Cost based on estimates by local developers and assumes development at 600 square foot units; Financing and other costs are assumed to be 15 percent of land and construction costs

This estimate is provided for the purpose of comparison and understanding the magnitude of costs involved and does not represent the precise market value of this project. The actual market value at time of sale will depend on market and properly conditions, lease out/turnover rates, among other factors.

Options to Preserve Affordability

State preservation laws¹⁵ require that property owners of government-subsidized affordable units give exclusive notification of intent to sell and opportunities for offer to purchase to qualified entities. Further restrictions require property owners to sell to the qualified entity if they bid at market rate (Gov. Code § 65863.11). Additionally, financial incentives such as the Affordable Housing Preservation Tax Credit provides a 50% tax credit up to \$20,000 per unit and \$1 million per transaction against State or Federal capital gains. This incentive allows public entities to gain a more competitive edge during the bidding process and markets profitability for property owners. Other sources of public preservation funding include CDBG, HOME grants, LIHTC and bonds that is already being utilized by the County.

If the current organizations managing the at-risk units are no longer able to maintain the project, transferring ownership of the affordable units to a non-profit housing organization can be a viable way to preserve affordable housing for the long term. The County’s Affordable Housing Program allows existing affordable units to be transferred to owners under long-term restrictions for ownership and rental units.

¹⁵ Gov. Code §§ 65863.10, -.11, -.13; HCD guidance <https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml>

Qualified Organizations for Preservation or Replacement of At-Risk Units

Partnering with non-profit, mission-driven organizations can aid in the preservation of at-risk units, as described in Table 14 below. The qualified organizations listed below are located in Sonoma County and throughout the Bay Area:

Table 14: Qualified Non-Profit Housing Development Organizations

Organization	Contact Name	Address	Phone Number
Burbank Housing	Jocelyn Lin, Associate Director of Housing Development	1425 Corporate Center Parkway Santa Rosa, CA 95407	707-526-9782
Community Housing Sonoma County	Keith Christopherson, President	131-A Stony Circle Suite 500 Santa Rosa, CA 95401	(707) 578-2338
Eden Housing	Dixie Lira-Baus, Associate Director, Acquisitions & Special Projects	22645 Grand Street Hayward, CA 94541	(510) 582-1460
John Stewart Company	Margaret Miller, Senior Vice President of Development	1388 Sutter Street 11th Floor San Francisco, California 94109	(415) 345-4400
MidPen Housing	Jan Lindenthal, Chief Real Estate Development Officer	303 Vintage Park Drive Suite 250 Foster City, CA 94404	(650) 356-2900

4.3.3 Zoning for a Variety of Housing Types

This section provides an analysis of zoning for a variety of housing types pursuant to Government Code §§ 65583(a)(4), 65583(c), and 65583.2(c). The County provides for a range of housing types within their Zoning Code. The County will bring its Zoning Code into full compliance with State requirements, through Program 15: Review and Update Zoning Code.

Multifamily Rental Housing

Multifamily dwellings are allowed by right in R2 and R3 zoning districts. Multifamily dwellings can be part of a mixed-use project that is allowed in zones C1, C2 and LC zoning districts. Multifamily developments of five or more units in R2 zones are subject to the high density residential (R3) development standards. Affordable multifamily housing is allowed by-right in mixed-use developments if the development meets the affordable housing inclusionary provisions of Article 89 (affordable housing) of the County’s Zoning Code.

Housing for Farmworkers and Agricultural Employees

Sonoma County has robust programs to house its agricultural workers. Housing for seasonal and extended season farmworkers (bunkhouses) is allowed by right in all Agricultural Zones (Land Intensive Agriculture (LIA); Land Extensive Agriculture (LEA); Diverse Agriculture (DA). Permanent housing units for agricultural employees and their families are allowed by right in all the above Agricultural Zones as well as in the Agriculture and Residential (AR) zone, with the number of allowable units dictated by the agricultural units (acres farmed or animals kept) on the property. Development impact fees are waived for construction of farmworker and ag employee housing, and a restrictive covenant is recorded.

Under California Health and Safety Code (HSC) § 17021.5, employee housing for 6 or fewer people shall be treated like a single-family structure with a residential land use designation. The County processes all such uses as residential uses regardless of the occupation of the residents. However, there are no provisions in the Zoning Code specifically for this use type. Under Program 15b, the County will amend the Zoning Code to clarify consistency with this requirement. The County's Zoning Code allows year round or extended seasonal agricultural employee housing up to 38 workers by-right subject to objective development standards. Under Program 15b, the County will review the development standards for other agricultural uses and amend the Zoning Code, if necessary, for compliance with HSC § 17021.6.

Emergency Shelters

Emergency homeless shelters are allowed by-right in the M1 Zone and in the Public Facilities (PF) Zone on sites within urban service areas. Large emergency shelters are limited to a maximum of fifty individuals except during extreme weather or natural disaster events. Small-scale homeless shelters are allowed by-right in C3 and LC zones and serve up to ten individuals (Zoning Code § 26-88-127). Neither type of emergency shelter requires additional discretionary review in these zones.

The County applies written objective standards for the development of homeless shelters, as follows:

- (a) **Permit Requirements.** Homeless shelters may require a use permit, depending on their type and location, as provided in the regulations for the base districts in which they are allowed.
- (b) **Property Development Standards.** Homeless shelters shall conform to all property development standards of the zoning district in which they are located except as modified by these performance standards.
- (c) **Maximum Number of Persons/Beds.** Small-scale homeless shelters shall serve no more than ten (10) persons. Emergency homeless shelters shall be limited to not more than fifty (50) persons served on a year-round basis, but during seasonal or emergency events of flooding, extreme temperature, or natural disaster, such shelters shall not be limited with regard to number of persons served, subject to occupancy limits of the Building Code, so long as the operating conditions set forth in this section are met.
- (d) **Lighting.** Adequate external lighting shall be provided for security purposes. The lighting shall be stationary, downward cast and fully shielded, shall be directed away from adjacent properties and public rights-of-way, and shall be of an intensity compatible with the neighborhood.
- (e) **Security.** Parking facilities shall be designed to provide security for residents, visitors, and employees.

- (f) **Common Facilities.** Shelters are encouraged but not required to provide the following common facilities for the exclusive use of the residents:
 - (1) Central cooking and dining room(s);
 - (2) Common recreation room;
 - (3) Office with services for residents;
 - (4) Laundry facilities adequate for the number of residents.
- (g) **On-Site Parking.** On-site parking for homeless shelters, including bicycle parking, shall be subject to requirements set forth in Article 86.¹⁶
- (h) **Secure Storage.** Shelters are encouraged but not required to provide secure, locked storage facilities for residents' personal belongings.
- (i) **Outdoor Activity.** For the purposes of noise abatement in residential districts or adjacent to residential uses, outdoor activities may only be conducted between the hours of 8:00 a.m. to 10:00 p.m.
- (j) **Concentration of Uses.** No more than one emergency homeless shelter shall be permitted within a radius of one thousand (1,000) feet from another such shelter.
- (k) **Health and Safety Standards.** All homeless shelters must comply with all standards set forth in Title 25 of the California Administrative Code (Part 1, Chapter F, Subchapter 12, Section 7972).

Standards g and j exceed the standards currently allowed under State law (Government Code § 65583(a)(4)(A)(ii) and (v)). Under Program 15b, the County will amend the Zoning Code to be consistent with these requirements. Additionally, under Program 15n, the County will consult with homeless service providers to determine if existing limits on homeless shelters (bed limits, parking requirements, etc) pose a constraint. Based on the results of this consultation, amend the Zoning Code to mitigate any identified constraints.

Unincorporated Sonoma County has sufficient sites that are properly zoned to accommodate its demonstrated need for emergency shelter of 161 individuals, as shown in Table 15. These sites include vacant sites and nonvacant sites with redevelopment potential. All sites used to meet the capacity requirement are in zones that have infrastructure access and are near both residential and commercial uses. Sites are spread throughout the community, located in various unincorporated communities. The demonstrated need can be met through sites zoned to allow larger emergency homeless shelters or on sites zoned to allow small-scale homeless shelters. More information about the suitability of each site, including redevelopment potential, is described in the table.

¹⁶ Parking Standards for Homeless Shelters within Article 86: 1 space for every 6 beds, plus 1 space for the management unit or office and 1 space for each employee, if any, on maximum shift.

Table 15: Sites with Capacity to Meet the Need for Emergency Shelter

APN	Zone	Acres	Realistic Capacity (Beds)	Current Use	Suitability and Redevelopment Potential
044-101-067	M1	0.35	50	Vehicle Storage	Adjacent to residential and commercial development, near bus stop
134-132-016	M1	3.00	50	Vacant	Near residential and commercial development, near bus stop
140-110-008	M1	0.54	50	Vehicle Storage	Adjacent to residential development, near bus stop and commercial development, in high resource area
083-080-061	M1	0.61	50	Vacant	Near residential and commercial development including a market and a pharmacy, near bus stop, in high resource area
039-012-006	C3	0.83	10	Vacant	Near bus stop, grocery stores, markets
039-012-007	C3	1.4	10	Vacant	Near bus stop, grocery stores, markets
140-100-039	C3	0.19	10	Vacant	Adjacent to bus station, near market
056-611-082	LC	0.63	10	Vacant	Adjacent to bus stop, residential, and commercial development
056-314-027	LC	0.23	10	Vacant	Near bus stop, adjacent to residential and commercial development, including grocery stores
054-340-016	LC	0.2	10	Vacant	Near market and bus stop, in higher resource area
056-314-027	LC	0.23	10	Vacant	Near market and bus stop
070-030-081	LC	0.18	10	Vacant	Near market, bus stop, and park 'n ride
070-040-022	LC	0.15	10	Vacant	Near residential, commercial uses and bus stop
074-312-025	LC	0.09	10	Vacant	Near residential and commercial uses, bus stop
130-142-001	LC	0.14	10	Vacant	Adjacent to bus stop and bike path, near residential development, in higher resource area
130-142-004	LC	0.28	10	Vacant	Near bus stop and bike path, residential development, in higher resource area
070-030-050	LC	0.13	10	Portion of underutilized parking lot	Near service providers and bus stop
021-024-064	LC	2.22	10	Lumberyard, Building Materials	ILV 0.08, near market and bus stop
130-141-002	LC	0.14	10	Storage Yard	No permanent structures, near residential, near bus stop and bike trail
083-080-047	LC	0.44	10	Commercial	ILV 0.7, Built 1969, Adjacent to bus stop, near residential and commercial
083-090-038	LC	0.4	10	Office	ILV 0.7, built 1940, near bus stop, residential, and commercial uses
Total		12.38	370		

Demonstrated need of 161 people. The 21 sites listed can accommodate 370 people based on development standards and a calculation of at least 200 sq.ft per bed.

Low Barrier Navigation Centers

A Low-Barrier Navigation Center (LBNC) is a low barrier, temporary, service-enriched shelter that helps homeless individuals and families to quickly obtain permanent housing. They are facilities and shelters are typically operated by a government entity, non-profit organization or religious centers and provide temporary overnight shelter (Zoning Code § 26-28-090). Non-profit organizations and centers that provide shelter services in the Sonoma County region include Family Support Center, Catholic Charities Family Support Center, and Samuel Jones Hall in Santa Rosa. The County opened two LBNC facilities on County-owned land during the 5th planning cycle (Veteran’s Village and Los Guillicos Village). They are not yet specifically allowed in the Zoning Code. Program 15 will add the applicable provisions.

Transitional Housing

Transitional housing consists of supportive services for persons or families transitioning from homelessness to permanent housing. The length of stay is typically six (6) months to two (2) years. Transitional housing is allowed by-right in all residential and commercial zoning districts.

Supportive Housing

Supportive housing is defined as rental housing with no limit on length of stay, occupied by a special needs population. Supportive housing is allowed by-right in all zoning districts that allow residential uses. Supportive housing development standards are subject to the same provisions as other residential dwellings of the same housing type in the relevant zones. The County’s provisions for supportive housing reduce regulatory barriers and further streamline the development of housing for special needs populations. To ensure consistency with State law, the County will amend the Zoning Code (Program 15b) to clarify that supportive housing is a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.¹⁷

Single-Room Occupancy (SRO) Housing

Small-scale single-room occupancy (SRO) units consist of less than ten (10) rooms and are allowed by right in R3 zones. Large-scale SROs consist of ten (10) or more rooms (Zoning Code § 26-88-125). In 2018, SROs were added as an allowable use in Retail Business and Service (C2) Zone and the Limited Commercial (LC) Zone in addition to the Planned Community (PC) Zone.

Manufactured Homes

Manufactured homes on permanent foundations are allowed in all zones that permit residential uses. Additionally, manufactured homes with or without a permanent foundation are allowed for farmworker housing. Manufactured homes without a permanent foundation require a zoning permit and are subject to development standards such as a 12-foot width minimum, skirting, and dedicated covered parking.

¹⁷ Gov. Code § 65583 pertaining to transitional and supportive housing

Mobile Home Parks

Mobile home parks are allowed subject to a use permit in the R1, R2, R3 or PC zones. Discretionary reviews include Section 18500 of the Health and Safety Code or its successors, Department of Housing and Community Development approval, and other pertinent permit requirements of the County such as water agency-approved drainage plans (Zoning Code § 26-88-100).

Accessory Dwelling Units

Accessory dwelling units (ADUs) and Junior ADUs (JADUs) are allowed by-right in all zoning districts that allow single-family or multifamily dwellings, consistent with State law¹⁸ The approval process is ministerial and involves the planner signing off on the building permit. The processing timeframe is less than 60 days, and a planning application is not required in most cases.

ADUs are not allowed in the Z (Accessory Dwelling Unit Exclusion) Combining District, which applies to areas with environmental, groundwater or access constraints.

4.3.4 Zoning Resources and Incentives

Density Bonus Programs

AB 2345 amended Government Code § 65915 to provide developers with density bonuses or other incentives in exchange for the provision of affordable housing which meets certain requirements. As of January 2021, up to a 50% density bonus can be approved for housing projects consisting of a combination of affordable and Above-moderate homes. The legislation also reduces specific thresholds for obtaining approvals and allowances from local jurisdictions, requires density bonus reporting, and reduces parking obligations for many projects qualifying for a density bonus. Program 15 will bring the County's Zoning Code up to date to provide consistency with these changes to the State density bonus law.

In addition to the State density bonus, the County provides a supplemental density bonus program that allows additional density increases beyond those mandated by State law when a project provides additional affordable or special needs units to meet a portion of the County's identified needs, such as for large family units and those with extremely low-incomes. Additional bonuses are also available for affordable housing projects that provide adequate alternative energy to offset tenants' utility costs, and for ownership projects that meet minimal Universal Design standards.

Housing Opportunity Area Programs

Because the Unincorporated County has limited areas where sewer is available to allow higher-density development, it must make the best use of those areas and minimum residential density requirements apply. Additionally, all areas with public sewer and Urban Residential land use (R1, R2 and R3) are considered to be Housing Opportunity Areas. The County administers two Housing Opportunity Area Programs, including one for rental housing and one for ownership housing.

¹⁸ Gov. Code § 65852.2 regarding supportive housing and 65852.22 regarding ADUs (Zoning Code § 26-88-060, 26-88-061)

The Rental Housing Opportunity Area Program applies to R2 and R3 parcels and provides an automatic doubling of the mapped density for any project that provides at least 40% of total project units as affordable to lower-income households, including very low-income households. Incentives are also provided for these projects as required by Government Code § 65915, even if a density bonus is not requested. This is the County's most popular and award-winning affordable housing program and is used both by non-profit developers to provide 100% affordable projects and by for-profit developers to provide mixed-income projects, often without need for public subsidy. Both non-profit and for-profit stakeholders indicate strong support for this housing program.

The Ownership Housing Opportunity Area Program is applied to R1 and R2 zoned parcels and allows 11 units per acre (before any density bonus is applied) for ownership projects which provide at least 20% of total project units affordable for purchase by lower-income households, with the remaining units affordable for purchase by moderate-income households. This Program has been utilized by non-profit developers in the past to provide ownership housing using a "sweat equity" approach but has not been used within the last Housing Element cycle. Program 18 will explore ways to increase this program's viability in the 6th cycle.

Affordable Housing Combining Zones

Sonoma County utilizes two special combining zones to increase the number of urban sites that qualify for by-right affordable housing development. The Affordable Housing Combining District (AH) is applied to non-residential sites within Urban Service Areas and allows by-right development of housing projects with densities of between 16 and 24 units per acre, before application of any density bonus. Projects are required to be 100% affordable to make use of this overlay. The AH Overlay has been utilized exclusively by non-profit developers to provide affordable projects.

The Workforce Housing Combining District (WH) was adopted into the County Zoning Code in 2018 to increase housing opportunities for Sonoma County's local workforce in areas that are close to employment and transit. Workforce Housing projects are also allowed at densities of between 16 and 24 units per acre before any density bonus, with projects that provide the required inclusionary units (10 or 15% for rental projects, 20% for ownership projects) on-site requiring only design review (where allowed) and a building permit. Projects that provide only market-rate housing or that do not meet WH development standards may be approved with a use permit and design review.

The WH Combining District has different siting criteria than the AH Combining District. It can also only be applied to properties in Urban Service Areas, and must be located within 3,000 feet of either a transit center or an employment node with at least three acres of commercial zoning or 10 acres of industrial zoning. The WH Combining District may be applied to properties in the Limited Commercial (LC), Retail Business and Service (C2), Industrial Park (MP), Rural Industrial (M3), Limited Urban Industrial (M1), and the Public Facilities (PF) zoning districts within Urban Service Areas.

Density Unit Equivalents

To further increase allowable densities on its limited urban lands and to encourage more, smaller units that are affordable “by design,” the County makes use of Density Unit Equivalents (DUEs). DUEs apply to all multifamily developments (see also Cottage Housing Developments) and are adopted into the County’s Zoning Code. Using DUEs, the allowable number of units is calculated as shown in 6, with studios and micro-apartments counting as only 1/3 of an allowable unit and one-bedroom units counting as only one-half. On a site with a mapped (minimum) density of 10 units per acre, studio apartments would be allowed at a density of 30 units per acre; if 40% of the studios were deed restricted as affordable, up to 60 units per acre would be allowed (based on 20 units per acre under the Housing Opportunity Area Program, calculated using DUEs).

Table 16: Residential Density Unit Equivalents

Dwelling Unit Size	Density Units
Micro Apt or Studio <500 sq. ft.	0.33
One-bedroom <750 sq. ft.	0.50
Two-bedroom <1,000 sq. ft.	0.75
Three-bedroom	1.00
Four or more bedrooms	1.50

Currently, the DUE system counts four-bedroom units as 1.5 units, potentially acting as a constraint to the construction of large rental units. The lack of affordable rental housing units for large families has been identified as a contributing factor through the County’s Fair Housing Analysis; therefore, Program 15c will amend the Zoning Code to remove this disincentive and to allow both three- and four-bedroom units to count as a single (1.0) density unit.

Cottage Housing Developments

While Dwelling Unit Equivalents apply to multifamily developments, the Cottage Housing program provides a similar approach to allowable densities in urban single-family areas. Under this program, a single-family (R1) parcel may be developed with up to three dwelling units by-right, with additional units allowed by use permit.

Cottage housing developments provide for a type of housing referred to as the “missing middle”—housing types that offer smaller units in buildings of a similar scale as a single family-home. The County’s Zoning Code encourages the development of these smaller units with shared parking and common open areas within existing low- and medium-density urban residential neighborhoods. The County allows two types of cottage housing developments—detached and attached.

Cottage housing developments are allowed on parcels of 8,000 square feet or more in the Low Density Residential (R1) and Medium-Density Residential (R2) zones on parcels located in Urban Service Areas. Once the minimum parcel size has been met, one cottage is allowed per 2,500 square feet of lot area for an effective density of 17 units per acre. The total building square footage for a cluster of three cottages is 2,700 square feet unless a use permit has been granted.

Tiny homes may be utilized as cottage housing developments when building codes are met and the homes are placed on foundations.

Through the Assessment of Fair Housing, a lack of access to opportunities in high-resource areas was identified as a factor contributing to fair housing issues within the county. Because portions of both Glen Ellen and the Larkfield-Wikiup area are identified as High Resource areas, Program 15d has been included to revisit these limitations outside of the High and Very High Wildfire Hazard Zones, and to revise the by-right allowance for CHDs upward from 3 units to 4 units per parcel.

4.3.5 Opportunities for Energy Conservation in Residential Development

Compact urbanization and high-density infill development is known to be more energy conserving than low-density sprawling development due to its proximity to existing infrastructure and can further reduce the pressure on agricultural lands to convert. Affordable housing near high quality transit lines typically increases multi-modal mobility since residents living near work, services, amenities, and recreation opportunities can reduce congestion caused by commuting. Sonoma County emphasizes community-centered growth, aiming to produce high-density affordable housing targeted for urban workforce in transit-oriented developments that are located within Urban Service Areas. Development within the USAs are bounded by a sphere of influence/urban growth boundary.

Energy-saving features and home systems can also reduce costs for residents. Retrofitting older home stocks with energy efficient utilities and design while landscaping with drought-tolerant plants can promote energy conservation. Sonoma Clean Power Authority provides resources for residences to electrify home tools such as lawn mowers and induction stoves. Irrigation systems are encouraged to install “WaterSense” labeled smart controllers instead of clock timer that base watering on local weather data and reduces water usage. Additionally, the County expedites and streamlines permitting of solar panels on small residences (Chapter 7D4).

The Sonoma County Energy and Sustainability Division promotes energy-saving features and systems through various incentives and programs for County employees, residents, and business owners. Homeowner workshops include best practices such as energy-efficient improvements, rebate and financing programs, fire-resistant designs, and water conservation methods. The Sonoma County Energy Independence Program (SCEIP) is a five-year strategic plan that subsidizes renewable energy retrofits and educational programs to enhance energy and water conservation and further meet statewide goals in reducing greenhouse gas emissions.

4.4 HOUSING CONSTRAINTS

There are many factors that may constrain the development of housing, particularly housing affordable to lower-income households. Constraints to the provision of adequate and affordable housing are created by market, governmental, infrastructure, and environmental factors, among others. These constraints may increase the cost of housing or render residential construction

economically infeasible for developers. Households with low and moderate incomes and special needs are particularly vulnerable to challenges posed by various constraints.

This section of the Housing Element, in compliance with Government Code § 65583, examines the constraints that could hinder the County's achievement of its housing objectives and the resources that are available to assist in the production, maintenance, and improvement of the County's housing stock.

4.4.1 Non-Governmental Constraints

The following is an analysis of potential non-governmental constraints to housing production in the unincorporated areas of Sonoma County including availability and suitability of land, cost of land, cost of construction, financing, and community opposition. While the availability of land and the cost of development may pose constraints to development, stakeholders in the development community expressed that unpredictability of construction costs was the largest constraint to development, including variations in cost of materials and labor shortages.

Vacant Land

Sonoma County is the largest of nine Bay Area counties in the region geographically, at over 1,500 square miles and, while the Unincorporated County comprises a large area, most of the vacant land in rural areas is not appropriate or safe for residential development because it is steep, largely inaccessible, and heavily wooded. Other rural lands that are not appropriate for residential development include active farmlands under agricultural preservation contracts, publicly owned parklands, wetland habitats, timberland production zones, and flood areas. Even with these limitations, most of the Unincorporated County's vacant developable land occurs within the rural areas of the county, without access to urban services or transit. Because of its shortage of suitable developable land with urban services, the County has adopted policies in its General Plan to promote opportunities for reuse of underutilized commercial centers and infill, support mixed-use development, and encourage more dense development along transportation and transit routes.

Land Costs

Land costs and other market constraints have a significant impact on housing development and affordability. The limited supply of developable land and high demand are primary contributors to costs. The large and varied geography of the Unincorporated County creates a large range of land costs. In general, while costs are high, they are lower than the cost of land in neighboring cities and in other Bay Area counties. Large parcels are less expensive, per acre, than smaller parcels, and lots nearer urban services that don't have environmental constraints usually have higher values.

Stakeholder interviews have not identified high land costs as a constraint that is unique to the county. Although high land costs serve as a constraint to housing development within the Unincorporated Sonoma County, they do not pose a unique constraint relative to the local area or region.

Construction Costs

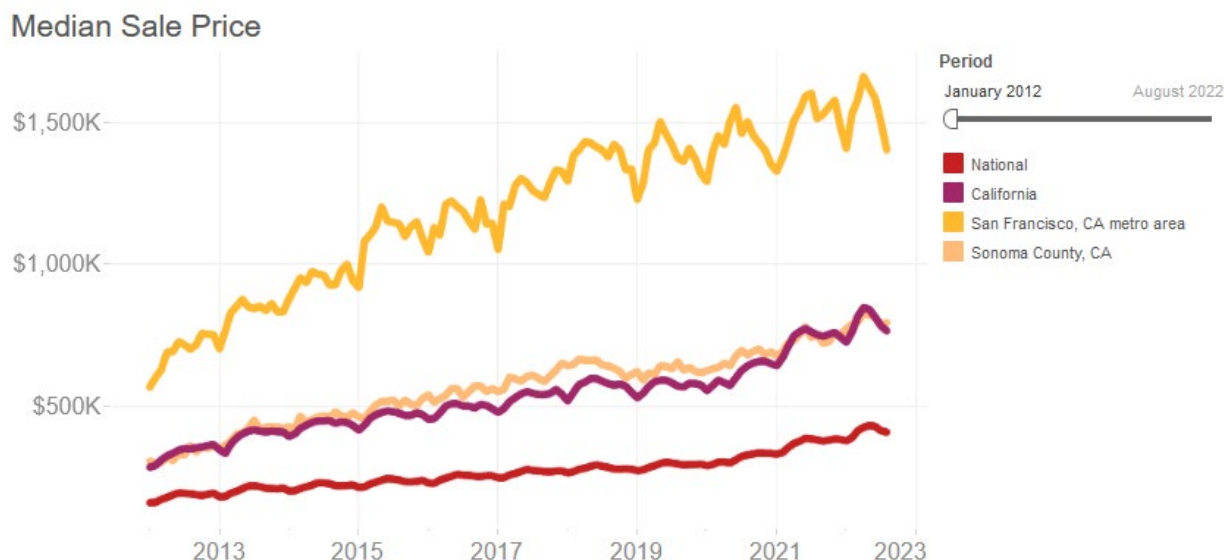
The cost of construction depends on the hard costs (cost of materials and labor) and soft costs (architectural, engineering, permit fees and services, development fees, construction financing, and insurance). Hard construction costs are the largest share of a project’s total costs, accounting for over 60% for new residential development. It is also influenced by market demand and market-based changes in the cost of materials. The cost of construction depends on the type of unit being built and is largely determined by the quality or type of materials used to produce the unit. The cost of labor ranges from 14% to 40% based on several factors including housing demand, inflation-induced wage increases, the number of contractors in an area and the unionization of workers.

According to local stakeholders in the development community, hard costs for residential construction typically start around \$400 per square foot. Construction costs vary based on the type of development. Construction costs for stacked flats start as low as \$250 per square foot. Disruptions in supply chains have exacerbated construction costs and further constrained housing development. Stakeholders also expressed that the unpredictability of construction costs was a constraint to the development of housing, especially for projects relying on tax credits or similar affordable housing funding sources. The cost of construction affects the affordability of new housing and is a significant constraint to housing in Sonoma County.

Home Costs and Financing

The median price of a single-family home in Sonoma County in August 2022 is \$793,000, an increase of 5.8% over the previous August. Home prices in Sonoma County tend to be more affordable than other counties in the Bay Area region (\$1.3 million) and are similar to the State average (\$763,000) for the same time period. However, home prices in California still represent some of the most expensive states in the country, where the median home price is \$406,000. Figure 6 demonstrates the upward trend of home sale prices over the last 10 years.

Figure 6: Median Home Sale Price, U.S. California, Sonoma County 2012-2022



Source: Redfin <https://www.redfin.com/county/351/CA/Sonoma-County/housing-market>

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Government insured loan programs may be available to reduce mortgage down payment requirements. First-time homebuyers are more likely to be affected by financing requirements than other buyers. Mortgage interest rates for new home purchases have been low in recent years but have been increasing gradually to range from 4.5% to 6.2% for a fixed-rate 30-year loan in 2022.¹⁹ Lower initial rates are available with other mortgage types.

Lenders typically prefer a 20 percent down payment on a mortgage loan. Prospective buyers, who might be able to support an 80 percent loan, may struggle with the required down payment that, for the median priced home, may be nearly \$200,000. Lenders will sometimes loan up to 90 percent of the asking price, but an applicant's credit is much more closely scrutinized, and monthly payments and monthly income requirements are significantly higher.

Homebuyers and realtors did not identify the availability of financing as a constraint during stakeholder interviews and surveys. First-time or moderate-income homebuyers, even those who might qualify for a standard loan, may nonetheless find that financing can pose a major obstacle due to the large down payment requirement.

Development Processing and Requested Density Trends

Local development trends provide insight into the feasibility of projected development. Requests to develop housing at densities lower than those identified in the current sites inventory may indicate that market demand and developer goals are potential constraints to reaching quantified development objectives within the 6th cycle. In Unincorporated Sonoma County, a motivated developer typically applies for a building permit 6-12 months after entitlement.

The County did not receive requests to develop inventory sites at lower densities during the 5th planning cycle. The County has established minimum residential densities for all of its urban residential land use categories (Zoning Districts R1, R2 and R3) and does not accept application for projects that do not meet minimum residential densities in these zones. Typically, development applications in R2 and R3 zones participate in the County's Rental Housing Opportunity Area Program and exceed the minimum mapped densities by up to 100%. Further analysis of development trends is provided within Section 3 of the 2023 Housing Element.

Community Opposition

One of the leading barriers to affordable, supportive, or transitional housing in many California communities is community opposition. Residents who fear or oppose change in their neighborhoods may assume changes in population characteristics of the new residents, an argument that is usually presented by NIMBY's. NIMBY, or Not-In-My-Backyard is a colloquial term describing the circumstance in which residents of a neighborhood call out and voice their opinion against a new housing development, such as a shelter, group home, or affordable

¹⁹ <https://www.redfin.com/county/351/CA/Sonoma-County/housing-market>

multifamily housing, and or a change in occupancy of an existing development as unwanted for their local area. The benefits to the residents from the development are often neglected, while arguments are made related to perceived increases in crime, litter, theft, or traffic, a change in community character, or a reduction in property values. This potential constraint is addressed through Programs to increase public outreach to a variety of communities, decreasing discretionary permitting processes and educating decision-makers, including the following:

- **Program 12:** Permitting Procedures and Priority Processing
- **Program 15:** Review and Update Zoning Code
- **Program 16:** Expand AH Combining District
- **Program 25:** Incentivize and Promote ADU and JADU Development
- **Program 32:** Proactive Outreach Program

Environmental Factors

Environmental factors pose constraints to housing development by limiting suitable land for the development of housing in the unincorporated area of Sonoma County, especially in outlying rural areas. The County, in partnership with the other local jurisdictions throughout Sonoma County, adopted a Multijurisdictional Hazard Mitigation Plan (MJHMP) in 2021 to analyze environmental hazards and identify strategies to reduce risks from natural disasters in the county. The plan complies with Federal and State hazard mitigation planning requirements to establish eligibility for funding under Federal Emergency Management Agency (FEMA) grant programs.²⁰

The most significant environmental constraints in Sonoma County are flooding hazards, wildfire hazards, seismic hazards, and sensitive habitats. This section contains an overview of environmental conditions that affect the Unincorporated County, and Appendix D contains a site-by-site analysis of potential environmental constraints impacting inventory sites.

Flooding

The county has both a riverine and coastal floodplain. The river systems in the county flood at irregular intervals, generally following intense winter rainstorms. There are six types of flood events that can impact the county: riverine flooding, urban flooding, coastal flooding, tsunami flooding, flooding from sea level rise, and flooding from a dam failure. Watersheds and areas in the county with heightened flood risk include the Russian River watershed, Petaluma River and Sonoma Creek area, and the Laguna De Santa Rosa.

Regional mitigation measures for flooding include channelization works, bypass conduit systems, diversion, and detention systems. At the project level, the County has development standards to protect development in flood hazard areas. These measures may contribute to additional costs

²⁰ Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021; Volume 1—Area-Wide Elements page 22-1, <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/BCCs/Long%20Range%20Plans/Hazard%20Mitigation%20Plan/Adopted-Sonoma-County-MJHMP-Volume-1-December-2021.pdf>

for developers but are necessary to mitigate risks and preserve life, safety, and property. Despite these constraints, these conditions do not affect the County's ability to accommodate its RHNA.

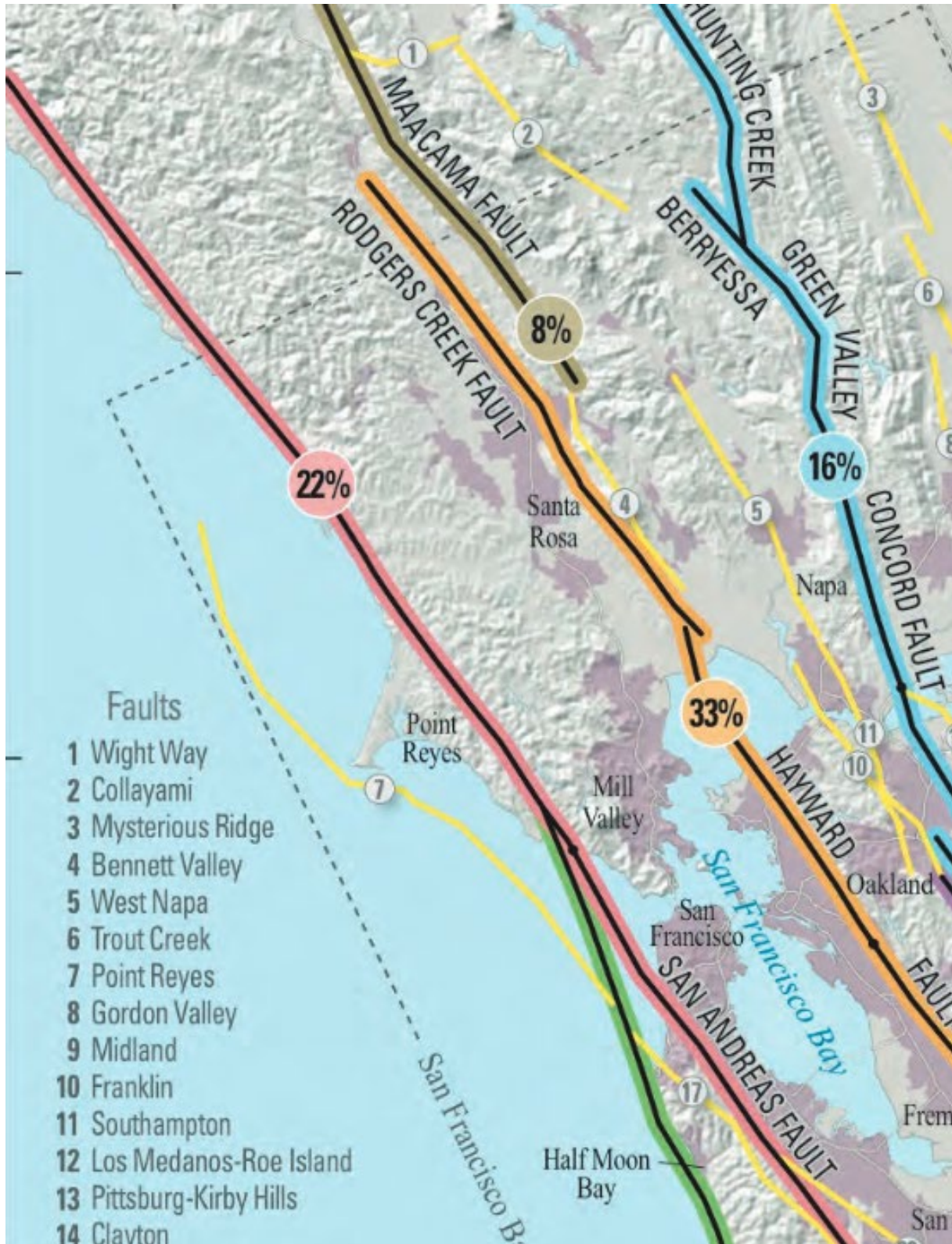
Earthquake

Areas in Sonoma County are within high-risk seismic zone. Several major faults traverse the county, including the San Andreas Fault, the Rodgers Creek Fault, and the Maacama Fault (Figure 7). Earthquake hazards will not impact the County's ability to accommodate its RHNA.

Wildfire

Sonoma County has experienced severe fires as development and human activity increased over the years. In California, more than 75% of wildfires have occurred since 2017. Wildfire risks are exacerbated by development in the wildland urban interface and are mitigated by development standards, including landscaping standards and fire-resistant building materials and development standards. While wildfire hazard areas impact development potential and limit developable areas (Figure 8), these hazards do not impact the County's ability to meet its RHNA.

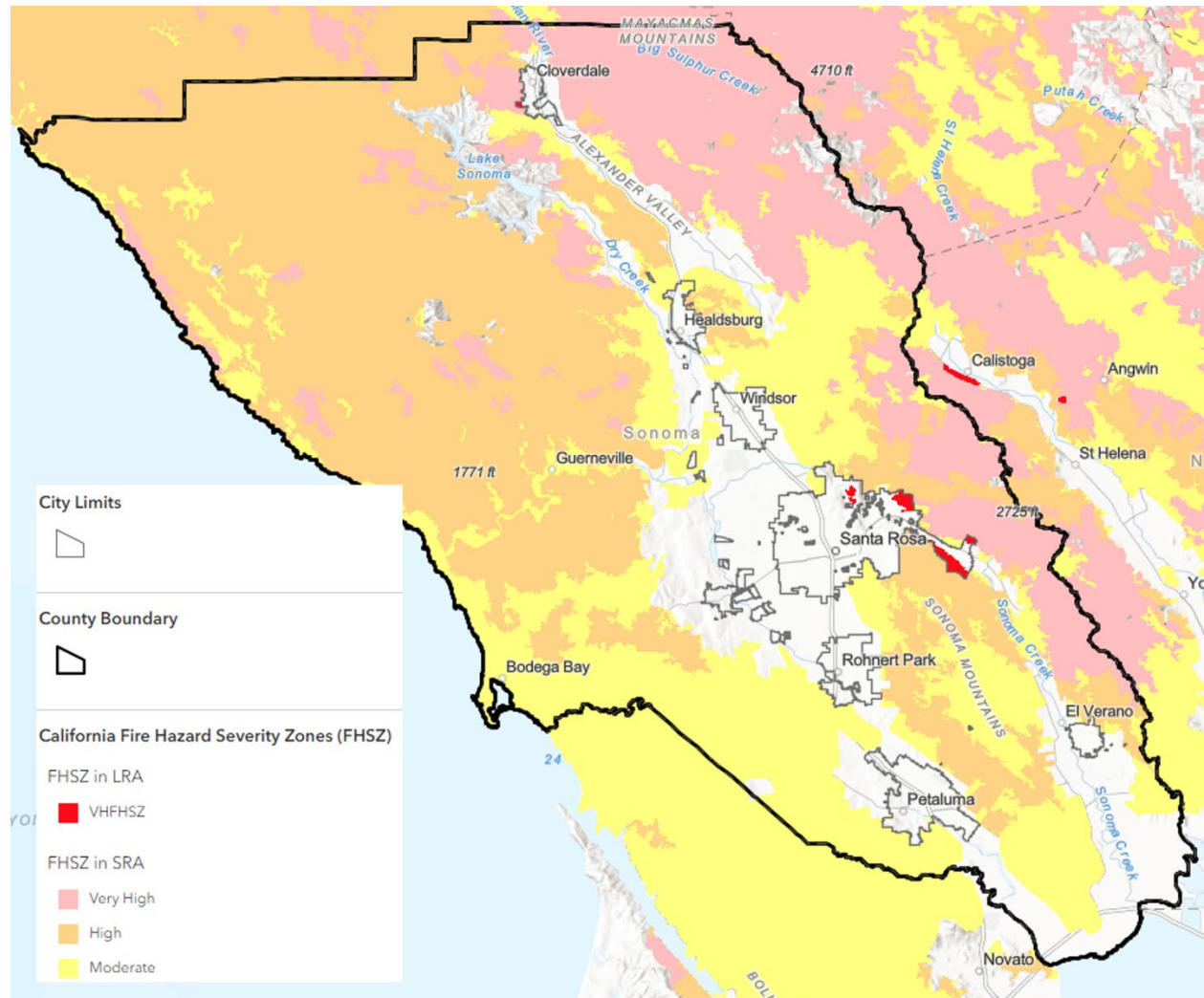
Figure 7: Mapped Faults in Sonoma County



Source: U.S. Geological Survey 2016

Percentages show likelihood of an earthquake of magnitude 6.7 or greater on the system over the 30-year period from 2014 through 2043

Figure 8: Fire Hazard Severity Zones



Source: CAL Fire Fire Hazard Severity Zone Viewer

Sensitive Habitats

A total of 132 special status plants and 51 special status animals are known to occur or have the potential to occur in Sonoma County, especially in its rural areas. Of these, 80 are special status plants of which 22 are State or federally listed. There are 31 special status animal species with some potential to occur in the county, including 20 federally or State-listed species. Future development could have significant impacts on special status species through injury or mortality and result in the loss or degradation of habitat during construction and/or operation. Within sensitive areas, a project-specific biological assessment is required for projects needing clearing/grading or vegetation trimming or removal during the demolition of existing buildings and redevelopment construction.

Riparian Habitat

Federally designated critical habitat units for steelhead, coho salmon, and California tiger salamander occur in the county. Sensitive and critical habitats could be significantly impacted by ground disturbance or vegetation removal adjacent to the habitat. A proposed project would be required to comply with existing County standards and processes, including Section 26-65 protecting riparian corridors. The potential impacts on riparian habitats or sensitive natural communities would reduce to less than significant levels through the implementation of mitigation measures. There are no inventoried sites with these riparian habitat restrictions.

Wetlands

Wetlands and waters may be affected by housing development if it were to occur within the limits of, or adjacent to, jurisdictional waters. If proposed development would impact wetlands, the development would either be designed to avoid impacts on federal and State waters or would be subject to Jurisdictional Delineation. Based on the results of the jurisdictional delineation, if a project would result in either direct or indirect impacts on waters of the State or waters of the U.S. then General Avoidance and Minimization would be required. While these standards may serve to constrain development near wetlands, they are necessary to mitigate potential losses to wetlands and habitat. Because no inventoried housing sites are located within wetland areas, this does not serve as a constraint to housing development

California Tiger Salamander

The California Tiger Salamander (CTS) is a federally threatened species and California Species of Special Concern. The CTS decline is significant in Sonoma County, particularly in Santa Rosa Plain, and was listed as endangered in 2003.

Santa Rosa Plain Conservation Strategy

The Santa Rosa Plain Conservation Strategy offsets adverse environmental effects of future development on the Santa Rosa Plain and surrounding areas and conserve protected species and contribute to their recovery. The Conservation Strategy provides the biological framework for the conservation of the CTS and three rare plant species found in conjunction with wetland habitats on the Santa Rosa Plain.

The parcel's zoning or land use designation does not change or add development restrictions even if a parcel is situated within the conservation area. However, it adds an extra step of mitigation to the parcel's development, without changing its potential. A mitigation bank is designed to create habitats large enough for numerous site mitigation. Mitigation for projects is usually performed by purchasing the appropriate type and number of credits from a mitigation bank to satisfy the mitigation requirements for development. There are two types of mitigation banks; preserve mitigation banks and wetland mitigation banks.

Mitigation is required per the Santa Rosa Plain Conservation Strategy at ratios of between 0.2-1 and 3:1, depending on the location of the site in relation to a known or potential resources. A survey may instead be conducted to determine if CTS is present in the project area. The process

may take up to two years to complete. If CTS is present, then the appropriate mitigation ratio will apply, but no mitigation will be required if no CTS is found.²¹

Infrastructure

Water and Sanitation Services

The Sonoma County Water Agency (Sonoma Water) is a water wholesaler which provides water to cities and districts. Sonoma Water also manages and operates sanitation services through eight as discussed by Planning Area in Appendix D, and has a written policy granting priority to developments with units affordable to lower-income households consistent with Government Code § 65589.7. The policy was last updated in May 2023. In addition, there are also numerous water and wastewater service providers not under the County's jurisdiction and control that serve Urban Service Areas in the Unincorporated County. Under Program 14, these independent providers will be notified and reminded every two years of their obligation to grant service priority to proposed developments that include housing units affordable to lower-income households. Each independent sewer or water service provider is unique in terms of size, geography, water sources, age and condition of lines and equipment, rate structure, entity type, and current status of long-range planning. Existing and planned water supplies and wastewater treatment facilities are considered adequate to serve buildout to address the County's RHNA.

Sonoma Water supplies wholesale potable water, primarily from the Russian River to nine Sonoma County cities and water districts. Lake Sonoma on the Dry Creek and Lake Mendocino on the East Fork of the Russian River are the two major reservoirs providing water supply for the Russian River watershed. These two reservoirs have dual purposes in that they serve as water supply storage and also provide flood protection. Sonoma Water mainly relies on Lake Sonoma for its potable water. The groundwater wells in the Santa Rosa Plain serve as a secondary source, mostly utilized during drought years or when the Russian River is constrained. The agency maintains over 88 miles of underground pipeline extending from the Russian River to cities and water districts in the portion of Sonoma County. See Figure 9 for an illustration of the Sonoma Water Service Areas in the county.

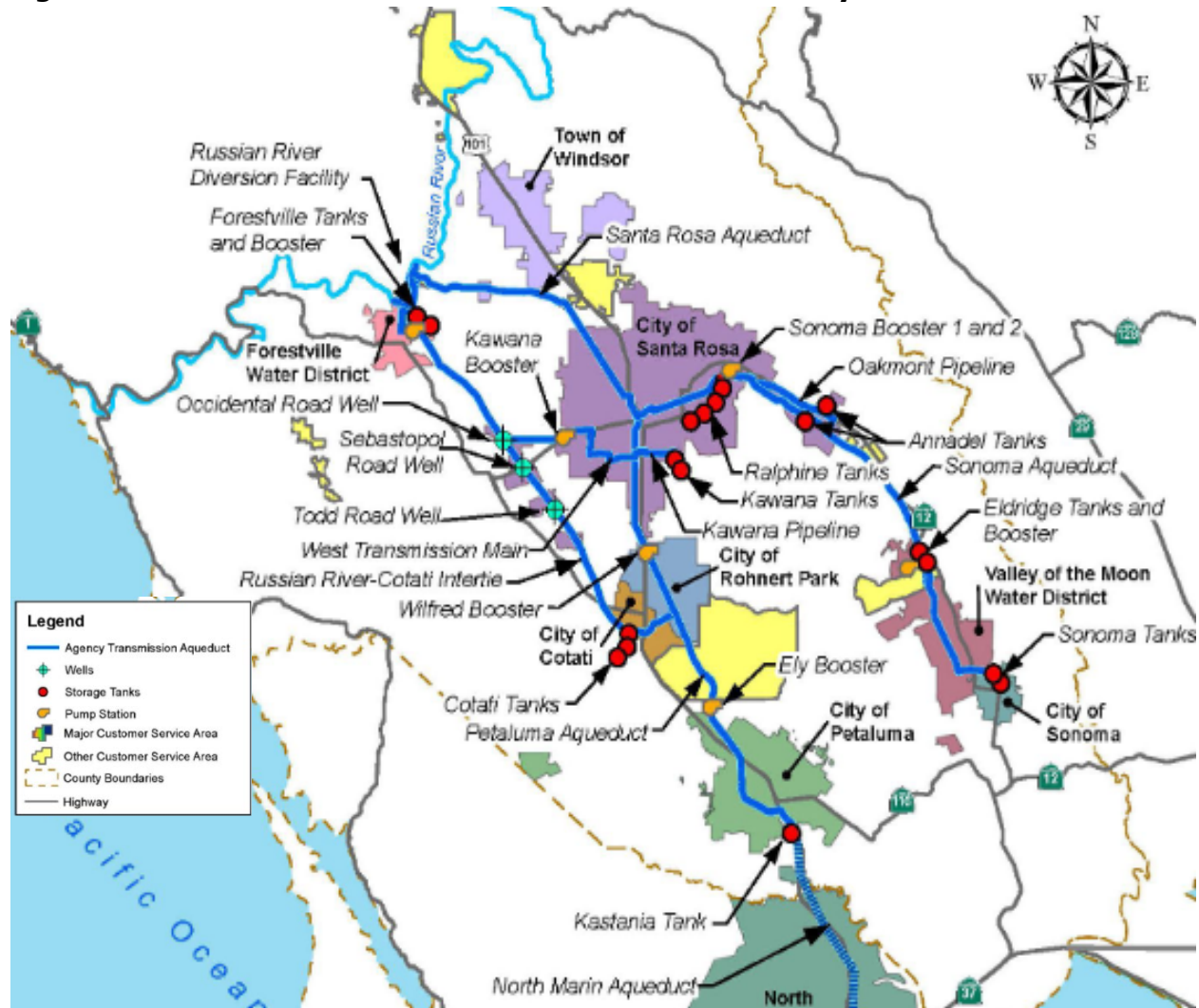
In accordance with the Urban Water Management Planning Act, Sonoma Water has its own Urban Water Management Plan (UWMP) that highlights past and projected water use and comparison of water supply to water needs during normal and dry years. The total water demand for Sonoma Water is projected to increase over time, prompting the development of the 2017 Strategic Plan.²² The Plan's goals include: 1) protecting the drinking water supply and promoting efficient water use; and 2) maintaining and improving the reliability of the water transmission system.

Sonoma Water treats wastewater and produces recycled water for agricultural, urban irrigation, and habitat restoration use. The agency owns and operates eight sanitation districts and zones that serve more than 50,000 people throughout the county.

²¹ <https://www.bcengineeringgroup.com/blog/developing-near-california-tiger-salamander-habitat#:~:text=Mitigation%20of%203%3A1%20%E2%80%93%20For,feet%20of%20an%20adult%20occurrence.>

²² Sonoma Water 2017 Strategic Plan <https://www.sonomawater.org/media/PDF/About/Strategic-Plan-2017.pdf>

Figure 9: Sonoma Water Service Areas in Sonoma County



Source: Sonoma Water, 2020 Urban Water Management Plan

There are 22 wastewater management and water service providers that are not under the County’s control and jurisdiction that serve the Urban Service Areas in the Unincorporated County, including but not limited to the following providers that serve housing sites listed in the County’s inventory:

- Geyserville Urban Service Area:** California American Water - Geyserville provides water service in Geyserville.. New residential developments may also drill their own wells in this Class 1 water availability area. The Geyserville Sanitation Zone facilities provide sewer service in the area. It is designed to treat an average dry weather flow of up to 92,000 gallons per day, but the existing dry weather flow treatment is less than its design capacity and future treatment is expected to remain low as well.
- Russian River Urban Service Area (Guerneville):** Sweetwater Springs Water District (SSWD) serves the area along the Russian River in the western portion of the county, including Guerneville. The SSWD is allowed to divert 3 cubic feet per second and a

maximum of 1,249 acre/feet per year from the river. The aging infrastructure has caused considerable loss of the water that is pumped. The treatment plant serving the Russian River County Sanitation District (RRCSD) is designed to treat an average dry weather flow of 0.71 million gallons per day (mgd) to advanced (tertiary) wastewater treatment standards. The existing dry weather treatment capacity is 0.51 MGD.

- **Airport/Larkfield/Wikiup Urban Service Area** is served by the California American Water Company. Approximately 72 percent of the water is from the wells pumped from the Glen Ellen formation water basin and 28% is from Sonoma Water. The system currently serves approximately 2100 connections. According to a water supply assessment prepared by Cal-Am, the ability to continue to serve new connections beyond General Plan buildout depends on the development of at least one new well, and new storage facilities. The Airport/Larkfield/Wikiup County Sanitation Zone (ALWSZ) provides sewer services to the Airport Business Park, Wikiup, and Larkfield area. The dry weather flow capacity of the treatment facility is 0.9 MGD, of which roughly 0.67 MGD is currently being used.
- **Sonoma Valley Urban Service Area:** Valley of the Moon Water District (VOMWD) provides service in unincorporated portions of the Sonoma Valley. Sonoma Valley County Sanitation District (SVCS) provides sewer service in the area. About two-thirds of the sewer laterals to individual residences in Sonoma Valley are at least 30 years old and likely in need of repair. The current SVCS Sewer Trunk Main Replacement Project is replacing approximately 1.8 miles of the sewer trunk. The first phase of the project commenced in 2019 and as of late 2022, the project is in its final construction phase.

Plans and Policies

The Sonoma Water Capital Improvement Plan²³ identified funding for 37 projects related to the sanitation zones and districts which includes nine projects for Airport-Larkfeld-Wikiup zone, one project for the Occidental district, two projects for the Penngrove zone, eight projects for the Russian River district, two projects for the Sea Ranch zone, thirteen projects for Sonoma Valley district, and two projects for South Park district.

The policies of the County's General Plan Water Resources Element, Public Facilities Element, and Land Use Element encourage the development of master facilities plans and service providers to plan and maintain infrastructure capacity necessary to meet the existing and future needs of the county. Additionally, Government Code § 65589.7(a) requires that service providers plan for and prioritize service to projects that include affordable housing units. Sonoma Water has a written procedure to meet this requirement for the districts and zones it manages, and the County will notify independent providers to remind them of this responsibility (Program 14).

Land Use Element Policy LU-4d states that the County must provide physical services and infrastructure that will accommodate the projected amount of growth authorized by the land use plan and assess the status of public infrastructure every five years. The County uses proposed annexations, redevelopment agreements, revenue sharing agreements, and the CEQA process as tools to ensure that incorporated development pays its fair share toward the service provision.

²³ Sonoma Water Capital Improvement Plan, <https://www.sonomawater.org/media/PDF/Projects/Capital%20Projects%20Plan/2021-2026.Capital.Improvements.Plan.pdf>

Policy LU-4f requires that new development contributes its fair share toward the provision of the public infrastructure and services needed for projected growth.

4.4.2 Potential Governmental Constraints and Opportunities

Governmental constraints can be policies, standards, requirements, or actions imposed by the various levels of government upon land and housing ownership and development. Although federal and state agencies play a role in the imposition of governmental constraints, these agencies are beyond the influence of local government and are therefore not addressed in this document.

General Plan and Zoning Code

State laws provide jurisdictions with the authority and scope to guide development under a set of policies and programs that have been vetted by community input. The set of policies are implemented under the General Plan and typically involve seven principal elements: land use, circulation, housing, environmental conservation, open space, noise, and safety. In 2021, the statute was amended to include an environmental justice element that identifies disadvantaged communities and include policies and programs to reduce cumulative pollution impacts to such communities.

The County is currently updating the General Plan and has prioritized equity. This is reflected in this Housing Element by creating a foundation to increase housing production for all income levels and affirmatively further fair housing. The Land Use Element sets the vision, goals, and policies for future development, land use, and conservation of resources. It establishes programs and land use categories that define the use and building intensity.

Zoning Codes are the primary planning tool to implement the policies of the General Plan. They apply specific regulations such as allowable uses within designated communities or districts, design standards, permit types, and associated review authority to each parcel that is located within jurisdictional boundaries. The Sonoma County zoning regulations contain nearly 50 articles and subsections that identify various zoning districts and their development standards, consistent with policies of the General Plan.

Sonoma County's Zoning Code allows for a variety of housing types in applicable zones and districts (Figure 17, Figure 18, and Figure 19). Some constraints have been identified that, with appropriate policies and programs, may further bolster allowable residential uses in all zones. Two-family and three-family dwellings are currently permitted by-right in R1 zones under the Cottage Housing Ordinance. Mobile home parks allowed in R1, R2 and R3 zones. Provisions to allow and encourage all housing types are described in Section 4.3.3, Zoning for a Variety of Housing Types.

Table 17: Permit Type and Types for Residential Uses Allowed in Residential Zones

Housing Type	AR	RR	R1	R2	R3
Accessory Dwelling Unit	P	P	P	P	P
Agricultural Employee Housing: Short Term Camp	P	-	-	-	-
Congregate Housing, Large		C	-	C	C
Congregate Housing, Small	-	P	P	P	P
Cottage Housing Developments	-	-	P	P	-
Dwelling, Multifamily	-	-	-	P	P
Dwelling, Single-Family	P	P	P	P	P
Dwelling, Two-Family	-	-	-	P	P
Guest House	P	P	P	-	-
Homeless Shelter, Small Scale	-	-	C	C	C
Junior Accessory Dwelling Unit	P	P	P	P	P
Live/Work	C	C	C	C	-
Mobile Home Parks	-	-	-	C	C
Permanent Supportive Housing	P	P	P	P	P
Residential Community Care, Large	C	C	C	C	C
Residential Community Care, Small	P	P	P	P	P
Single-Room Occupancy, Small	-	-	-	C	P
Single-Room Occupancy, Large				C	C
Temporary Occupancy of Travel Trailer	P	P	P	-	-
Transitional Housing	P	P	P	P	P

Source: County of Sonoma Zoning Code § 26-08-030, 2022

P = Permitted Use

P* = Permitted Use, subject to discretionary approval criteria

C = Conditional Use

- = Prohibited Use

t = Permit requirement indicated in Use Regulations column

Table 18: Permit Types by Housing Type in Commercial and Office Zones

Housing Type	CO	C1	C2	C3	LC	CR	AS	K
Accessory Dwelling Unit	P	P	P	P	P	P	P	P
Caretaker Dwelling	-	-	-	-	C	-	C	C
Dwelling, Single-Family	C	C	C	C	C	P	P	C
Homeless Shelter: Emergency	-	-	C	C	C	C	-	-
Homeless Shelter: Small Scale	-	-	C	P	P	C	-	-
Junior Accessory Dwelling Unit	P	P	P	P	P	P	P	P
Live/Work	C	C	C	C	C	C	C	C
Mixed-Use Development	C	P*/C	P*/C	-	P*/C	-	-	C
Permanent Supportive Housing	P	P	P	P	P	P	P	-
Residential Community Care, Large	C	C	C	C	C	-	C	C
Residential Community Care, Small	P	P	P	-	P	P	P	P
Single-Room Occupancy, Large	-	C	C	-	C	-	-	-
Single-Room Occupancy, Small	-	-	C	-	P*	-	-	-
Transitional Housing	P	P	P	P	P	P	P	-

Source: County of Sonoma Zoning Code § 26-10-030, 2023

P – Permitted Use

P* - Permitted Use, subject to discretionary approval criteria

C – Conditional Use

- - Prohibited Use

† - Permit requirement indicated in use regulations column

Table 19: Permit Types by Housing Type in Industrial and Special Purpose Zones

Housing Type	MP	M1	M2	M3	PCRR	PCUR	PCCOM	PF
Accessory Dwelling Unit	P	P	P	P				
Caretaker Dwelling	C	C	C	C	-	-	-	C
Congregate Housing, Large					C	C	-	-
Dwelling, Single-Family					P	P	P	-
Guest House					P	-	-	-
Junior Accessory Dwelling Unit	P	P	P	P	P	P	P	-
Residential Community Care Facility, Large	C	C	C	C	C	C	C	-
Residential Community Care Facility, Small					P	P	P	
Work/Live	-	C	-	-	C	C	C	-
Homeless Shelter, Emergency	C	P	C	-				
Homeless Shelter, Small Scale	C	P	C	-	-	C	-	-
Mixed Use Development					-	-	C	-
Mobile Home Parks					-	C	-	-
Permanent Supportive Housing					P	P	-	-
Single-Room Occupancy, Large					-	C	C	-
Transitional Housing					P	P	-	-

Source: County of Sonoma Zoning Code § 26-12-030 and Sec. 26-14-030, 2022

P = Permitted Use

P* = Permitted Use, subject to discretionary approval criteria

C = Conditional Use

- = Prohibited Use

† = Permit requirement indicated in use regulations column

Density

Allowable densities in commercial, mixed-use, office, industrial and special use district zones are specific to the parcel and can be accessed on the County’s zoning and land use GIS map. Table 20 below describes the allowed density for residential use zones. In urban residential zones (R1, R2 and R3), the mapped densities represent the minimum required density. See Section 4.3.4, Zoning Resources and Incentives, for a discussion of increased densities in urban areas for projects that contain affordable units or that provide very small units. Accessory dwelling units, junior accessory dwelling units, farm family housing, and agricultural employee housing are exempt from density calculations.

Table 20: Density Allowed per Land Use/Zones Categories

Land Use Designation/Zoning Description	Zoning District Density*
Agriculture and Residential (AR)/Provides land for raising crops and farm animals	1-20 acres per dwelling unit
Rural Residential (RR)/Preserves the rural character and amenities in areas best utilized for low-density residential development. Rural residential uses are intended to take precedence over agricultural uses. Agricultural service uses are not allowed.	1-20 acres per dwelling unit
Low Density Residential (R1)/Low-density single-family homes which are compatible with the existing neighborhood character	1-6 dwelling units per acre
Medium Density Residential (R2)/Preserves single-family neighborhoods while accommodating a variety of housing types at higher densities	6-12 dwelling units per acre
High Density Residential (R3) Allows a range of dwelling types at higher densities in appropriate locations	12-20 dwelling units per acre

Source: Sonoma County Zoning Code, 2021

*Minimum densities required in Urban Areas (R1, R2, R3)

Residential densities for projects utilizing the R3 standards are calculated using density unit equivalents per net parcel area, resulting in an increase of total units when smaller units are utilized.

Development Standards

The Sonoma County Zoning Code sets forth standards for development that designate the allowable density, lot area, setback requirements, maximum lot coverage, building height, and open space provisions. General development standards for orientation, design, and building frontage aim to preserve topography and promote public health and welfare.

The County’s development standards are generally conducive to affordable housing development and encourage a variety of housing types. Accessory dwelling units, junior accessory dwelling units, farm family housing, and agricultural employee housing are exempt from the maximum density standards subject to their applicable zoning districts. The affordable housing combining district aims to bolster the supply of low-income rental housing developments at under-utilized commercial or industrial lots located in Urban Service Areas.

Minimum lot sizes for urban residential zones (R1, R2, and R3) are 6,000 square feet, consistent with surrounding jurisdictions and smaller than most counties. Within the ownership housing opportunity areas (all R1 zones and the R2 zones with a mapped minimum density of 6 units per acre), minimum parcel sizes for qualifying projects are as low as 2,000 square feet and depend on the average size of the dwellings. This is an objective standard. Height limits are 35’ allowing 3 stories across all of the urban residential zones; for projects within the rental housing opportunity areas (all R2 and R3 zones), height limits are 40’. These height limits, together with the lot coverage limits of 40% in the R1 (single family) and 50% and 60% in the R2 and R3 multifamily zones respectively, facilitate development above the required minimum densities for each zone and most urban projects achieve significantly higher densities. Development projects within the R3 high density residential zone utilize the County's density unit equivalent provisions, which counts small studio apartments as 1/3 of a unit and small 1-bedroom apartments as 1/2 of a unit (Table 21). These provisions allow developments of market-rate small apartments at a

Table 21: Sonoma County Development Standards for Residential Zoning Districts

Zoning District	RR*	R1	R2	R3
Minimum Lot Size (sq. ft.)	20,000**	6,000	6,000	6,000
Minimum Lot Width (ft.)	80	60	60	80
Max. Residential Density (units/acre)	0.05-1***	1 to 6	6 to 12	12 to 20
Maximum Building Height (ft.)	35	35	35	†
Minimum Front Yard Setback (ft.)	20	20	20	15
Minimum Side Yard Setback (ft.)				
Street Side	20	20	20	15
Interior Side	5	5	5	5
Minimum Rear Yard Setback (ft.)	20	20	20	10
Maximum Lot Area Coverage (%)	35%	40%	50%	60%

Source: County of Sonoma Zoning Code, 2022

*RR is generally applied in areas that do not have public sewer and/or water, and which must rely on on-site sewage disposal (septic) systems.

** Minimum lot size is for RR zones designated urban residential on the general plan land use map.

*** AR and RR zones allow one (1) dwelling unit for every 1-20 acres.

**** Lots < 6,000 sq. ft. (not exclusively commercial use) = same setbacks as R1 zone ; Lots ≥ 6,000 sq. ft. (not exclusively commercial use) = same setbacks as RR zone, but maybe reduced under planning director’s discretion due to practical hardship.

† R3 building height maximum of three (3) stories and forty feet (40’) is allowed with design review approval if project is 1) Housing opportunity area type "A" projects; or 2) provides the majority of resident parking as tuck-under (podium-style) ground floor parking.

density of 30 units per acre, and small affordable apartments at a density of up to 60 units per acre.

In addition to the residential zoning districts, Sonoma County allows mixed use developments within its urban commercial zones and allows 100% housing projects within its Affordable Housing (AH) and Workforce Housing (WH) Overlay Zones. Mixed use projects are subject to the standards in Section 26-88-123 and are typically developed at a density of 8-10 units per acre. Projects within the AH and WH Overlays are allowed at densities of between 16 and 24 units per acre (without concession, bonuses, or waivers) and are subject to the provisions of Articles 59 and 75 of the Zoning Code, and the development standards of the R3 Zone, not the standards of the underlying commercial zoning. Additionally, these housing types also utilize the density unit equivalent provisions. Affordable housing projects in any urban residential district are also provided considerable flexibility in development standards, consistent with Government Code § 65915.

Subdivision Standards

On-site and off-site improvement requirements include curb widths, heights, street lengths, sidewalk widths, park dedications, landscaping, utility easements such as storm drain, water and sewer facilities, and other improvements that are necessary to build new residential development. Infrastructure improvement costs are usually incurred by the subdivision owner and can be expensive to build. Construction of improvements may pose a constraint to housing development if the requirements are beyond those necessary to protect the health and welfare of the community.

The infrastructure requirements for new high-density residential areas are, for the most part, codified in Chapter 25, Subdivisions, of the County Code of Ordinances.

The County's subdivision standards are generally conducive to affordable housing and do not pose a significant or unique constraint to housing production.

Streets

The Subdivisions Code requires that roads for projects consisting of ten (10) lots or fewer or where "feeder" roads within a larger project contain 10 lots or fewer and where further divisions are not possible may, with approval, be only twelve feet (12') in width. A six foot (6') cleared lane shall adjoin the twelve foot (12') paved section for additional fire access.

Streets are required to be designed and located in a manner as to maintain and preserve mutual topography, cover, significant landmarks, and trees, and to preserve and enhance views and vistas on or off the subject parcel. The color, size, height, lighting, and landscaping of any structure are evaluated for compatibility with local architectural motifs and the maintenance of view and vistas of natural landscapes, recognized historic landmarks, urban parks, or landscaping.

Driveways

Driveways (defined as private roads serving two lots or less) off subdivision roads shall meet County grade standards for private roads and may be required by the Sonoma County to be improved depending on terrain, grade, length, and other factors.

Landscaping

A minimum of eight percent (8%) of all parking lot areas where more than ten (10) parking spaces are provided are required to be landscaped and uniformly distributed.

Fencing

Fences in residential areas and visitor-serving districts (AR, RR, R1, R2, R3, K) may not exceed three feet in height within the front yard setback and within 15 feet of a street corner, and six feet in height within the side and rear yard setbacks. With a minor use permit, restriction on fence height within the setback areas may be exceeded. More detailed requirements are applied at sites that abut other developments.

Water

The source of water for any new development must meet standards established by the County to ensure the quality and reliability of the water supply.

Traffic and Vehicle Miles Traveled

To reduce greenhouse gas emissions, State law requires jurisdictions to use Vehicle Miles Traveled (VMT) rather than congestion levels or Level of Service (LOS) to measure environmental impacts under the California Environmental Quality Act (CEQA). LOS attempted to measure resulting additional traffic at or near the site of a new development. Mitigation generally required additional capacity in the form of wider streets to accommodate more traffic at the same (original) speeds. The change to the VMT as a metric requires the measure of how many more trips (and their length) are created in locations beyond the site of the development. In counties like Sonoma, the result is that development farther away from the goods and services will generate more and longer trips and are likely to require mitigation.

Policies already supported by the County are aligned with the intent of the VMT requirement. Large developments are unlikely to be approved in remote areas due to the challenge of mitigating VMT. The Sonoma County Transportation Authority led a countywide effort to develop a county-specific VMT Mitigation and Reduction Calculator.

Parking Requirements

If parking standards are excessive, they can pose a constraint to housing development by increasing development costs and reducing land that may otherwise be available for amenities or residential units. The County requires one (1) covered parking space per dwelling unit for most residential developments, with market-rate multifamily developments required to provide an additional 1 uncovered parking space for each 2 units and an additional half-space per unit when they have 3 or more bedrooms. Projects qualifying for a density bonus need only provide 1 space

for each studio or 1 bedroom unit and 2 spaces for each unit with 2 or more bedrooms (see Table 22 below). Covered parking waivers are routinely granted through the Design Review process. Parking spaces may be reduced if solar panels, vegetated swales, or other forms of low impact development are provided on-site (Sec. 26-86-010).

Table 22: Sonoma County Parking Requirements

Type of Residential Use	Required Parking
One single-family dwelling	1 covered space
One duplex	2 covered spaces
One triplex	3 covered spaces
Single mobile homes	1 covered space/unit
Travel trailer parks	1 space/10 coach sites
Condominiums and planned unit developments	1 covered space/unit plus 1 uncovered guest space/unit
Multifamily projects	1 covered parking space plus ½ uncovered guest parking space for each dwelling unit. An additional ½ parking space shall be provided for each dwelling unit having more than 2 bedrooms.
Micro-apartments	1 space per unit
Affordable housing projects provided pursuant to §26.89.050 (Density bonus programs)	1 space for each studio or 1-bedroom unit; 2 spaces for each 2- or more bedroom unit
Cottage Housing Developments	1 reserved space per unit, and 1 guest parking space for every 3 units or portion thereof.
SRO facilities	1 space for every 2 SRO rooms, plus 1 space for the management unit or office and 1 space for each employee, if any, on maximum shift.
Homeless shelters	1 space for every 6 beds, plus 1 space for the management unit or office and 1 space for each employee, if any, on maximum shift.
Home occupations	1 parking space, in addition to that required by the residential use of the property.
Live/work units	1 parking space, in addition to that required by the residential use of the property. An additional parking space shall be provided for each non-resident employee.
Work/live units	2 spaces/unit (need not be covered)
Senior mobile home parks	1 space per unit plus 1 guest parking space for every 3 mobile homes in accordance with §26-88-100 (Mobile home parks).
Family mobile home parks	2 spaces per unit plus 1 guest parking space for every 3 mobile homes in accordance with §26-88-100 (Mobile home parks).

Source: County of Sonoma Zoning Code, Article 86 (2022).

Parking standards in Sonoma County are generally less than those in many communities within the state since most residential projects require only one off-street parking space per dwelling unit. As such, parking requirements in Sonoma County do not pose a significant or unique constraint to housing development. Guest parking is required for condominiums, planned unit developments, multifamily projects not utilizing the County's density bonus programs, cottage housing developments, and mobile home parks. Guest parking standards do not pose a significant constraint, especially when analyzed cumulatively with the County's already low parking requirements. For example, condominiums only require one covered space and one uncovered guest space per unit, even for large units. Developers with local experience did not identify guest parking requirements as a constraint to development. In Program 15m, this outreach will be expanded through a parking study to identify the most appropriate parking ratios and identify any constraints posed by the County's current guest parking requirements. Based on the outcome of this study, the County will amend the Zoning Code to mitigate any identified constraints.

When considered cumulatively, the land use and development standards for the county's urban areas are less restrictive than surrounding jurisdictions, are highly conducive to affordable housing production, and do not restrict the ability of projects to achieve maximum densities. These development standards do not pose a significant or unique constraint to housing production.

Growth Controls

The County does not have any growth control measures in effect.²⁴ The County's previous growth management program was not carried forward in the Sonoma County General Plan 2020 and is no longer in use by the County. However, the Zoning Code still includes two former growth management areas (Sonoma Valley and Planning Area 6) and the allocations to be made in each area. Even though the growth management program is no longer used, it has been identified as a potential constraint to development because its continued presence in the Zoning Code conflicts with current provisions to increase housing production and with the County's own policies and practices. Sonoma County is not an "affected county" under the Housing Crisis Act of 2019 (Government Code § 66300). Although Sonoma is designated as an agricultural county, its previous growth management program was not voter approved and thus would not have qualified for an exemption from the HCA. Program 15 will eliminate this obsolete language from the code in the first year of the 2023-2031 Housing Element cycle.

Specific Plans

Under State law, Specific Plans are long-range planning documents that provide for the systematic implementation of the general plan and establish uses and standards for specific geographic areas, including infrastructure, financing, and implementation. The County has one specific plan in effect, and also has several area plans, which govern specific areas of the unincorporated area but at a lower level of detail than a specific plan. The County's existing specific and area plans are as follows:

²⁴ The Zoning Code includes obsolete references to growth control measures applied to the Sonoma Valley and Sebastopol areas that both sunsetted by 2005.

- Airport/ Industrial Area Specific Plan
- South Santa Rosa Area Plan
- Bennett Valley Area Plan
- Sonoma Mountain Area Plan
- West Petaluma Area Plan
- Penngrove Area Plan
- Franz Valley Area Plan
- Sonoma Developmental Center Specific Plan

In addition, the following Specific Plans are in process and will be adopted by the end of 2024:

- The Springs Specific Plan
- Sonoma County Airport Area Specific Plan

The older specific and area plan may limit residential uses and will need to be examined to determine if changes are needed to maintain compliance with State law. Program 15 will ensure that the County makes this assessment within the first 2 years of the planning period and, if changes are needed, completes them by the end of the third year (2026).

Local Processing and Permit Procedures

Permit Sonoma is Sonoma County's department responsible for the issuance of building permits. Land development or construction that takes place in the unincorporated area of Sonoma County (outside the nine incorporated cities) is reviewed, permitted, and inspected by Permit Sonoma.

Ease of Access

Permit Online²⁵ is Sonoma County's web portal that allows public access to permitting tools to start an application, view records and check permit status, pay fees, schedule an inspection. Permit Sonoma's website also allows the public access to property information, search existing permits, and view reports. The County's website provides transparency by making it easy to determine zoning and development standards for each parcel. The website also provides a preliminary application and process for qualified housing projects; Program 12a will ensure that this process and form meet all requirements for objective review and that they are clearly posted on the County website.

A single-family dwelling on an existing lot is generally a by-right project, requiring no land use entitlement or design review. The processing time for structural review for single family homes in urban areas, which includes obtaining sewer and water permits, is approximately six weeks. Single family subdivisions generally require a processing time of approximately eight months due

²⁵ Permit Online-Sonoma County <https://prmd.sonomacounty.ca.gov/CitizenAccess/Default.aspx>

to Subdivision Map Act procedures and requirements. Zoning clearance for accessory dwelling units and agricultural employee dwellings is the same as for single family homes; separate planning permits are not required.

Multifamily projects are permitted uses (i.e., no use permit required) on appropriately zoned sites, subject only to design review where not exempt; processing time is approximately six months assuming a CEQA exemption or minimal environmental review. The design review process does not add to the overall time it takes to receive entitlements and commence construction. The Design Review Committee does not exercise discretion over land use, nor over the number of units or project density. Mixed use and multifamily residential require 1-2 meetings, one of which may be a hearing of the Design Review Committee.

Zoning Clearances and Permits

Zoning clearance is required for new buildings, structures, or additions to existing buildings or structures. Setbacks are required for building near a scenic roadway or waterway. Administrative design review may be an additional requirement prior to the issuance of a building permit. In general, all zoning permit applications must include planning applications, indemnification agreements, and site plans at a minimum. Zoning permits are no longer required for all ADUs but a zoning permit may be required to designate an existing dwelling unit as an ADU.

Use Permits

Use Permits are not required for multifamily developments, or for Mixed Use projects when at least 20% of the total project units are provided as affordable for lower-income households. Use permits are required for Planned Developments that do not conform to the Zoning Code standards, unless exemptions have been granted under Government Code § 65915 (density bonus) for projects that include affordable units. Since the County's 2005 adoption of its inclusionary ordinance, all planned developments have qualified for the exemptions by providing affordable units as a part of the development.

When a use permit is necessary, a public hearing may be required before the Board of Zoning Adjustments, or before the Planning Commission when processed with a zone change and/or general plan amendment. Use Permits are discretionary in nature, and, if approved, will include conditions of approval. A Use Permit can only be approved if found to be consistent with the Sonoma County General Plan, Zoning Code, applicable Area or Specific Plan, and with the health, safety, and welfare of the neighborhood. A general planning application, supplemental application information, indemnification agreement, and at-cost project reimbursement form are submitted as part of a use permit application.

Subdivisions, Major and Minor

Major subdivisions are governed by the Subdivision Map Act (California Government Code, § 66410, et. seq.), the Sonoma County Subdivisions and Zoning Codes (Chapters 25 and 26), and the Sonoma County General Plan. A project planner in the Project Review Division is assigned to the project after a complete application for a major subdivision is submitted. Project applications are sent on referral for review, comment, and recommended conditions by the County and state agencies. Further studies and information may be required based on the staff review and

responses. Environmental review (CEQA) is required for major subdivisions. The project planner prepares an initial study based on the CEQA Guidelines. Project applications are reviewed by first by the Project Review Advisory Committee (PRAC), which reviews the application and formulates recommendations, and then a noticed public hearing is held before the Planning Commission. If the project is approved by the Planning Commission, there is a 10-day appeal period before the approval is final. Applicants normally have 24 months to comply with the conditions of approval and record the final map after the final approval. The applicant may apply for a one-year extension of time prior to the expiration of this 24-month period and be allowed a maximum of five (5) one-year extensions of time.

Required application materials include a planning application form, signed by all property owners, major subdivision supplemental information signed by the applicant, maps, sewage disposal, water supply, deeds, Assessor's parcel map, USGS map, Fire Safe and vegetation management plan, stormwater management submittals.

Design Review

The design review process varies widely depending on the size and complexity of the project. For minor matters such as a waiver of covered parking or a minor change to an existing approval, design review is conducted by staff as an over-the-counter process. For more complex projects, including large multifamily projects, review is normally started either before the application with an optional conceptual review with staff and the design review committee, or with a formal preliminary review and public hearing before the design review committee. Final design review of housing projects, if required, is typically delegated to staff and additional hearings or meetings before the design review committee are not required. The design review process is not discretionary in terms of land use entitlements or the maximum number of units on a site; rather, its purpose is to ensure land use compatibility through such design aspects as site layout, placement of smoking areas, window placement and screening for privacy, and ensuring the provision of adequate open space to meet Code requirements.

The Sonoma County Zoning Code requires that all major subdivisions, mixed use projects, and multifamily residential projects are subject to design review where allowed by law.. These projects typically require only 1 public hearing or meeting with the design review committee. The time frame for completing design review ranges from same-day approval to 6 months or more, depending on other entitlements that may be sought by the applicant concurrently such as a tentative map or use permit. Design review applications are evaluated in accordance with the development standards found in Article 82 (Design Review) of the Zoning Code, any applicable local area or plan guidelines, and the standards of the applicable base zoning districts. There are no findings required to be made for design review approvals; rather, projects are only reviewed for consistency with the code's standards and with any applicable local area or plan guidelines. Because local area and plan guidelines are currently written with subjective measures, they may pose a constraint as they add a degree of uncertainty to the project. Programs 12b will establish Objective Design and Development Standards to ensure that design review does not pose a constraint for qualified housing projects, including multifamily and mixed-use projects.

Priority Processing

Projects which include affordable units are given priority processing, as required by the County's 2014 Housing Element and its Zoning Code. For these projects, staff offers to meet with applicants, free of charge, prior to application submittal to identify potential issues at the earliest stages. Applicants are advised of the referral process, and scheduling for any required hearings is discussed. In instances where the securing of block grant funds is critical to the project, staff coordinates the review process with funding deadlines. Priority processing generally reduces processing time by as much as 50 percent. As with conventional projects, the County allows processing of grading and construction permits prior to project approval.

Processing Times

Typical processing times for different application types are provided in Table 23 below and are inclusive of CEQA review timelines. CEQA exempt projects are processed at the lower end of the time range. As noted above, priority processing of affordable projects generally reduces these review times by up to 50 percent.

Table 23: Typical Permit Processing Times

Type	Typical Processing Times	Approval Authority
Ministerial Review	1-2 months	Planning Division
Conditional Use Permit	6-24 months	Board of Zoning Adjustments
Zone Change	12-36 months	BOS
General Plan Amendment	12-36 months	BOS
Design Review	Same day OTC/3 months Staff/6-12 months DRC	Staff or DRC
Major Subdivision	2-3 years	Planning Commission
Parcel Maps	1-2 years	Project Review Advisory Committee (staff)
Environmental Impact Report	2-3 years	Approval Authority for Project

Taken together, these processing times and design review requirements do not pose a significant constraint on the development of housing and are similar to or better than many jurisdictions throughout the State.

Development and Permitting Fees

Various permitting fees for housing development, as shown in Table 24, are charged by the agencies within the county to cover the cost of processing, evaluating, and ensuring compliance. The County is legally required to set permit and development fees in amounts that do not exceed and are equal to the cost of providing services associated with these fees. The fee schedule notes that some permit application fees are charged on a fixed fee basis, and some charged as a deposit because the fee is charged on an actual cost basis during the permit process, as discussed in the "Local Processing and Permit Procedures" section earlier.

Table 24: Planning Project Review Fees

Fee Type	Fee
Approved Permit Condition Compliance Review*	\$3,029.00
Certificate of Modification*	\$5,511.00
Conditional Certificate of Compliance (per lot)	\$3,258.00
Design - Administrative Review Major	\$1,817.00
Design - Administrative Review Minor	\$801.00
Design Review - Residential Major*	\$5,862.00
Design Review - Residential Minor*	\$3,486.00
Design Review - Revision/Extension of Time	\$722.00
Environmental Review Level I*	\$3,531.00
Environmental Review Level II*	\$5,204.00
Environmental Review Level III*	\$6,250.00
Landscape Water Efficiency Plan Check (base)	\$445.00
Use Permit - Minor Level I with Hearing Waiver, Time Extension, Renewal*	\$1,083.00
Use Permit - Minor Level II with Hearing Waiver*	\$3,171.00
Use Permit Extension of Time	\$2,682.00
Zoning Permit Level I	\$172.00
Zoning Permit Level II	\$695.00
Zoning Permit Level III	\$931.00
Zoning Permit Level IV	\$2,844.00

* At cost, min. deposit

Source: <https://permitsonoma.org/divisions/planning/projectreviewfees>, effective 07/01/2022

Impact Fees

The County and other local agencies impose development impact fees on new development to fund infrastructure improvements including water and sewer utility improvements, schools, parks, and roads. Each of these fees is directly linked to the provision of services and facilities necessary to support residential development. The use of impact fees to fund local infrastructure is essential since other local sources of funding have been restricted.

Some typical fees charged by jurisdictions in or near Sonoma County are shown in Table 25 below. Sonoma County has lower fees than most other local jurisdictions, with development fees comprising less than 10 percent of development costs.

While fees do add costs to development projects, they do not necessarily increase the home prices for market-rate homes. Home prices are driven by regional and local market conditions rather than by the cost to build the home. On the other hand, fees may make it more difficult to produce affordable housing since prices are "set" to achieve affordability rather than being set by the market. When developing affordable housing, additional development costs are relevant and cost control is essential. However, as is the case with building codes and other restrictions, these

fees pay for the infrastructure necessary to secure public health, safety, and welfare. Additionally, new County policy now allows impact fees for residential projects to be deferred until occupancy.

Table 25: Comparison of Impact and In-Lieu Fees Per Unit

	Jurisdiction	Water	Sewer/ Wastewater	Traffic/ Circulation	Parks/ Recreation	Storm Drain	Affordable Housing	School District Fees	Other	Totals
Single Family Home										
1	County of Sonoma	\$4,000	\$2,000	\$6,778	\$3,165	\$1,007	\$10,149	\$4,455	-	\$31,554
2	City of Cloverdale	\$7,192	\$11,160	\$2,560	\$4,299	\$255	\$-	\$6,120	\$8,030	\$39,616
3	City of Cotati	\$10,046	\$16,638	\$7,325			\$21,400	\$3,790	\$400	\$59,599
4	City of Santa Rosa	\$6,463	\$6,548		\$14,139		\$12,000	\$3,630	\$9,175	\$51,955
5	County of Napa						\$13,500	\$6,120		\$19,620
	Averages	\$6,925	\$9,087	\$5,554	\$7,201	\$631	\$11,410	\$4,823	\$3,521	\$40,469
Multi Family Home										
1	County of Sonoma	\$4,000	\$2,000	\$6,778	\$3,165	\$2,000	\$2,900	\$5,250	-	\$26,093
2	City of Cloverdale	\$5,308	\$8,236	\$1,419	\$3,173	\$68		\$4,080	\$6,315	\$28,599
3	City of Cotati	\$11,046	\$16,638	\$7,329			\$11,400	\$3,790	\$350	\$50,552
4	City of Santa Rosa	\$4,370	\$4,501		\$10,165		\$8,000	\$2,420	\$6,226	\$35,682
5	County of Napa						\$5,500	\$4,080		\$9,580
	Averages	\$6,181	\$7,844	\$5,175	\$5,501	\$1,034	\$6,950	\$3,924	\$2,578	\$30,101

"Other" includes public facilities, public safety, general administration, and fire fees. SFR based on a 1,500 sq foot, or 3 bedroom single family house, 6 upa density, 600k valuation. MFR based on a 1,000 sq ft, or 2 bedroom multifamily unit, 20 upa development, with 80 units over 4 acres, 350k valuation.

Sources: Cloverdale Development Impact Fee Program Fiscal Year 2021-22; Cloverdale Unified School District Board Item Summary (March 24, 2021); Cotati Master Fee Schedule November 2022; Cotati-Rohnert Park Unified School District Developer Fee Rates 2021-2022; Santa Rosa Fee Schedule (2023); City of Santa Rosa Fee Schedule July 2022; Napa Sanitation District Fees and Charges (2022); Napa Valley Unified School District Developer Fees (2022); County of Napa Draft Housing Element (2022); Napa County Code Residential Housing Impact Fee Resolution Exhibit A; Petaluma City Schools Developer Fees (as of September 19, 2020); Sebastopol Union School District Board of Trustees Agenda (October 13, 2022); Sonoma County Affordable Housing Development Program - Residential Fee Schedule (January 2023)

Affordable Housing Fees

The County imposes affordable housing fees for the new construction of residential and non-residential structures as part of the affordable housing program. Table 26 below shows the fees for non-exempt market-rate residential construction, Table 27 through Table 29 outline a variety of other applicable fees, and Table 30 summarized typical fees and processing time by type of residential project.

Table 26: Affordable Housing Fees per Unit

Unit Square Footage	Total Fee (per unit)
≤1000	\$0
1001- 1490	\$2,746-9,611
1500-1990	\$9776-17,850
2000-2490	\$18,061-24,659
2500-2990	\$24,751-29,270
3000-3490	\$29,367-34,196
3500-3990	\$34,279-38,333
4000-4400	\$38,416-41,642
>4400	\$9.48/sq. ft.

The Regional Parks and Transportation and Public Works Departments both levy fees on new residential development, and those fees are collected by Permit Sonoma as a convenience to the customer. School impact fees are collected by the respective school districts.

Table 27: Maximum Parks Fee on Residential Development

Residential Land Use	Maximum Fee (per unit)
Single-Family	\$5,402
Multi Family	\$4,582

Table 28: Maximum Traffic Mitigation Fee on Residential Development

Residential Land Use	Maximum Fee Countywide (per unit)	Maximum Fee Sonoma Valley (per unit)
Single-Family	\$12,687	\$7,982
Multifamily (low rise)	\$9,838	\$6,189
Multifamily (high rise)	\$7,311	\$4,600
ADU	\$5,981	\$3,763
Mobile Home	\$6,720	\$4,228
Senior Housing	\$5,739	\$3,610

Traffic and Park Fees otherwise assessed on new residential development are waived or reduced for accessory dwelling units as follows:

Table 29: Development Impact Fees for Accessory Dwelling Units

Size of the Unit	% of Development Impact Fees Assessed
Up to 750 sq. ft.	0%
751-1000 sq. ft.	50%
1001-1200 sq. ft.	100%

Table 30: Summary of Processing Time and Total Fees by Residential Type

	SFD on Existing Lot	SFD w/Subdivision	Multifamily
Entitlements	Admin design review in scenic (rural) areas Building permit	Subdivision map Final map CEQA Design review Building permit	Design review CEQA if not exempt Building permit
Typical processing time	1-30 days	24-48 months	3-9 months
Estimated Fees per unit, including planning and review fees, impact fees, and building permit fees	\$55,040	\$52,294	\$37,871

Assumes 1,500 sq.ft SFDs, 20 unit subdivision, 1,000 sq.ft MFR units, 50 unit development.

When considered together, processing time and total fees are lower for multifamily development than single-family development and facilitate the development of housing at all income levels.

Building Codes and Enforcement

Building codes are an essential part of planning and development and establishing design standards for any building construction to include proper installation of plumbing, mechanical, electrical, and fire safety systems.

The California Building Standards Code is the basis for the design and construction of buildings in California. It is a compilation of building standards that have been adopted by state agencies and adapted as authorized by the California legislature to address California’s ever-changing conditions.

Sonoma County’s Building Code outlines building regulations for the unincorporated area to ensure construction protects the public health and safety. The state adopts new codes every three years to establish uniform standards for the construction and maintenance of buildings.

Adoption of State Model Code and Local Amendments

On December 6, 2022, the County adopted an ordinance making amendments to Chapters 7, 7A, and 13 of the Sonoma County Code (SCC) to address changes to the California Code of Regulations, Title 24, Parts 1-12, commonly referred to as the “model codes,” which govern the design and construction of structures and the maintenance of life safety systems within structures for fire prevention. The State published the model codes on July 1, 2022, and they became effective on January 1, 2023. Local jurisdictions may adopt local amendments that are equal to or more stringent than the model codes if reasonably necessary due to local climatic, geographical, and topographical conditions. These local conditions impact fire prevention efforts and the frequency, spread, intensity and size of fires in the county, and increase the potential for significant damage to all structures from earthquakes. The County therefore found it reasonably necessary to amend the California Code to mitigate the effects of these conditions.

Adoption of the new Code also included requirements for the use of electric appliances in most new residential construction. The new code advances the County's climate action goals and requires most new dwellings to have all-electric appliances (with the exception of cooktops) and the infrastructure to support them. Electric appliances may utilize renewable energy to power home appliances to reduce the emissions and costs.

The County also modified the plumbing code to allow for composting toilets in response to community feedback from low-income residents and housing advocates.

The County has demonstrated the energy cost-effectiveness of the new code's energy standards pursuant to Public Resources Code § 25402.1 and Title 24, Part 1 Section 10-106 of the California Code of Regulations. The local amendments were filed with the California Building Standards Commission along with findings following adoption of the ordinance.

Taken together, the local amendments result in increased costs related to fire protection for new homes constructed within the Wildland Urban Interface (WUI). Unfortunately, Sonoma County continues to experience hotter summers and more frequent wildfires which have caused significant loss of homes and lives. Adoption of the local amendments is necessary to protect residents and property and does not affect any of the sites zoned for lower-income households in the sites inventory.

Code Enforcement

Code Enforcement is the section that deals with violations of the County's building, zoning, and health regulations. Staff investigates and resolves instances of accessibility complaints, construction without permits, failing septic systems, grading violations, health and safety issues, housing code violations, zoning violations, and illegal use of land.

The Code Enforcement Division of the Permit & Resource Management Department is empowered to enforce existing ordinances such as grading, public health (well and septic systems), building code, and Zoning Code violations, as well as the State codes for housing. The County does not require pre-sales code compliance inspections of residential units. The Division responds to potential code violations on a complaint basis and does not seek out violations on its own initiative. When a complaint is received, the Division investigates it according to a priority system, in which health and safety violations have the first priority. The goal of the enforcement process is to return the property to lawful status whenever possible.

Analysis of Potential Constraints to Housing for People with Disabilities

Government Code § 12926 defines disability as a physical or cognitive impairment that limits a major life activity. Disability groups need affordable and accessible housing that is within proximity to services.

Under Federal law all federally assisted new housing development with five or more units must construct a minimum percentage of units accessible to persons with mobility disabilities and an additional percentage of units accessible to persons with visual or hearing disabilities. In addition, all new multifamily development with four or more units must meet the accessibility requirements

of the Federal Fair Housing Act. Enforcement of these requirements is not at the discretion of the County but is mandated under Federal law.

Under Title II of the ADA, which covers activities of state and local government, jurisdictions must modify policies, practices and procedures when necessary to avoid disability-based discrimination, unless the public entity demonstrates that making the modifications would “fundamentally alter the nature of the service, program, or activity.” (ADA Title II Regulation 28 § 35.130.) The law generally states that local governments retain agency to regulate land uses and to apply neutral and non-discriminatory regulations. Local governments are required, however, to provide equal opportunity to persons with disabilities to participate in the programs and services offered by local governments, including housing programs, .

Reasonable Accommodation Procedures

Pursuant to the Federal Fair Housing Act, the Americans with Disabilities Act (ADA) and the California Fair Employment and Housing Act (FEHA), the County of Sonoma implements and enforces a Requests for Reasonable Accommodation ordinance for people with disabilities that is codified as Article 93 of the Zoning Code. This ordinance provides a simple procedure for individuals or housing providers to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Fair Housing Acts. County staff are available to assist applicants with wording their requests, which may include a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice. A Reasonable Accommodation is simple to apply for (an email submittal is acceptable), has no formal application form, and has zero cost. Requests are typically reviewed by the Director or his/her designee and are granted within 24 hours if no additional information is needed. Requests submitted for concurrent review with another discretionary land use application are reviewed by the reviewer of that application. The criteria used to evaluate the request are consistent with the Acts, as follows:

- (1) Whether the housing which is the subject of the request will be used by an individual or a group of individuals considered disabled under the Acts, and that the accommodation requested is necessary to make specific housing available to the individual or group of individuals with (a) disability(ies) under the Acts;
- (2) Whether there are alternative reasonable accommodations available that would provide an equivalent level of benefit, or if alternative accommodations would be suitable based on the circumstances of this particular case;
- (3) Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the County;
- (4) Whether the requested reasonable accommodation would be consistent with the general plan land use designation of the property which is the subject of the reasonable accommodation request, and with the general purpose and intent in the applicable zoning district; and
- (5) Whether the requested reasonable accommodation substantially affects the physical attributes of the property.

The County processes and approves between two and four Reasonable Accommodations requests per year. Staff can recall only one request that was denied because the County did not have jurisdictional authority to grant the request. The Reasonable Accommodations process is simple, easily accessed, free of charge, and does not pose a constraint for persons with disabilities.

Zoning for Group Homes and Community Care Facilities

In the Sonoma County Zoning Code, a residential community care facility is defined as one that provides “primarily nonmedical residential care for children and/or adults.” This includes a family home, group care facility or similar licensed facility for 24-hour care of persons in need of “services, supervision, or assistance essential to sustaining the activities of family living or for the protection of the individual,” including those with disabilities.²⁶

Small residential care facilities serving six or fewer persons are permitted in AR, RR, R1, R2, and R3 residential and CO, C1, C2, LC CR, AS, and K commercial zones and must be located within an Urban Service Area. In R2 and R3 zones, they are only allowed on lots 8,000 square feet or more.²⁷

Large facilities serving more than six persons are conditionally permitted with a use permit and must be serviced by public sewer. Pursuant to state law, neither small nor large community care facilities are permitted on land that is subject to an Agricultural Preservation (Williamson Act) Contract. The County will review its provisions for large group homes and community care facilities under Program 15, Review and Update Zoning Code.

Definition of Family

The County prefers the term “household” and does not codify a definition of “family” because a household may be composed of any combination of individuals whether or not related by blood or marriage, but who function together as a single unit. This does not serve as a constraint to housing.

Historic Preservation

The County established a program and administrative procedures for designated historic landmarks and historic districts through “Historic District” (HD) zoning under the Historic Zoning Code in 1974. Structures are determined to be “contributing” or “non-contributing” to the historic significance with different design criteria for each category. The first document on preserving historic resources, “Historic Preservation Program: Sonoma County General Plan Technical Report” was prepared in 1976. Sonoma County has about 190 Historic Landmarks, most of which were designated between the mid-1970s to mid-1980s.

A multi-parcel Historic District is a specific area of the county in which there is a significant concentration or continuity of historic sites, buildings, structures, and objects of historic merit or which represent an historic theme important to Sonoma County, the State of California, or the nation. There are five small multi-parcel Historic Districts that have been designated as county

²⁶ Sonoma County Ordinance No. 6335

²⁷ Ibid

landmarks. None of the county's inventoried housing sites are within a designated Historic District. Historic preservation requirements to not pose a constraint to housing development.

Locally-Adopted Ordinances

Tree Protection Ordinance (Zoning Code § 26-88-010(m))

Sonoma County is home to a large variety of tree species and tree resources located throughout the county's urban and rural lands. Trees are a defining feature of the local landscape and a shared resource that provide a variety of community benefits. These benefits are often described as "ecosystem services," or beneficial services that natural systems provide to the county. Trees and their related natural communities provide significant services in both urban and natural settings. Trees and their related natural communities provide significant services in both urban and natural settings. Maintaining and increasing these services is key to achieving resiliency and sustainability for Sonoma County.

This ordinance requires that applicants for discretionary development permits identify trees proposed for removal and trees proposed for protection. If trees are planned to be protected, tree protection measures are required during construction. If trees that were not planned for removal are damaged, replacements or payment of an in-lieu fee is required. The ordinance provides protections to eleven specific species of trees, including madrone, big leaf maple, bay, redwood and seven varieties of oak. Ministerial permits (e.g., most single family and multifamily developments) are exempt from the ordinance.

Heritage and Landmark Tree Ordinance (Sonoma County Code Chapter 26D)

This ordinance provides a process for trees to be nominated for special protections based on age, size, shape, rarity, or location. Anyone can nominate a tree, but the property owner must agree to the nomination. The Board of Supervisors considers the nomination and may recognize the tree in a public meeting, and the property owner receives a certificate and plaque to be placed on or near the tree to notify all persons of the special status and protections. A notice is filed at the Sonoma County Recorder's Office to support continued awareness and protection. Around 50 trees have been recognized through this process; none are located on sites included in inventory.

Valley Oak Habitat (VOH) Combining Zone (Zoning Code Art. 67)

The purpose of this zone is to protect and enhance one particular tree species and plant community type, the valley oak (*Quercus lobata*) and valley oak woodland. The district was applied to parcels with soils that typically support valley oaks. In this zone, a permit is required to cut down any valley oak tree with a diameter at breast height (dbh) greater than 20 inches, or multiple trees having a cumulative dbh greater than 60 inches. The applicant must mitigate the resulting loss of trees by either retaining other valley oaks on the property, planting replacement valley oaks on- or off-site, or paying an in-lieu fee per tree to support a County park planting program. Because the majority of the valleys and uplands within Sonoma County are suitable habitat for valley oaks, this designation is widespread and is present on at least a portion of 43 sites in inventory. It should be noted that presence of the VOH Combining Zone does not indicate

that there are valley oaks to be protected on a site, only that the site is suitable habitat for this species.

Riparian Corridor (RC) Combining Zone (Zoning Code Art. 65)

The zone is intended to protect and enhance the natural function and biotic value of streams and applies to areas both in-stream and immediately adjacent. The zone is intended to balance the demands of mining, agriculture and development with the preservation of riparian vegetation, protection of water resources, floodplain management, wildlife habitat and movement, stream shade, fisheries, water quality, slope stability, and groundwater recharge. The ordinance prohibits grading, vegetation removal, agricultural cultivation, structures and roads within recognized stream channels or streamside conservation areas, with limited exceptions. There are 21 sites in inventory that have the RC Combining Zone definition, which is based on stream or river classification. Riparian corridor stream setbacks range from 50' to 100' (200' for the Russian River) and are accounted for in the calculation of realistic development capacity for the 21 sites in inventory that have this designation.

Local Area Development Guidelines (Zoning Code Article 90)

Sonoma County is a large and geographically diverse county with many small, unincorporated communities with unique characteristics. The purpose of the Local Guidelines is to protect and enhance the unique character of specific unincorporated communities and areas, as designated while allowing for land uses and development authorized in the General Plan. In each case where the Local Guidelines are in effect, the zoning designation for the parcel so specifies. Local Guidelines have been adopted for the following areas:

- Canon Manor West (LG/CMW)
- Glen Ellen (LG/GE1), (LG/GE2)
- Highway 116 Scenic Corridor (LG/116)
- Penngrove Main Street (LG/PNG)
- Russian River Corridor (LG/RRC)
- Sebastopol Road Urban Vision Plan (LG/SVP)
- The Springs, Highway 12 (LG/SPR)
- Taylor/Sonoma/Mayacamas Mountains (LG/MTN)

In most cases, ministerial projects are exempt from Local Guidelines (LG).

There are 23 sites in inventory that have the LG designation. The County will review the respective Local Guidelines to ensure consistency with State law. Program 15 requires that the County make this assessment within the first 2 years of the planning period and, if changes are needed, complete them by the end of the third year (2026).

4.5 FAIR HOUSING ANALYSIS

4.5.1 Background

In 2017, California State Assembly Bill 686 (2018) introduced into state law an obligation to affirmatively further fair housing (AFFH). AFFH is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” This includes persons of color, persons with disabilities, and other protected classes. The bill added an assessment of fair housing to the Housing Element that includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction’s fair housing enforcement and outreach capacity;
- An analysis of segregation patterns and disparities in access to opportunities;
- An assessment of contributing factors (Table 54);
- An identification of fair housing priorities and goals;
- Strategies and action to implement those priorities and goals.

The AFFH rule was derived from Federal requirements applicable to entitlement jurisdictions that can receive Community Planning and Development (CPD) funds directly from the U.S. Department of Housing and Urban Development (HUD). Before the 2016 Federal rule was repealed in 2019, entitlement jurisdictions were required to prepare an Assessment of Fair Housing (AFH) or an Analysis of Impediments to Fair Housing Choice (AI). AB 686 allows a jurisdiction to incorporate findings from either report into the Housing Element and this Assessment of Fair Housing (AFH).

Data Availability and Analysis

Pursuant to a Joint Powers Agreement (JPA), the Sonoma County Community Development Commission (CDC) administers CPD funds on behalf of the HUD-designated “Urban County” entitlement jurisdiction which consists of the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma. Much of the data provided by HUD for the purpose of housing and community development, disproportionate needs, and AFFH analyses is based on this collective Urban County geography. Separate data for just the unincorporated areas is not available without extensive manipulation, which can exaggerate the margins of error. Therefore, using the general estimates for this detailed assessment of fair housing may not be appropriate.

Additionally, there are very large census tracts in the rural areas of the Unincorporated County that have relatively small populations. As a result, it is possible that changes in a small group may be over reported. For example, a group of four people with common characteristics may increase by two. This would be counted by the census as a 50% increase. When compared to other, more densely populated census tracts this growth rate is not an accurate comparison. This possible distortion requires that the findings be supplemented by local other sources.

The CDC contracts with various organizations for fair housing outreach and enforcement services as detailed in the next section. Currently, these contracted scopes of services do not include reporting fair housing records by geographic area (i.e. separating records for individual cities and the unincorporated areas). The lack of fair housing records by specific geographic location can make it difficult to understand the nature and extent of housing discrimination and to tailor appropriate resources. This makes local knowledge increasingly important.

Two sources of local knowledge utilized throughout this analysis are the Sonoma County Housing Advisory Committee (HAC) and the Napa Sonoma Collaborative Equity Working Group (EWG). The HAC consists of local residents, renters, builders, and non-profits. Members advise staff, review draft concepts, serve as community ambassadors to help publicize public workshops, and participate in the planning effort. While the committee is not a decision-making body, members' experiences related to housing need, constraints to housing development, and feasibility of policies and programs will greatly benefit the effort. The EWG was convened by the Napa Sonoma Collaborative to engage community members in the Housing Element Update process within the region. The group discussed barriers, obstacles, and constraints to providing affordable housing within the Napa Sonoma region and developed recommendations for addressing these issues.

Contributing Factors

Pursuant to AB 686, the housing element must identify and prioritize significant contributing factors to the fair housing issues outlined in the following assessment: segregation, racially or ethnically concentrated areas of poverty or affluence, disparities in access to opportunity, and disproportionate housing needs. A fair housing contributing factor is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues.

Fair housing issues and contributing factors were identified through an analysis of regional and local data. These findings were presented to the Housing Advisory Committee, who used their local knowledge and the information provided to prioritize the contributing factors as follows:

- **High Priority Contributing Factors**
 1. Displacement of residents due to economic pressures
- **Medium Priority Contributing Factors**
 1. Lack of affordable, accessible housing in a range of sizes
 2. Lack of public investment in neighborhoods, including services and amenities
 3. Lack of regional cooperation
- **Low Priority Contributing Factors**
 1. Lack of affected populations on boards and committees
 2. Lack of funding for local fair housing outreach and enforcement
 3. Community opposition

These factors will be referred to throughout the remainder of the AFH and summarized in Table 54 at the end of the assessment. Some factors contribute to more than one fair housing issue, in which case it will be acknowledged at the end of multiple sections.

4.5.2 Fair Housing Enforcement & Outreach Capacity

Fair Housing Law

The County of Sonoma maintains compliance with all Federal and State fair housing laws and is committed to ensuring access to fair housing and services. Federal fair housing law, including the Federal Fair Housing Act of 1968 (FHA) and the Fair Housing Amendments Act of 1988 (FHAA), prohibits intentional housing discrimination and prohibit any actions or policies which may have a discriminatory effect on a protected group of people make it illegal to discriminate based on a person's protected class, including race, color, religion, sex, national origin, familial status, and disability. The California Fair Employment and Housing Act (FEHA)^{16F28} and the Unruh Civil Rights Act also make it illegal to discriminate based on marital status, ancestry, sexual orientation, source of income, or any other arbitrary forms of discrimination. Examples of policies or practices with discriminatory effects include exclusionary zoning and land use policies, predatory mortgage lending and insurance practices, and residential rules that may indirectly inhibit religious or cultural expression.

"Out of fear, we don't want to report illegal things. When people are undocumented, they are more afraid to report things that are not worth it even more so if one does not speak the language."

- Day Laborer in Sonoma County

Additional State protections include the following:

- **The Ralph Civil Rights Act** (California Civil Code § 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute.
- **The Bane Civil Rights Act** (California Civil Code § 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.
- **California Civil Code § 1940.3** prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.
- **The California Tenant Protection Act** (AB 1482; California Civil Code §§ 1946.2, 1947.12 and 1946.13)¹ prohibits tenants from being evicted without "just cause," which means that multifamily tenants who have lived in a unit for at least a year may only be evicted for enumerated reasons, such as failure to pay rent, criminal activity, or breach of

²⁸ Government Code § 12955 et seq

a material term of the lease. The law also caps rent increases at 5% plus inflation up to a 10% maximum cap.

- **California Government Code §§ 11135, 65008, and 65580-65589.8** prohibit discrimination in programs funded by the State and in land use decisions.

The County of Sonoma complies with all applicable fair housing laws. To affirmatively further fair housing on the local level, the County of Sonoma enforces an inclusionary zoning ordinance, provides density bonuses, offers Housing Opportunity Area programs, maintains a housing trust fund, and assesses affordable housing fees for non-residential development to increase its supply of affordable housing.²⁹ Additionally, Sonoma County has eased restrictions on the development of accessory dwelling units to allow increased residential density on land previously zoned for single-family use.

The County provides information on fair housing and affordable housing on its website, including Section 504 Grievance Form and instructions on reporting discrimination based on a disability; an inventory of affordable housing in the county;³⁰ information on how to contact rental property owners; income and rent limits; and general information on state and local housing programs.

Sonoma County residents also benefit from local and regional organizations that provide fair housing information, outreach, and enforcement, including their capacity and resources available to them. These organizations include:

County Supported Organizations

- **2-1-1 Sonoma County:** The 2-1-1 local resource hotline, operated by United Way of the Wine Country, is a free comprehensive information and referral service that connects community members to information and health and human services available in Sonoma County, including housing and homelessness services. The website provides a list of organizations that provide tenant rights information and/or counseling services.
- **Sonoma County Housing Authority (SCHA):** SCHA is a local public agency that provides affordable housing and supportive services to eligible persons with limited incomes. Some of their offerings include Housing Choice Voucher, Family Self-Sufficiency, Mainstream Voucher, Family Unification, and Shelter Plus Care.
- **Sonoma County Community Development Commission (Commission):** The Commission administers various affordable housing programs and funds to protect, preserve and produce affordable housing. The Commission also makes investments in capital projects that benefit lower-income and disabled households and neighborhoods and coordinates and administers funds and services to help homeless individuals and families access supportive services and housing. While the CDC currently provides limited funding for fair housing organizations, the current funding sources may only be used to provide specified services to income-qualified clients, and may not be used to conduct

²⁹ Sonoma County Permit Sonoma, Affordable Housing Policies and Programs, <https://permitsonoma.org/regulationsandinitiatives/housing/housinginitiatives>

³⁰ County of Sonoma website, "[Affordable Housing Inventory](#)"

general outreach or to provide information about housing and services. It will be important for the County to identify funding sources that may be used for this purpose.

Federal, State and Privately Supported Organizations

- **Legal Aid of Sonoma County (LASC):** Legal Aid of Sonoma County represents low- and very low-income residents throughout Sonoma County. Their housing practice provides legal assistance regarding public, subsidized (including Section 8 and other HUD subsidized projects) and private housing, tenant rights' education and housing discrimination, housing conditions, rent control, eviction defense, lockouts and utility shut-offs, residential hotels, and training advocates and community organizations. It is important to note that LASC is restricted from representing undocumented clients.
- **Housing and Economic Rights Advocates (HERA):** HERA is a statewide non-profit service and advocacy organization centered on helping the most vulnerable with free legal services related to financial hardships, housing and debt counseling for tenants and homeowners.
- **Department of Fair Employment and Housing (DFEH):** The California DFEH is a state agency dedicated to enforcing California's civil rights laws. Its mission targets unlawful discrimination in employment, housing, and public accommodations, hate violence, and human trafficking. Victims of discrimination can submit complaints directly to the department. DFEH is also a HUD Fair Housing Assistance Program (FHAP) agency and receives funding from HUD to enforce fair housing laws.
- **Fair Housing Advocates of Northern California (FHANC):** Fair Housing Advocates of Northern California is a private 501(c)(3) nonprofit organization with a stated mission of ensuring equal housing opportunity and educating communities on the value of diversity in their neighborhoods. FHANC is also a grantee under HUD's Fair Housing Initiatives Program (FHIP), which means that it receives funding from HUD to assist victims of housing discrimination. FHANC provides fair housing counseling services, fair housing complaint investigation, and assistance in filing fair housing administrative complaints to residents of Sonoma, Solano, and Marin counties. FHANC also offers counseling and education programs on foreclosure prevention and pre-purchase homebuying.
- **Department of Housing and Urban Development (HUD) San Francisco Regional Office:** The U.S. Department of Housing and Urban Development is the Federal agency that administers housing and urban development laws. The regional office for Bay Area residents is located in San Francisco, CA.
- **California Rural Legal Assistance (CRLA):** CRLA is a statewide nonprofit law firm serving low-income residents of California's rural areas and small cities, including support on fair housing issues such as reasonable accommodation for individuals with a disability. The Sonoma County branch is in Santa Rosa at 1160 N. Dutton Ave, Suite 105.
- **Sonoma County Tenants Union:** The Sonoma County Tenants Union provides counseling and resources for tenants, including legal resources for navigating fair housing

issues. In August 2020, the nonprofit organization launched the Sonoma County Tenant hotline that is staffed by volunteer tenant counselors.

Complaints, Findings, Lawsuits, Enforcement Actions, Settlement or Judgements

The California and U.S. governments have legal structures in place to enforce and investigate violations of fair housing law. The California Department of Fair Employment and Housing (DFEH) maintains the authority to investigate complaints of discrimination related to employment, housing, public accommodations and hate violence. The agency processes complaints online, over the phone and by mail and provides protection and monetary relief to victims of unlawful housing practices. Of the 143 complaints filed in Sonoma County in 2020, seven were based on housing.

HUD's Office of Fair Housing and Equal Opportunity (FHEO) is the administrative body responsible for processing Federal Title VIII fair housing cases which may be filed based on race, color, national origin, religion, sex, disability, familial status, and retaliation for filing an FHEO complaint. In the 14 and a half years between January 1, 2006, and June 30, 2020, there were 236 FHEO Title VIII Cases filed in Sonoma County.³¹ Cases are broken down even further by race basis as follows:

- 22 Cases with a Race Basis:
 - 15 Cases with a Black or African American Race Basis
 - Two Cases with a Hawaiian or Pacific Islander Race Basis
 - Three Cases with a white Race Basis
 - One Case with another Multi-Racial Race Basis.
- 153 Cases with a Disability Basis
- 28 Cases with a Familial Status Basis
- Two Cases with a Religion Basis
- 25 Filed Cases with a Sex Basis
- 45 Filed Cases with a Retaliation Basis.

The highest number of cases were filed based on disability while only two were filed based on religion. Of the 22 race basis cases, a disproportionate number of cases were filed based on Black or African American race; however, this type of complaint had a low rate overall, at about one compliant per year.

As of June 2023, there is one open lawsuit against the County alleging discrimination against homeless individuals and violations of their civil rights, Vannucci et al. v. County of Sonoma, Sonoma County Community Development Commission, City of Santa Rosa, et al., U.S. District Court, Northern District of California, San Francisco Division Case No. 18-CV-01955-VC. Upon resolution of this case and as part of

³¹ Data.gov FHEO Filed Cases, Metadata Updated: November 10, 2020

its continuing actions to affirmatively further fair housing, the County will continue to work with impacted persons, communities and agencies to address concerns as needed. **Housing Enforcement & Outreach Capacity: Fair Housing Issues and Contributing Factors**

There are several local organizations that enforce and/or provide outreach to the public about fair housing. California's Department of Fair Employment and Housing (DFEH) also focuses on enforcing California's civil rights laws and operates in Sonoma County. Multiple fair housing organizations receive or have received HUD Fair Housing Initiative Program (FHIP) funds and benefit from Community Development Block Grant (CDBG) funds. While these services are available, they are often underfunded, underpublicized, or underutilized.

The primary factors that contribute to fair housing issues related to Fair Housing Enforcement & Outreach Capacity in Sonoma County are:

- Lack of regional cooperation
- Lack of affected populations on boards and committees
- Lack of funding for local fair housing outreach and enforcement
- Community opposition

4.5.3 Patterns of Integration and Segregation

Segregation is the separation of demographic groups into different geographic locations or communities, meaning that groups are unevenly distributed across geographic space. Integration is the equal distribution of demographic groups within a geographic location or community. Segregation is partly a result of historical exclusionary zoning, which is a practice that either intentionally or unintentionally excludes certain types of land uses and/or races and ethnicities from a given community. Zoning Codes that discriminate based on race and ethnicity are now illegal, however, nearly all communities in the United States have land use patterns that reflect past practices. This has the practical effect of limiting the supply of available housing units.

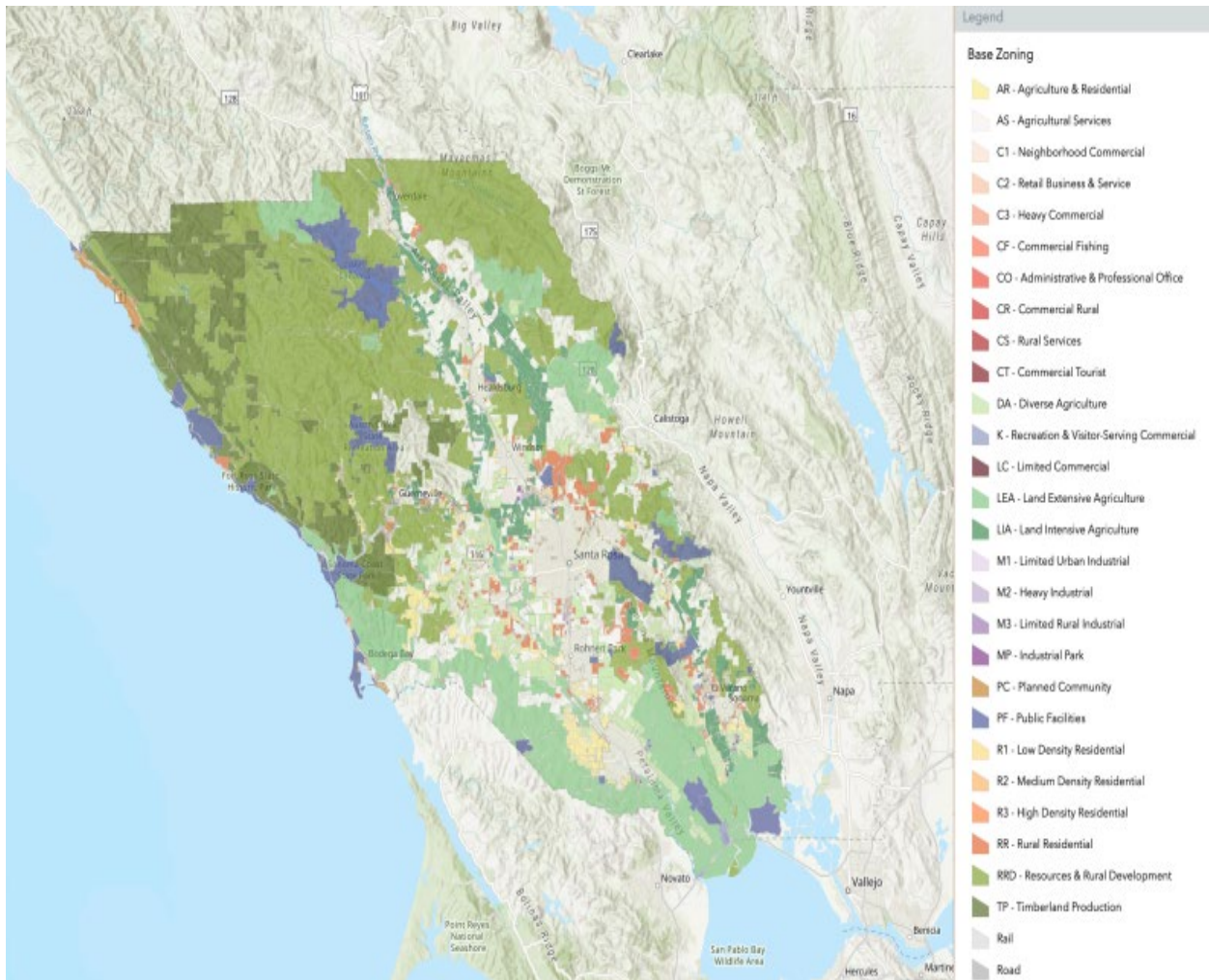
Land use and zoning laws play a significant role in a variety of fair housing issues. Specifically, overly restrictive zoning to retain low-density development has suppressed the production of affordable housing resulting in the exclusion of low-income individuals from many parts of the area. Many low-income residents, particularly people of color, disproportionately occupy high-density housing because it tends to be more affordable than the purchase or rental of a single-family home. High density housing can generally be built only in areas zoned for multifamily homes or mixed-use development. These relationships typically result in segregation by race and income level. Additionally, these restrictive laws are more likely to generate disproportionately high rates of housing cost burden and overcrowding among some racial and ethnic groups, persons with disabilities, and large families.

Sonoma County has four primary residential zoning designations. In addition to the Agricultural and Residential zones (AR) allowing agricultural use and Rural Residential (RR), the primary residential designations in Sonoma County are Low Density Residential (R1), Medium Density

Residential (R2) and High Density Residential (R3). R2 and R3 zoning allow for multifamily housing which is typically necessary to ensure affordability and provide meaningful access to low-income households that are disproportionately members of protected groups. The number of dwelling units allowed in R3 districts can vary greatly while R2 districts permit up to 10 dwellings per acre. In Sonoma County, very few parcels have R3 designation except in a few concentrated areas (Figure 10).

Most areas zoned for R3 are concentrated near the southern part of Santa Rosa adjacent to Highway 101. Another high-density zoned area is in Larkfield/Wikiup where 10 acres are zoned to allow multifamily dwellings. A smaller portion is also present near El Verano, Glen Ellen, and Guerneville. For the most part, Sonoma County relies on R2 zoning districts to provide higher density multifamily housing. R2 zones are located near the R3 zones and make up the bulk of land zoned for multifamily dwellings within the county. As a result, most housing sites reserved for multifamily housing require a minimum density of 10 units per acre for large market-rate units. Higher densities are allowed for micro-apartments (up to 60 units per acre), Housing Opportunity Area projects (up to 24 units per acre), within the AH (Affordable Housing) and WH (Workforce Housing) Combining Zones (16 to 24 units per acre), and under the State and County Density Bonus programs (up to 50% increase over minimum density).

Figure 10: Zoning Map



Source: Permit Sonoma GIS: Zoning and Land Use map, Sonoma County

Race and Ethnicity

The Bay Area is a racially diverse region of over seven million people, more than 100 incorporated municipalities, and nine counties including the County of Sonoma. While racial segregation occurs in every county and metropolitan statistical area, it is relatively pronounced in Sonoma County which has the highest percentage of white residents of any county in the Bay Area. In this section of the AFH, county level racial segregation is broken down by several different indicators, including racial population breakdown by percent, the racial dot map, the Racial Isolation Index, the Racial Dissimilarity Index, and the Theil’s H Index for Racial Segregation. This information was originally compiled by University of California Merced Urban Policy Lab and ABAG/MTC staff in preparation for Housing Element updates in a report titled “AFFH Segregation Report: Unincorporated Sonoma.”

Between 2000 and 2015, the total population in Sonoma County grew by 7%, however non-white populations grew significantly, by 46%. Conversely, while the white population made up two-

thirds of the population in 2020, it decreased by 11.5% since 2000. Sonoma County has become more diverse over the last two decades with the Latino population increasing the most over time (16.6% in 2000 to 24.2% in 2020). The one population that has remained relatively stagnant over time is the Black/African American population.³²

Table 31: Population by Racial Group, Unincorporated Sonoma County

Race	Unincorporated Sonoma County			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	1.8%	2.2%	3.4%	28.2%
Black/African American	0.9%	0.8%	0.8%	5.6%
Latinx	16.6%	22.0%	24.2%	24.4%
Other or Multiple Races	3.6%	3.2%	6.0%	5.9%
White	77.1%	71.7%	65.6%	35.8%

Source: 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 2012, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

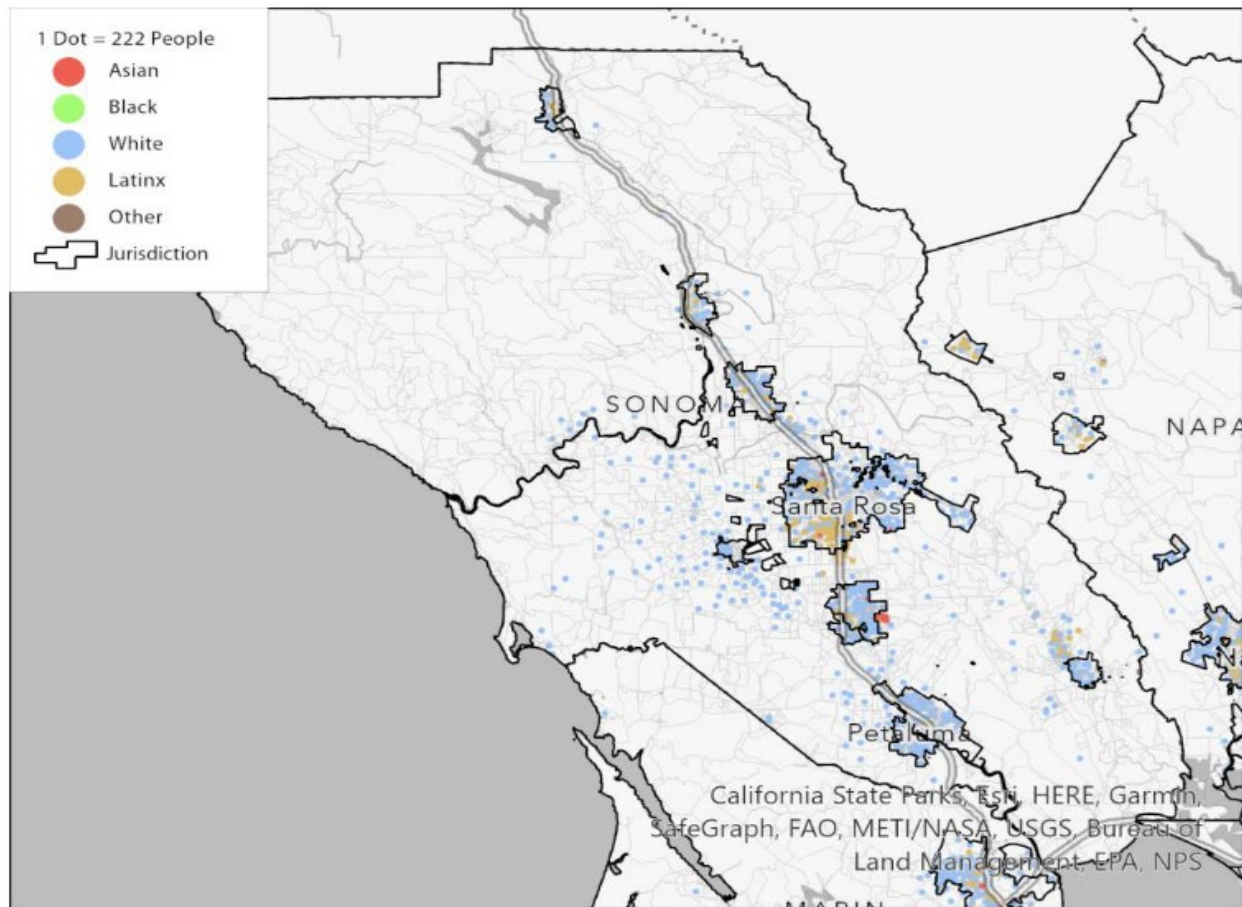
³² 2019 Countywide Assessment of Fair Housing: Analysis of Impediments to Healthy and Thriving Communities

Sonoma County's increased racial diversity over time is not an indicator of decreased segregation. White populations remain the most segregated group with the region and minorities are still more likely to be integrated with each other than they are to be integrated with white communities.³³ There are several data tools to discern the extent to which racial groups are integrated throughout the county. Racial dot maps, for example, are useful for examining neighborhood racial segregation within a jurisdiction. Generally, when the distribution of dots does not appear clustered, segregation measures tend to be lower. Conversely, when clusters of certain groups are apparent on a racial dot map, segregation measures may be higher. The racial dot map of Unincorporated Sonoma County (Figure 11) offers a visual representation of the spatial distribution of racial groups within the jurisdiction.

Clusters of Latino residents can be identified in the southwestern part of Santa Rosa (the Roseland Area) which extends slightly beyond city limits to the south along Highway 101; the western half of the City of Cloverdale; to the north of the City of Sonoma in the Sonoma Springs area; and in the southwestern part of the City of Rohnert Park bordering the northeasterly part of the City of Cotati. There is also a concentration of Asian residents directly to the east of Rohnert Park near Sonoma State University. Aside from these obvious patterns, most of the county is populated by predominantly white residents, heavily concentrated in urban areas and within city limits. These populations are represented by blue dots on the maps in Figure 11 and Figure 12, below.

³³ Id.

Figure 11: Racial Dot Map Unincorporated Sonoma County

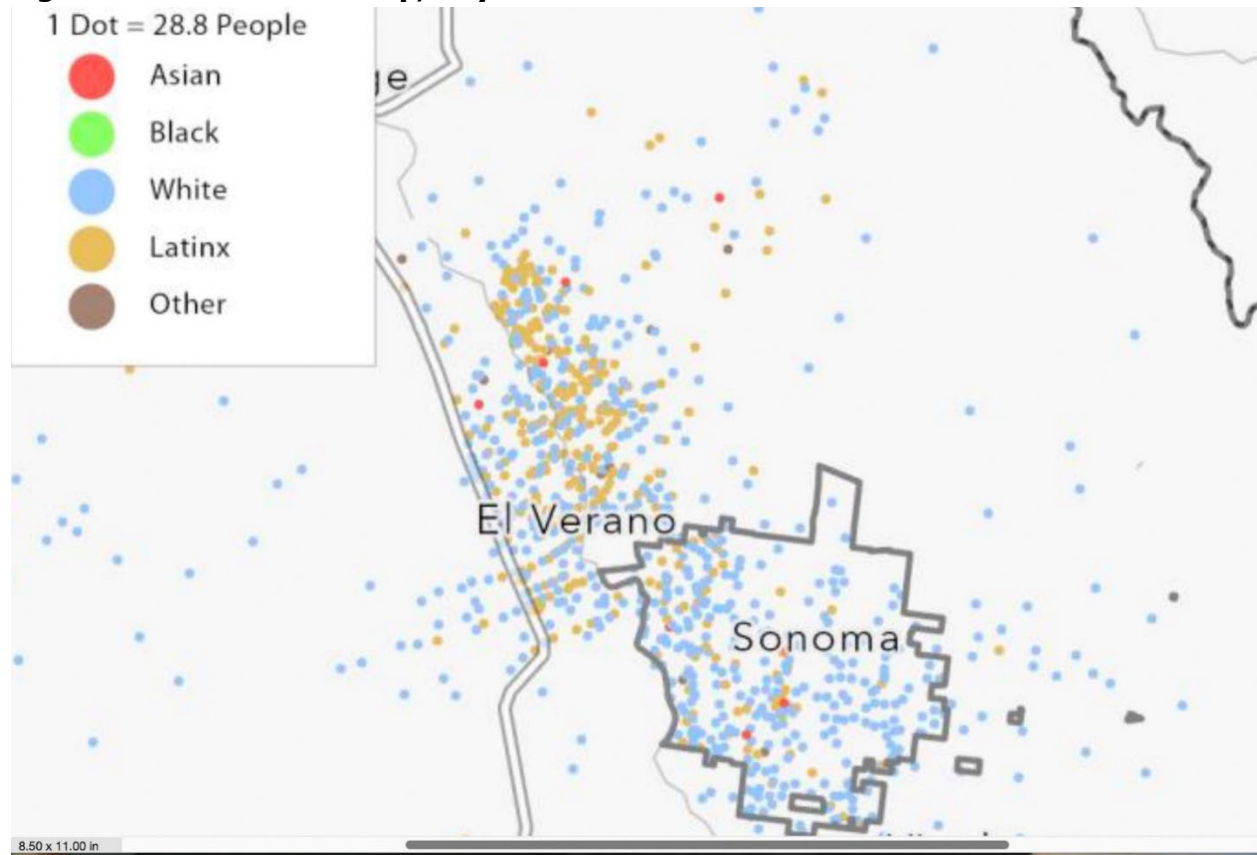


Source: Source: U.S. Census Bureau, 2020 Census State Redistricting Data Summary File, 2020 Census of Population and Housing

Figure 12 zooms in on the notable segregation that exists between predominantly white residents in the City of Sonoma and Latino residents to the immediate north. These differences reflect historical patterns of zoning and land use restrictions as discussed in Section 4.5.6, below. The County has prepared and published a Draft Springs Specific Plan³⁴, a place-based strategy to improve infrastructure and public services as well as to increase opportunities for housing development at all income levels. The communities of Agua Caliente, Fettlers Hot Springs, and Boyes Hot Springs are known collectively as the “Springs.”

³⁴ Springs Specific Area Plan <https://permitsonoma.org/springs>

Figure 12: Racial Dot Map, City of Sonoma and El Verano



Source: U.S. Census Bureau, 2020 Census State Redistricting Data Summary File, 2020 Census of Population and Housing

The racial isolation index compares each neighborhood’s composition to the jurisdiction’s demographics. This index ranges from 0 to 1. Higher values indicate that a particular group is more isolated from other groups. The index can be interpreted as the experience of the average member of that group.

Sonoma County’s isolation index of 0.704 for white residents means that the average white resident lives in a neighborhood that is 70.4% white. Non-white racial groups are less isolated and more likely to encounter other racial groups in their neighborhoods. The isolation index values for all racial groups in Sonoma County for the years 2000, 2010, and 2020 can be found in the table below. Among all racial groups in the jurisdiction, the Asian population’s isolation index has changed the most over time. From 2000 through 2020, the white population remained the most isolated racial group in Unincorporated Sonoma County

The Bay Area Average column provides the average isolation index value across Bay Area jurisdictions for different racial groups in 2020. The data in this column can be used as a comparison to provide context for the levels of segregation experienced by racial groups in Sonoma County. For example, the average isolation index value for white residents across all Bay Area jurisdictions is 0.491, which is significantly lower than that of Sonoma County.

Table 32: Racial Isolation Index Values for Segregation, Unincorporated Sonoma County, and the Region

Race	Unincorporated Sonoma County			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander	0.027	0.029	0.187	0.245
Black/African American	0.014	0.011	0.013	0.053
Latinx	0.274	0.361	0.357	0.251
White	0.792	0.752	0.704	0.491

Note: Higher values indicate higher rates of racial isolation.

Source: 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.

While the racial isolation index measures the segregation of a single group, the dissimilarity index measures segregation between two different groups. Table 29 below provides the dissimilarity index values indicating the level of segregation in Sonoma County between white residents and residents who are Black, Latino, or Asian/Pacific Islander. It also provides the dissimilarity index between white residents and all residents of color in the jurisdiction across three time periods. In Sonoma County, the highest segregation is between Asian/Pacific Islander and white residents followed by Black/African American and white residents. It should be noted, however, that this index value is based on a racial group making up less than 5% of the population in the jurisdiction which could lead to unreliable values.

Table 33: Racial Dissimilarity Index Values for Segregation, Unincorporated Sonoma County, and the Region

Race	Unincorporated Sonoma County			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	0.253*	0.243*	0.414*	0.185
Black/African American vs. White	0.296*	0.292*	0.339*	0.244
Latinx vs. White	0.375	0.397	0.377	0.207
People of Color vs. White	0.299	0.336	0.315	0.168

* Index value is based on a racial group making up less than 5% of the population in the jurisdiction which could lead to unreliable values

Note: Higher values indicate higher levels of segregation.

Source: 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.

Finally, 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 a whole area. 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 jurisdiction have the same demographics as the jurisdiction in its entirety. A value of 1 would mean each group lives exclusively in their own, separate neighborhood.

The “Bay Area Average” column in the table below provides the average Theil’s H Index across Bay Area jurisdictions in 2020. Between 2010 and 2020, the Theil’s H Index for racial segregation in Sonoma County increased, suggesting that there may now be more neighborhood level racial segregation within the jurisdiction. This value is higher than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in Unincorporated Sonoma County is more than the average Bay Area city average value for Bay Area jurisdictions (Table 34).

Table 34: Theil’s H Index Values for Racial Segregation

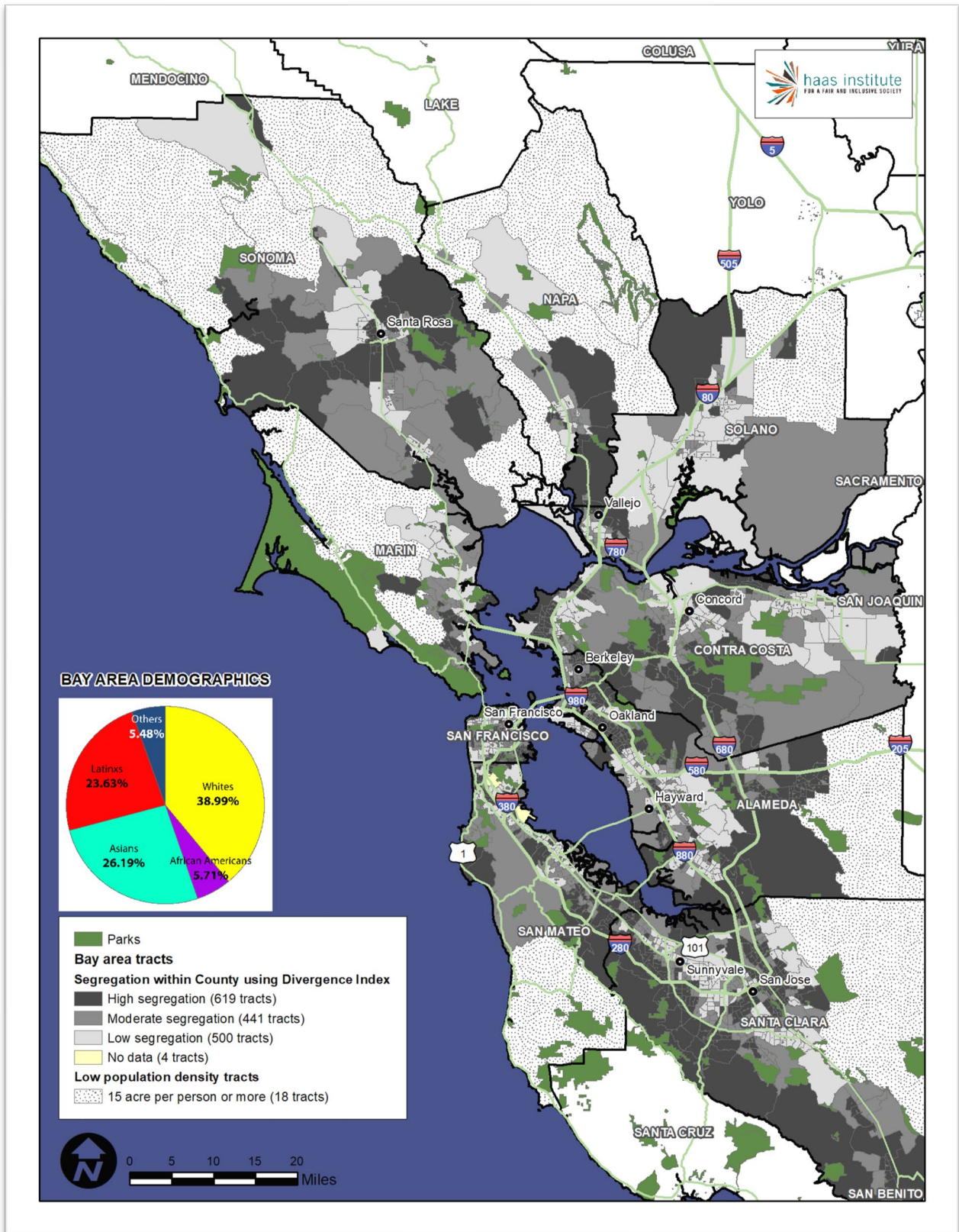
Index	Unincorporated Sonoma County			Bay Area
	2000	2010	2020	2020
Theil's H Multi-racial	0.087	0.108	0.114	0.042

Note: Higher values indicate higher levels of segregation.

Source: 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.

The map in Figure 13 below illustrates the degree of racial segregation throughout the Bay Area region. The region and each county are shaded into three categories that indicate the degree of segregation measured for that geography: high, moderate, or low. These categorizations are based on the divergence index score of each census tract. Relatively low levels of diversity are reflected on the neighborhood level with 51% of census tracts having similar proportions of white people to the overall county population. For Latinos, Asians, and Black people, those percentages are 23%, 26%, and 13%, respectively. Three of the six whitest segregated neighborhoods in the Bay Area are found in Sonoma County neighborhoods in or around the City of Santa Rosa.

Figure 13: Levels of Segregation, Bay Area Region, 2018



Source: *Racial Segregation in the San Francisco Bay Area, Part 1, Othering & Belonging Institute*

Persons with Disabilities

The Americans with Disabilities Act (ADA) defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” People with disabilities are at greater risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. According to 2019 American Community Survey data, 11.0% of Sonoma County report having a disability of some kind. The most prevalent disability in Sonoma County is ambulatory difficulty, which affects 6.0% of the population (Table 35).

Table 35: Population by Type of Disability, Sonoma County

Disability	Percentage of Population
With an ambulatory difficulty	6.0%
With an independent living difficulty	5.3%
With cognitive difficulty	4.6%
With hearing difficulty	3.7%
With a vision difficulty	2.5%
With a self-care difficulty	1.9%

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

Within this population, there are differences in disability status by race and ethnicity. Though the smallest race group in Sonoma County, American Indian, Alaska Native residents are the most likely to live with a disability followed by Black or African American individuals (Figure 36).

Table 36: Disability by Race or Ethnicity, Sonoma County

Race or Ethnicity	Total Population	Number with a Disability	Percent with a Disability
Total Non-Institutionalized Population	492,417	57,586	11.7%
White alone, Not Hispanic or Latino	357,226	44,801	12.5%
American Indian and Alaska Native alone	4,322	708	16.4%
Black or African American Alone	8,054	1,262	15.7%
Asian alone	21,120	1,775	8.4%
Hispanic or Latino (of any race)	132,899	11,679	8.8%

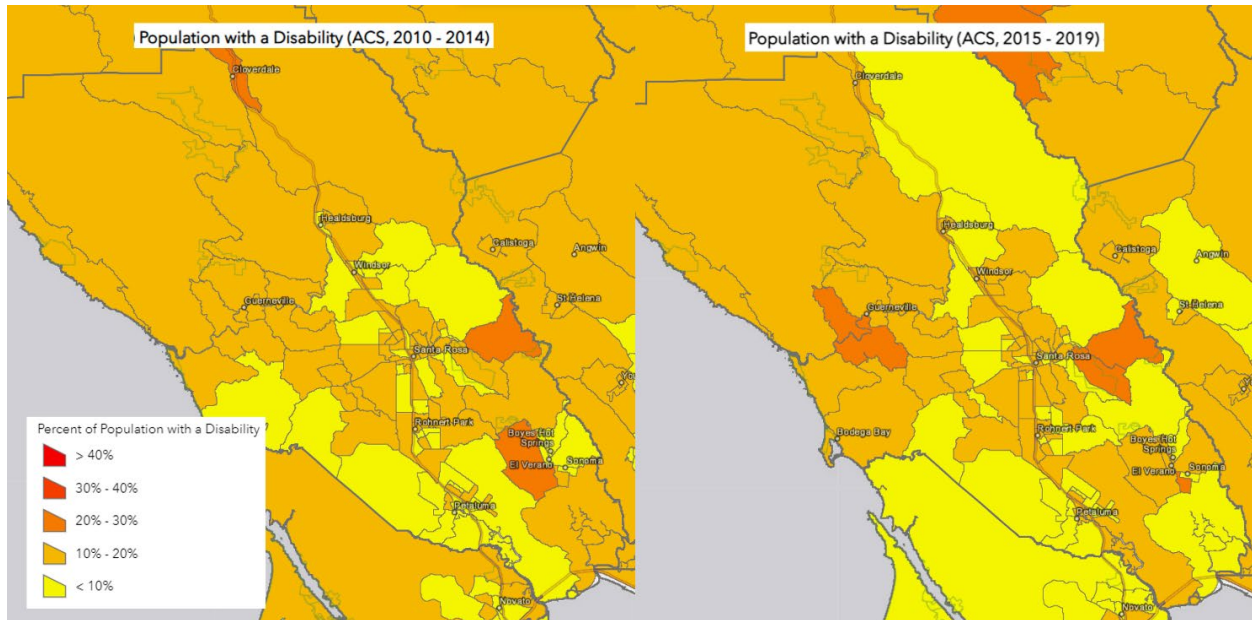
Source: 2015-2019 American Community Survey 5-Year Estimates

Persons with disabilities are relatively evenly distributed across Sonoma County and none of the jurisdictions have significantly higher proportions of persons with disabilities than the others. Areas with higher concentrations of Hispanic residents who are disproportionately low-income (as will be discussed in a later section) have lower concentrations of persons with disabilities than their more heavily white surrounding counties. Note that small groups in large census tracts may be difficult to identify. Local knowledge is important in these circumstances. HUD data provides information about the concentration of persons with disability by type, as follows:

- **Hearing Disabilities:** Concentrations of persons with hearing disabilities generally mirror patterns of concentrations of persons with disabilities.
- **Vision Disabilities:** People with vision disabilities are more dispersed throughout the region than are persons with disabilities overall. Most areas of relative concentration of persons with vision disabilities are the same as those for persons with disabilities generally, with the addition of one tract in the northern portion of Santa Rosa and another in Rohnert Park.
- **Cognitive Disabilities:** Patterns of concentration of persons with cognitive disabilities diverge more significantly from overall trends. There are additional areas of concentration near the center of Santa Rosa along with in rural areas to the west of Santa Rosa including Graton. The parts of Santa Rosa with concentrations of persons with cognitive disabilities are more heavily Hispanic than the broader region.
- **Ambulatory Disabilities:** There are additional areas of concentration of persons with ambulatory disabilities in the central portions of Santa Rosa, in Rohnert Park, on the west side of the city of Sonoma, and in Guerneville. These areas include a mix of predominantly white and more heavily Hispanic areas.
- **Self-Care Disabilities:** There are additional areas of concentration of persons with self-care disabilities in the central portions of Santa Rosa, in the northern portion of the city of Sonoma and Windsor. These areas include a mix of predominantly white and more heavily Hispanic areas.
- **Independent Living Disabilities:** There are additional areas of concentration of persons with independent living disabilities in the central portions of Santa Rosa, in Windsor, and in Forestville. These areas include a mix of predominantly white and more heavily Hispanic areas.

Children with disabilities are concentrated on the south side of Santa Rosa, which is disproportionately Hispanic. Working age adults with disabilities are concentrated in Santa Rosa. Elderly adults with disabilities are concentrated in rural areas, primarily in Sonoma County and mostly to both the east and west of Santa Rosa. These patterns have changed slightly over time, as shown in Figure 14, with an increase in the proportion of people with disabilities in west Sonoma County, and a decrease in the Sonoma Valley area.

Figure 14: Population with a Disability, Sonoma County



Source: 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates

Familial Status

Family status is another key predictor of access to affordable housing. In Sonoma County, 39.4% of households are categorized as families with children under the age of 18. The cities of Petaluma and Santa Rosa have notably higher rates of families with children compared to the county as a whole. Between 1990 and 2020, the percentage of families with children countywide has significantly decreased (Table 37).

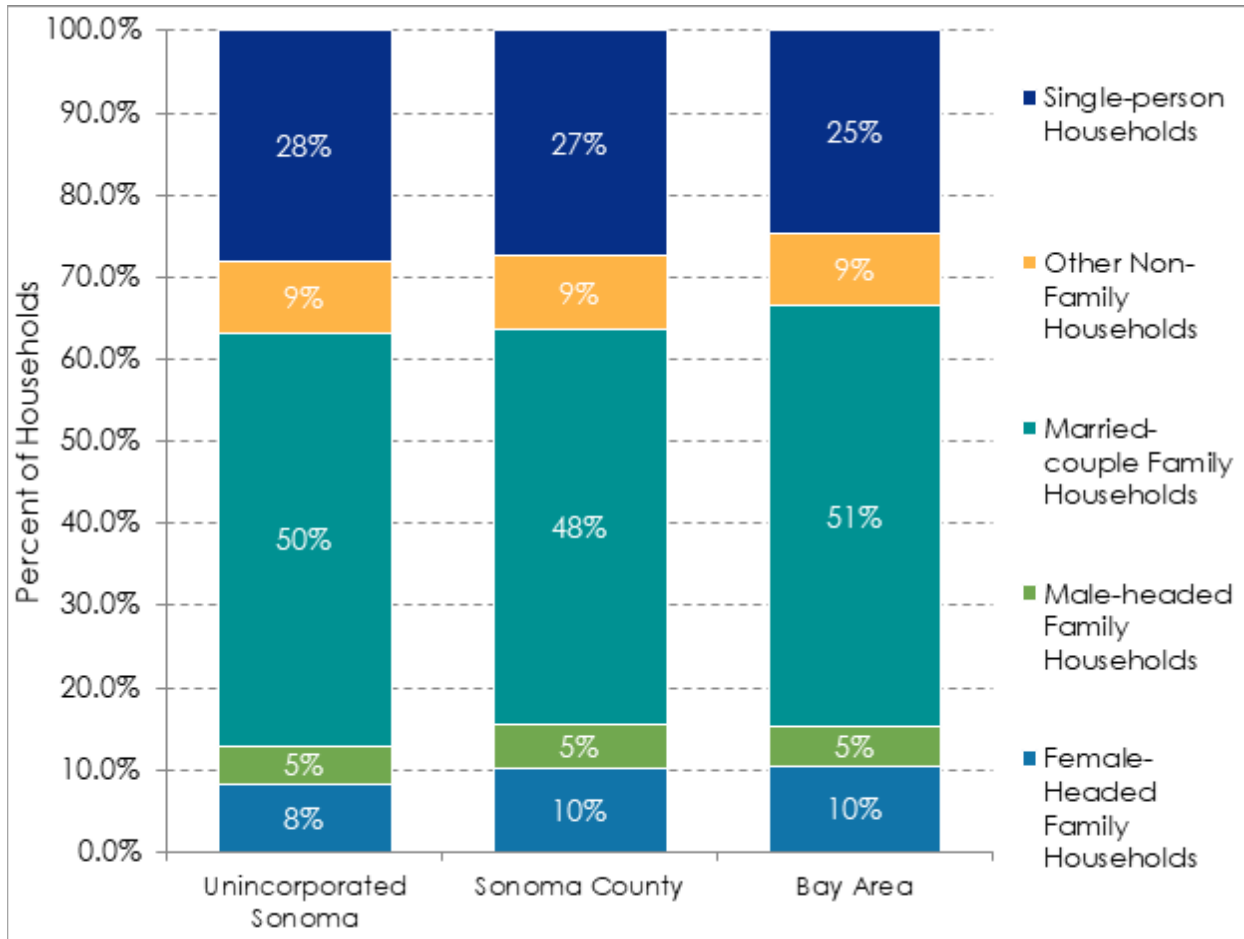
Table 37: Families with Children, Sonoma County Trends

Family Type	1990		2000		2010		2019	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Families with children	48,764	48.4%	46,805	48.7%	52,266	44.6%	47,477	39.4%

Source: American Community Survey, 2015-2019, 2010, 2000, 1990

Unincorporated Sonoma County has comparable shares of single-person households, other/non-family households, married couple family-households, and male- and female-headed households to Sonoma County and the Bay Area region (Figure 15).

Figure 15: Household Type Unincorporated, Countywide, and Bay Area Region



Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release

There are no concentrations of children in female-headed households within Sonoma County (Figure 16), but there are several tracts with high concentrations of children within married-couple households, particularly in the northeastern part of the county (Figure 17).

Figure 16: Percent of Children in Female-Headed Households, Sonoma County

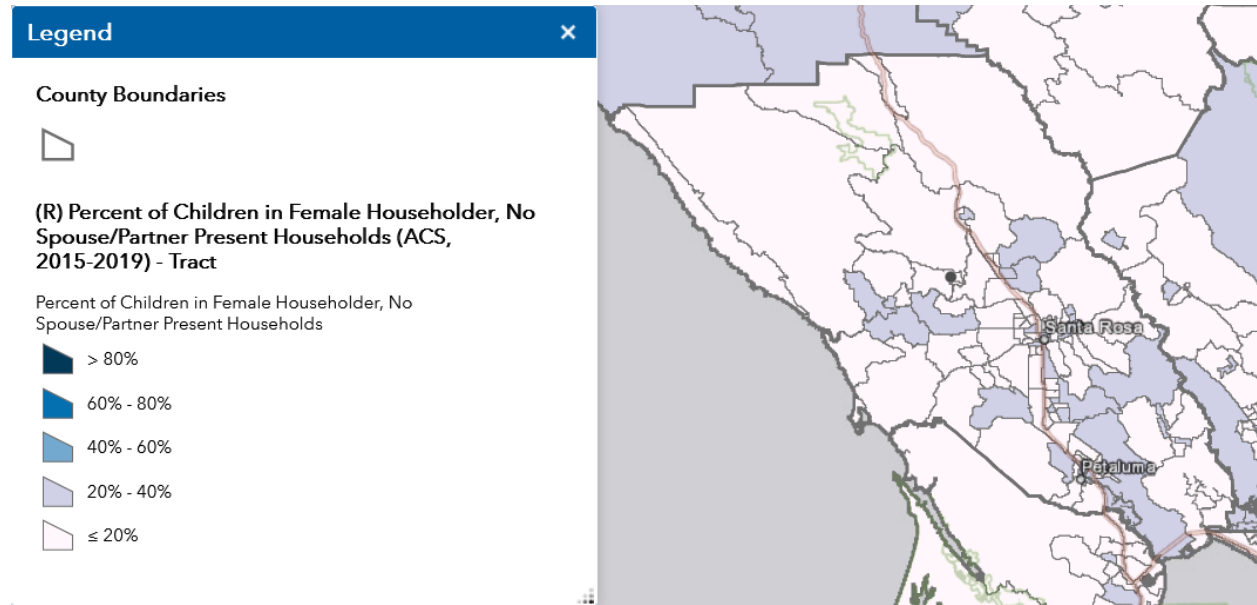
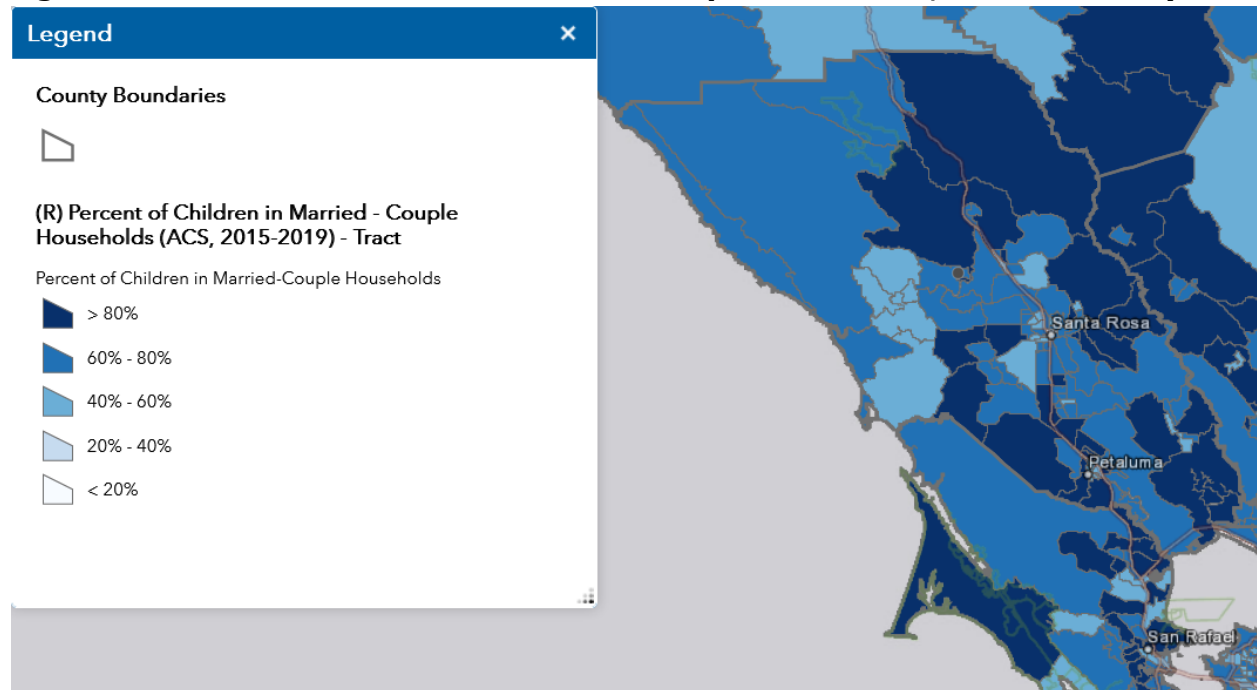


Figure 17: Percent of Children in Married-Couple Households, Sonoma County



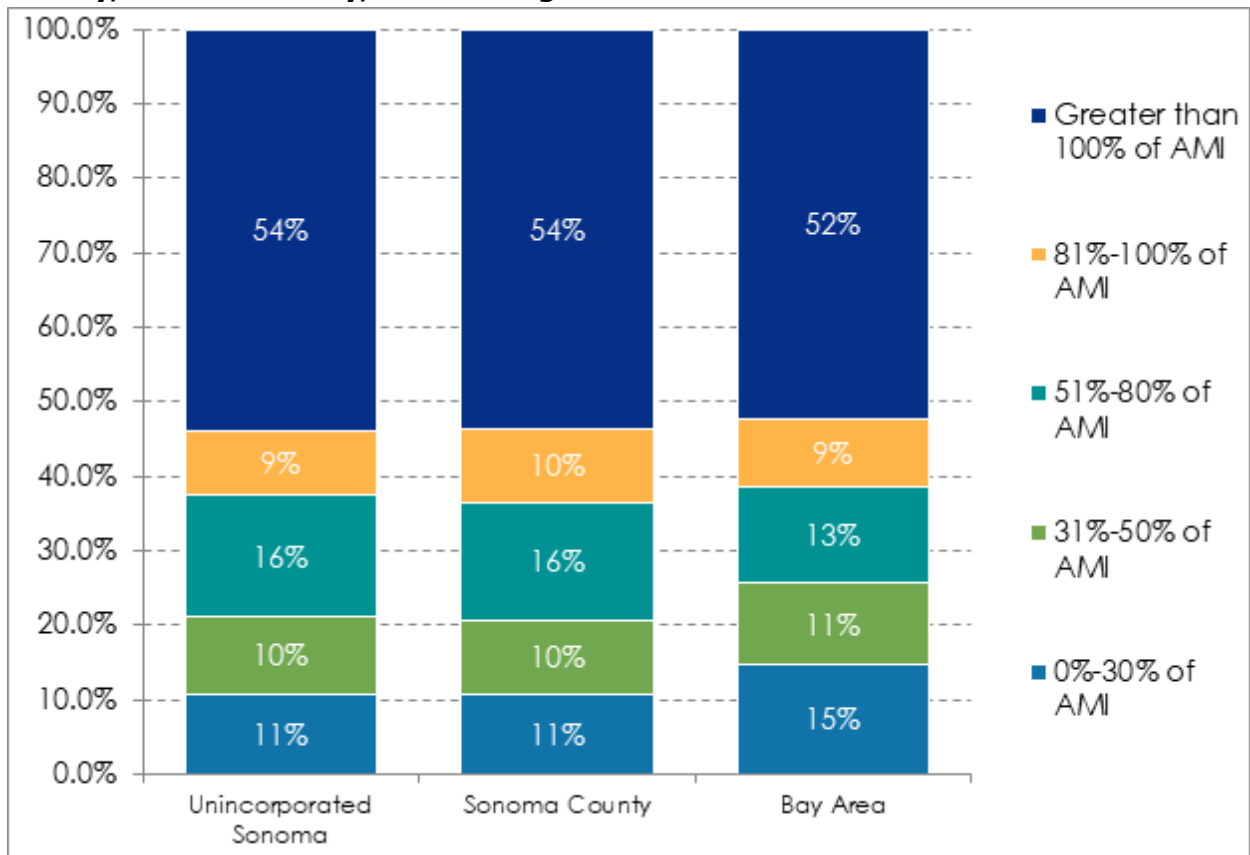
Income

Household income is the principal factor in determining a household’s ability to balance housing costs with other basic life necessities. Households with lower-incomes are limited in their ability to balance housing costs with other needs, and often face additional barriers when seeking adequate housing. While economic factors that affect a household’s housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

Identifying geographies and individuals with a low- to moderate-income (LMI) is an important tool to overcoming patterns of segregation. HUD defines LMI areas as a census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the area median income). Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen. California is one of the most economically unequal states in the nation, and the Bay Area has the largest income gap between the highest-and lowest-income households in the state.

Figure 18 breaks down the distribution of population that falls into each income level in Unincorporated Sonoma County, Sonoma County as a whole, and the Bay Area Region. There are smaller shares of lower-income and slightly higher shares of higher income residents in Sonoma County compared to the Bay Area.

Figure 18: Households by Household Income Level, Unincorporated Sonoma County, Sonoma County, and the Region



Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release

The ability of households at different income levels to pay for housing is based on HCD 2022 income limits. HCD classifies housing as “affordable” if households pay no more than 30 percent of gross income for payment of rent (including utilities) or monthly homeownership costs (including mortgage payments, taxes, and insurance).

Table 38 shows the 2022 HCD income limits for Sonoma County. The area median income (AMI) for a four-person household in Sonoma County was \$112,800 in 2022. Income limits for larger or smaller households were higher or lower, respectively, and are calculated using a formula developed by HUD.

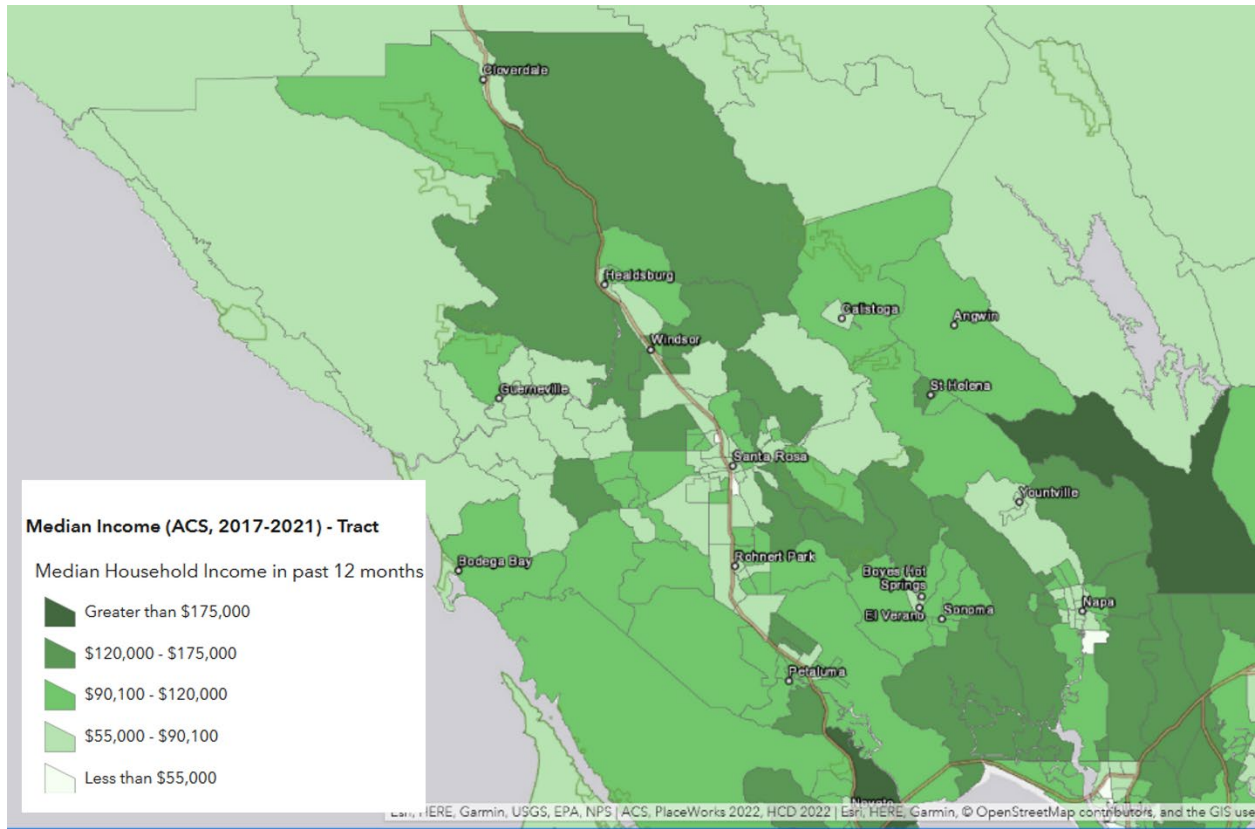
Table 38: HCD 2022 Income Limits by Household, Sonoma County

Income Category	1- Person	2- Person	3- Person	4- Person	5- Person	6- Person	7- Person	8- Person
Acutely Low	11,850	13,500	15,200	16,900	18,250	19,600	20,950	22,300
Extremely Low	25,000	28,550	32,100	35,560	38,550	41,400	44,250	47,100
Very Low	41,600	47,550	53,500	59,400	64,200	68,950	73,700	78,450
Low	66,550	76,050	85,550	95,050	102,700	110,300	117,900	125,500
Median	78,950	90,250	101,500	112,800	121,800	130,850	139,850	148,900
Moderate	94,750	108,300	121,800	135,350	146,200	157,000	167,850	178,650

Source: HCD 2022 Income Limits

The map of median income by census tract in Figure 19 highlights the distribution of average household incomes throughout Sonoma County. The lowest range expressed in the Unincorporated County, \$55,000-\$90,100 per household, is found in communities throughout the Lower Russian River, Sonoma Coast (north of Bodega Bay to the Mendocino border), Larkfield-Wikiup, Fulton, Southwest Santa Rosa, Penngrove, and rural communities east of Santa Rosa along the Napa County border. Conversely, tracts with the highest range of median household incomes expressed (\$120,000-\$175,000) are found in the Alexander Valley including Geyserville; Piner-Olivet; Sonoma Mountain including Glen Ellen, Kenwood, and communities along Bennett Valley Road; northwest Sebastopol; northeast Santa Rosa; exurban Windsor to the west and east; and the western Adobe Road and I Street tracts of greater Petaluma.

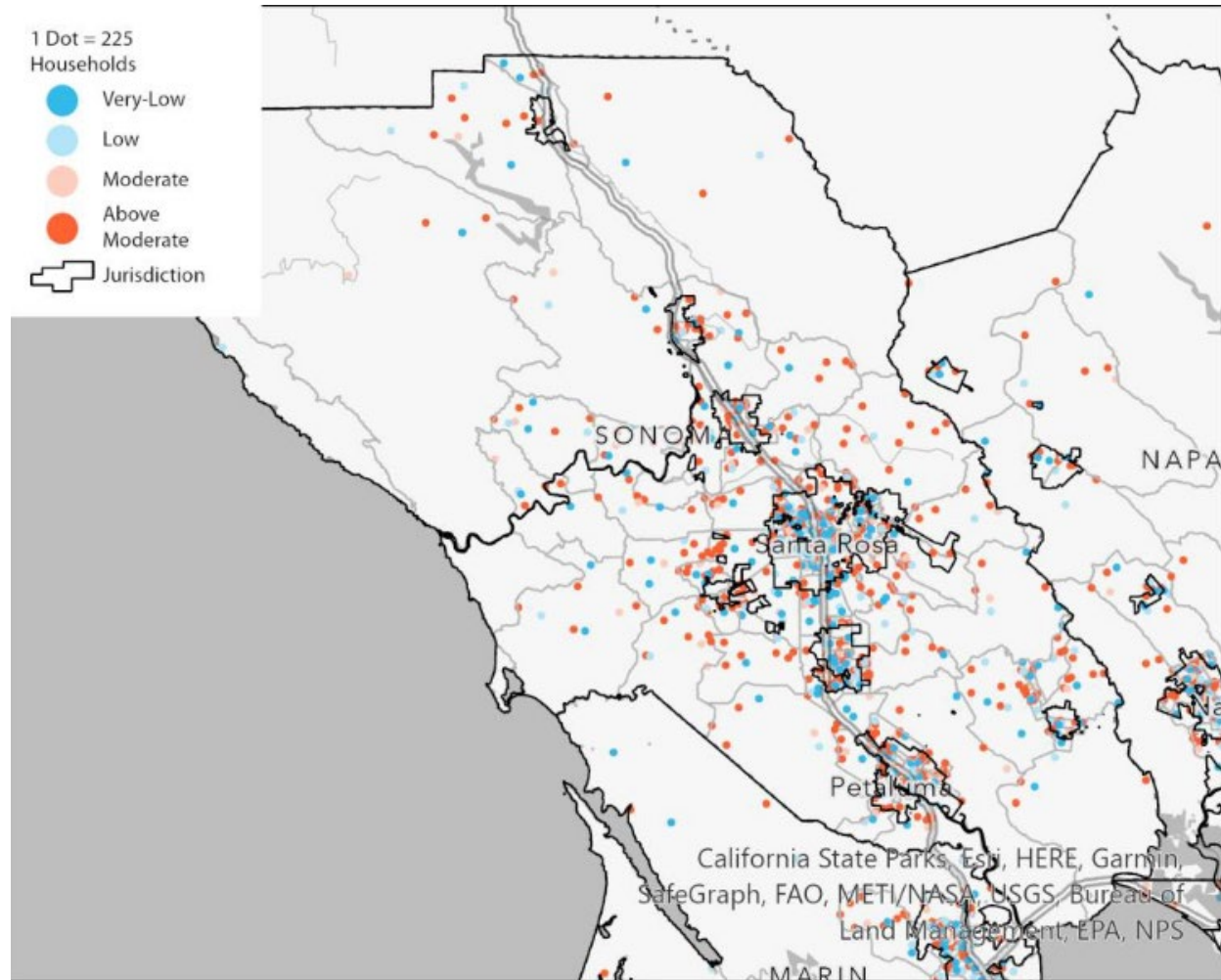
Figure 19: Median Income by Census Tract, Sonoma County



Source: American Community Survey, 2017-2021

The income dot map of Unincorporated Sonoma County in Figure 20 below offers a visual representation of the spatial distribution of income groups within the jurisdiction. As with the racial dot maps, when the dots show lack of a pattern or clustering, income segregation measures tend to be lower; conversely, when clusters are apparent, the segregation measures may be higher as well. This map shows concentrations of very low-income households in the central Santa Rosa area as well as Rohnert Park. There are also several very low- and low-income households in the unincorporated areas, especially in the Sonoma Valley, Southern Santa Rosa, and West County. This is partially led by population density.

Figure 20: Income Dot Map, Sonoma County



Source: 2011-2015 American Community Survey (ACS)

The isolation index values for all income groups in Unincorporated Sonoma County for the years 2010 and 2015 can be found in Table 39 below. Above moderate-income residents are the most isolated income group with an isolation index value of 0.427 as of 2015. This means that the average above moderate-income resident in Sonoma County lives in a neighborhood that is 42.7% above moderate-income. Among all income groups, isolation levels of the moderate-income population have changed the most over time, becoming less segregated from other income groups between 2010 and 2015.

Like the tables presented earlier for neighborhood racial segregation, the “Bay Area Average” column in Table 39 provides the average isolation index value across Bay Area jurisdictions for different income groups in 2015. The data in this column can be used as a comparison to provide context for the levels of segregation experienced by income groups in this jurisdiction. For example, the average isolation index value for very low-income residents across Bay Area jurisdictions is 0.269, meaning that in the average Bay Area jurisdiction a very low-income resident lives in a neighborhood that is 26.9% very low-income.

Table 39: Income Group Isolation Index Values, Unincorporated Sonoma County and the Region

Income Group	Unincorporated Sonoma County		Bay Area Average
	2010	2015	2015
Very Low-Income (<50% AMI)	0.286	0.275	0.269
Low-Income (50%-80% AMI)	0.196	0.207	0.145
Moderate-Income (80%-120% AMI)	0.212	0.180	0.183
Above Moderate-Income (>120% AMI)	0.428	0.427	0.507

Note: Higher values indicate higher levels of isolation.

Source: ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data, ACS 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Table 40 below provides the dissimilarity index values indicating the level of segregation in Sonoma County between lower-income households (earning less than 80% of AMI) and those who are not lower-income (earning above 80% of AMI). Segregation in Sonoma County between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. Additionally, Table 35 shows dissimilarity index values for the level of segregation in Sonoma County between residents who are very low-income (earning less than 50% of AMI) and those who are above moderate-income (earning above 120% of AMI). This supplementary data point provides additional nuance to an analysis of income segregation, as it indicates the extent to which a jurisdiction’s lowest and highest income residents live in separate neighborhoods. This value also decreased between 2010 and 2015.

Like other tables in this report, the “Bay Area Average” column shows the average dissimilarity index values for these income group pairings across Bay Area jurisdictions in 2015. For example, the average dissimilarity index between lower-income residents and other residents in a Bay Area jurisdiction is 0.198, so on average 19.8% of lower-income residents in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect income group integration in that jurisdiction.

In 2015, the income segregation between lower-income residents and other residents in Sonoma County was lower than the average value for Bay Area jurisdictions. This means that the lower-income residents are less segregated from other residents within Sonoma County compared to other jurisdictions in the region.

Table 40: Income Group Dissimilarity Index Values for Segregation, Unincorporated Sonoma County and the Region

Income Group	Unincorporated Sonoma County		Bay Area Average
	2010	2015	2015
Below 80% AMI vs. Above 80% AMI	0.234	0.192	0.198
Below 50% AMI vs. Above 120% AMI	0.241	0.220	0.253

Note: Higher values indicated higher levels of segregation.

Source: ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data, ACS 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Poverty

Poverty thresholds, as defined by the Census Bureau, vary by household type but remain constant throughout the country and do not correspond to Area Median Income. Approximately 8.8% of Sonoma County residents were determined to be living below the poverty level in 2020.³⁵

Across the region, state, and country, people of color are more likely to experience poverty and financial instability due to the lasting impacts of historical housing and social policies that have excluded them from opportunities extended to white residents. These economic disparities also leave communities of color at higher risk for housing insecurity, displacement, or homelessness. In Unincorporated Sonoma County, American Indian or Alaska Native and Hispanic or Latino residents experience the highest rates of poverty, followed by Other or Multiple Races (Table 41).

Table 41: Poverty Status by Race Unincorporated Sonoma County

Racial/Ethnic Group	Value
Black or African American (Hispanic and Non-Hispanic)	11.7%
Other Race or Multiple Races (Hispanic and Non-Hispanic)	14.8%
Asian/API (Hispanic and Non-Hispanic)	11.4%
Hispanic or Latino	16.0%
White, Non-Hispanic	7.6%
White (Hispanic and Non-Hispanic)	8.3%
American Indian or Alaska Native (Hispanic and Non-Hispanic)	18.3%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I)

There is no concentration of poverty within the county (Figure 21), and segregation by poverty has decreased since 2014 (Figure 22).

³⁵ American Community Survey 2019 5-Year Estimates

Figure 21: Population by Poverty Status, Sonoma County

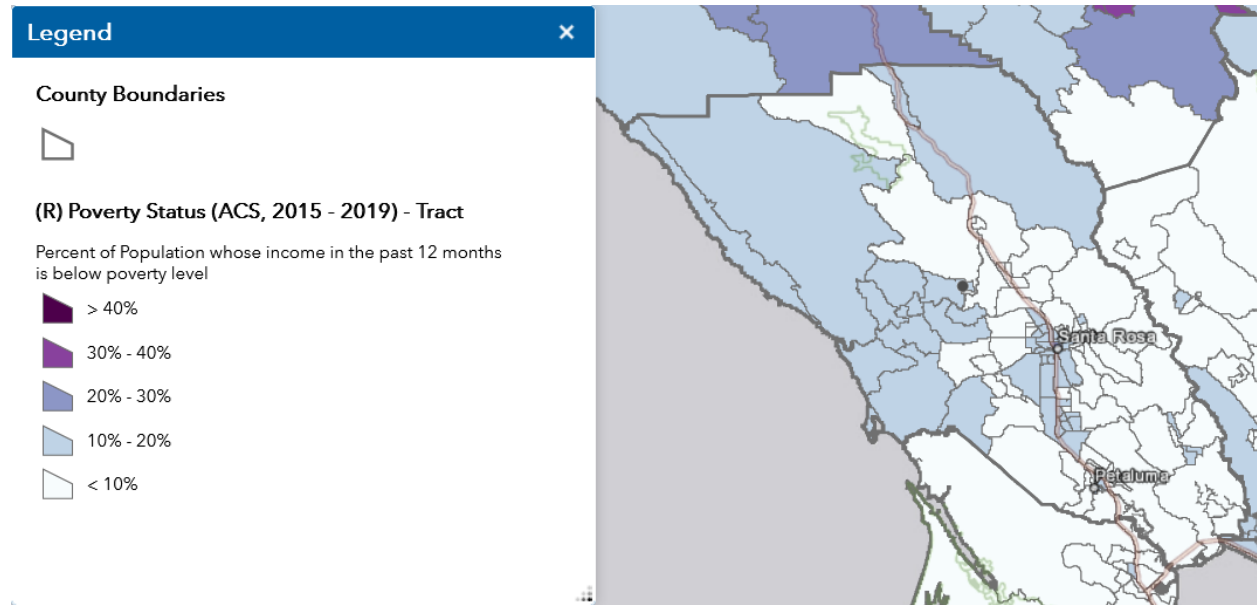
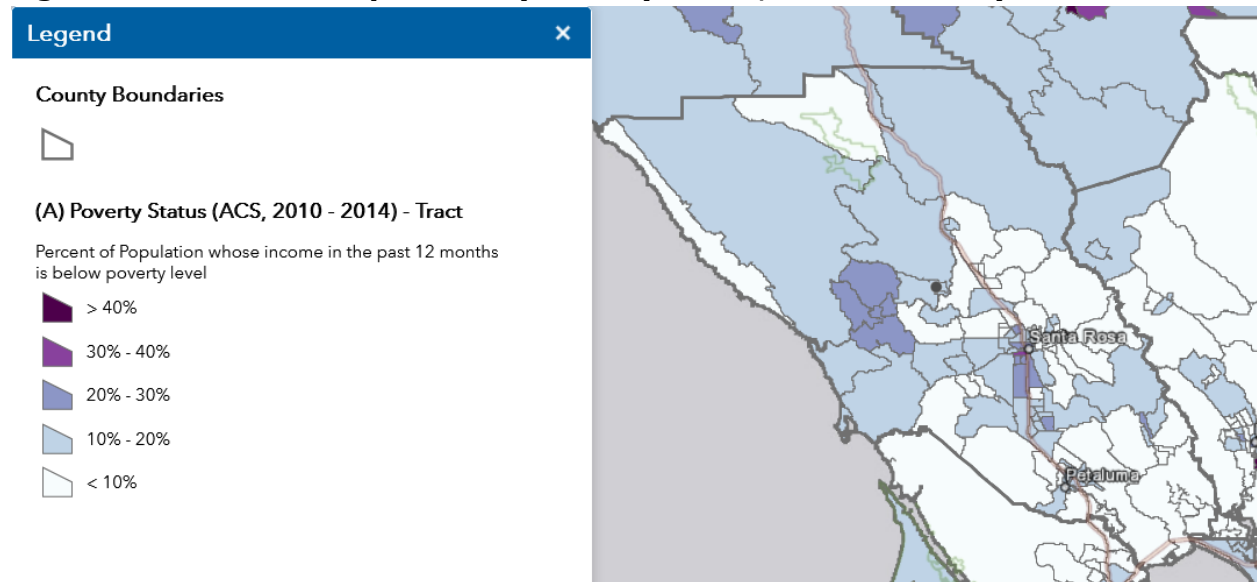


Figure 22: Previous Population by Poverty Status, Sonoma County



Racially & Ethnically Concentrated Areas of Poverty (R/ECAP) and Affluence (RCAA)

The U.S. Department of Housing and Urban Development (HUD) defines census tracts with a majority non-white population (greater than 50%) that have either a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower, as Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs). There are no R/ECAPs in the County of Sonoma.

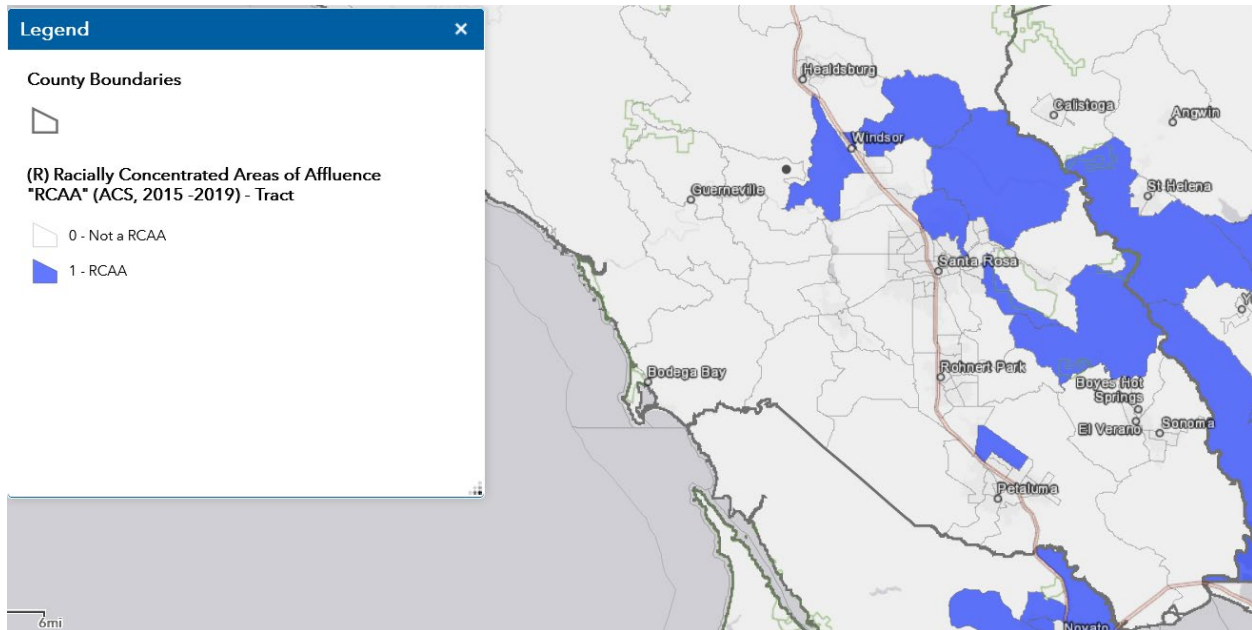
While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence should also be analyzed to ensure housing is integrated, a key to fair housing choice.

Scholars at the University of Minnesota Humphrey School of Public Affairs have created the Racially Concentrated Areas of Affluence (RCAs) metric to tell the story of segregation more fully in the United States. Based on their research, RCAs are defined as census tracts where 1) 80% or more of the population is white, and 2) the median household income is \$125,000 or greater.

There are several RCAs in Sonoma County, primarily northeast and southeast of the City of Santa Rosa and in unincorporated communities such as Larkfield/Wikiup, Kenwood, Glen Ellen, Penngrove, and rural agricultural valleys. This is not a new or unexpected trend; these outlying areas tend to be more difficult to develop due to environmental constraints and the need for expensive on-site wastewater disposal systems. The RCA near Glen Ellen abuts the Springs area which has higher rates of segregation of Hispanic/Latino residents, linguistic isolation, cost burden, and other housing problems.

Years of environmental preservation measures, including the establishment of community separators, urban growth boundaries (UGBs), and large minimum lot sizes that restrict subdivisions have resulted in a concentration of wealth and racial isolation in select rural areas. This observation is supported by the concentration of Sonoma County's RCAs in rural areas with large lots in the periphery of incorporated communities, near services but with desirable characteristics including privacy and open space (Figure 23). These communities tend to have high environmental scores on the CalEnviroScreen 4.0, yet also have among the highest wildfire risk in the county. Sonoma Valley RCAs are located adjacent to lower-resource communities with a high degree of linguistic isolation.

Figure 23: Racially Concentrated Areas of Affluence



Integration and Segregation: Fair Housing Issues and Contributing Factors

Like most communities across the Bay Area and the country, residential segregation persists in Sonoma County first and foremost by race and ethnicity. Sonoma County experiences relatively low levels of segregation across racial and ethnic categories. Asian and white populations experience the lowest levels of segregation in the county while the highest levels are between Black and white populations.

Segregation also exists between income groups in the county, though it has declined between 2010 and 2015. Historical practices such as single-family zoning, minimum lot sizes, and maximum density continue to impede development of more affordable multifamily properties, making it more difficult for lower-income households to access housing. These practices disproportionately affect non-white populations, particularly Latino farmworkers, which may also help to explain the Racially & Ethnically Concentrated Areas of Affluence described in the previous section.

The primary factors that contribute to fair housing issues related to Integration and Segregation in Sonoma County are:

- Community opposition
- Displacement of residents due to economic pressures
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Community opposition

4.5.4 Disparities in Access to Opportunity

Racial and economic segregation can lead to unequal access to opportunities within communities such as access to high performing schools, good paying jobs, public transportation, parks and playgrounds, clean air and water, public safety, and other resources. This generational lack of access for many communities, particularly people of color and lower income residents, can result in poor life outcomes including lower educational attainment, higher morbidity rates, and higher mortality rates.

This section of the Assessment of Fair Housing will identify socioeconomic barriers related to education, environment, employment, and transportation that could negatively impact certain communities in the County of Sonoma.

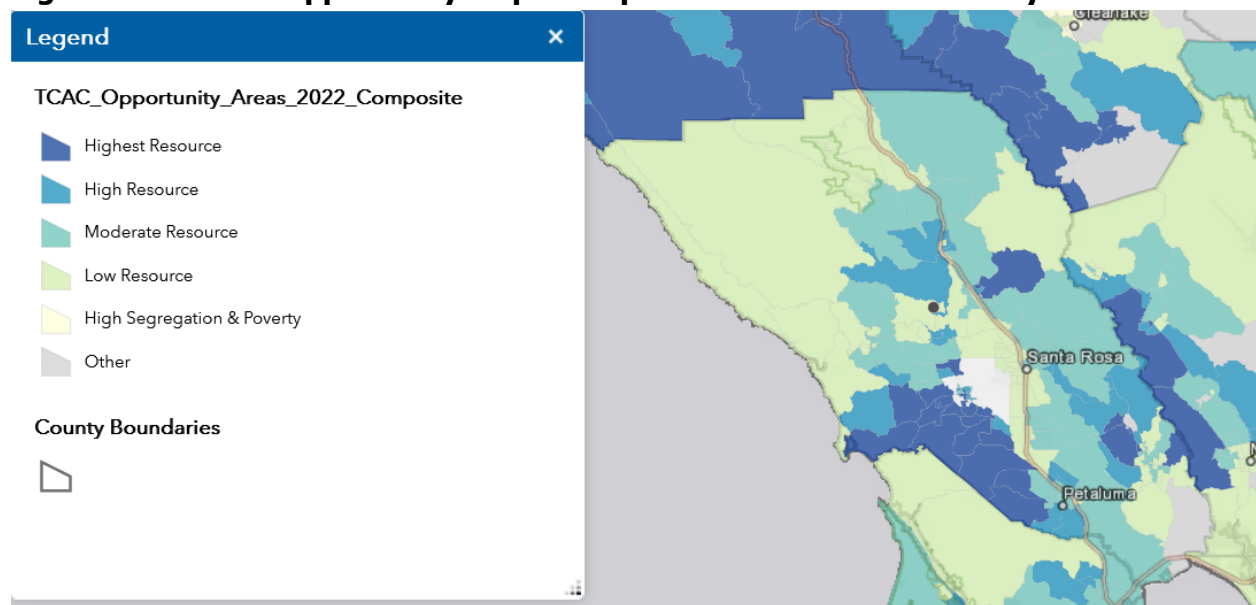
Resource Areas

The Tax Credit Allocation Committee (TCAC) Opportunity Areas 2022 Composite Score assesses the level of resources related to education, poverty, proximity to jobs and economic opportunities, low pollution levels, and other factors in neighborhoods across the county. A "Composite Score," an index that weighs all factors, is assigned to each census tract and ranges from "Low Resource"

(light green) to “Highest Resource” (dark blue) in Sonoma County. There are no areas that have been identified as having “High Segregation & Poverty.”

For the most part, the county has a larger number of low and moderately resourced tracts than high or highest resourced tracts. The distribution of these areas is imbalanced, with higher resource areas on the western part of the county bordering the cities of Santa Rosa and Petaluma, as well as northern Sonoma Valley and west of the Town of Windsor (Figure 24). The incorporated cities, however, are identified as low or moderately resourced areas. There are also two highly resourced rural areas in the west part of the county, south of Sebastopol and along Sonoma’s southern border with Marin County; however, both of these areas are rural and lack proximity to urban resources such as jobs and transit.

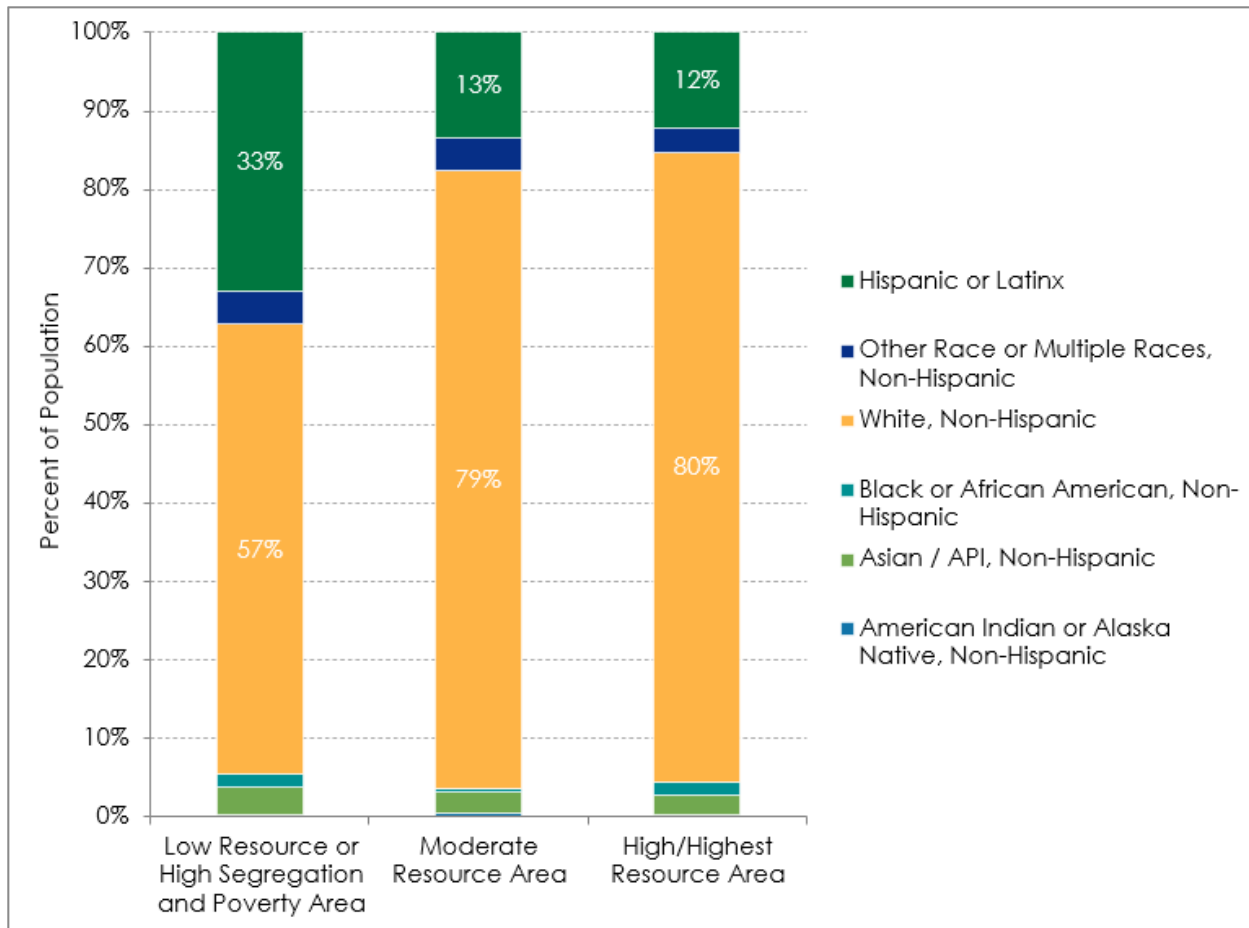
Figure 24: TCAC Opportunity Maps Composite Score Sonoma County



Source: TCAC/HCD Opportunity Area Maps, 2022

Over three-quarters (80%) of those living in the High and Highest Resource areas are white, while only 12% are Hispanic or Latino. Conversely, in Low Resource Areas, 57% are white while a third are Hispanic or Latino, more than twice the amount living in Moderate and High/Highest Resource Areas (Figure 25).

Figure 25: Population Living in Resource Areas by Race, Sonoma County



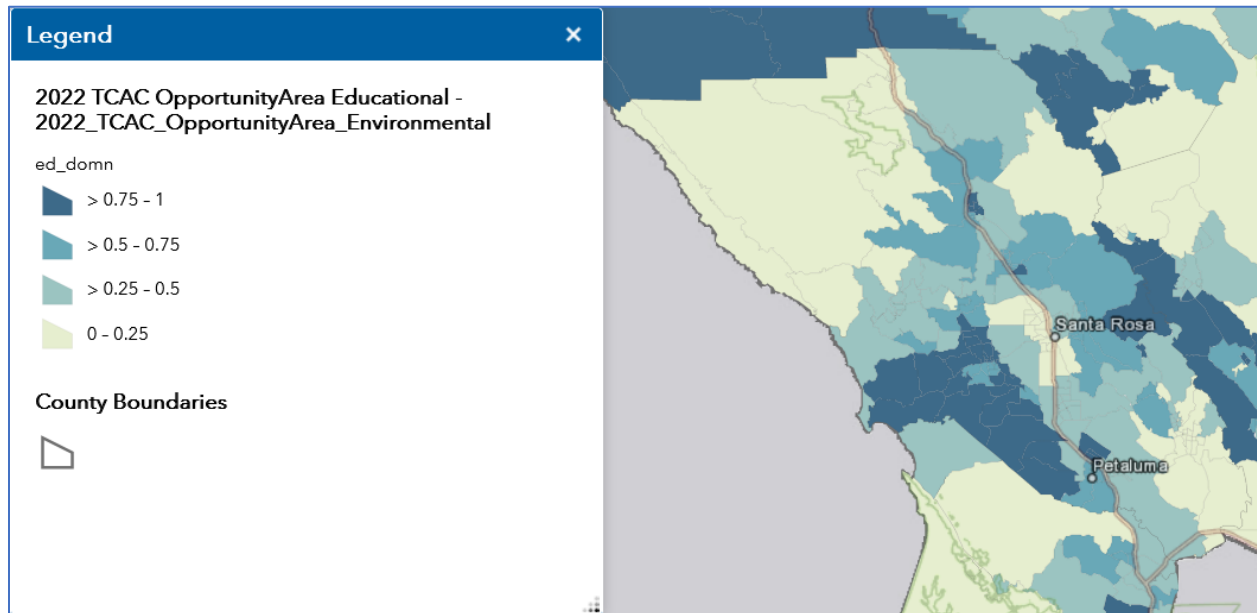
Source: California Tax Credit Allocation Committee (TCAC)/California Housing and Community Development (HCD), Opportunity Maps (2020); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002

Education

The Sonoma County Office of Education is a partner of the County’s 40 districts but does not create or direct policy for the specific districts. It has published a report on “Building Equitable Schools,” which analyzes demographics of the county’s students, teachers, and outcomes. The report also highlights the importance of an inclusive curriculum, conversations centering race, and a diverse teacher workforce. This report does not direct the county’s 40 districts to make any tangible improvements, however, so it will not necessarily have a direct impact.

Education Scores from the 2022 TCAC Opportunity Areas shown in Figure 26 provide an index for measuring the level of educational outcomes within a census tract. The higher the score, the more positive the outcomes. Education scores for Sonoma County range from between 0.25 – 0.50 (light yellow), to greater than 0.75 – 1 (dark blue) indicating a wide range of educational outcomes across the county.

Figure 26: TCAC Opportunity Areas Education Score by Tract



Source: HCD AFFH Data Viewer

There are significant disparities in access to proficient schools based on race and ethnicity throughout Sonoma County, with all non-white racial groups having lower access when looking exclusively at the population living below the poverty line. White residents have the highest access to proficient schools followed by Asian American and Native American residents. As shown in Table 42 below, Black residents have slightly lower access and Hispanic residents have the least access by a substantial margin.

Table 42: School Proficiency Index for Sonoma County

Race/Ethnicity	Percent of Population	Percent of Population below Federal Poverty Line
White, Non-Hispanic	47.64%	42.55%
Black, Non-Hispanic	40.88%	30.75%
Hispanic	36.48%	35.89%
Asian or Pacific Islander, Non-Hispanic	43.67%	40.03%
Native American, Non-Hispanic	42.10%	37.37%

Source: Portrait of Sonoma County, 2021

According to the Portrait of Sonoma County 2021 update, Black children and young adults are enrolled in school at a rate of six percentage points lower than the Black statewide average. Additionally, Black residents in Sonoma County have lower educational attainment rates which is an indicator of educational outcomes. The County of Sonoma Department of Health Services confirms that educational attainment rates “vary modestly by gender but significantly by ethnicity,

with Hispanics currently lagging behind their white counterparts...³⁶ As of 2019, just over 4% of white residents had not obtained a high school diploma while 35.4% of Hispanic residents had not obtained the same degree (Table 43).

Table 43: Sonoma County Educational Attainment by Race/Ethnicity for Population 25 Years and Older

Educational Attainment	Total %	White, Non-Hispanic	Hispanic	Black	Asian or Pacific Islander	Native American
High School Graduate or Equivalency	88.8%	95.8%	64.6%	89.3%	88.9%	79.7%
Bachelor’s Degree or Higher	35.5%	41.9%	14.1%	29.8%	44.4%	10.3%

Source: U.S. Census Bureau, 2005-2019 ACS 5-Year Estimates, Table S1501

Since 2010, the percentage of residents with college educations has increased in all Sonoma County cities and towns except for Cotati. Attainment levels are highest in the cities of Sebastopol, Healdsburg, Sonoma, and Petaluma, where 40% or more of residents are college educated.³⁷

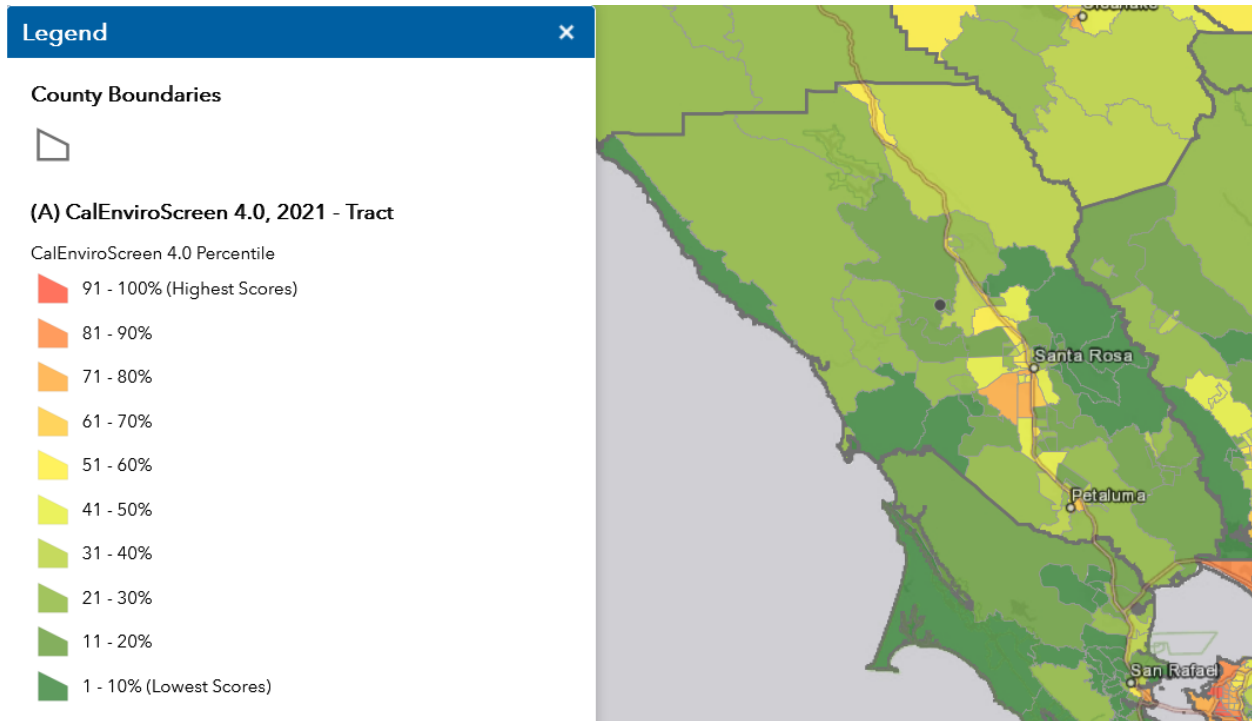
Access to Healthy Environment

In October 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the latest version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community environmental scores. For purposes of this analysis, a community within the 75th percentile or above is one with higher levels of pollution and/or has other negative environmental traits and is considered a “disadvantaged community.” In previous years, one census tract in Rohnert Park had been designated as a disadvantaged community (the orange tract shown in Figure 26 below). As of October 2021, there were several census tracts in Sonoma County, specifically those south of Santa Rosa and to the east of Petaluma that fall into the 75th percentile. Communities within these census tracts are categorized as environmentally “disadvantaged” by COEHHA metrics.

³⁶ County of Sonoma Department of Health Services “Demographics”

³⁷ American Community Survey and Decennial Census, Generation Housing “State of Housing in Sonoma County 2022” report

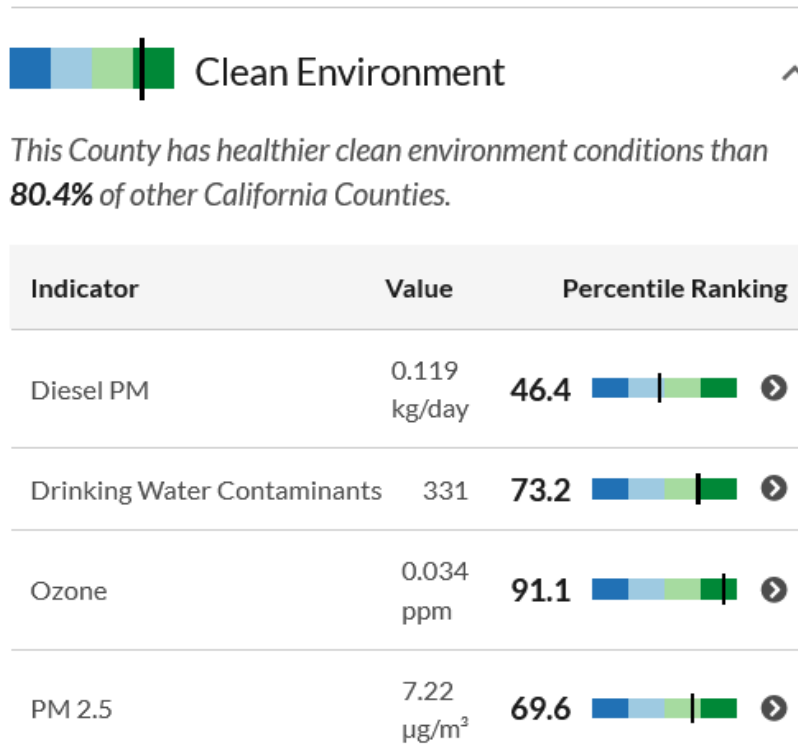
Figure 27: CalEnviroScreen 4.0 Percentiles Sonoma County Census Tracts



Source: CalEnviroScreen 4.0, 2021 – Tract

The California Healthy Places Index (HPI) combines 25 community characteristics, like access to healthcare, housing, education, and more, into a single indexed HPI score. The healthier a community, the higher the HPI score. The HPI applies a positive frame focusing on assets a community has that they can build on, rather than what is lacking. According to this index, the County of Sonoma has healthier community conditions than 85.7% of California counties. Looking specifically at the Clean Environment component of the index, Sonoma County has healthier conditions than 80.4% of other California counties. The county ranks particularly high on ozone quality and more average on levels of diesel particulate matter (Figure 28).

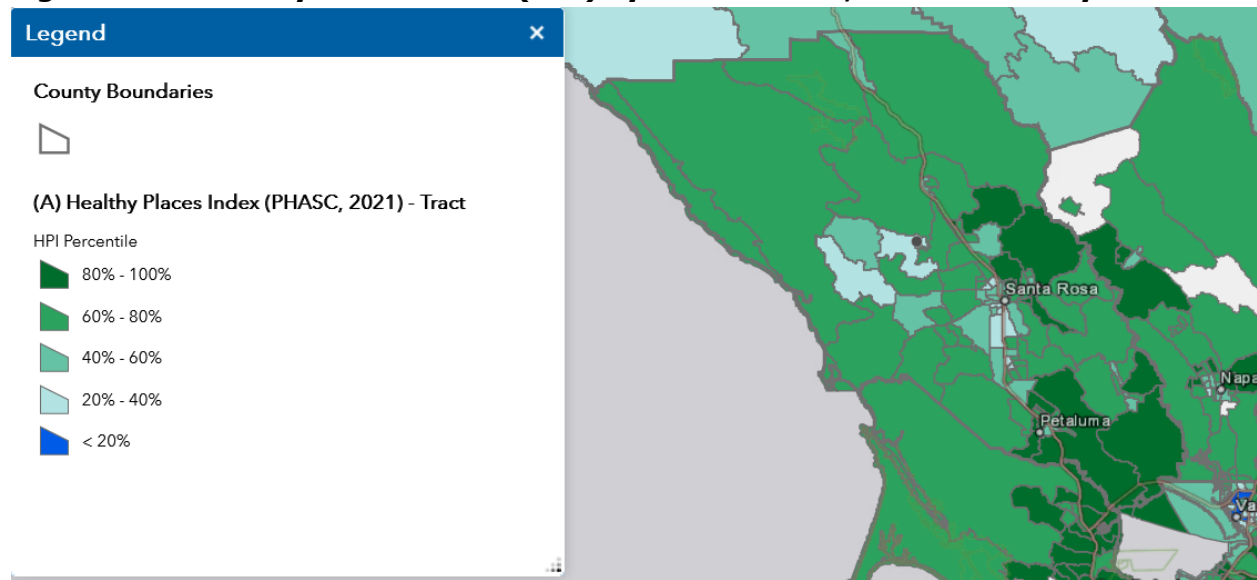
Figure 28: Healthy Places Index (HPI) Clean Environment Indicators, Sonoma County



Source: The California Healthy Places Index (PHASC) 2021, Public Health Alliance of Southern California

The AFFH Data Viewer created by the state Department of Housing and Community Development provides a breakdown of how each census tract within the county ranks on the HPI as of 2021. All census tracts within Sonoma County rank between the 60th and 100th percentiles indicating relatively strong environmental outcomes across the region. Census tracts to the north of Santa Rosa and in the most southern part of the county rank highest on this index (Figure 29). Census tracts primarily in south Santa Rosa, West County, and in the Springs area rank on the lower end of the index.

Figure 29: Healthy Places Index (HPI) by census tracts, Sonoma County



Source: *The California Healthy Places Index (PHASC) 2021, Public Health Alliance of Southern California*

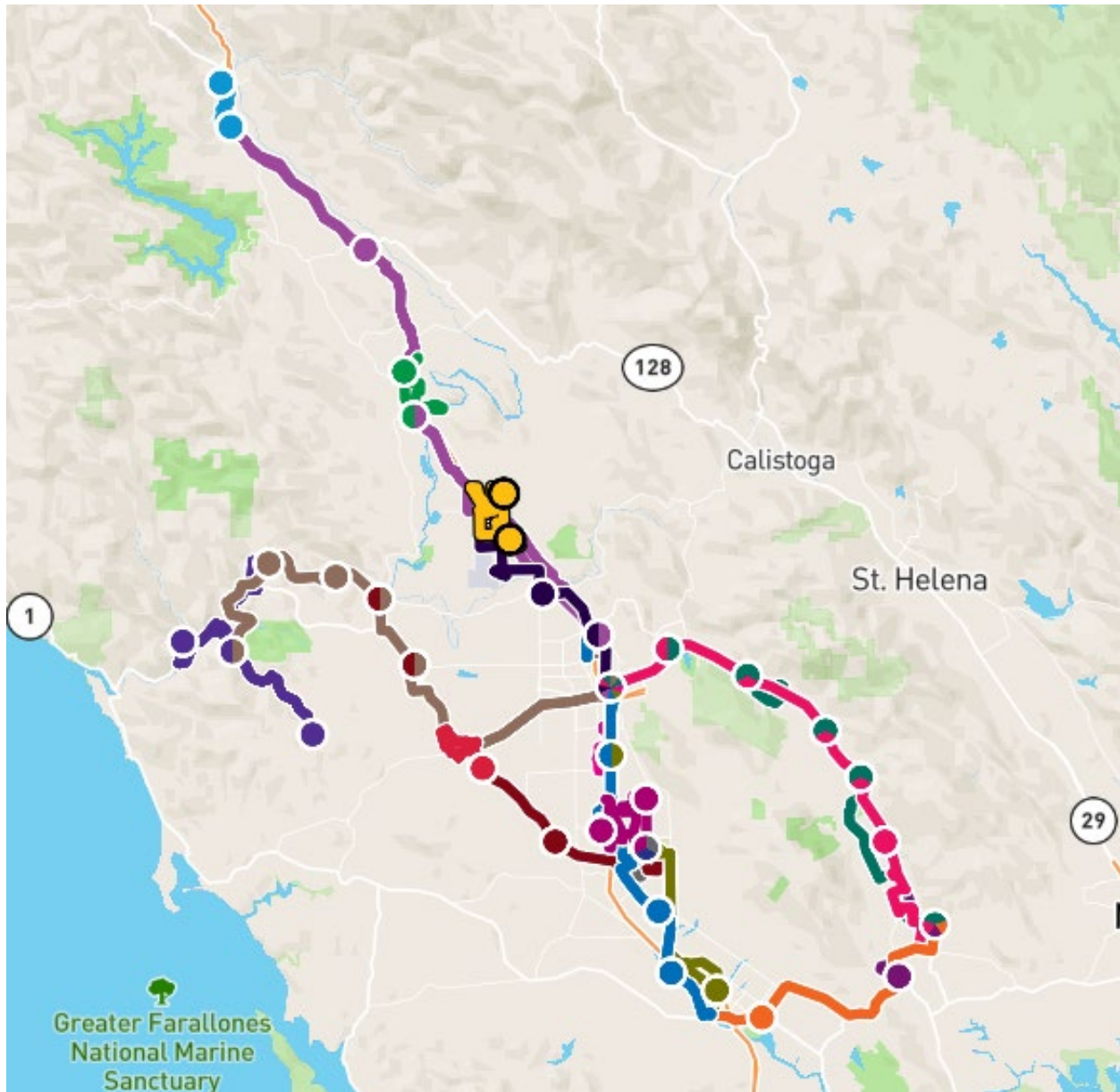
Transportation

Reliable transportation is of paramount importance to households affected by low-incomes and rising housing prices. Public transit should link lower-income persons, who are more likely to be public transit-dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce public assistance usage rates and increase housing mobility, which enables residents to find housing outside of traditionally lower- and moderate-income neighborhoods. The lack of a relationship between public transit, employment opportunities, and affordable housing can impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live. In addition, elderly and disabled persons also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit must provide a link between job opportunities, public services, and affordable housing to help ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.

Sonoma-Marin Area Rail Transit (SMART) is the San Francisco Bay Area’s newest transportation option, offering passenger rail service in Sonoma and Marin counties. SMART’s rail corridor includes 12 stations, from the Sonoma County Airport to Larkspur. In the future, SMART service will ultimately be extended to Windsor, Healdsburg, and Cloverdale, and provide 70 miles of passenger rail service and a bicycle-pedestrian pathway, connecting SMART passengers with jobs, education centers, retail hubs and housing along the Sonoma-Marin corridor.

Bus service in the county is provided by Sonoma County Transit (SCT), Golden Gate Transit (GGT), and Paratransit. Sonoma County Transit is the primary transit provider for all Sonoma County jurisdictions; it provides regularly scheduled fixed-route service to major activity centers and transit hubs (Figure 30). All routes operate on approximately 45- to 90-minute headways. Sonoma County Transit staff indicated that all service routes operate well within maximum capacity levels.

Figure 30: Sonoma County Transit System Map



Source: Sonoma County Transit, 2022

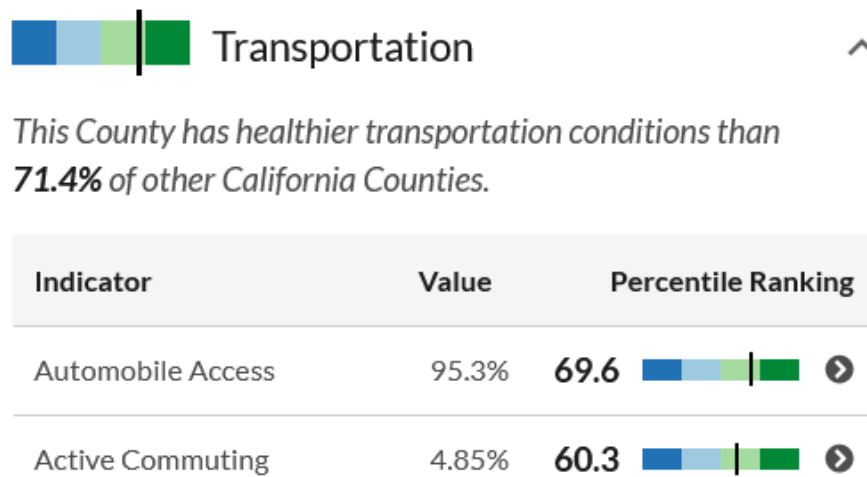
Paratransit, also known as dial-a-ride or door-to-door service, is available for Sonoma County residents that are unable to independently use the transit system due to a physical or mental disability. Individuals must be registered and certified as ADA eligible before using the service. Paratransit operators are required by the ADA to service areas within three-quarters of a mile of their respective, public fixed-route service. Volunteer Wheels serves as the ADA paratransit operator for Sonoma County Transit.

SCT supports the needs of the disabled community by ensuring that all bus lines are accessible through wheelchair lifts and can transport two wheelchair passengers at a time on each bus. In addition, the agency offers half-priced fares to youth between the ages of five and 18, senior

passengers 65 years and over, Medicare card holders, children under the age of five, U.S. veterans, college students, and disabled passengers with identification. In June 2018, Sonoma County Transit began its first “Fare-Free.” This program has resulted in a significant increase in ridership on the “Fare-Free” routes, with some riders citing the ease of boarding without needing to plan for paying for a ride or purchasing a pass as an attraction.

The California Health Places Index (HPI) uses Active Commuting and Automobile Access as indicators of healthy transportation conditions in a jurisdiction. For this index, active commuting measures the percent of the population 16 years or older who commute to work by transit, walking, or cycling, using data from the 2015-2019 American Communities Survey. Sonoma County has healthier transportation conditions than 71.4% of other California counties according to this index (Figure 31). The rate of Active Commuting in the county is low (4.85% of workers 16 years and older) but still within the 60.3 percentile.

Figure 31: Transportation Conditions, Sonoma County and California



Source: The California Healthy Places Index (PHASC) 2021, Public Health Alliance of Southern California

The Low Transportation Cost Index and Transit Trips Index are used to measure access to transportation within a location. The Low Transportation Cost Index (LTCI) measures access to low-cost transportation services, and the Transit Trips Index measures how often residents take transit trips. The Index scores range from 0-100. A higher score correlates to greater transportation access.

The county’s LTCI values strongly correspond with the trend for the individual jurisdictions in Sonoma ranging from 62 to 67 (Table 44). As is the case throughout, Black residents have slightly higher LTCI values, 67, than other groups while white residents have the lowest, 62. The index value trend for low-income residents also corresponds to the jurisdictional ones for LTCI values. All racial groups, besides Native American residents, undergo slight increases in LTCI values when economic status is considered and as these values increase, the racial disparity widens between white residents’ index values and Black residents’ index values.

Table 44: Transit Trips and Low Transportation Cost Indices, Sonoma County

Sonoma County	Transit Trips Index	Low Transportation Cost Index
Total Population		
White, Non-Hispanic	42.18	66.17
Black, Non-Hispanic	51.27	71.40
Hispanic	48.18	70.28
Asian or Pacific Islander, Non-Hispanic	46.96	68.65
Native American, Non-Hispanic	47.88	68.93
Population below Federal Poverty Line		
White, Non-Hispanic	46.59	69.09
Black, Non-Hispanic	61.61	77.20
Hispanic	50.04	72.06
Asian or Pacific Islander, Non-Hispanic	49.84	70.79
Native American, Non-Hispanic	53.92	73.62

The Low Transportation Cost Index (LTCI) measures access to low-cost transportation services, and the Transit Trips Index measures how often residents take transit trips. The Index scores range from 0-100. A higher score correlates to greater transportation access.

Source: Location Affordability Index (LAI) data, 2012-2016

Low-income residents in Sonoma County experience significant disparities in transportation due to the area’s asymmetric investments in car-based infrastructure over public transportation that results in a high dependency on automobiles as the primary transportation mode. This creates inequities in transportation access for low-income residents because of the cost prohibitive nature of cars and the lack of sufficient transit infrastructure alternatives to supplement this car-centric transportation model. Residents who are low-income are disproportionately burdened by the existing car-dominant transportation system because the purchase, maintenance, and gasoline cost consume a disproportionate share of their income in comparison to higher-income residents.

According to a study published by the Center for Neighborhood Technology, low- and moderate-income households are hit the hardest by high transportation costs household travel costs were about \$1,300–1,400 per month. It also found that the average household in Sonoma County spent over 20% of its budget on transportation in 2019.”³⁸ Additionally, the lack of adequate public transportation infrastructure further contributes to these transportation inequities. Alternative forms of transportation (i.e., public transit) are extensive enough to support commuters, particularly low-income workers who are more likely to use this more affordable

³⁸ Center for Neighborhood Technology, <https://cnt.org/transportation-and-community-development>

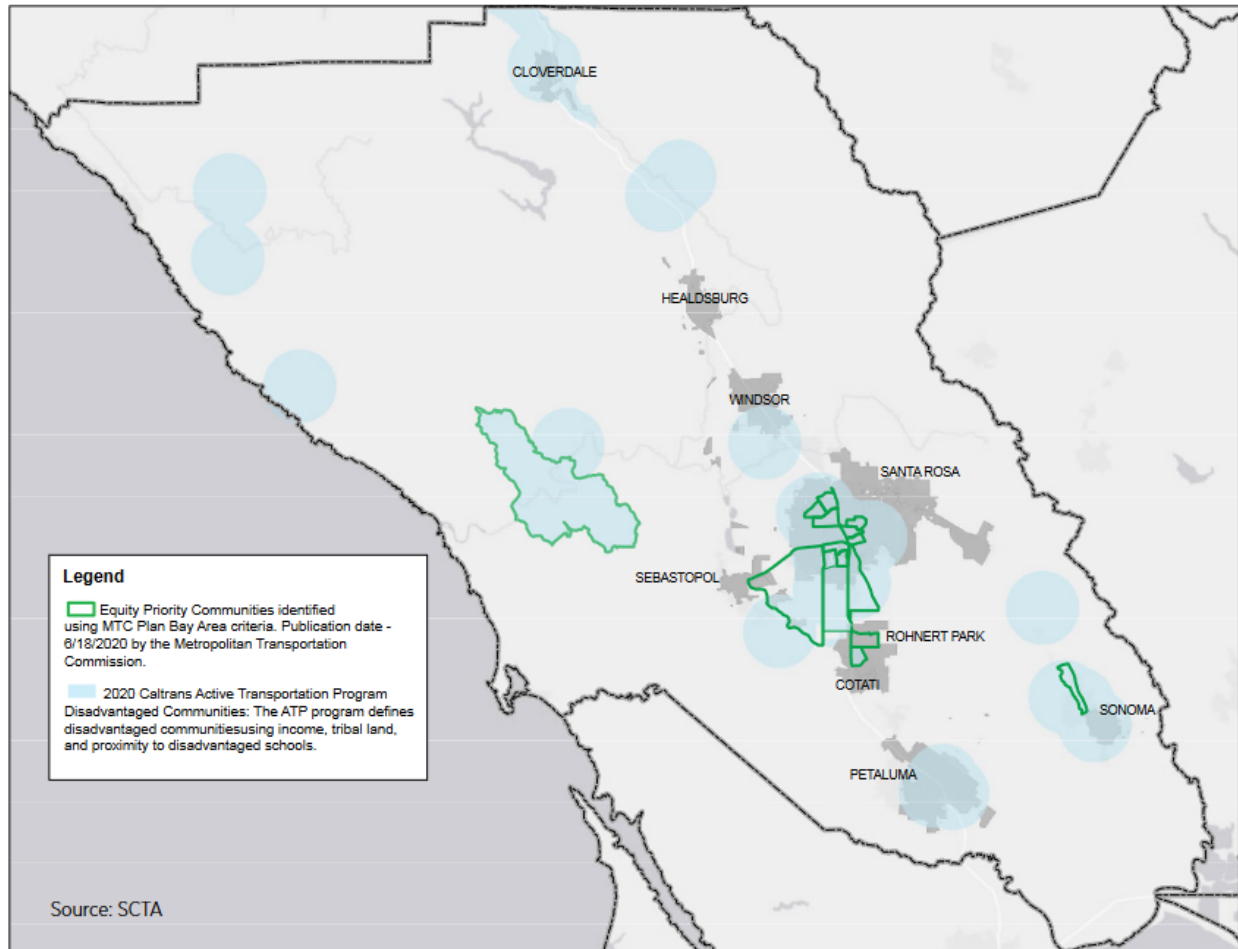
transportation option. As a result, low-income residents are forced to decide between costly car ownership or limited public transportation. Irrespective of which mode of transportation low-income residents decide upon, they may be denied equitable access to transportation if they live in an underserved area.

The transit trip and low-cost transportation index value ranges do not run in parallel for the jurisdictions. Although residents in Sonoma County generally do not rely on public transit as their primary mode of transportation, many residents reside in areas near low-cost transportation services. The relatively high access to low-cost transportation strongly suggests that cost is not the main barrier to use of transit. Indeed, lack of consumer interest appears to be the more likely cause of limited usage. Poor operational services and limited transit infrastructure are likely to deter riders who can afford an alternative form of transportation (i.e., personal vehicle). Thus, low-income individuals are more likely to make up the core ridership for public transit, which the data suggests. While the index values for transportation access display slight racial or ethnic disparities, and in some cases, favor residents of color over white residents, these figures alone do not accurately capture the transportation inequities in this environment.

To address transit shortfalls, Sonoma County Transportation Authority (SCTA) outlines current and future options for public transit in their Comprehensive Transportation Plan, Moving Forward 2050.³⁹ This public document is updated every five years to ensure the plan is relevant and meets community needs. In the most recent update, released in September 2021, SCTA outlines “Equity Priority Communities” and “2020 Caltrans Active Transportation Program Disadvantaged Communities” (Figure 32).

³⁹ Sonoma County Transportation Authority, <https://scta.ca.gov/planning/comprehensive-transportation-plan/> /

Figure 32: Equity Priority Communities Sonoma County



The Plan suggests that rising transportation costs impact household incomes and affordability throughout Sonoma County. The Center for Neighborhood Technology (CNT) estimates that transportation and housing costs together accounted for over 50% of household incomes in our county. Reducing household transportation costs will increase countywide affordability and improve quality of life in Sonoma County.

Economic Development and Job Access

Access to employment at a livable wage is an integral component of broader access to opportunity. Where one lives can affect one's access and the quality of employment opportunities. This can happen both through proximity of residential areas to places with high concentrations (or low concentrations) of jobs and through barriers to residents of neighborhoods accessing jobs, even when they are close by.

Table 40 reviews two data indicators for Sonoma County, the Labor Market Index, and the Jobs Proximity Index. The Labor Market Index measures, by census tract in a jurisdiction, the level of engagement residents within that tract have in the labor force. Values range from 0 to 100. The higher the score, the higher the rates of employment in that area. The Jobs Proximity Index

measures by census tract, the accessibility that tract’s residents have to employment opportunities. Values range from 0 to 100. The higher the score, the more access residents from that area have to employment opportunities.

Overall, in Sonoma County, white residents enjoy the highest Labor Market Engagement Index value. Black, Asian or Pacific Islander, and Native American residents all experience similar, lower Labor Market Engagement Index values. Hispanic residents experience the lowest Labor Market Engagement value in the county. When adjusted for income levels, Labor Market Index values for residents below the Federal poverty line, remain the same across all racial and ethnic categories.

Native American residents enjoy the highest Jobs Proximity Index values in the county. Black and Hispanic residents experience similar Jobs Proximity Index values. White and Asian or Pacific Islander residents also experience similar Jobs Proximity Index values which are the lowest in the Unincorporated County. When adjusted for income levels, Jobs Proximity Index values for residents below the Federal poverty line, increases for white, Black, Hispanic, and Native American residents. The value increases significantly for Asian or Pacific Islander residents (Table 45).

Table 45: Labor Market and Jobs Proximity Indices, Sonoma County

Sonoma County	Labor Market Index	Jobs Proximity Index
Total Population		
White, Non-Hispanic	59.91	47.34
Black, Non-Hispanic	51.20	51.27
Hispanic	49.55	51.41
Asian or Pacific Islander, Non-Hispanic	55.29	47.78
Native American, Non-Hispanic	51.40	52.82
Population below Federal Poverty Line		
White, Non-Hispanics	59.91	50.02
Black, Non-Hispanic	51.20	59.11
Hispanic	49.55	53.29
Asian or Pacific Islander, Non-Hispanic	55.29	45.42
Native American, Non-Hispanic	51.40	63.53

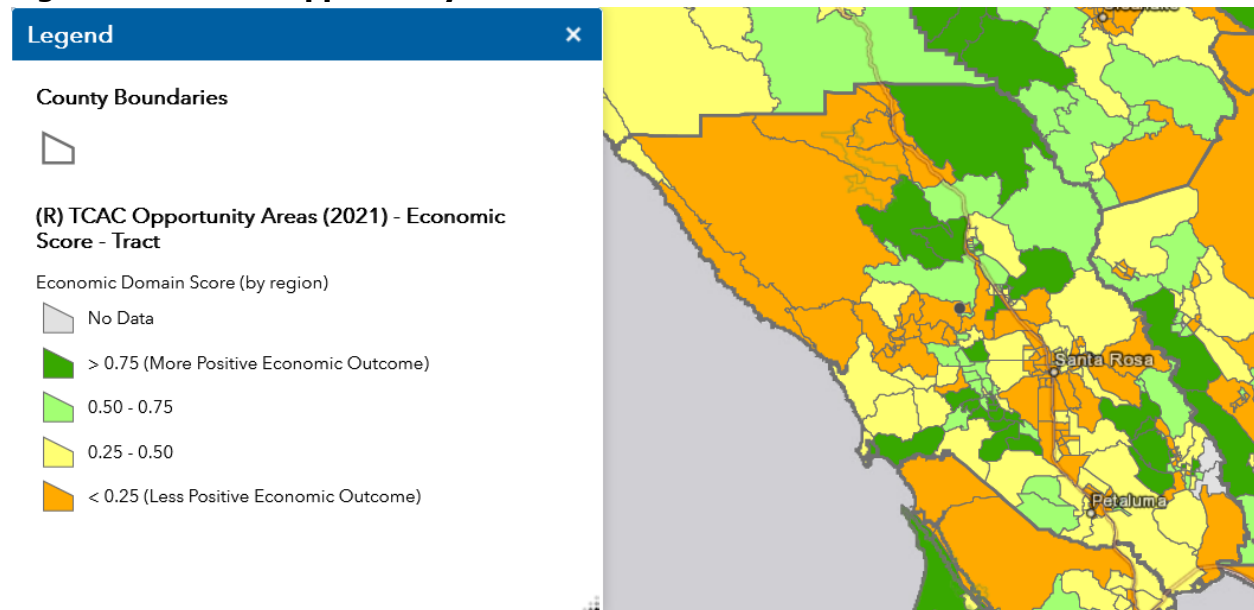
Sources: American Community Survey (ACS), 2011-2015, Longitudinal Employer-Household Dynamics (LEHD), 2017.

The Tax Credit Allocation Committee (TCAC) Opportunity Area Maps accounts for regional differences in access to opportunities within census tracts. The Economic Domain factors in the following indicators to generate Economic Scores for each tract:

- **Poverty:** Percent of population with income level above 200% of Federal poverty line
- **Adult Education:** Percent of adults with a bachelor’s degree or above
- **Employment:** Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces
- **Job Proximity:** Number of jobs filled by workers with less than a BA that are all within a given radius of each census tract
- **Median Home Value:** Value of owner-occupied units

A score of less than 0.25 (orange) is considered a less positive economic outcome, while scoring greater than 0.75 (dark green) indicates greater access to economic opportunities. Most of Sonoma County scores in the lowest quartile by these metrics, though there is a wide range of economic outcomes (Figure 33).

Figure 33: TCAC Opportunity Areas Economic Scores



Source: TCAC Opportunity Areas, 2021

Access to FDIC-regulated banks reduces the likelihood of discrimination in lending and credit services as well as predatory lending practices that further racial and socio-economic inequities. The cities of Santa Rosa, Healdsburg and Sonoma provide the greatest access to these banks while the cities of Cotati, Cloverdale, and Windsor provide the least (Table 46). It should be noted, however, that Redwood Credit Union serves the entire North Bay Area and has 19 branch locations including Cloverdale, Windsor, and Rohnert Park/Cotati. Multiple other Credit Unions also serve the county but because Credit Unions are not FDIC regulated, these facilities are not reflected in Table 46 below.

Table 46: FDIC-Regulated Bank Branches, Sonoma County Municipalities

Municipality	Population	% Minority Population	FDIC-Regulated Full-Service Brick and Mortar Branches	FDIC-Regulated Non-Brick and Mortar Branches
Santa Rosa, CA	178,127	48.8%	38	11
Petaluma, CA	59,776	33.4%	10	1
Rohnert Park, CA	44,390	41%	8	0
Windsor, CA	26,344	46.7%	4	2
Healdsburg, CA	11,340	36.8%	11	0
Sonoma, CA	10,739	27.9%	11	0
Cloverdale, CA	8,996	42.2%	2	0
Cotati, CA	7,584	25.9%	1	0
Sebastopol, CA	7,521	21.7%	6	0
County Total	488,863	40.6%	99	13

Source: All FDIC-related data derived from: Download Data, Federal Deposit Insurance Corporation, https://www7.fdic.gov/idasp/advSearch_warp_download_all.asp?intTab=1 (last visited Feb. 2, 2022).

Future housing needs depend in part on the trajectory of the local workforce. Changes in the types and pay levels of jobs available in Sonoma County and the surrounding region will impact the type and cost of housing that current and future residents can afford. Employment trends indicate a need for a range of housing types that support Sonoma County residents who are employed in various industries. There is a particular need for more moderate- and lower-income housing units to support workers in the retail, manufacturing, and other lower-wage industries.

Projections 2040 is the Association of Bay Area Governments' (ABAG) series of data on demographic, economic, and land use changes in coming decades, covering the period between 2010 and 2040. The projections in Table 47 below illustrate how the Unincorporated County will grow economically both in terms of the number of jobs and employed residents. Both the number of jobs and the number of employed residents are expected to grow by less than 3% in each five-year period. The largest growth has already occurred in 2015 when the number of employed residents grew by 7.01% and in 2020 when the number of jobs grew by 4.4%. Minimal to declining numbers of jobs and employed residents is expected in the years 2035 and 2040.

Table 47: Projected Change in Jobs and Employed Residents, Unincorporated Sonoma County

Year	Jobs	% Change	Employed Residents	% Change
2010	56,950		73,450	
2015	54,175	-4.9%	78,600	7.01%
2020	56,560	4.4%	80,085	1.89%
2025	58,535	3.5%	80,950	1.08%
2030	60,570	3.5%	81,835	1.09%
2035	60,570	0.0%	81,975	0.17%
2040	60,020	-0.9%	80,095	-2.29%

Source: ABAG/MTC, Plan Bay Area 2040 Projections, 2017

Employment Inflow/Outflow analyses highlight the movement of workers commuting into and out of Sonoma County and are useful in understanding the ratio between residents who are employed within the county and those who are employed outside of the county as well as how much workers are commuting from outside of the county for employment opportunities.

As shown in Figure 34, Sonoma County has a net outflow of employed residents meaning that most commute outside of the county for work. Of the 205,030 employed residents, roughly two-thirds (67.9%) are employed and live in Sonoma County while roughly one-third (32.1%) are employed in but live outside of Sonoma County.

Figure 34: Inflow and Outflow of Workers in Sonoma County



**Note: Arrows do not indicate directionality of worker flow*

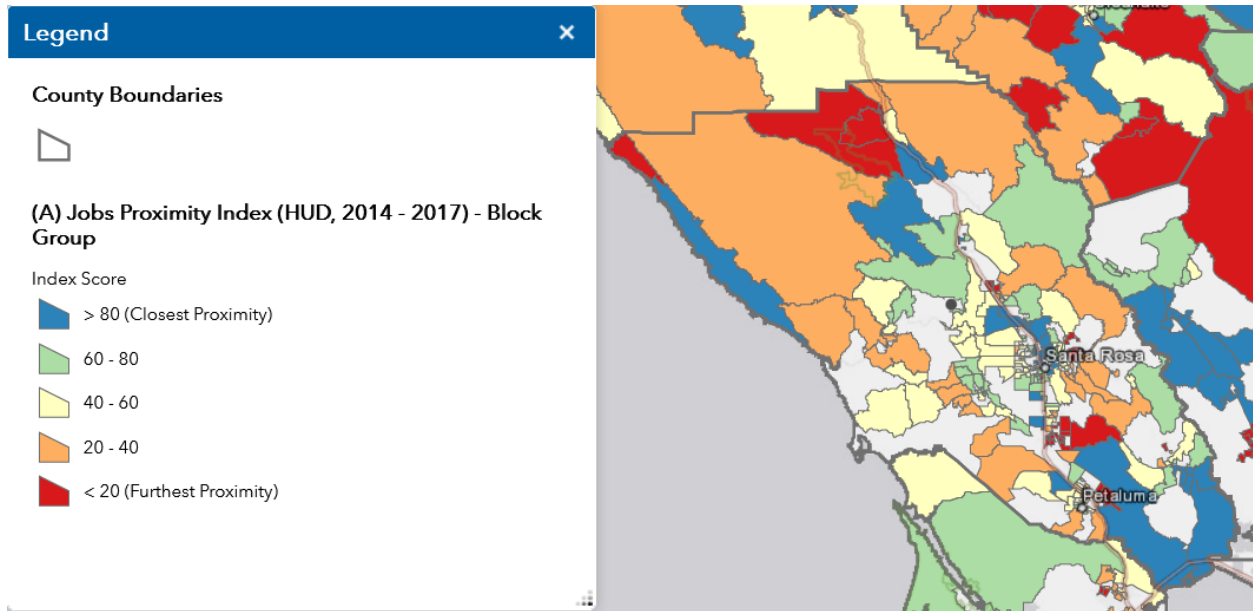
Source: U.S Census Bureau, OntheMap, 2019

The HUD Jobs Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. In Sonoma County, block groups covering the northern part of the county rank at the bottom of the index meaning the residents in these tracts are in furthest proximity to jobs. Residents in the remaining block groups are in closer proximity to jobs, however, only a small number fall into the highest category of job proximity (Figure 35).

Geographically, Job Proximity Index values are highest in the southeastern portion of the county as well as certain clusters surrounding the cities of Sonoma and Santa Rosa. The lowest Job Proximity Index values are in the northern portion of the county. Immigrant populations in Sonoma County are concentrated near the large urban areas.

There are large clusters of Mexican immigrants near the cities of Petaluma and Sonoma. There is also a significant cluster of Filipino immigrants near Petaluma. Immigrant populations are most likely to live near areas of with high Job Proximity Index values and high Labor Market Engagement Index values. Families with children are most likely to live near the urban areas of Sonoma County. The largest cluster of families with children is near the City of Santa Rosa, which has a high Job Proximity Index value.

Figure 35: Job Proximity Index Map Sonoma County

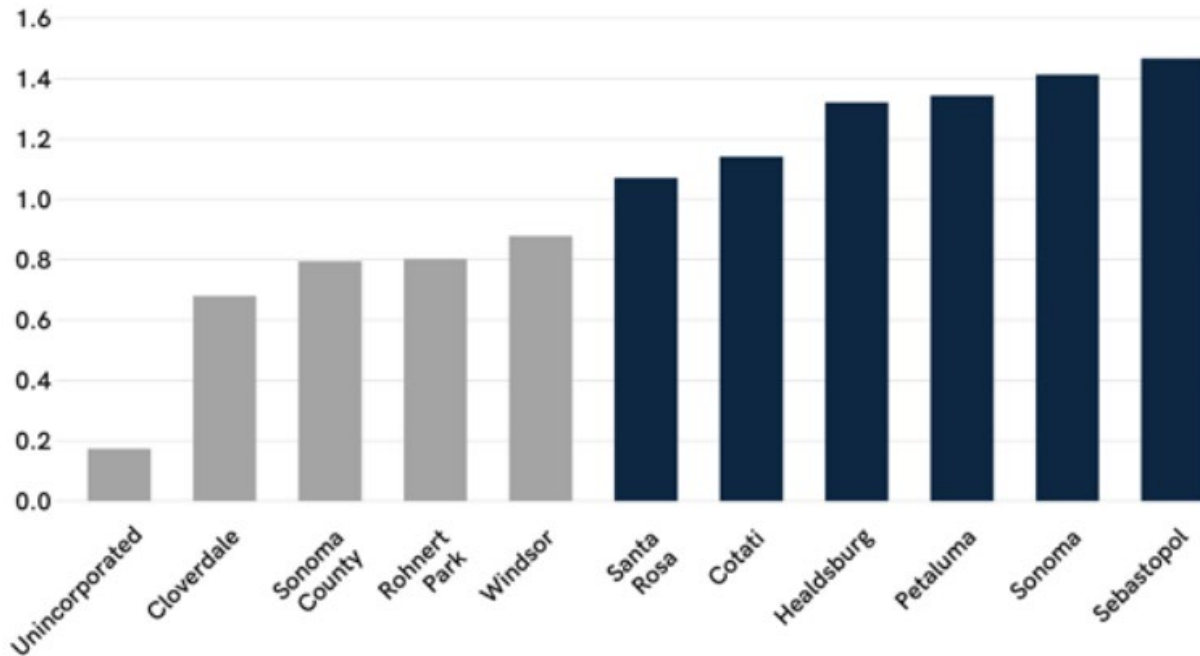


Source: Longitudinal Employer-Household Dynamics (LEHD) data, 2014-2017.

Figure 36 ranks jurisdictions in Sonoma County in order of jobs-to-housing ratios. The higher the ranking, the more jobs there are in comparison to housing units. Sonoma and Sebastopol have the highest ratios, with jobs-to-housing ratios above 1.4 (i.e., 1.4 jobs produced for every home built). The Unincorporated County ranks the lowest with less than 0.2 jobs for every home built. All Sonoma County jurisdictions rank well below the average for the greater Bay Area; cities like San Francisco and San Jose produce more than three jobs for every permitted home.⁴⁰

⁴⁰ State of Housing in Sonoma County, 2022

Figure 36: Ratio of All Jobs to Homes, Sonoma County Jurisdictions



Source: California Department of Housing and Community Development, Annual Progress Reports, Generation Housing, 2022

Compared to the State of California, Sonoma County has a strong local employment with a modest unemployment rate of 4.2% according to the Bureau of Labor Statistics as of December 2021.⁴¹ This is lower than the California unemployment rate of 5.8%, and similar to the unemployment rate of the neighboring counties of Napa (4.1%), Marin (4.2%), and Lake (4.2%). Subject to significant margins of error, the American Community Survey reports, as of 2015-2019 (and thus capturing worse employment conditions than those that are currently present), unemployment rates of 4.2% for white workers, 8.8% for Black workers, 2.7% for Asian alone workers, and 5.2% for Hispanic workers. The level of disproportionality is like current national data from the Bureau of Labor Statistics showing, as of December 2018, unemployment rates of 3.1% for white workers, 6.2% for Black workers, 3.2% for Asian American workers, and 5.1% for Hispanic workers.⁴²

A variety of programs operating in Sonoma County seek to connect disproportionately Black and Hispanic low-income workers to opportunities for employment and professional advancement. The County’s Department of Human Services operates the Sonoma County Job Link which seeks to connect residents with businesses looking for workers. Sonoma County also operates the SonomaWorks program which provides enhanced employment services to eligible residents.

⁴¹ Bureau of Labor Statistics, Local Area Unemployment Statistics, March 2022.

⁴² ACS data table S2301, 2019 ACS 5-Year Estimates Subject Tables, https://data.census.gov/cedsci/table?t=Employment%20and%20Labor%20Force%20Status&g=0500000US06097&y=2019&tid=AC_SST5Y2019.S2301

Primary Contributing Factors to Disparities in Access to Opportunity

"A Portrait of Sonoma County: 2021 Update" analyzes Human Development Index (HDI) scores across the 99 inhabited areas that are designated by the U.S. Census Bureau as census tracts. Overall, Sonoma County's HDI score is 6.19 out of a possible of 10 which is up from 5.42 in 2012. Sonoma County also leads over the State of California's score of 5.85 likely due to high Health and Education Index scores. Overall, Asian residents have the highest well-being score among the four most populous racial and ethnic groups in the county (6.86) followed by white residents (6.74), Latino residents (4.93) and Black residents (3.99).

Opportunity access and overall quality of life always varies by neighborhood. For example, in Roseland, the HDI is 3.38, whereas in East Bennett Valley it is 8.65 – a notably larger gap than those that separate demographic groups. High HDI scores are found across the county and only four tracts score under 4.00 on the HDI (Rohnert Park B/C/R Sections, Bicentennial Park, Comstock, and Roseland). However, Santa Rosa and surrounding areas have a disproportionate share of neighborhoods with low HDI scores. These same neighborhoods in and around Santa Rosa are also more diverse than other areas of the county, particularly with the share of Latino residents.

The primary factors that contribute to fair housing issues related to Disparities in Access to Opportunity in Sonoma County are:

- Lack of affordable, accessible housing in range of unit sizes
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation

4.5.5 Disproportionate Housing Needs, Including Displacement

Disproportionate Housing Needs refers to conditions in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs 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.

Across Sonoma County, many residents face high rates of housing problems and severe housing cost burden. The four HUD-designated housing problems include 1) lacking complete kitchen facilities; 2) lacking complete plumbing facilities; 3) a household is overcrowded; and 4) a household is cost burdened.⁴³ Households are considered to have a housing problem if they experience at least one of the above. This analysis also considers what HUD designates as severe housing problems, which are a lack of kitchen or plumbing, more than 1.5 occupants per room, or cost burden of greater than 50%.

⁴³ U.S. Department of Housing and Urban Development, *CHAS Background*, https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html

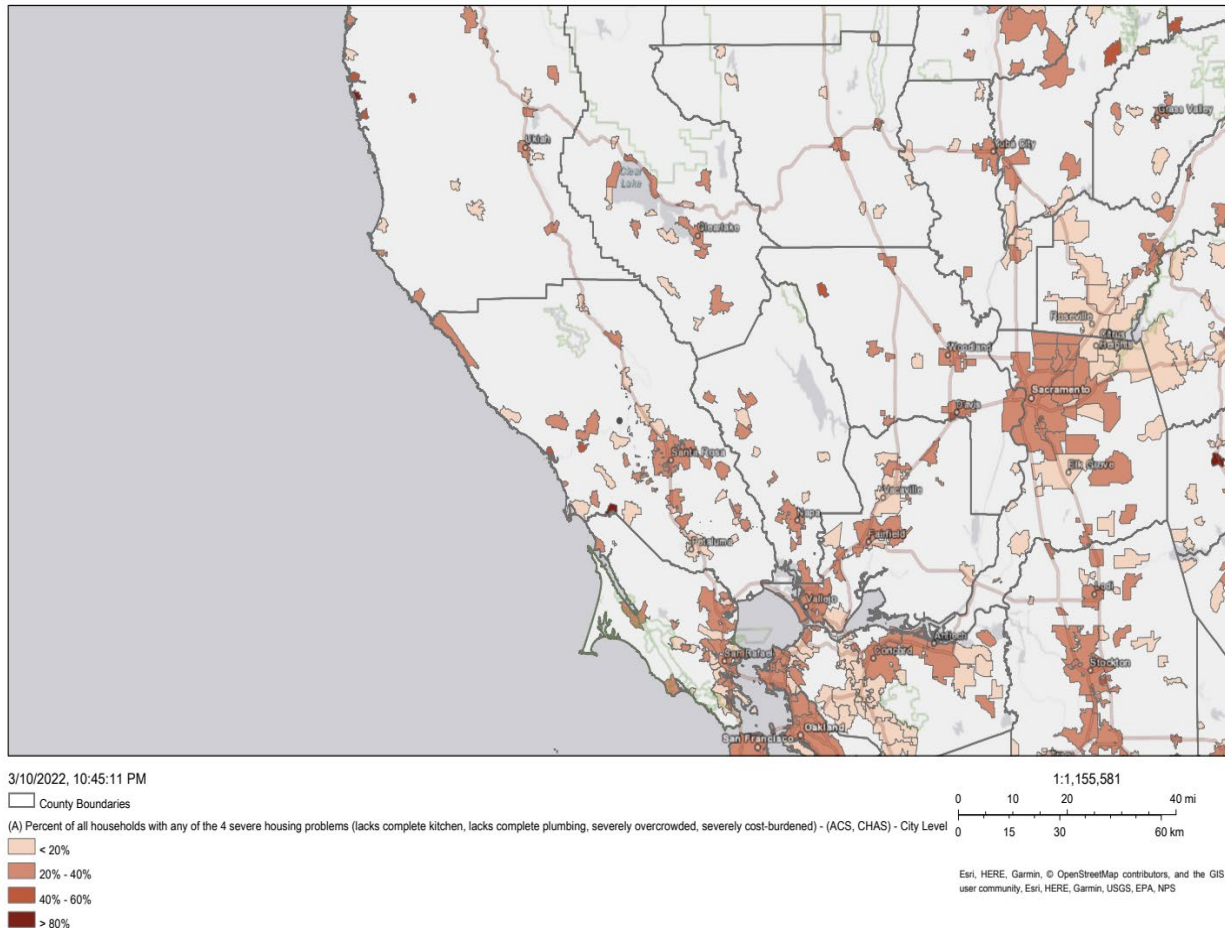
Rates and degree of housing problems vary by race, income, and geographic location. In Sonoma County, people with lower-income, Hispanics (Table 48), and/or those living in or around Santa Rosa (Figure 37) are the most likely to experiencing any of the four housing problems listed above. Conversely, white populations are the least likely population to experience one of these housing problems.

Table 48: Demographics of Households with Disproportionate Housing Needs, Sonoma County

Households Experiencing any of Four Housing Problems	Number Households	Number with Problems	Percent with Problems
Race/Ethnicity			
White, Non-Hispanic	143,925	55,075	38.27%
Black, Non-Hispanic	2,089	1,180	56.49%
Hispanic	31,445	18,505	58.85%
Asian American or Pacific Islander, Non-Hispanic	6,375	2,780	43.61%
Native American, Non-Hispanic	714	314	43.98%
Other, Non-Hispanic	4,500	2,270	50.44%
Total	189,045	80,125	42.38%
Household Type and Size			
Family households, <5 people	103,275	36,720	35.56%
Family households, 5+ people	16,595	10,485	63.18%
Non-family households	69,170	32,920	47.59%
Households Experiencing any of Four Severe Housing Problems			
Race/Ethnicity			
White, Non-Hispanic	143,925	28,325	19.68%
Black, Non-Hispanic	2,089	604	28.91%
Hispanic	31,445	12,080	38.42%
Asian American or Pacific Islander, Non-Hispanic	6,375	1,785	28.00%
Native American, Non-Hispanic	714	229	32.07%
Other, Non-Hispanic	4,500	1,250	27.78%
Total	189,045	44,280	23.42%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.

Figure 37: Percent of Households with Any of the Four Housing Problems, Sonoma County and Region

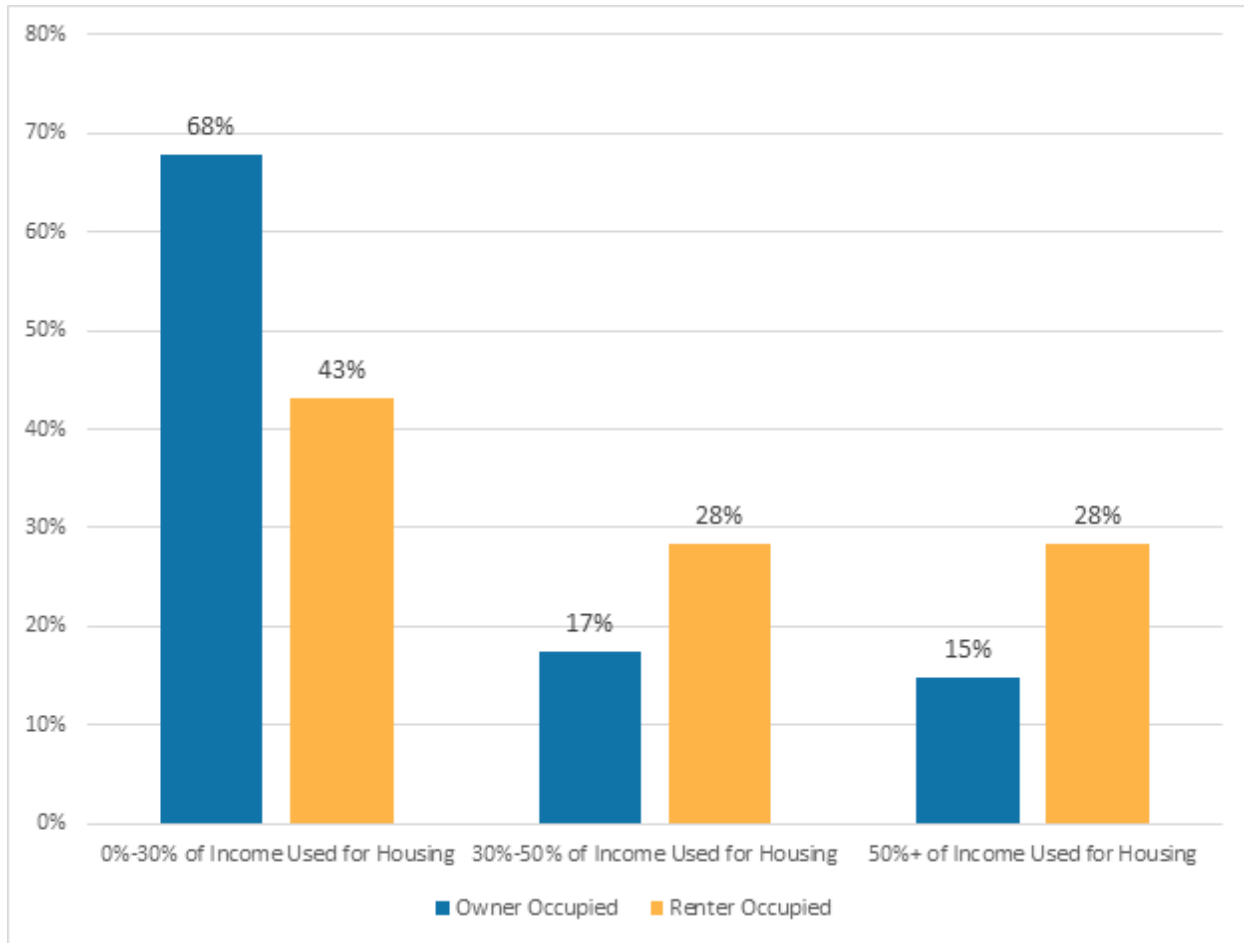


Cost Burden and Severe Cost Burden

Housing cost burden is commonly measured as the percentage of gross income spent on housing, with a 30% threshold for 'cost burden' and 50% threshold for 'severe cost burden.' A lower-income household spending the same percent of income on housing as a higher-income household is therefore more likely to experience a 'cost burden.' Some of the implications of high-cost burden can include housing-induced poverty, where overspending on housing leaves households little financial resources for other expenditures, and reduced savings which can impact long term wealth.

Home prices have risen considerably and have impacted both new buyers and renters. Renters, subject to rent increases based on market rates, tend to experience more cost-burden. This is the case in Sonoma County where just over half (56%) of renters and roughly one third (32%) of homeowners are either cost burdened (30%-50% of income used for housing) or severely cost-burdened (50%+ of income used for housing) (Figure 38).

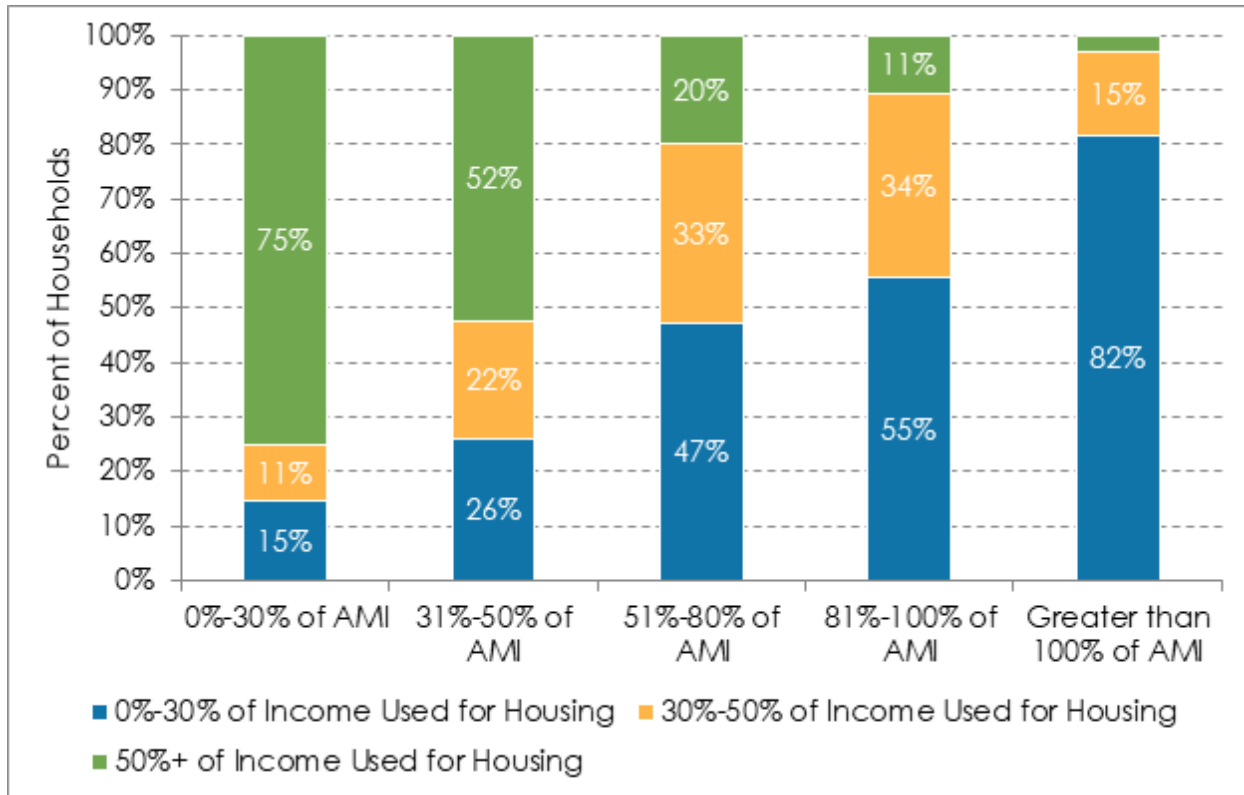
Figure 38: Cost Burden by Tenure, Unincorporated Sonoma County



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

Lower-income households in Sonoma County experience housing cost burden most acutely. While less than 5% of those earning more than 100% of AMI are severely cost-burdened, the share of severely cost burdened households increases as income decreases. Three quarters (75%) of Sonoma County households earning less than 30% of AMI are severely cost burdened, the most cost-burdened income group in the county (Figure 39).

Figure 39: Cost Burden by Income Level, Unincorporated Sonoma County



Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release

There is a more equal distribution in Sonoma County of households experiencing severe housing cost burden. One-quarter of Black and Native American households have severe housing cost burden, compared to 18% of white households. Likewise, both Hispanic and Asian American or Pacific Islander households also have higher rates of severe cost burdens than their white counterparts. Non-family households have the highest rate of severe housing cost burden, with 26% paying at least 50% of their income towards housing costs compared to 14% of families (Table 49).

Table 49: Demographics of Households with Severe Housing Cost Burden, Sonoma County

	Number of Households	Number of Households with Severe Cost Burden	Percent with Severe Cost Burden
Race/Ethnicity			
White, Non-Hispanic	143,925	25,405	17.65%
Black, Non-Hispanic	2,089	550	26.33%
Hispanic	31,445	7,100	22.58%
Asian American or Pacific Islander, Non-Hispanic	6,375	1,305	20.47%
Native American, Non-Hispanic	714	175	24.51%
Other, Non-Hispanic	4,500	1,140	25.33%
Total	189,045	35,675	18.87%
Household Type and Size			
Family households, <5 people	103,275	15,324	14.84%
Family households, 5+ people	16,595	2,389	14.40%
Non-family households	69,170	17,950	25.95%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.

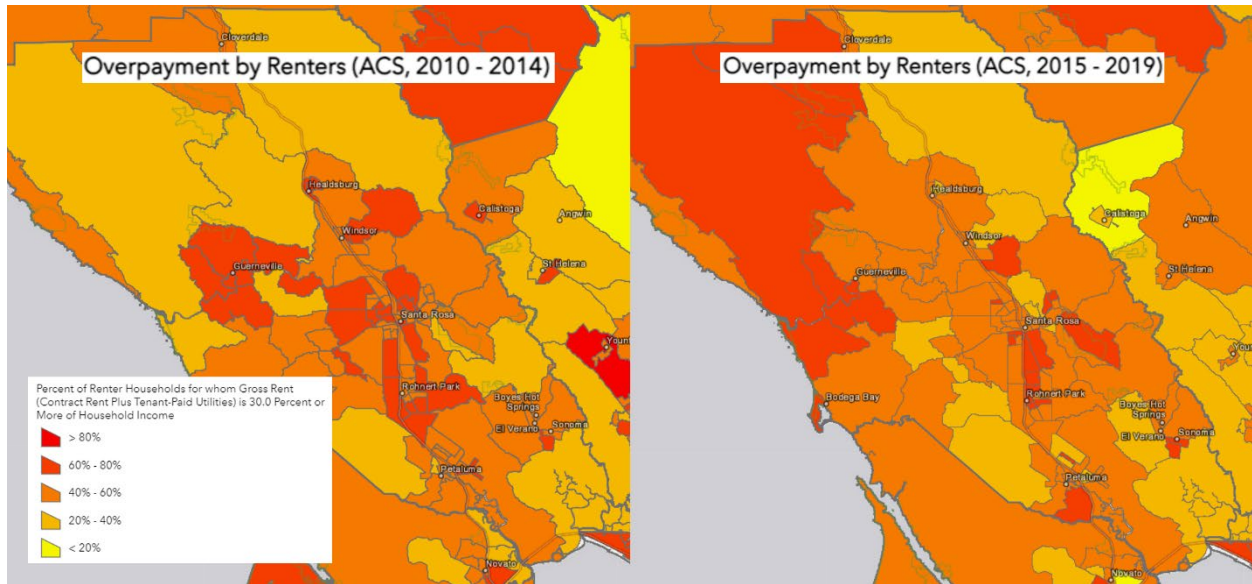
Sonoma County and the Bay Area have overall better rates of housing cost burden compared to the State of California (Table 50). Whereas roughly a quarter of California residents are cost burdened (25.4%) and a quarter are severely cost burdened (26.6%) these numbers drop to 19.7% and 16.4% respectively in the Bay Area and 21.5% to 17.4% in Sonoma County.

Table 50: Cost Burden Severity, Sonoma County, Bay Area, and California

Geography	0%-30% of Income Used for Housing	30%-50% of Income Used for Housing	50%+ of Income Used for Housing
Sonoma County	58.7%	21.5%	17.4%
Bay Area	61.7%	19.7%	16.4%
California	43.0%	25.4%	26.6%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091

Figure 40: Overpayment by Renters in Sonoma County Over Time



Source: U.S. Census Bureau, American Community Survey, 2014 and 2019 5-Year Estimates

Cost burden is a significant issue throughout the county and has increased in the Unincorporated County over time (Figure 40).

Overcrowding

Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, and half-rooms. Residential overcrowding reflects demographic and socioeconomic conditions as it has been correlated with increased risks of contracting communicable diseases, higher rates of respiratory illness, and greater vulnerability to being homeless.

Older-adult immigrant and recent immigrant communities, families with low-incomes and renter-occupied households are more likely to experience household crowding. A form of residential overcrowding known as “doubling up” is co-residing with family members or friends for economic reasons. Doubling up is the most reported living situation for families and individuals before the onset of homelessness.⁴⁴

In Sonoma County, Hispanic households are far most likely to experiencing overcrowding (Table 51) though age may play some role in explaining racial and ethnic disparities in overcrowding. Relatively younger adults are more likely to have minor children in their households which increases the likelihood of overcrowding. Conversely, older adults are more likely to reside in one- or two-person households.

⁴⁴ California Department of Health and Human Services

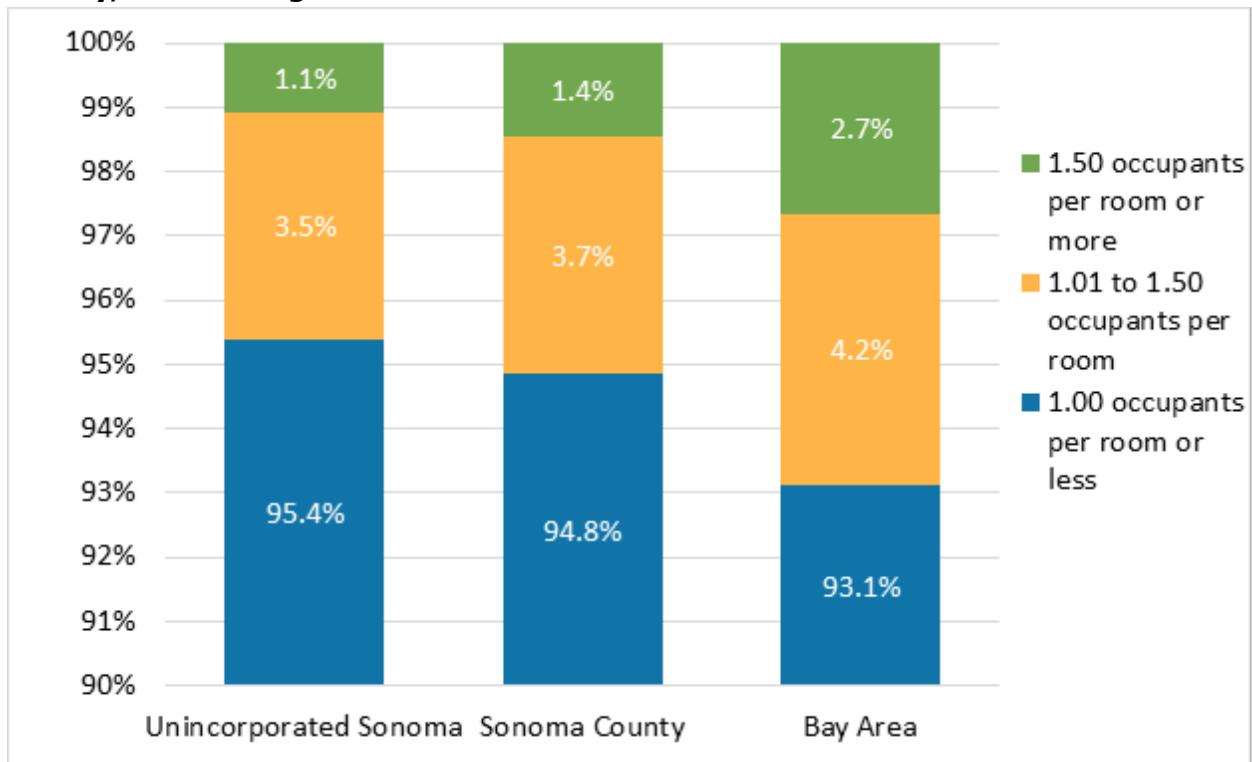
Table 51: Percentage of Overcrowded Households by Race or Ethnicity, Sonoma County

Race or Ethnicity	Number	Percent
Non-Hispanic white	5,208	3.3%
Black	126	5.3%
Native American	87	5.4%
Asian American or Pacific Islander	291	4.7%
Hispanic	6,767	19.2%

Source: 2015-2019 American Community Survey 5-Year Estimates

Rates of overcrowded households in Unincorporated Sonoma County (4.6%) are lower than those of Sonoma County (5.1%) and the Bay Area (6.9%), indicating that overcrowding may occur more frequently in larger urban areas.

Figure 41: Overcrowding Severity, Unincorporated Sonoma County, Sonoma County, and the Region



Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release

Substandard Housing

As defined by the U.S. Census, there are two types of substandard housing problems: (1) Households without hot and cold piped water, a flush toilet and a bathtub or shower; and (2) Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. In Sonoma County, less than 1% of owner households and just over 2% of renters lack kitchen and/or plumbing.

Table 52: Substandard Housing Issues, Sonoma County

Building Amenity	Owner	Renter
Kitchen	0.3%	1.5%
Plumbing	0.4%	0.7%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049

Based on Code Enforcement data, there are an estimated 24 residential units in need of replacement and 84 residential units in need of substantial rehabilitation in the Unincorporated County. The units in need of replacement have typically been affected by natural hazards, such as fire, flooding, or tree damage. The majority of code enforcement complaints for substandard housing are from the following areas:

- Unincorporated Santa Rosa, including South Santa Rosa, Fulton, and rural areas to the east and west of City limits;
- Unincorporated Sebastopol, including the rural areas north, south, and west of City limits;
- Unincorporated Sonoma, mainly in the Springs area north of City limits; and
- Unincorporated areas along the lower Russian river, including Guerneville and Forestville.

Homelessness

Homeless individuals and families have perhaps the most immediate housing need of any group. They also have a challenging set of housing needs due to both the diversity and complexity of factors that lead to homelessness. Even before the passage of AB 686, Housing Element Law promoted more inclusive communities by addressing the disproportionate housing needs of households with special needs, including people experiencing homelessness.

As defined by HCD guidance, homelessness is lacking or a perceived lack of fixed, regular and adequate nighttime residence, or as having primary nighttime residence in a shelter, on the street, in a vehicle, or in an enclosure that is not authorized or fit for human habitation.⁴⁵ The protected groups outlined in the “Patterns of Integration and Segregation” section of this assessment are also more susceptible to experiencing homelessness among other housing challenges.

the 2022 Point-In-Time Count was the first official count of people experiencing homelessness since the start of the COVID pandemic and showed an overall downward trend in Sonoma County

⁴⁵ California Department of Housing and Community Development “Affirmatively Furthering Fair Housing” guidance

and its cities from 4,539 counted individuals experiencing homelessness in 2011 Countywide, to 2,893 in 2022. Although this marks a 5% increase in homeless populations since 2021, it is still significantly lower than the 2011 count and what was predicted during the COVID-19 pandemic. The County attributes this minimal increase to emergency response measures like Project Homekey and rental assistance as well as ongoing programs such as safe parking, interim housing, and housing vouchers.⁴⁶

As of the 2022 Point-In-Time Count, there were 161 individuals in Unincorporated Sonoma County. Of these, most reside in West County and Sonoma Valley. Of the areas surveyed, unincorporated Santa Rosa experienced the largest decline in homelessness from 2019 to 2022, and Unincorporated West County experienced the largest decline in homelessness from 2020 to 2022. Unincorporated South County is the only region in which homelessness increased from 2019 to 2022, with an increase of only 12 individuals (Table 53).

Table 53: Unincorporated Sonoma County Homelessness by Region Over Time

	2019	2020	2022	Change 2019-2022
North County Unincorporated	63	69	27	-57%
South County Unincorporated	9	16	21	133%
West County Unincorporated	211	228	49	-77%
Sonoma Valley Unincorporated	91	27	41	-55%
Santa Rosa Unincorporated	142	67	23	-84%
Total	516	407	161	-69%

Source: Applied Survey Research, "County of Sonoma 2022 Point-in-Time County Results"

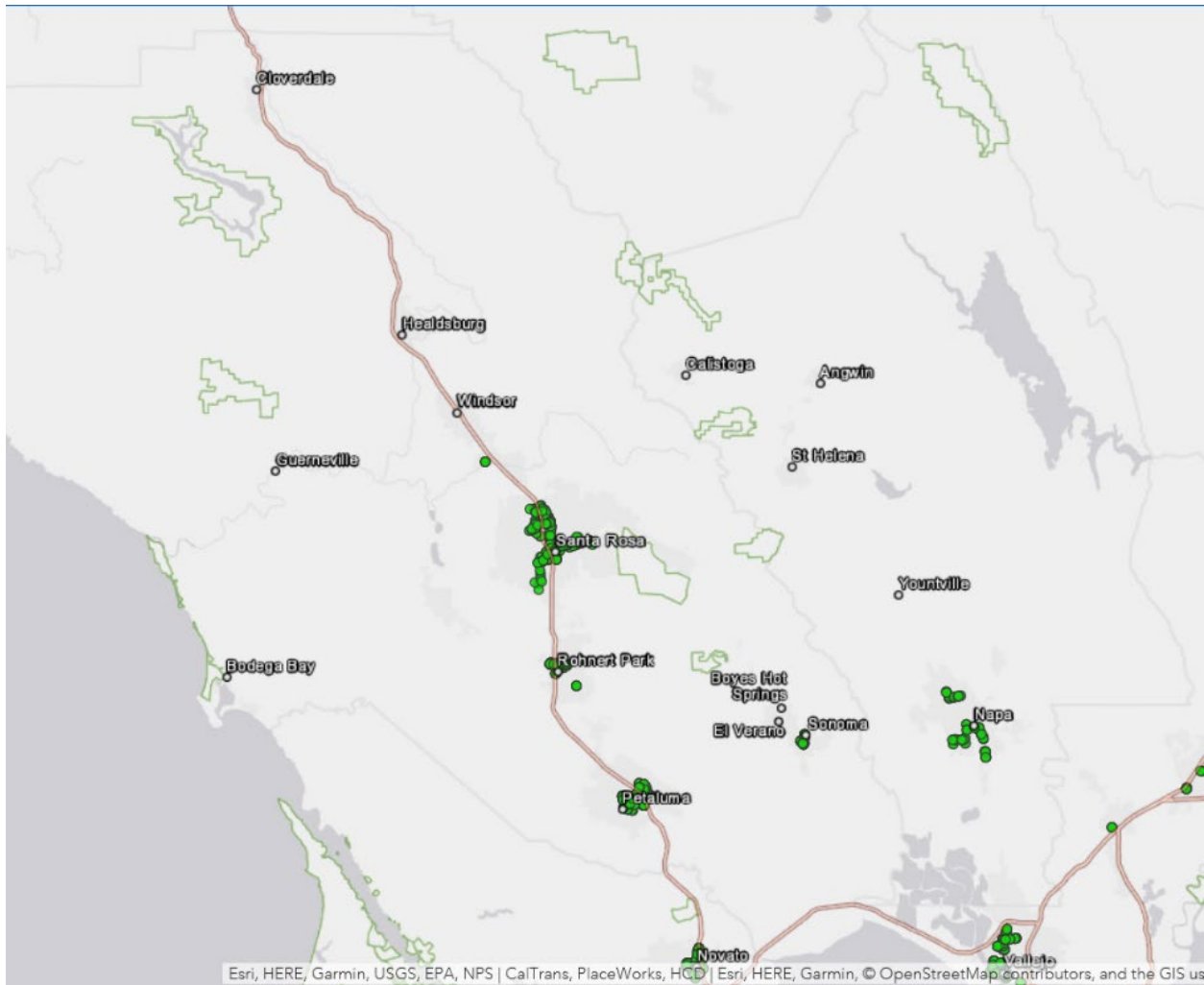
While there are slightly more individuals experiencing homelessness in the West County and in the Sonoma Valley, there are no significant concentrations of homelessness in the Unincorporated County. As of 2022, Unincorporated West County has 41 shelter beds and Unincorporated Sonoma Valley has 26 shelter beds, comparable to the demonstrated need.⁴⁷ Homeless service providers in the Unincorporated County typically focus on a subregion of the county, such as West County Community Services serving the Lower Russian River or Petaluma People Services Center serving both incorporated Petaluma and the greater Unincorporated South Sonoma County.

Most homeless individuals in Sonoma County reside within incorporated areas. This may be due in part to the relative lack of public transportation in the Unincorporated County, with only one high-quality transit stop (Sonoma County Airport SMART Station) and the remainder concentrated in the county's five southernmost jurisdictions (Figure 42).

⁴⁶ County of Sonoma Immediate Release: Sonoma, Bay Area counties release preliminary homelessness count statistics, May 16, 2022

⁴⁷ HUD, 2022 Housing Inventory Count. Does not include 400+ beds in inventory with location suppressed for safety.

Figure 42: High-Quality Transit Stops in Sonoma County, 2022



Source: Caltrans, 2022, via HCD AFFH Data Viewer 2.0

Sonoma County follows the statewide trend of having high rates of unsheltered homeless populations – 61% of unhoused residents in the county and its cities and 60% in the whole state are unsheltered versus 39% nationwide. This means that approximately four in ten homeless individuals in Sonoma County have access to temporary shelter.⁴⁸ According to the 2022 census, seven in ten people experiencing homelessness had lived in the county prior to housing loss; of them, 74% had been homeless for a year or more and almost one-quarter reported loss of employment as the primary driver of homelessness.⁴⁹

Black and Native American people, who make up about 1.5% and 1% of the population respectively, represent 8% and 9% of unhoused individuals in Sonoma County. Native Hawaiians and Other Pacific Islands make up 0.4% of the total population and 1.5 percent of the homeless population.⁵⁰ Other special needs populations that are disproportionately affected by

⁴⁸ Applied Survey Research, “County of Sonoma 2022 Point-in-Time County Results”

⁴⁹ Ibid

⁵⁰ HUD, 2022 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations

homelessness in Sonoma County include LGBTQ youth, people who have been in the foster care system, and people with disabilities.⁵¹

Several recent efforts to mitigate the harmful consequences of homelessness were spurred by the COVID-19 pandemic. In 2020, the County applied and received approval for five permanent supportive housing sites under the State of California's Project Homekey program totaling 312 new housing units for unhoused individuals in Sonoma County. Sonoma County Board of Supervisors allocated \$2 million to new safe parking and interim housing programs in Santa Rosa, Sebastopol, and Petaluma. The County also distributed \$40 million in State and federal Emergency Rental Assistance Program (ERAP) funds which assisted more than 5,000 applicants to protect tenants' rights and limit evictions, one of the primary drivers of homelessness.⁵²

Displacement

Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. Neighborhood change is influenced by three processes: movement of people, public policies, and investments, such as capital improvements and planned transit stops, and flows of private capital.⁵³ These processes can disproportionately impact people of color, as well as lower-income households, persons with disabilities, large households, and persons at-risk or experiencing homelessness. They can also cause displacement and even homelessness.

For the purposes of this assessment, displacement is used to describe any involuntary household move caused by landlord action or market changes. Displacement is fueled by a combination of rising housing costs, income inequality, stagnant wages, and insufficient market-rate housing production. Decades of disinvestment in low-income communities can result in rent gaps, or disparities between current rental income and potentially achievable rental income if the property is converted to its most profitable use. Because of this, market forces and investor speculation can play a part in displacement.

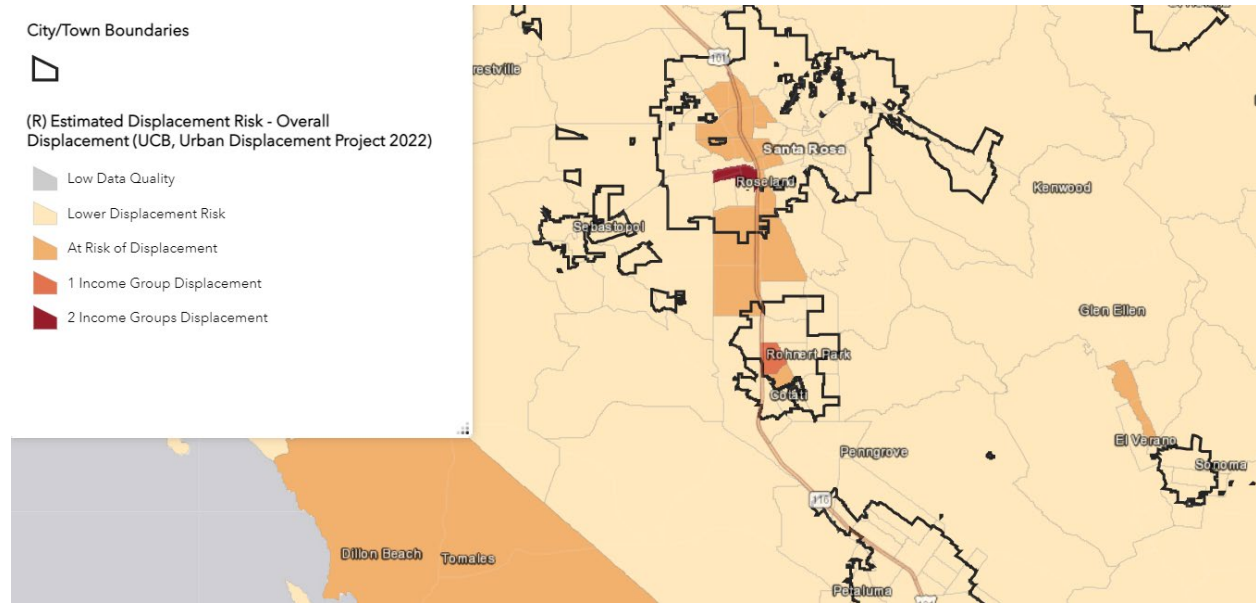
The University of California, Berkeley (UCB) Urban Displacement Project Bay Area Model 2022 identifies most census tracts as "Lower Displacement Risk," however, tracts within the South Santa Rosa Area and the Sonoma Valley were identified as "At Risk of Displacement." (Figure 43). The elevated displacement risk in South Santa Rosa is shared by nearby census tracts in incorporated Santa Rosa and Rohnert Park. The elevated displacement risk in the Sonoma Valley is not shared by the incorporated City of Sonoma.

⁵¹ See 45

⁵² County of Sonoma Immediate Release: Sonoma, Bay Area counties release preliminary homelessness count statistics, May 16, 2022

⁵³ Zuk, M., et al. (2015). Gentrification, Displacement, and the Role of Public Investment. Federal Reserve Bank of San Francisco, 32.

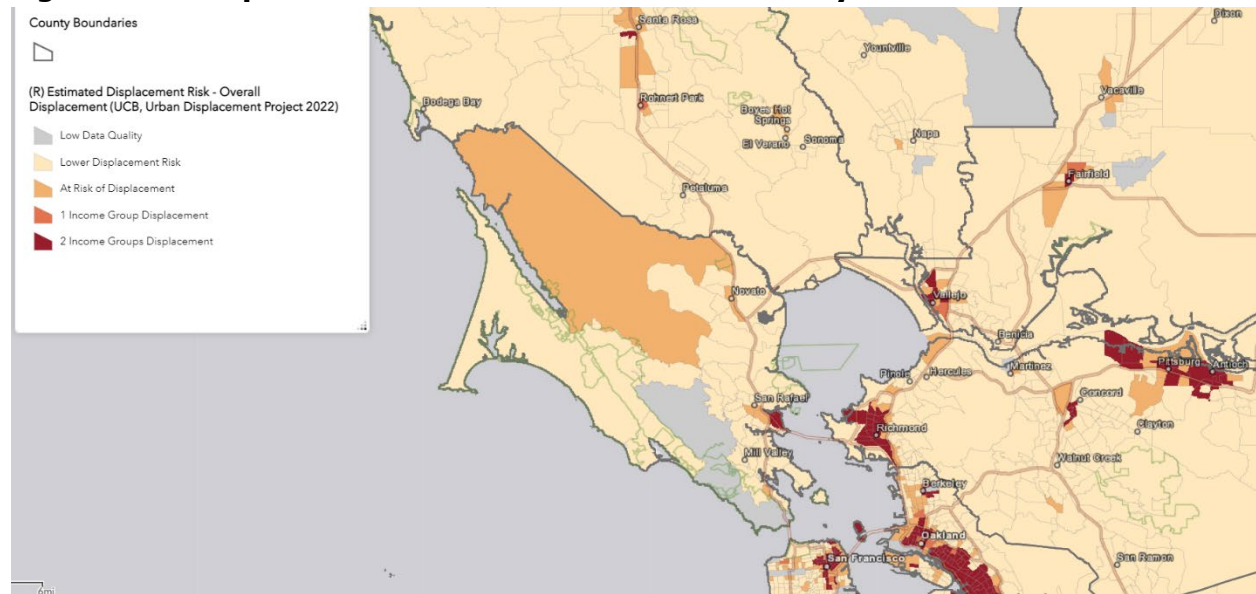
Figure 43: Displacement Risk in Sonoma County



Source: Chapple, K., & Thomas, T., and Zuk, M. (2022). Urban Displacement Project website. Berkeley, CA: Urban Displacement Project.

Overall, displacement risk in Sonoma County is slightly higher than nearby Napa County, lower than nearby Marin County, and significantly lower than most Bay Area counties (Figure 44).

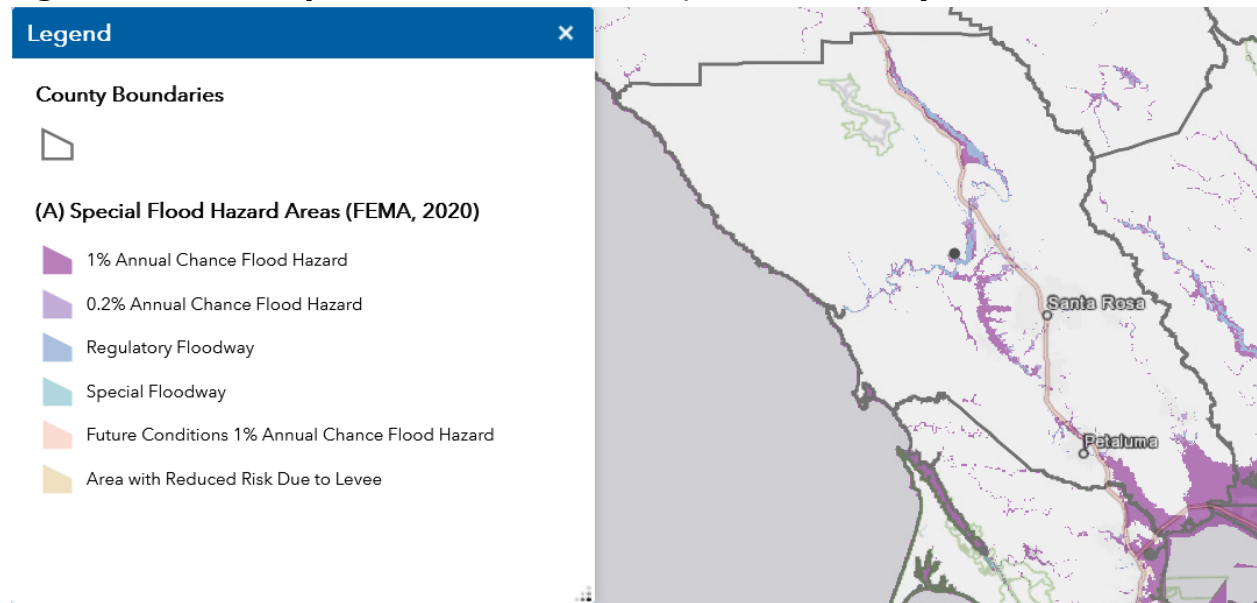
Figure 44: Displacement Risk in the North and East Bay Area



Source: Chapple, K., & Thomas, T., and Zuk, M. (2022). Urban Displacement Project website. Berkeley, CA: Urban Displacement Project.

Displacement can also occur because of natural disasters. Figure 37 identifies areas that are at risk of flooding and disaster-driven displacement. The Special Flood Hazard Areas in Sonoma County are concentrated along the most southern part of the county where there are 1% (dark purple) Annual Chance Flood Hazard zones as well as Regulatory Floodways. These areas do not coincide with those that are susceptible to displacement or have high concentrations of protected classes or low-income residents.

Figure 45: FEMA Special Flood Hazard Areas, Sonoma County



Source: Flood Hazard Areas from the Flood Insurance Rate Map created by the Federal Emergency Management Agency (FEMA), 2020

Increasingly severe wildfire events have also risen as a major driver of displacement in Sonoma County, leading to a worsening affordable-housing shortage and economic insecurity that falls disproportionately on communities of color.

Disproportionate Housing Needs: Fair Housing Issues and Contributing Factors

As mentioned in the previous section, Human Development Index (HDI) scores are relatively high and are increasing across geographies and races. In some instances, however, rising HDI scores may be a sign of displacement. In other words, if the population changes significantly over time, a higher score might mean that different, more affluent people are moving into Sonoma County rather than the overall population experiencing increased quality of life.⁵⁴

In Sonoma County, disproportionate housing needs, including displacement, is driven primarily by the increasingly challenging housing market and mounting economic pressure with new production lagging critically behind demand. Home and rental prices have been on the rise in Sonoma County since 2003, but the median household income has dropped between 2003 and

⁵⁴ A Portrait of Sonoma: 2021 Update

2016.⁵⁵ Today, those in the rental market must earn \$34.31 per hour to afford an average two-bedroom apartment, which far exceeds minimum wage and the incomes of lower wage employees that comprise a large segment of the Sonoma County workforce.⁵⁶

The primary factors that contribute to fair housing issues related to Disproportionate Housing Needs in Sonoma County are:

- Displacement of residents due to economic pressures
- Lack of affordable, accessible housing in range of unit sizes
- Lack of public investments in specific neighborhoods, including services or amenities

The Napa Sonoma Collaborative Equity Working Group’s final report also identifies displacement and lack of affordable and safe housing as a prevalent fair housing issue across the region and attribute this to “cost of land, high development costs, units leaving the market due to disasters faster than their replacement rate, and landlords displacing tenants due to housing emergencies, and gentrification.”

4.5.6 Other Relevant Factors

Redlining

The historical practice of “redlining” is one of the most impactful exclusionary practices that shaped inequitable land use practices across the country. In the 1930s, The Home Owners' Loan Corporation (HOLC) created a neighborhood ranking system based on quality of housing, recent history of sale and rent values, and, crucially, the racial and ethnic identity and class of residents. Residential neighborhoods were assigned grades, ranging from A (“Best”) to D (“Hazardous”), and used to shape intentionally exclusive neighborhoods through mortgage lending. These practices created racial disparities in intergenerational wealth and other patterns of inequity. There was no HOLC redlining shown in Sonoma County.⁵⁷

Exclusion of communities of color took place in the form of racially restrictive covenants. While these covenants have been illegal and unenforceable for decades, they are associated with lasting racial disparities in homeownership, generational wealth building, and racial segregation.⁵⁸

“These covenants are generally found in what we would see as higher-opportunity, higher-income, more white areas now, because those were the areas that worked trying to exclude communities of color and other groups from entering those communities.”

- Holden Weisman, Greenlining Institute

While this practice is property-specific, the location and distribution of homes with these covenants, combined with other factors, may have contributed to the development of racially concentrated areas of affluence, trends and patterns of segregation, and access to opportunity

⁵⁵ Bay Area Council Economic Institute “North Bay Fire Recovery” report, January 2020

⁵⁶ California Housing Partnership Housing Needs Dashboard, 2020

⁵⁷ Robert K. Nelson, LaDale Winling, Richard Marciano, Nathan Connolly, et al., “Mapping Inequality,” American Panorama, ed, accessed February 27, 2023

⁵⁸ Sam Mauhay-Moore, "[Sonoma County to Remove Racist Restrictions in Millions of Real Estate Documents](#)," SFGATE, April 19, 2023

by race within Unincorporated Sonoma County. Integration and segregation are discussed within Section 4.5.3, and racial disparities in access to opportunity are discussed within Section 4.5.4, in sections discussing TCAC opportunity areas, access to education, access to low-cost transportation, and economic development. The Sonoma County Recorder's Office has initiated an effort to proactively identify and redact racially restrictive language within these documents and is the first county in California to undertake this process, beyond the requirements of AB 1466 (McCarty, 2021).

Redevelopment

While Redevelopment was in effect, the County had three distinct redevelopment plans for its lower-income areas: the Roseland Area; the Russian River; and Sonoma Springs area. Since this time, Roseland has been incorporated into the City of Santa Rosa. Many measures of opportunity have improved in the Russian River and Sonoma Springs Areas, but the disparities in access to opportunities remain stark within the Sonoma Valley: While the heart of Sonoma Springs (the villages of Agua Caliente, Fetters, and Boyes Hot Springs along Highway 12) received the benefit of public and state investments in terms of roadway and safety improvements, those actions more directly benefitted commuters traveling the Highway 12 corridor and failed to provide economic benefit to the area's residents (although much greater pedestrian safety was provided for residents). Integration and segregation within these areas are discussed within Section 4.5.3, and disparities in access to opportunity in these areas are discussed within Section 4.5.4, in sections discussing TCAC opportunity areas, access to a healthy environment, and access to transportation. State and local monies provided toward affordable housing projects in these areas did provide a direct benefit to residents, as did monies focused on schools and library improvements. Under Program 5c, Specific Plans and Master Plans will be used in this area to target investment into areas of most need, focused on improving community assets such as schools, recreational facilities and programs, social service programs, parks, streets, active transportation, and infrastructure.

Historic Zoning, Aesthetic Requirements, and Growth Control

Historically, required minimum parcel sizes and community design guidelines have restricted the type and character of housing that can be built in the Glen Ellen area of the Sonoma Valley. Environmental rationales were a part of the justification for strong protections of its rural character. The resulting development pattern is one of large, expensive homes in this area while smaller, less expensive homes and apartments were built in the nearby Springs area.

At the same time, growth control measures in the adjacent communities of unincorporated Glen Ellen/Kenwood and the City of Sonoma ensured that home prices and property values remained high by limiting residential growth in these areas. While the Unincorporated County discontinued its Growth Management Program with adoption of its 2009 General Plan, the Growth Management Program within the City of Sonoma remains in place.

These disparities are discussed within Section 4.5.3, within the section on racially and ethnically concentrated areas of poverty (R/ECAPs) and Affluence (RCAAs) and are addressed through programs to development objective design guidelines (Program 12b), review community design guidelines (Program 15I), and rezone sites within historically exclusive areas where higher density

development is feasible (Program 4a). These strategies are discussed further within Section 4.5.8, Fair Housing and Housing Sites.

4.5.7 Summary of Fair Housing Issues, Goals, and Actions

Table 54: Meaningful Actions to Address Prioritized Contributing Factors

Prioritized Contributing Factors (CFs)	Meaningful Actions
<p>CF: Displacement of residents due to economic pressures Priority: High</p>	<p>Protect existing residents from displacement through the following actions:</p> <ul style="list-style-type: none"> • Require replacement housing in targeted growth/Specific Plan/PDA areas and on sites identified to accommodate the housing needs of lower-income households (Program 5a and 5b) • Utilize Specific Plans and Master Plans to target investment (Program 5c) • Utilize affirmative marketing strategies in marketing plans for subsidized housing projects (Program 5d) • Continue to implement the County’s density bonus ordinance and the Rental and Ownership Housing Opportunity Programs that expand on State programs and requirements (Program 7)
<p>CF: Lack of affordable, accessible housing in range of unit sizes Priority: Moderate</p>	<ul style="list-style-type: none"> • Expand programs to increase housing choices and affordability in moderate and high opportunity areas (Program 1) • In coordination with the Napa Sonoma ADU Center, prepare and maintain a list of property owners developing and renting ADUs or JADUs suitable for people with disabilities and provide the list to individuals on housing waiting lists. (Program 25f) • Increase the number of ADUs allowed per site (Program 25g) • Modify permitting levels for cottage housing development projects to allow four cottages by right. (Program 15d) • Increase opportunities for housing land trusts (Program 18) • Develop additional by-right multifamily housing in unincorporated areas (Programs 15e, 15h)
<p>CF: Lack of public investments in specific neighborhoods, including services or amenities Priority: Moderate</p>	<p>Factor is not related to housing only and will be addressed in upcoming development of integrated Environmental Justice/ Integrated Policies and General Plan update process. Constraints specifically related to housing will be addressed through the following programs:</p> <ul style="list-style-type: none"> • Utilize Specific Plans and Master Plans to target investment (Program 5c) • Increase intra-governmental coordination and create a Housing Equity and Action Plan (Program 31)
<p>CF: Lack of regional cooperation Priority: Moderate</p>	<p>Increase intergovernmental coordination and cooperation on housing matters by:</p> <ul style="list-style-type: none"> • Formation of a subregion for the 7th RHNA (Program 6) • Participation in and provision of funding for the Napa-Sonoma Housing Collaborative (Programs 20, 25d) • Continuing participation in bimonthly meetings of the interjurisdictional housing coordinating committee (Program 27)

Prioritized Contributing Factors (CFs)	Meaningful Actions
<p>CF: Lack of affected populations on boards and committees Priority: Low</p>	<p>Factor related to much more than housing and will need to be addressed in the upcoming Environmental Justice Element and General Plan update processes. Factors related to housing will be addressed through the following program:</p> <ul style="list-style-type: none"> • Increase intra-governmental coordination and create a Housing Equity and Action Plan (Program 31)
<p>CF: Lack of funding for local fair housing outreach and enforcement Priority: Low</p>	<ul style="list-style-type: none"> • Contract with a fair housing resource provider (Program 29) • Provide budget for County staff to provide local outreach (Program 32f) • Reinstate dedicated housing program implementation positions in the CDC and Permit Sonoma (Program 1d) • Through the Proactive Outreach Program (Program 32a), ensure developers are aware of existing funding programs.
<p>CF: Community opposition Priority: Low</p>	<ul style="list-style-type: none"> • Develop additional by-right multifamily housing in unincorporated areas (Programs 15e, 15h) • Partner with a qualified non-profit to develop and provide funding for a campaign to combat local opposition to affordable housing (Program 32d)

4.5.8 Fair Housing and Housing Sites

In development of a Housing Element’s Sites Inventory, the location of sites must be analyzed for consistency with the obligation to affirmatively further fair housing. This section evaluates the distribution of sites relative to all components of the Fair Housing Assessment, integrates data and local knowledge, analyzes improved and exacerbated conditions, and identifies meaningful actions to combat any exacerbated conditions. The full inventory is located within Appendix D.

Segregation and Integration

Sonoma County has the highest percentage of white residents of any county in the Bay Area, and white populations are the most segregated group within Sonoma County. While racial diversity has increased over time, areas with higher racial segregation remain. Areas with higher isolation of white residents are located northeast and southeast of the City of Santa Rosa, in unincorporated communities such as Larkfield/Wikiup, Kenwood, Glen Ellen, Penngrove, and in rural agricultural valleys. Areas with higher segregation of Hispanic/Latino residents include El Verano, Agua Caliente, Feters Hot Springs, and Boyes Hot Springs (known collectively as the “Springs”), south Santa Rosa, and portions of West County. These areas also have higher rates of segregation for lower-income households. There is no notable segregation by familial status or disability within the community.

Inventory sites are not disproportionately located in areas with high concentrations of racial or ethnic minorities (Table 55). Some sites are located in areas with existing patterns of segregation, where there is sufficient infrastructure and remaining vacant land. While these sites will bring housing into areas of need, other programs are included to ensure these sites do not exacerbate current conditions.

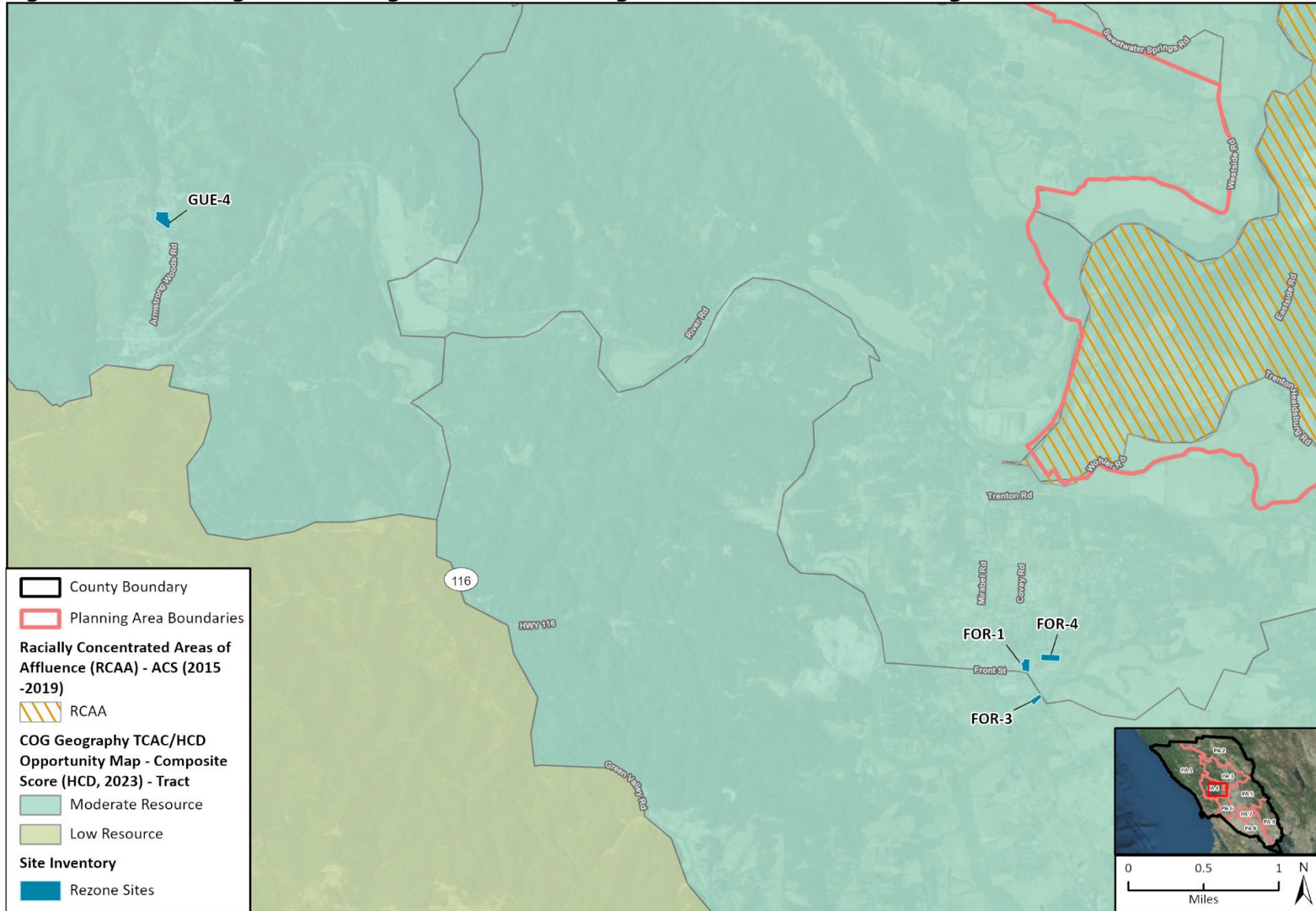
Table 55: Distribution of RHNA Units by Racial/Ethnic Minority Pop. (Block Group)

% Non-white Population	LI Units	%	MI Units	%	AMI Units	%	Total Units	Total %
< 20%	329	38.39%	208	32.55%	389	46.75%	926	39.78%
21 - 40 %	363	42.36%	388	60.72%	384	46.15%	1135	48.75%
41 -60%	165	19.25%	43	6.73%	59	7.09%	267	11.47%
Total	857	100%	639	100%	832	100%	2,328	100%

Racially and Ethnically Concentrated Areas of Poverty and Affluence

While there are areas of racial segregation within Unincorporated Sonoma County, there are no areas designated as Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). There are several Racially Concentrated Areas of Affluence (RCAAs) throughout the Unincorporated County. While most of the land within these RCAAs lacks the necessary infrastructure or environmental conditions to support high-density housing, sites with lower-income capacity have been identified in or near these zones where possible in order to promote integrated and balanced patterns of living (Figure 46 through Figure 50). The RCAA near Glen Ellen abuts the Springs area which has higher rates of segregation of Hispanic/Latino residents, linguistic isolation, cost burden, and other housing problems.

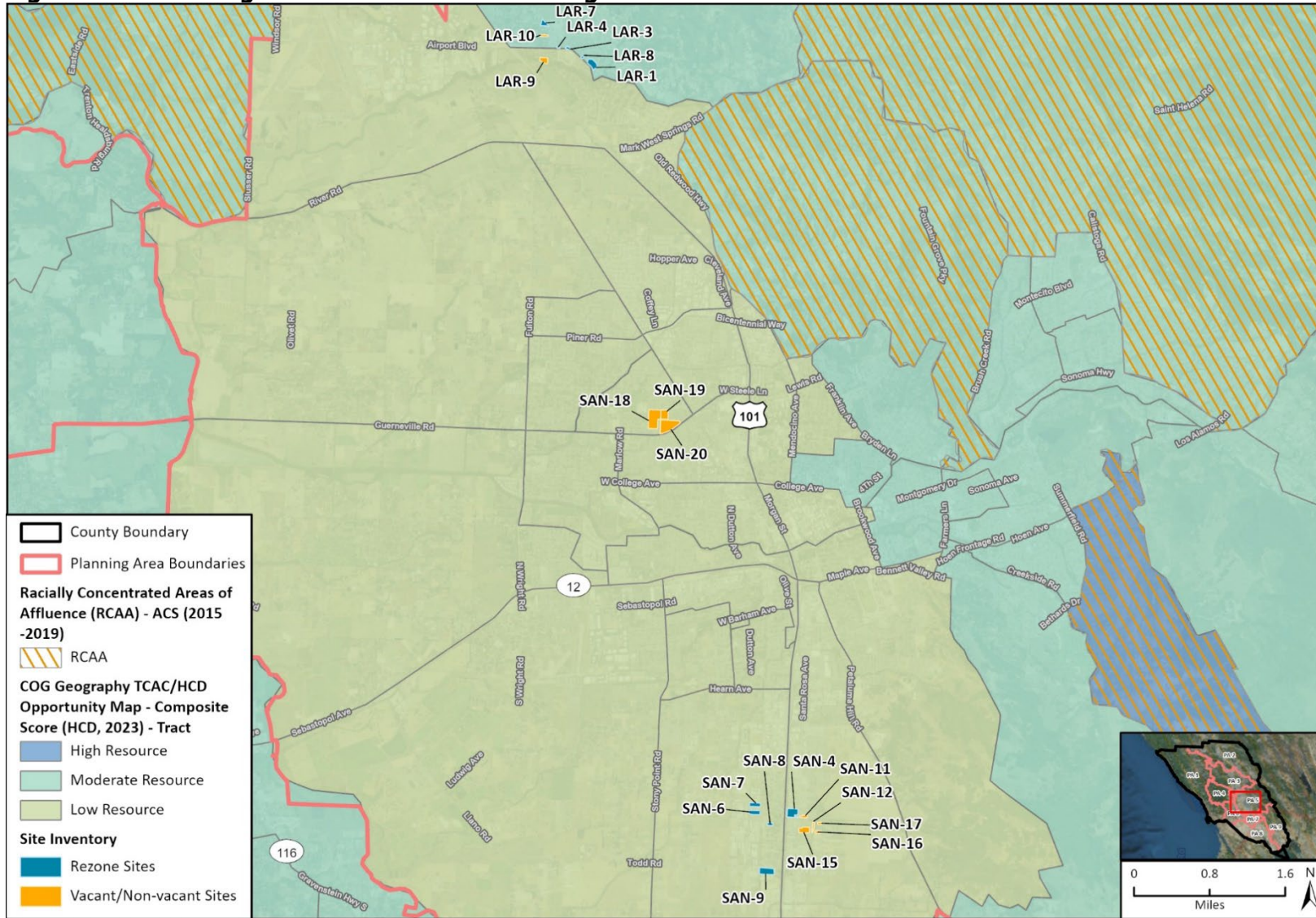
Figure 46: Housing Sites and Figure 47: Housing Sites and RCAAs in Planning Area 4



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 Additional data provided by County of Sonoma, 2023; HCD, 2023.

19-08587_Rezoning Pipeline
 Site Inventory - PA4_Russian River

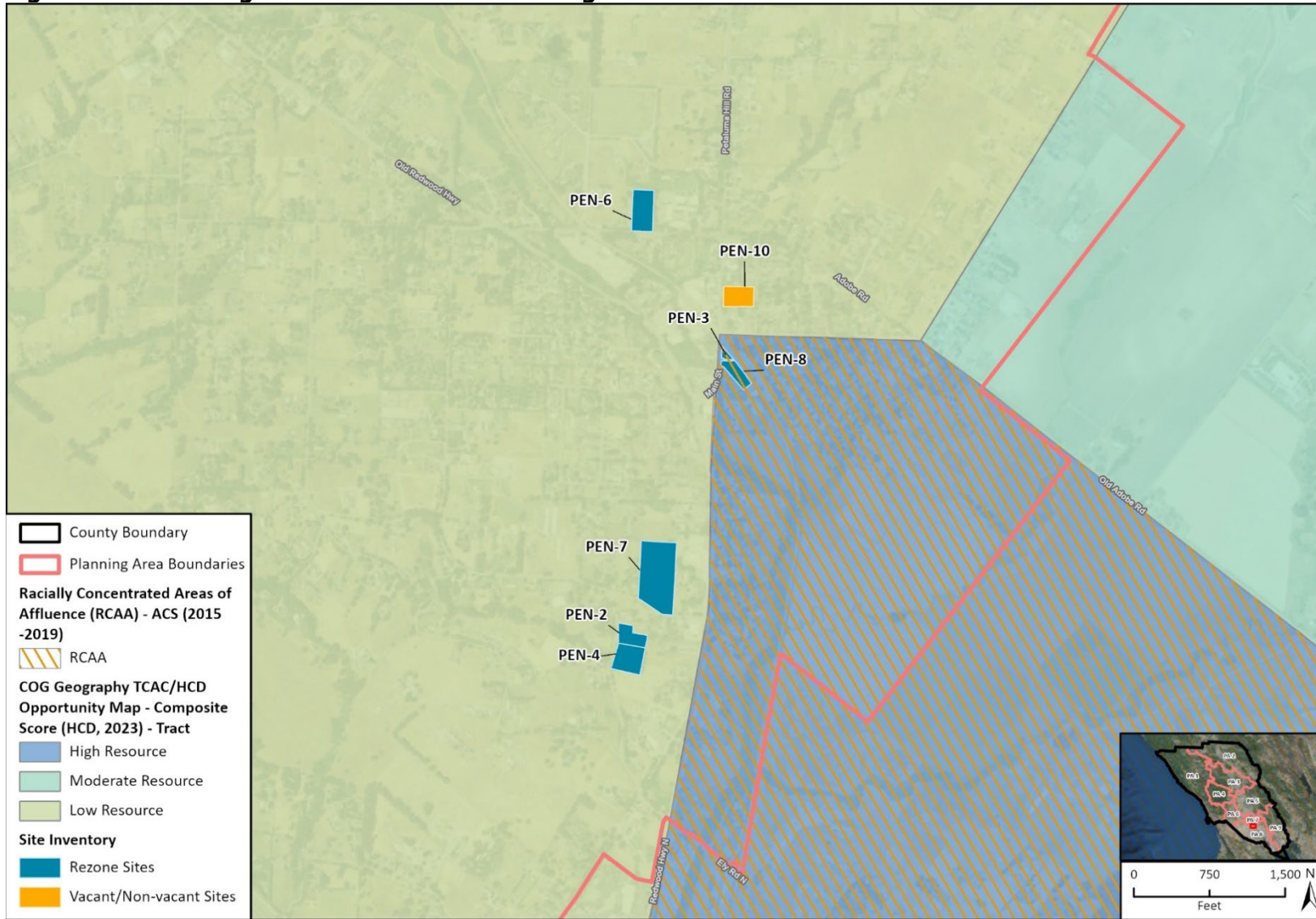
Figure 48: Housing Sites and RCAs in Planning Area 5



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 Additional data provided by County of Sonoma, 2023; HCD, 2023.

19-08587_Resoning Pipeline
 Site Inventory - PA5_Santa Rosa

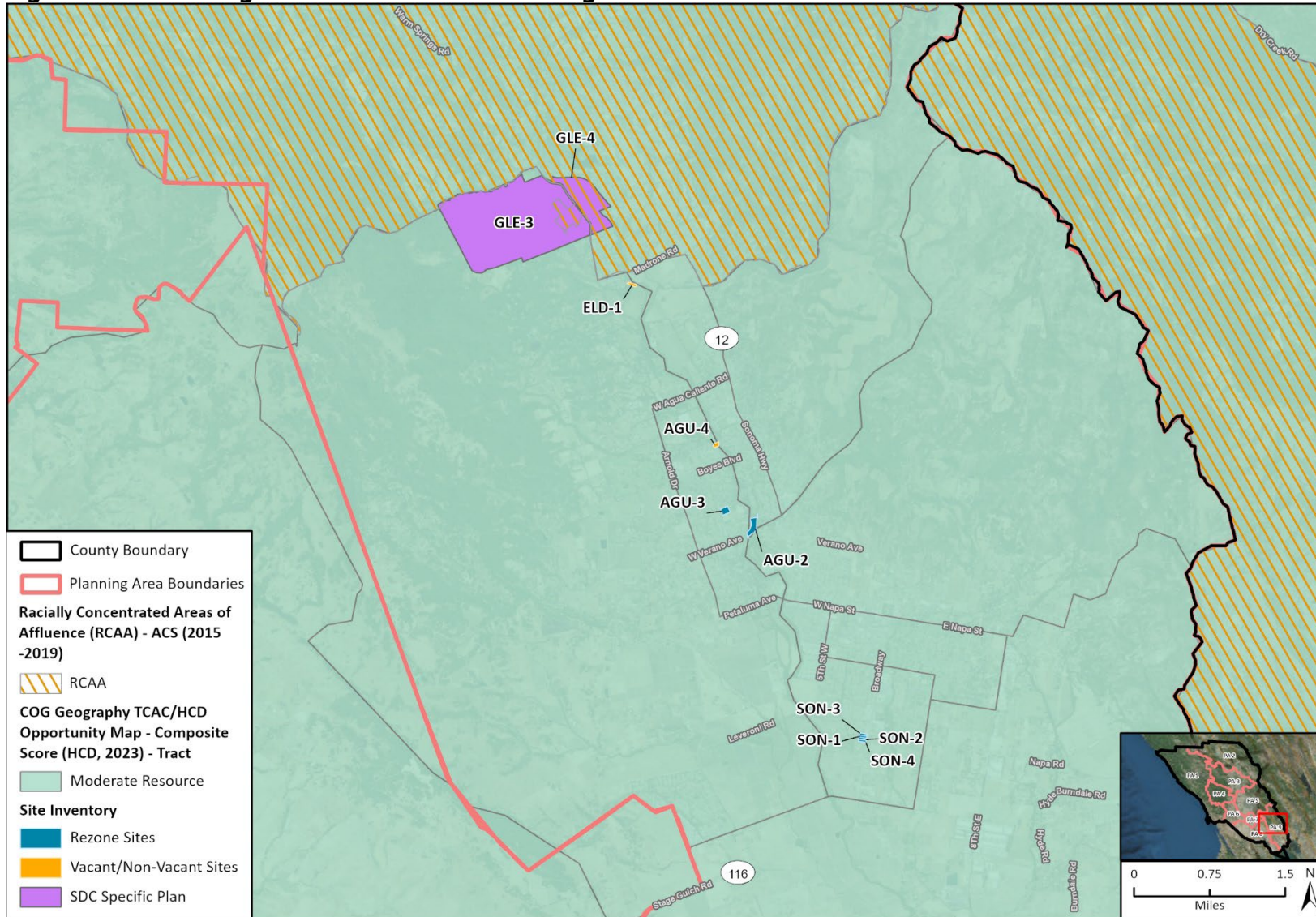
Figure 49: Housing Sites and RCAAs in Planning Area 7



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 Additional data provided by County of Sonoma, 2023; HCD, 2023.

19-08587_Resoning Pipeline
 Site Inventory - PA7_Rohnert Park_Cotati

Figure 50: Housing Sites and RCAAs in Planning Area 9



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 Additional data provided by County of Sonoma, 2023; HCD, 2023.

19-08587_Rezoning Pipeline
 Site Inventory - PA9_Sonoma Valley

Disparities in Access to Opportunity

HCD/TCAC Opportunity Area scores provide an overview of access to opportunity within a census tract based on educational, economic, and environmental factors. While most of Unincorporated Sonoma County is designated as Low and Moderate Resource, there are several areas designated as High and Highest Resource. Tracts with this designation are generally more rural and lack the necessary infrastructure, environmental conditions, or proximity to transit and amenities to support high-density housing. Sites with lower-income capacity have been identified in or near areas with higher Opportunity Area scores where possible in order to promote integrated and balanced patterns of living. Identified unit capacity by Resource Area is included within Table 57. All sites are located in areas with access to transit. Sites in the Springs, south Santa Rosa, and West County have less healthy environmental conditions. Sites in West County have better economic and educational conditions than most of the Unincorporated County and south Santa Rosa sites have higher job proximity. Place-based strategies are in place to avoid contributing to existing disparities.

Disproportionate Housing Needs, Including Displacement

While housing affordability is a concern throughout the whole county, the Springs and south Santa Rosa areas have higher rates of overcrowding, housing cost burden, and risk of displacement. Some of these needs are caused by the lack of sufficient suitable and affordable units, which will be addressed by increased housing stock. Over half of the unit capacity on inventory site are in census tracts vulnerable to displacement (Table 56). This is true across the income levels, and lower-income units are not disproportionately concentrated in areas with higher displacement risk. Strategies to combat displacement risk are discussed below.

Table 56: Distribution of RHNA Units by Sensitive Community At Risk of Displacement

Displacement Typology	LI Units	%	Mod Units	%	AM Units	%	Total Units	Total %
Vulnerable	405	47.26%	216	33.80%	235	28.25%	856	36.77%
Other	452	52.74%	423	66.20%	597	71.75%	1472	63.23%
Total	857	100%	639	100%	832	100%	2,328	100%

Improved and Exacerbated Conditions

Improved Conditions

Most housing sites are classified as mixed-income sites, which will promote patterns of racial and economic integration, bring investment into lower resource areas, and provide housing opportunity in higher resource areas. Sites are located in proximity to transit, amenities, and promote access to opportunity. One primary factor that contributes to housing issues in the Unincorporated County is the lack of housing. Development on sites in inventory will improve housing conditions by increasing the affordable housing stock.

Exacerbated Conditions

Housing sites with capacity for lower-income units have been identified in areas with poor conditions related to racial and economic segregation, access to opportunity, and disproportionate housing needs. The following strategies are being used to mitigate exacerbated conditions:

- Use a mixed-income approach, identifying capacity for moderate- and above moderate-income units on the same sites as lower-income units
- Identifying sites with capacity for lower-income units within identified RCAs and High Resource areas where possible
- Implement anti-displacement measures, particularly in areas with higher displacement risk (Program 5)
- Expand programs to increase housing choice and affordability in moderate and high opportunity areas (Program 12)
- Increase allowances and incentives for various affordable housing types (Program 25g, 15d, 15e, 15h, 16)
- Preserve existing affordable housing (Program 2, 3, 8)

The areas of highest need in the Unincorporated County are the Springs area and south Santa Rosa. The following place-based strategies are in place to improve housing conditions in these areas:

- Utilize Specific Plans and Master Plans to target investment (Program 5c)
- Require replacement housing in targeted growth/Specific Plan/PDA areas and on sites identified to accommodate the housing needs of lower-income households (Program 5a and 5b)
- Increase efforts to engage in meaningful public participation with vulnerable and hard to reach populations during long-range planning or policy projects related to housing and development (Program 32e)

Additionally, programs are included to increase mobility, promote equitable access to housing countywide, and create more housing opportunities in higher opportunity areas

- Include higher resource areas when rezoning housing sites (Program 4)
- Utilize affirmative marketing strategies in marketing plans for subsidized housing projects (Program 5d)
- Expand programs to increase housing choice and affordability in moderate and high opportunity areas (Program 12)
- Continue and expand use of housing land trust programs (Program 18)
- Expand allowances for ADUs (Program 25)

- Promotion of Housing Choice Voucher Program and system navigation assistance (Program 29)

To ensure fair housing conditions and areas of higher need continue to be addressed throughout the planning period and beyond, the following programs will be implemented:

- Increase intra-governmental coordination and create a Housing Equity and Action Plan (Program 31)
- Form a subregion for the 7th RHNA (Program 6)
- Participate in and provide funding for the Napa-Sonoma Housing Collaborative (Programs 20, 25d)
- Continue participation in bimonthly meetings of the interjurisdictional housing coordinating committee (Program 27)
- Partner with a qualified non-profit to develop and provide funding for a campaign to combat local opposition to affordable housing (Program 32d)

Summary of Fair Housing and Sites

Fair housing considerations for the sites inventory are summarized in Table 57. As shown in this table, housing sites identified to meet Sonoma County's RHNA are distributed throughout the community. While the Unincorporated County has significant environmental and infrastructure constraints that limit where housing development is feasible, housing sites were identified in higher resource areas and areas with higher access to opportunity where possible. The strategies discussed above will assist in affirmatively furthering fair housing and avoid exacerbating fair housing issues through the development of inventory sites.

Table 57: Distribution of RHNA Summary Table

Census Tract	Number of Households in Tract	Total Capacity	Lower - Income Units	Moderate -Income Units	Above Moderate -Income Units	Percent Non-white	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Overcrowded Households	Displacement Sensitivity	RCA	RECAP
9 - Sonoma Valley												
150305	1,558	9	0	0	9	41 -60%	Moderate Resource	40 - 60%	8.3 - 12%	Vulnerable	No	No
150607*	2,234	119	72	24	23	41 -60%	Moderate Resource	60 - 80%	Less than 8.2%	Vulnerable	No	No
152702	2,000	18	11	4	3	21 - 40%	Low Resource	40 - 60%	Less than 8.2%	Other	No	No
153200*	2,031	55	33	12	10	21 - 40%	Low Resource	40 - 60%	12 - 15%	Vulnerable	No	No
153600*	2,162	200	40	0	160	Less than 20%	Moderate Resource	20 - 40%	Less than 8.2%	Other	No	No
7 - Rohnert Park/Cotati												
150303	2,090	7	0	0	7	Less than 20%	Moderate Resource	20 - 40%	Less than 8.2%	Other	No	No
151402*	3,347	22	12	5	5	21 - 40%	Low Resource	60 - 80%	8.3 - 12%	Vulnerable	No	No
152701*	1,988	180	101	39	40	21 - 40%	Moderate Resource	60 - 80%	Less than 8.2%	Other	No	No
6 - Sebastopol												
151201*	2,725	44	30	4	10	Less than 20%	Low Resource	40 - 60%	Less than 8.2%	Other	No	No
151402*	3,347	44	31	4	9	21 - 40%	Low Resource	60 - 80%	8.3 - 12%	Vulnerable	No	No
5 - Santa Rosa												
150203*	2,128	36	13	15	8	Less than 20%	Moderate Resource	60 - 80%	Less than 8.2%	Other	No	No
150304	2,249	24	0	17	7	21 - 40%	Moderate Resource	40 - 60%	12 - 15%	Other	No	No
150500	1,852	57	0	37	20	Less than 20%	Moderate Resource	40 - 60%	Less than 8.2%	Other	Yes	No
150607*	2,234	49	30	10	9	41 -60%	Moderate Resource	60 - 80%	Less than 8.2%	Vulnerable	No	No
151402*	3,347	110	53	28	29	21 - 40%	Low Resource	60 - 80%	8.3 - 12%	Vulnerable	No	No
152701*	1,988	319	11	155	153	21 - 40%	Moderate Resource	60 - 80%	Less than 8.2%	Other	No	No
153200*	2,031	275	61	107	107	21 - 40%	Low Resource	40 - 60%	12 - 15%	Vulnerable	No	No
153600*	2,162	366	102	131	133	Less than 20%	Moderate Resource	20 - 40%	Less than 8.2%	Other	No	No

4 - Russian River												
150607*	2,234	90	63	9	18	41 -60%	Moderate Resource	60 - 80%	Less than 8.2%	Vulnerable	No	No
151201*	2,725	70	49	7	14	Less than 20%	Low Resource	40 - 60%	Less than 8.2%	Other	No	No
151402*	3,347	83	50	17	16	21 - 40%	Low Resource	60 - 80%	8.3 - 12%	Vulnerable	No	No
2 - Cloverdale/Northeast County												
150203*	2,128	11	0	0	11	Less than 20%	Moderate Resource	60 - 80%	Less than 8.2%	Other	No	No
150304	2,249	5	0	0	5	21 - 40%	Moderate Resource	40 - 60%	12 - 15%	Other	No	No
151201*	2,725	135	95	14	26	Less than 20%	Low Resource	40 - 60%	Less than 8.2%	Other	No	No

**These census tracts cover multiple areas and are duplicated in this table.*