



RACIAL EQUITY ANALYSIS

In November 2020, the [Board of Supervisors approved](#) the use of the Government Alliance on Race and Equity (GARE) [Racial Equity Analysis toolkit](#) for significant board items, which provided the questions listed here for your exploration. To eliminate racial inequities in our communities, the County of Sonoma continues to integrate explicit consideration of racial equity in decisions and in the development of our policies, programs, and budgets.

Board Item Date	10/7/2025
Board Item Name	Agricultural Employee Housing Code Update
Department/Agency	Permit Sonoma <i>If this is an inter-departmental initiative, please identify a lead above.</i>
Person(s) Completing Analysis (Lead)	Eric Gage

1. Overview: Describe your program or policy and the desired results and outcomes.

- What is the program, policy, or plan?
- What are the desired results (in the **community**) and outcomes (within your own **organization**)?
- What does this proposal have an ability to impact?

<input checked="" type="checkbox"/> Children and youth	<input checked="" type="checkbox"/> Health
<input type="checkbox"/> Community engagement	<input checked="" type="checkbox"/> Housing
<input type="checkbox"/> Contracting equity	<input type="checkbox"/> Human services
<input type="checkbox"/> Criminal justice	<input type="checkbox"/> Jobs
<input checked="" type="checkbox"/> Economic development	<input type="checkbox"/> Parks and recreation
<input type="checkbox"/> Education	<input checked="" type="checkbox"/> Planning / development
<input type="checkbox"/> Environment	<input type="checkbox"/> Transportation
<input checked="" type="checkbox"/> Food access and affordability	<input type="checkbox"/> Utilities
<input type="checkbox"/> Government practices	<input checked="" type="checkbox"/> Workforce equity
<input type="checkbox"/> Other _____	

The program is one of several implementation measures of the adopted Sonoma County Housing Element. The Housing Element implementation measures affirmatively further fair housing and facilitate development of affordable housing to meet the County's state-mandated Regional Housing Needs Allocation (RHNA) of 3,824 dwelling units for the 2023-2031 Housing Element period. Implementation of Housing Element Subprogram 15g will reduce the qualifying agricultural production thresholds for development of farmworker housing. The acreage of agricultural production and the number of animals necessary to qualify for an on-site farmworker dwelling will be reduced. Updates to the code for consistency with the California Employee Housing Act will expand allowances for state-permitted agricultural employee housing. The Act requires that agricultural employee housing be subject to the same permitting requirements as other agricultural land uses. Because

consistency with the Employee Housing Act is mandated by state law, those amendments are not the focus of the discussion below.

Implementation of the program will affirmatively further fair housing and facilitate development of affordable housing for agricultural employees that work and live in Sonoma County. The program will reduce local barriers to farmworker housing by reducing the production thresholds needed to qualify for on-site units. The proposed updates for consistency with the Employee Housing Act will increase opportunities for agricultural employee housing by allowing state-permitted agricultural employee housing wherever other agricultural land uses are allowed.

2. Data: What's the data? What does the data tell us? What is the "Why"?

- a. Will the proposal have impacts in specific geographic areas (neighborhoods, areas, or regions)? What are the racial demographics of those living in the area?
- b. What does population level data, including quantitative and qualitative data, tell you about existing racial inequities? What does it tell you about root causes or factors influencing racial inequities?
- c. What performance level data do you have available for your proposal? This should include data associated with existing programs or policies.
- d. Are there data gaps? What additional data would be helpful in analyzing the proposal? If so, how can you obtain better data?

Relevant data sources include U.S. Census data, and local and state studies on agricultural employee health and housing. The local studies reviewed were of geographically nearby communities, West Marin (Growing Together: Advanced Housing Solutions for Workers in West Marin and Napa County 2024), and Napa County Farmworker Housing Needs & Impacts Assessment (2024). The UC Merced statewide study (Farmworker Health in California 2022) aggregated data from several regions including Sonoma County. There are approximately 15,000 agricultural employees in Sonoma County and they are overwhelmingly Latino. Most are monolingual in Spanish, with a minority bilingual in both English and Spanish. Roughly 47 percent of agricultural employees in Sonoma County are permanent residents and that percentage is increasing. The median income reported for individual agricultural employees in the statewide study was \$25,000 a year –within Sonoma County's area median income category for extremely low-income individuals. The overwhelming majority of agricultural employees are renters with higher rates of substandard living conditions including health and safety hazards. They may face linguistic and racial prejudice and are challenged to access social services, credit and lending institutions. County data on farmworkers is limited. To improve County data on farmworker housing, the County could fund and develop a farmworker housing needs assessment similar to Napa County.

Regarding performance data, Subprogram 15g of the adopted Housing Element directed staff to evaluate the agricultural production thresholds qualifying for onsite farmworker dwelling units. The permit data on the farmworker dwelling units going back to the year 2000 showed that the average annual permit approval rates for this housing category are approximately six units per year. In the last decade the annual permitting rate has dropped to four units per year.

3. Community Engagement: How have communities been engaged?

- a. What does the community need to know about this item?
- b. Who are the most affected community members who are involved with or have lived experience related to this proposal? How have you involved these community members in the development of this proposal?
- c. What has your engagement process told you about the burdens or benefits for different groups? (concerns, facts, potential impacts)
- d. What has your engagement process told you about the factors that produce or perpetuate racial inequity related to this item?
- e. What are ways to minimize any negative impacts (harm to communities of color, increased racial disparities, etc.) that may result? What opportunities exist for increasing racial equity?

Farmworkers and farmers are the community members most affected by the proposed code amendments. They were engaged at various stages during and after the development of the Housing Element program. To inform policy development for the Housing Element, a community advisory committee was established in 2023, which included a representative from Community Alliance with Family Farms. In 2023, staff also held two farmworker housing focus groups, and one with Spanish interpretation services. The feedback received highlighted the high cost of applying for housing, lack of access to credit, racial and linguistic discrimination, substandard and overcrowded housing conditions, and fear of landlord retaliation. Access to permanent affordable housing would provide stability and a higher standard of living to agricultural employees and their families.

Following the adoption of the Housing Element, additional outreach was conducted to support the development of the new qualifying production thresholds. In coordination with the County Agricultural Commissioner's Office, staff met with members of the local Farm Bureau, Sonoma County Vintners, and Community Alliance with Family Farmers. Surveys and focus groups were conducted to determine what thresholds would support small farming operations. The well-being of agricultural employees and small farmers are closely connected. Reducing the cost of and increasing the supply of housing for agricultural workers also benefits small farms and the agricultural sector as a whole. The proposed threshold update benefits farmers and provides affordable onsite housing for agricultural employees. Small farmers are challenged by rising cost of land and housing for employees, which they pay indirectly. Feedback from farmers through surveys and focus groups identified the need for an annual gross sales threshold for small farms that cannot meet the qualifying thresholds due to their size. Farmers indicated that cost of employee housing was also a major factor in attracting and retaining skilled workers. The threshold update may also stabilize and expand small farms which the agricultural sector and many agricultural workers rely on.

4. Analysis and Strategies: What are your strategies for advancing racial equity?

- a. Given what you have learned from research and stakeholder involvement, how will your recommended actions increase or decrease racial equity? Who would benefit from or be burdened by your item?

- b. What are potential unintended consequences? What are the ways in which your proposal could be modified to enhance positive impacts or reduce negative impacts?
- c. Are there complementary strategies that you can implement? What are ways in which existing partnerships could be strengthened to maximize impact in the community? How will you partner with stakeholders for long-term positive change?
- d. Are the impacts aligned with your community outcomes defined in Step #1? If not, what will you change in order to create alignment?

The Housing Element subprogram is explicitly intended to reduce barriers to affordable housing for agricultural employees. The primary beneficiaries of the threshold update are agricultural employees and the farmers that indirectly pay employee housing costs. Potential unintended consequences include property owners who are not professional farmers exploiting these provisions to develop additional units on agricultural parcels. Abuse of these provisions is not anticipated based on the limited and declining number of housing units approved under existing thresholds. There are other paths available to develop housing exempt from density requirements, such as Accessory Dwelling Units, which do not require a substantial investment in agriculture to establish. Staff must balance the benefit of increasing the development of affordable housing for farmworkers against the unknown potential for abuse by bad faith actors. Staff has proposed annual self-reporting by property owners to verify ongoing compliance with the qualifying production thresholds. Staff will monitor development over a period of years and determine whether a pattern emerges of agricultural operations ending and agricultural employee housing becoming non-conforming dwelling units.

Complementary strategies that could be implemented, would be annual surveys as part of monitoring, to determine how onsite housing has improved the farming operation and job satisfaction for employees. It would be a challenge for the County to survey agricultural employees while maintaining privacy. There is a role for local housing advocates to assess the accruing benefits of onsite agricultural employee housing, to be determined through the development of monitoring mechanisms.

5. Implementation: What is your plan for implementation?

Following adoption of the code update, the County will issue zoning permits for farmworker units regulated by the County, and construction permits for both County- and State-permitted agricultural employee housing. County permit holders will enter into a covenant for Permit holders for County will submit documentation annually confirming ongoing compliance with the production thresholds. If a County-permitted farmworker unit no longer meets the production thresholds, the County would collect deferred impact fees consistent with the covenant. The unit would be redesignated as a non-conforming residence or other allowable use such as an Accessory Dwelling Unit. Permit data on agricultural employee units will be compiled annually and reported to state agencies and the Board of Supervisors. Based on annual data, additional adjustments to the program may be proposed.

Realistic?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequately funded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequately resourced with personnel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequately resources with mechanisms to ensure successful implementation and enforcement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequately resourced to ensure on-going data collection, public reporting, and community engagement?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>If the answer to any of these questions is no or unsure, what resources or actions are needed?</i> Ongoing monitoring procedures and forms are undetermined at this time. Depending on the number of housing permits resulting from the proposed amendments, more staff time for ongoing monitoring and enforcement and engagement may be required.</p>			

6. Accountability and Communication: How will you ensure accountability, communicate, and evaluate results?

- a. How will impacts be documented and evaluated? Are you achieving the anticipated outcomes? Are you having impact in the community?
- b. What are your messages and communication strategies that will help advance racial equity?
- c. How will you continue to partner and deepen relationships with communities to make sure your work to advance racial equity is working and sustainable for the long-haul?

Staff has proposed annual reporting for permit holders, ensuring ongoing compliance with the production thresholds. This monitoring is primarily to prevent abuse of the code provisions by property owners who are not professional farmers. Permit Sonoma does not propose to monitor or survey the occupants of agricultural employee housing. It is challenging for the County to survey agricultural employees while maintaining their privacy. There is a role for local housing advocates to assess the accruing benefits of onsite agricultural employee housing. Possible approaches to ongoing coordination with community partners could include annual surveys of farmworkers by farming and farmworker advocates such as Community Alliance with Family Farmers.

OFFICE OF EQUITY (OOE) SUMMARY



The Office of Equity completes this Summary page in collaboration with the department lead. It highlights effective practices that are helping to identify and narrow disparities and outlines key recommendations to further advance equitable community outcomes. This summary is intended to support tracking, implementation, and monitoring of racial equity priorities and community impact more effectively across the county.

Highlights & Key Actions
<p>A major highlight of this item (Housing Element Subprogram 15g) is that it explicitly seeks to reduce barriers to affordable housing for agricultural employees, who we know are predominately Latino, monolingual Spanish speaking and historically very low-income workforce. Permit Sonoma recognize the importance of prioritizing this analysis.</p> <p>In preparation for this item, the Permit Sonoma team engaged with farmworker communities, and farmworker advocates, to best understand the existing barriers and potential solutions. This item will meet a community need, by supporting farmworkers and their families, who often face high rates of overcrowded and substandard housing, along with discrimination, language barriers, and limited access to services. It will also meet a need for farmers, as small farms have struggled to meet existing thresholds to cover housing costs, and this update will help stabilize small farms while improving farmworker living conditions. The equitable impacts intend to improve access to safe, stable, and affordable housing for this essential workforce.</p>
OOE Recommendations
<ol style="list-style-type: none"> 1. Adopt the threshold reduction: The OOE agrees with the Permit Sonoma staff proposal to adopt a reduced production thresholds to expand eligibility for on-site farmworker housing for smaller scale farms. 2. Community Engagement & Collaboration: Consider continued partnerships with the farmworker advocates to assess impacts and amplify farmworker voices, while protecting farmworker privacy. Explore County funding for a farmworker housing needs assessment, modeled after Napa County, using the feedback from those farmworkers to fill local data gaps. 3. Program Monitoring: The OOE also agrees with Permit Sonoma staff that this requires annual self-reporting for permit holders, to ensure compliance with production thresholds and prevent unintended misuse.

Department Head has reviewed the analysis and the OOE Summary: ☐ Yes ☐ No

CAO Analyst has reviewed the analysis and the OOE Summary: ☐ Yes ☐ No

Core Team 2 Lead has reviewed the analysis and the OOE Summary: ☐ Yes ☐ No

Progress Updates: To be completed by the OOE 6-12 months after Board item.

Progress Updates