



## SONOMA GROUP

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Administrative Committee  
Association of Bay Area Governments  
375 Beale Street  
San Francisco, California 94105  
Re: Sonoma County RHNA Appeal

By E-mail and Electronic Submittal  
[rhna@bayareametro.gov](mailto:rhna@bayareametro.gov)

RE: Support for Sonoma County's REGIONAL HOUSING NEEDS DETERMINATION APPEAL

Dear Administrative Committee members:

We are writing this letter of support for Sonoma County's REGIONAL HOUSING NEEDS DETERMINATION APPEAL to reduce the allocation of housing units for the sixth RHNA cycle.

Why would Sierra Club request a reduction in a RHNA allocation when in 2018 we issued an aggressively pro-housing policy report?<sup>1</sup> Because we believe that these housing units should be reallocated inside the cities and their respective Urban Growth Boundaries. The cities in Sonoma County have the infrastructure, the tax base, and the governance institutions to support all the additional new housing units ABAG seeks in our region. The unincorporated County does not.

We urge you to take a deeper look into our County, and correct this evidently inadvertent error by upholding Sonoma County's Appeal.

Sierra Club believes that if we begin to rebuild our existing neighborhoods and regional infrastructure around properly tailored Smart Growth design, instead of continuing to build new sprawling development, we can save vast amounts of land. We can also dramatically cut our climate emissions while creating more convenient and equitable neighborhoods and regions. In addition to better environmental and social outcomes this strategy can also better serve the economic needs of our society.

The Sierra Club recently released a guidance document<sup>2</sup> on our Urban Infill Policy which takes some bold stands: Every neighborhood should be walkable. Every neighborhood should be inclusive. Housing is a human right. Economic development should create more middle wage jobs. These are the types of promises around which a powerful multi-sector climate justice movement can be organized. The Sierra Club infill policy is designed to support this goal.

Sierra Club has consistently endorsed, and voters throughout Sonoma County have overwhelmingly approved Urban Growth Boundaries (UGBs) around all of our cities. These UGBs are enhanced by community separators, and together these zoning tools work to concentrate new housing and commercial development inside the UGBs and existing utility service areas.

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<sup>1</sup> Sierra Club California Housing Policy: Meeting Our Housing Needs and Protecting the Environment (Aug. 2018)  
<https://www.sierraclub.org/california/housing-land-use>

<sup>2</sup> Guidance For Smart Growth And The Urban Infill Policy (Aug. 2021)  
<https://www.sierraclub.org/smart-growth-urban-infill-guidance>

All ten of our County's local jurisdictions have adopted General Plans focused on city-centered growth, including transit oriented development around our network of SMART rail stations.

Requiring the unincorporated County of Sonoma to implement the draft RHNA allocation of 3,881 new units (a 654% increase over the 5th cycle RHNA of 515 units) would undermine decades of climate-smart planning. During the 5th cycle, Sonoma County met its existing state mandated housing need. Most of our cities are able to provide more housing inside their Urban Growth Boundaries.

We urge ABAG to take into consideration the key constraints that exist in unincorporated Sonoma County, most notably inadequate utilities and transportation infrastructure, insufficient water and sewer capacities, severe wildfire hazards, and increasingly limited access to insurance.

In addition to increasing greenhouse gases resulting from increased Vehicle Miles Traveled (VMT), the proposed draft allocation will negatively impact groundwater, endangered species, open space and parks access and protection, agricultural preservation, city-centered growth, environmental justice, and fire-safe roads.

A reallocation of these excess housing units to the incorporated cities would directly address these issues and enable a less destructive growth pattern throughout the entire region.

We look forward to your committee's reconsideration of the draft allocation and a decision to uphold the County's appeal. Thank you for your time, consideration, and action to address these important concerns we have raised.

Respectfully Yours,

*Sierra Club, Sonoma Group Executive Committee*

*Richard Sachen (Chair), Tom Conlon, Suzanne Doyle, Shirley Johnson, Dan Mayhew and Theresa Ryan*

Cc:

Supervisor Chris Coursey

Supervisor James Gore

Supervisor Susan Gorin

Supervisor Linda Hopkins

Supervisor David Rabbitt

Planning Director Tennis Wick

Jim Sweeney, The Press Democrat