



CITY OF SONOMA

6TH CYCLE PUBLIC REVIEW DRAFT HOUSING ELEMENT

Housing Plan Background Report

August 2022

Prepared For:

City of Sonoma
Planning Department
No. 1 The Plaza
Sonoma CA 95476
P: 707-933-2204
Contact: Wendy Atkins, Associate Planner
wendya@sonomacity.org
<https://www.sonomacity.org/housing-element-update/>

Prepared By:

De Novo Planning Group
1020 Suncast Lane, #106
El Dorado Hills, CA 95762
<https://denovoplanning.com/>



City of Sonoma

6th Cycle Public Review Draft Housing Element

BACKGROUND REPORT

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BACKGROUND REPORT

1. INTRODUCTION

The City of Sonoma Housing Element consists of two documents: the 6th Cycle Housing Element Background Report and the 6th Cycle Housing Element Housing Plan (policy document). The Background Report provides information regarding the City's population, household, and housing characteristics, quantifies housing needs, addresses special needs populations, describes potential constraints to housing, addresses fair housing issues, and identifies resources available, including land and financial resources, for the production, rehabilitation, and preservation of housing. The Housing Element Background Report provides documentation and analysis in support of the goals, policies programs, and quantified objectives in this Housing Element policy document.

The Background Report of this housing element identifies the nature and extent of Sonoma's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, impediments to fair housing, and energy conservation opportunities. By examining the City's housings, resources, and constraints, the City can then determine a plan of action to address housing needs and constraints. This plan is presented in the 6th Cycle Housing Element Housing Plan, which is the policy component of the Housing Element. In addition to identifying housing needs, the 6th Cycle Housing Element Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

A. CONTENTS

This 6th Cycle Housing Element Background Report is divided into the following seven chapters:

1. Introduction

The Introduction describes the components of the 6th Cycle Housing Element and the contents of the 6th Cycle Housing Element Background Report.

2. Housing Needs Assessment

This Chapter includes an analysis of population and employment trends, quantified housing needs for all income levels, including the City's share of the Regional Housing Needs Allocation (RHNA), household characteristics, housing characteristics, housing stock condition, special housing needs, such as those of the elderly, disabled, including developmentally disabled, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter, and the risk of assisted housing developments converting from lower income to market-rate units.

3. Constraints

This Chapter includes an analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and locally adopted ordinances that directly impact the cost and supply of residential development. This Chapter also provides an analysis of potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, proposed and approved densities versus minimum densities, and building permit timing. A discussion of resources available for housing development, including funding sources for affordable housing, rehabilitation, and refinancing is provided.

4. Inventory of Residential Sites

This Chapter provides an inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship between zoning, public facilities, and city services to these sites.

5. Affirmatively Furthering Fair Housing

This Chapter includes an assessment of fair housing, including a summary of fair housing issues, an assessment of the City's fair housing enforcement and fair housing outreach capacity, an analysis of available data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk, an assessment of the contributing factors for identified fair housing issues, identification and analysis of the City's fair housing priorities and goals, and identification of strategies and opportunities to implement fair housing priorities and goals.

6. Evaluation of the 2015-2023 Housing Element

This Chapter evaluates the implementation of the 2015-2023 Housing Element, including its effectiveness in achieving the community's housing goals and objectives and its effectiveness in addressing the City's housing needs.

7. Other Requirements

This Chapter addresses opportunities for energy conservation and the 6th Cycle Housing Element's consistency with the Sonoma General Plan.

2. HOUSING NEEDS ASSESSMENT

A. INTRODUCTION

This chapter of the Housing Element Background Report discusses the characteristics of the City's population and housing stock as a means of better understanding the nature and extent of unmet housing needs. The Housing Needs Assessment is comprised of the following components: A) Demographic Profile; B) Household Profile; C) Housing Stock Characteristics; and D) Regional Housing Needs.

B. DATA AND METHODOLOGY

To understand the context of local housing in the City of Sonoma, a review and analysis of the community's population characteristics and housing stock was performed. The primary data source for the 2023-2031 Housing Element Update are the California Department of Housing and Community Development Department (HCD)-Approved Housing Element 6th Cycle Data Package prepared by Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) staff. The ABAG 6th Cycle Housing Element Update data package has been reviewed and approved by the State of California Department of Community Development and was developed specifically to provide data adequate for use in 6th Cycle Housing Elements to all ABAG jurisdictions. Additional data sources include the U.S. Census Bureau (2010 Census and 2015-2019 American Community Survey (ACS)), California Department of Finance (DOF), California Employment Development Department (CEDD), HCD income limits, and other sources as noted in the document. Due to the use of multiple data sources (with some varying dates), there are slight variations in some of the information, such as total population and total household numbers, presented in this document.

C. DEMOGRAPHIC PROFILE

Demographic changes such as population growth or changes in age can affect the type and amount of housing that is needed in a community. This section addresses population, age, race, and ethnicity of Sonoma residents.

1. POPULATION GROWTH AND TRENDS

Table 1 shows population growth for the City of Sonoma and Sonoma County from 2000 to 2020. According to data prepared by the California DOF, the population of Sonoma in 2020 was 11,050 persons, an increase of approximately 3.8% or 402 people since 2010. During the previous decade (2000 to 2010), Sonoma experienced significantly greater growth, increasing by 14.8% or 1,373 people resulting in an annual growth rate of 1.5%. Between 2015 and 2020, Sonoma grew approximately 1.1% from 10,929 to 11,050 people, resulting in an annual growth rate of 0.2% (see Table 1). Looking at the growth rates for Sonoma County as a whole, it appears that Sonoma's recent growth (2010 to 2020) was double that of the growth experienced Countywide (1.9%). Additionally, during the 2000 to 2010 period, Sonoma County experienced significantly less growth than Sonoma, increasing only 5.5% while the City increased by 14.8% (see Table 1).

Table 1. Population Statistics and Projections – City of Sonoma and Sonoma County (2000–2020)				
	2000	2010	2015	2020
Population, City of Sonoma	9,275	10,648	10,929	11,050
Percent Change	--	14.8%	2.6%	1.1%
Annual Percent Change	--	1.5%	0.5%	0.2%
Population, Sonoma County	458,614	483,878	500,640	492,980
Percent Change	--	5.5%	3.5%	1.5%
Annual Percent Change	--	0.6%	0.7%	0.3%
Sources: ABAG 2021 6 th Cycle Housing Element Data Package - U.S. Census Bureau, 2000 Census; 2010 Census, State of California, Department of Finance, E-5 Population Estimates for Cities, Counties, and the State, 2010-2020, California, April 2021				

Table 2 compares the growth rate of Sonoma to other cities in Sonoma County from 2010 to 2020. City of Petaluma had the greatest percentage change in population (9.1%). Sonoma experienced less percentage change in population (3.8%).

Table 2. Population Trends – Sonoma County Jurisdictions (2010–2020)				
Jurisdiction	2010	2020	Change	% Change
City of Santa Rosa	162,647	173,628	+10981	+6.8%
City of Petaluma	56,689	61,873	+5184	+9.1%
City of Cloverdale	8,618	9,213	+595	+6.9%
City of Cotati	7,265	7,533	+268	+3.7%
City of Healdsburg	11,254	12,089	+835	+7.4%
City of Sebastopol	7,379	7,745	+366	+5.0%
City of Rohnert Park	40,521	43,069	+2548	+6.3%
City of Windsor	26,801	28,248	+1447	+5.4%
Unincorporated Sonoma County	145,363	138,532	-6831	-4.7%
City of Sonoma	10,648	11,050	+402	+3.8%
Sources: ABAG 2020 6 th Cycle Housing Element Data Package - State of California, Department of Finance, E-5 Population Estimates for Cities, Counties, and the State, 2010-2020, California, April 2021				

2. AGE CHARACTERISTICS

Table 3 compares changes in age distributions between the years 2010 and 2019 for Sonoma. The U.S. Census Bureau data shows Sonoma has a diverse population, with mostly increases in the percentage share of the total population for age categories 45 to 64 years of age, and 65 year of age or older. The data also shows a decrease for age categories under 5 years of age, 5 to 24 Years, and 25 to 44 years of age. For Sonoma, the number of persons under 5 years of age decreased by 92 or about 20.4% since 2010 and persons between 25 to 44 years of age also decreased by 351 or 9.2%. Additionally, persons 65 years or older increased by 1,159 or 52.4% since 2010. The median age of Sonoma residents increased from 48.4 in 2010 to 52.3 in 2019, which is significantly higher than the State's median age of 36.5 and significantly higher than Sonoma County's median age of 42.1. This trend points to projecting a larger aging population in Sonoma and the need to plan for services, such as health and medical services for this older community.

Table 3. Age Distribution – City of Sonoma (2010, 2019)				
Age Group	2010		2019	
	Number	Percent	Number	Percent
Under 5 Years	467	4.4%	358	3.2%
5 to 24 Years	2,012	18.9%	1,997	18.0%
25 to 44 Years	2,252	21.1%	1,946	17.6%
45 to 64 Years	3,250	30.5%	3,402	30.7%

Table 3. Age Distribution – City of Sonoma (2010, 2019)

Age Group	2010		2019	
	Number	Percent	Number	Percent
65 + Years	2,667	25.0%	3,372	30.4%
Median Age	48.4		52.3	

Source: ABAG 2021 6th Cycle Housing Element Data Package - U.S. Census Bureau, 2010 Census; U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019

3. RACE AND ETHNICITY

Table 4 shows that the City's residents are predominantly white (73.4%) or Hispanic (20.8%). Between 2010 and 2019, the population of other race or multiple races increased by about 146 people or 79.8%, and the number of Hispanic residents increased by about 673 people or 41.2%. During this time period, the City's residents reporting two or more races increased from 1.7% to 3.0% of the City's population, while Black or African American population declined from 0.5% to 0.1%, the American Indian or Alaskan Native population slightly declined from 0.3% to 0.1%, and the Asian and Pacific Islander population decreased from 3.0% to 2.6%. However, it is noted that the ACS data reflects an estimate based on a sample size and the small number of persons (less than 10 per category) may be too small to be accurately reflected in the 2019 ACS estimates.

Table 4. Population Distribution by Race & Origin –City of Sonoma (2010, 2019)

Race	2010		2019	
	Number	%	Number	%
American Indian or Alaska Native, Non-Hispanic	35	0.3%	8	0.1%
Asian / API, Non-Hispanic	318	3.0%	291	2.6%
Black or African American, Non-Hispanic	48	0.5%	15	0.1%
White, Non-Hispanic	8,430	79.2%	8,125	73.4%
Other Race or Multiple Races, Non-Hispanic	183	1.7%	329	3.0%
Hispanic or Latinx	1,634	15.3%	2,307	20.8%
Total	10,648	100.0%	11,075	100.0%

Source: ABAG 2020 6th Cycle Housing Element Data Package - U.S. Census Bureau, 2010 Census; U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019

4. EMPLOYMENT

One of the factors that can contribute to an increase in demand for housing is expansion of the employment base. According to the ACS, the estimated civilian labor force in Sonoma totaled 5,274 people in 2019, increasing by 293 workers since 2010. The civilian labor force includes those civilians 16 years or older living in Sonoma who are either working or looking for work. Table 5 summarizes the employment by industry for Sonoma residents in 2010 and 2019. The largest industry in Sonoma in 2019 was Educational, Health, and Social Services at 21.3%. This is followed by Arts, Entertainment, Recreation, Accommodation, and Food Services at 11.5% and Manufacturing at 10.6%.

Table 5. Sonoma Employment by Industry (2010, 2019)

Industry	City of Sonoma				Sonoma County			
	2010		2019		2010		2019	
	Number	%	Number	%	Number	%	Number	%
Agriculture, Forestry, Fishing and Hunting, and Mining	55	1.1%	105	2.0%	6,511	2.8%	7,333	2.9%
Construction	390	7.8%	262	5.0%	20,348	8.7%	20,905	8.2%
Manufacturing	430	8.6%	559	10.6%	23,192	9.9%	24,321	9.5%
Wholesale Trade	203	4.1%	228	4.3%	7,330	3.1%	7,257	2.8%
Retail Trade	577	11.6%	488	9.3%	30,662	13.1%	29,750	11.6%

Table 5. Sonoma Employment by Industry (2010, 2019)								
Transportation and Warehousing, and Utilities	107	2.1%	145	2.7%	7,587	3.3%	9,547	3.7%
Information	101	2.0%	62	1.2%	5,445	2.3%	5,118	2.0%
Finance and Insurance, and Real Estate and Rental and Leasing	379	7.6%	501	9.5%	16,565	7.1%	14,502	5.7%
Professional, Scientific, and Management, and Administrative and Waste Management Services	512	10.3%	497	9.4%	25,760	11.0%	30,249	11.8%
Educational Services, and Health Care and Social Assistance	1,125	22.6%	1121	21.3%	46,154	19.8%	53,713	21.0%
Arts, Entertainment, and Recreation, and Accommodation and Food Services	634	12.7%	608	11.5%	21,572	9.3%	27,791	10.9%
Other Services, except Public Administration	227	4.6%	382	7.2%	12,980	5.6%	14,959	5.8%
Public Administration	241	4.8%	316	6.0%	9,076	3.9%	10,629	4.2%
Total Civilian Employed Population 16 Years and Over	4,981	100.0%	5,274	100.0%	233,182	100.0%	256,074	100.0%
Source: ACS 5-Year Estimates, 2006 – 2010, 2015-2019 (Table S2405)								

Sonoma is located within County of Sonoma. EDD projections indicate that the total employment within the County of Sonoma is expected to increase by 7.1% between 2018 and 2028. The highest forecast for job growth is in the Private Educational Services (19.3% increase), Health Care, and Social Assistance (19.0% increase), and Professional, Scientific, and Technical Services (16.3% increase) categories. EDD also predicts that the State Government Excluding Education and Computer, State Government, and Durable Goods Manufacturing categories will decrease by 26.3%, 9.1%, and 6.7% respectively, within this time period. (*State of California EDD, 2018–2028 Industry Employment Projections*). Table 6 shows examples of typical jobs and associated mean hourly wages and estimated annual wages in the County of Sonoma.

Table 6. Examples of Occupations and Wages – Sonoma County (2020)		
Standard for 1 Adult in Sonoma County	Hourly Wages	Estimated Annual Wages
Living Wage	\$18.90	\$37,800
Poverty Wage	\$6.13	\$12,260
Minimum Wage	\$12.00	\$24,000
Occupation Title	Mean Hourly Wage	Mean Annual Wage
Management	\$62.12	\$129,199
Business and Financial Operations	\$39.19	\$81,514
Computer and Mathematical	\$45.90	\$95,489
Architecture and Engineering	\$49.68	\$103,335
Life, Physical, and Social Science	\$44.45	\$92,459
Community and Social Service	\$29.63	\$61,615
Legal	\$60.02	\$124,843
Educational Instruction and Library	\$35.38	\$73,604
Arts, Design, Entertainment, Sports, and Media	\$35.84	\$74,563
Healthcare Practitioners and Technical	\$53.85	\$112,007
Healthcare Support	\$19.72	\$41,011
Protective Service	\$32.95	\$68,534
<i>Food Preparation and Serving Related</i>	<i>\$17.14</i>	<i>\$35,666</i>
Building and Grounds Cleaning and Maintenance	\$19.67	\$40,918
Personal Care and Service	\$19.32	\$40,182
Sales and Related	\$24.95	\$51,906

Table 6. Examples of Occupations and Wages – Sonoma County (2020)

Office and Administrative Support	\$23.93	\$49,787
<i>Farming, Fishing, and Forestry</i>	<i>\$18.10</i>	<i>\$37,637</i>
Construction and Extraction	\$33.35	\$69,374
Installation, Maintenance, and Repair	\$29.52	\$61,402
Production	\$22.13	\$46,017
Transportation and Material Moving	\$20.62	\$42,880
Wages below the living wage for one adult supporting one child are in italics. Annual wages assumed wages paid for 2,000 hours per year (50 weeks times 40 hours per week). Source: MIT Living Wage Calculator for Sonoma County, California 2019; State of California EDD, Occupational Employment and Wage 2021 – 1 st Quarter Data, June 2021.		

D. HOUSEHOLD PROFILE

Household size and type, income levels, and the presence of special needs populations all affect the type of housing needed by residents. This section details the various household characteristics affecting housing needs in Sonoma.

1. HOUSEHOLD CHARACTERISTICS

According to the Census, a household is defined as all persons living in a housing unit. This definition includes families (related individuals living together), unrelated individuals living together, and individuals living alone.

A housing unit is defined by the Census as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other persons in the building and have direct access from the outside of the building or through a common hall. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

The household characteristics in a community, including household size, income, and the presence of special needs households, are important factors in determining the size and type of housing needed in the City.

Table 7 below identifies households by tenure and ages of householder in Sonoma and Sonoma County in 2019 based on ACS data from 2015–2019. In Sonoma, 61% of households own their home and 39% rent. The City's renter rate and homeowner rate are similar to Sonoma County's. In Sonoma, homeowner households are generally headed by older residents, with 45.3% of households headed by a resident 55 years of age or older. Households who rent their homes are generally younger; only about 18.7% of renter households are headed by a person over the age of 55. Similarly, in Sonoma County, 39.6% of homeowner households are headed by a resident 55 years of age or older and only about 13.4% of renter households are headed by a person over the age of 55.

Table 7. Households by Tenure and Age (2019)

	City of Sonoma		Sonoma County	
	Number	%	Number	%
Total:	5,125	100.0%	189,374	100.0%
Owner Occupied:	3,124	61.0%	116,393	61.5%
Householder 15 to 24 years	6	0.1%	284	0.1%
Householder 25 to 34 years	64	1.2%	6,872	3.6%
Householder 35 to 44 years	247	4.8%	13,268	7.0%
Householder 45 to 54 years	487	9.5%	21,027	11.1%

Table 7. Households by Tenure and Age (2019)

	City of Sonoma		Sonoma County	
	Number	%	Number	%
Householder 55 to 64 years	673	13.1%	29,312	15.5%
Householder 65 to 74 years	975	19.0%	27,473	14.5%
Householder 75 to 84 years	532	10.4%	13,039	6.9%
Householder 85 years and older	140	2.7%	5,118	2.7%
Renter Occupied:	2,001	39.0%	72,981	38.5%
Householder 15 to 24 years	99	1.9%	3,551	1.9%
Householder 25 to 34 years	286	5.6%	15,434	8.2%
Householder 35 to 44 years	245	4.8%	15,875	8.4%
Householder 45 to 54 years	415	8.1%	12,782	6.7%
Householder 55 to 64 years	211	4.1%	10,828	5.7%
Householder 65 to 74 years	283	5.5%	8,335	4.4%
Householder 75 to 84 years	209	4.1%	3,859	2.0%
Householder 85 years and older	253	4.9%	2,317	1.2%
Source: 2020 ABAG 6 th Cycle Housing Element Data Package – U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25007)				

Table 8 identifies the household sizes by housing tenure. In 2019, the majority of households consisted of 2 to 4 persons. Large households of 5 or more persons only made up 3.8% of the total households in Sonoma and 9.3% of total households in Sonoma County. Additionally, the average household size in City of Sonoma in 2019 for an owner-occupied unit was 2.16 persons per household and 2.05 persons per household for a renter-occupied unit. While the average household size of owner-occupied units declined from 2.24 in 2010 to 2.16 in 2019, the average household size in rental-occupied units increased from 1.86 in 2010 to 2.05 in 2019. (Source: U.S. Census Bureau, 2015-2019 and 2006-2010 American Community Survey reports).

Table 8. Household Size by Tenure (2019)

	City of Sonoma		Sonoma County	
	Number	%	Number	%
Owner	3,124	100.0%	116,393	100.0%
Householder living alone	1,019	32.6%	27,819	23.9%
Households 2–4 persons	2,009	64.3%	79,654	68.4%
Large households 5+ persons	96	3.1%	8,920	7.7%
Average Household Size	2.16 persons		2.57 persons	
Rental	2,001	100.0%	72,981	100.0%
Householder living alone	962	48.1%	24,191	33.1%
Households 2–4 persons	939	46.9%	40,156	55.0%
Large households 5+ persons	100	5.0%	8,634	11.8%
Average Household Size	2.05 persons		2.63 persons	
Total:	5,125	100.0%	189,374	100.0%
Total Householder living alone	1,981	38.7%	52,010	27.5%
Households 2–4 persons	2,948	57.5%	119,810	63.3%
Large households 5+ persons	196	3.8%	17,554	9.3%
Average Household Size	2.12 persons		2.59 persons	
Source: 2020 ABAG 6 th Cycle Housing Element Data Package – U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25009); U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (DP04 & S1101)				

2. HOUSEHOLD INCOME

Household income is one of the most important factors affecting housing opportunity and determining a household's ability to balance housing costs with other basic necessities of life.

INCOME CHARACTERISTICS

According to HCD, the estimated median household income (AMI) for a four-person family in the State of California in 2021 was \$90,100. The estimated median household income for Sonoma County was \$103,300 in 2021. In nearby counties, Lake County had a median income of \$70,700. Napa County had a median income of \$109,200. Mendocino County had a median income of \$70,700, and Marin County had a median income of \$149,600.

INCOME BY HOUSEHOLD TYPE AND TENURE

Table 9 shows the income level of Sonoma residents by household tenure. A higher percentage of renter households (46.9%) were lower income (<80% median) compared to lower-income residents who owned their homes (23.9%). The high incidence of lower income renter households is of particular significance as market rents in Sonoma exceed the level of affordability for lower-income households. As shown in Table 10, all lower income households, including both renter and homeowner households, are more likely to pay more than 30% of their income for housing. This issue is further evaluated in the Housing Affordability section.

Table 9. Income by Owner/Renter Tenure – City of Sonoma (2017)

Income Level	Renters		Owners		Total	
	Number	%	Number	%	Number	%
Extremely Low Income (<30% AMI)	375	19.3%	240	8.1%	615	12.5%
Very Low Income (31–50% AMI)	175	9.0%	225	7.6%	400	8.1%
Low Income (51–80% AMI)	360	18.6%	245	8.2%	605	12.3%
Moderate Income & Above (>80% AMI)	1,030	53.1%	2,260	76.1%	3,290	67.0%
Total	1,940	100.0%	2,970	100.0%	4,910	100.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data 2013-2017, City of Sonoma

As indicated by Table 10, there is a significant variation in cost burden (overpaying for housing) by income level. Approximately 2,005 (40.8%) of households in Sonoma overpay for housing, which is slightly higher than percent of households (38.4%) in Sonoma County overpaying for housing. The majority of households in Sonoma overpaying for housing are in the extremely low (545 households overpaying), very low (355 households overpaying), and low (415 households overpaying) categories. In Sonoma, more renter households overpay for housing (790 owner households overpaying) than owner households (525 renter households overpaying). Similarly, in Sonoma County, more renter households overpay for housing than owner households.

Table 10. Housing Characteristics (Tenure, Overpayment) by Income Level (2017)

Total Households Characteristics	City of Sonoma		Sonoma County	
	Number	% of Total	Number	% of Total
Total Households	4,910	100.0%	190,060	100.0%
Total Renter households	1,940	39.5%	75,450	39.7%
Total Owner households	2,970	60.5%	114,610	60.3%
Total lower income (0-80% AMI) households	1,620	33.0%	69,230	36.4%
Lower income renters (0-80%)	910	18.5%	39,955	21.0%
Lower income owners (0-80%)	710	14.5%	29,275	15.4%
Extremely low income renters (0-30% AMI)	375	7.6%	13,380	7.0%
Extremely low income owners (0-30% AMI)	240	4.9%	6,920	3.6%

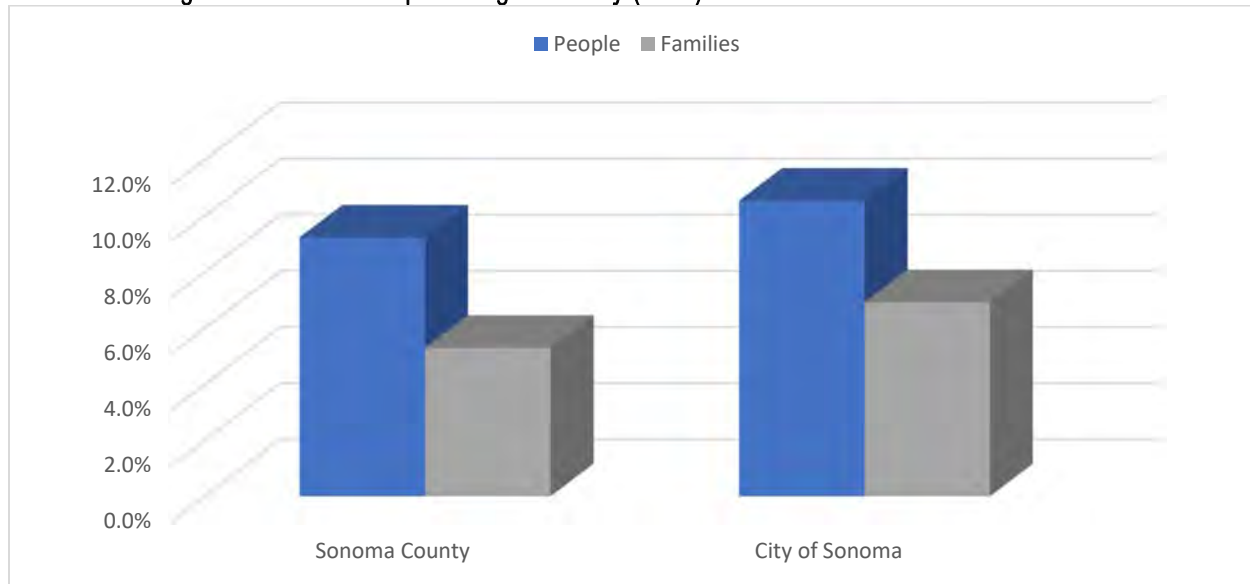
Table 10. Housing Characteristics (Tenure, Overpayment) by Income Level (2017)				
Total Households Characteristics	City of Sonoma		Sonoma County	
	Number	% of Total	Number	% of Total
Low, Very Low, and Extremely Low Income Households Overpaying for Housing				
Lower Income Paying More than 30%	1,315	26.8%	48,440	25.5%
Lower Income Renter Overpaying	790	16.1%	30,755	16.2%
Lower Income Owner Overpaying	525	10.7%	17,685	9.3%
<i>Extremely Low Income (0-30%)</i>	<i>545</i>	<i>11.1%</i>	<i>15,885</i>	<i>8.4%</i>
<i>Very Low Income Overpaying (30-50% AMI)</i>	<i>355</i>	<i>7.2%</i>	<i>14,130</i>	<i>7.4%</i>
<i>Low Income Overpaying (50 -80% AMI)</i>	<i>415</i>	<i>8.5%</i>	<i>18,425</i>	<i>9.7%</i>
Low, Very Low, and Extremely Low Income Households Severely Overpaying for Housing				
Lower Income Paying More Than 50%	900	18.3%	30,685	16.1%
Lower Income Renter Severely Overpaying	530	10.8%	19,255	10.1%
Lower Income Owner Severely Overpaying	370	7.5%	11,430	6.0%
<i>Extremely Low Income (0-30%)</i>	<i>510</i>	<i>10.4%</i>	<i>13,940</i>	<i>7.3%</i>
<i>Extremely Low Income Renter Severely Overpaying</i>	<i>300</i>	<i>6.1%</i>	<i>9,380</i>	<i>4.9%</i>
<i>Extremely Low Income Owner Severely Overpaying</i>	<i>210</i>	<i>4.3%</i>	<i>4,560</i>	<i>2.4%</i>
<i>Very Low Income Severely Overpaying (30-50% AMI)</i>	<i>230</i>	<i>4.7%</i>	<i>9,580</i>	<i>5.0%</i>
<i>Low Income Severely Overpaying (50-80% AMI)</i>	<i>160</i>	<i>3.3%</i>	<i>7,165</i>	<i>3.8%</i>
Total Households Overpaying	2,005	40.8%	72,990	38.4%
Total Renter Households Overpaying	1,100	22.4%	38,360	20.2%
Total Owner Households Overpaying	905	18.4%	34,630	18.2%
Total Households Overpaying 30-50% Income for Housing	870	17.7%	38,670	20.3%
Total Households Severely Overpaying 50% of Income or More for Housing	1,135	23.1%	34,320	18.1%
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data 2013-2017, City of Sonoma and Sonoma County.				

HOUSEHOLDS IN POVERTY

The level of poverty in a jurisdiction often influences the need for housing to accommodate those persons and families in the Very Low and Low-income categories. The U.S. Census Bureau measures poverty by using a set of money income thresholds that vary by family size and composition of who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. For example, the poverty threshold for a family of two with no children would be \$17,331, a household of two with a householder aged 65 or older and no children has a poverty threshold of \$15,644, and the poverty threshold of a family of four with two children under the age of 18 would be \$26,246. (Source: U.S. Census Bureau, 2020).

Poverty rates in Sonoma are shown in Chart 2-1, which compares the numbers of families living in poverty in Sonoma to those living in Sonoma County. Compared with Sonoma County, there is a higher incidence of individuals and families in Sonoma living under the poverty line. In 2010, 2.4% or 60 families in Sonoma were listed as living below the poverty level. Corresponding numbers for 2019 show that the poverty rate increased to 6.9% in 2019.

Chart 2-1. Percentage of Families & People Living in Poverty (2019)



Source: ABAG 2020 6th Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B17001&B17012)

Table 11 shows the poverty rates for families in Sonoma, with a focus on female-headed households. Overall, 189 of 2,733 families were in poverty (6.9%). Although female-headed households made up only 9.3% of all families, they accounted for 17.5% of families in poverty.

Table 11. Families in Poverty in City of Sonoma (2019)		
Family Type	City of Sonoma	
	Number	Percent
Total Families	2,733	100.0%
Female Headed Households	254	9.3%
Householder 65 Years and Over	813	29.7%
Total Families Under the Poverty Level	189	6.9%
Female Headed Households Under the Poverty Level	33	17.5%
Householder 65 Years and Over Under the Poverty Level	41	21.7%
Source: U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (S1702)		

EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income. For Sonoma County, the median household income in 2021 was \$103,300 for a family of 4. For ELI households in Sonoma County, this results in an income of \$34,900 or less for a four-person household or \$24,450 for a one-person household. ELI households have a variety of housing situations and needs. For example, most families and individuals receiving only public assistance, such as social security insurance or disability insurance are considered ELI households. Table 12 provides representative occupations with hourly wages that are within or close to the ELI income range. As shown in Table 9, ELI households make up 12.5% of all households in Sonoma. Based on Tables II-9 and II-10, approximately 88.6% of ELI households in Sonoma pay more than 30% of their incomes for housing.

Table 12. Occupations with Wages for Extremely Low Income Households in Sonoma County (2021)		
Occupation Title	Median Hourly Wage	Median Annual Wages
Dining Room and Cafeteria Attendants and Bartender Helpers	\$12.36	\$25,700
Ushers, Lobby Attendants, and Ticket Takers	\$12.52	\$26,030
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	\$12.58	\$26,164
Packers and Packagers, Hand	\$13.05	\$27,157
Amusement and Recreation Attendants	\$13.15	\$27,369
Real Estate Sales Agents	\$13.33	\$27,720
Waiters and Waitresses	\$13.49	\$28,069
Hairdressers, Hairstylists, and Cosmetologists	\$13.77	\$28,646
Food Servers, Nonrestaurant	\$13.84	\$28,790
Bartenders	\$13.98	\$29,079
Source: Employment Development Department, Long-Term Occupational Employment Projections 2018-2028, April 2021		

Pursuant to Government Code Section 65583(a)(1), 50% of the City's very low-income regional housing needs assigned by HCD are extremely low-income households. As a result, from the very low-income need of 83 units, the City has a projected need of 42 units for extremely low-income households. Based on current figures, extremely low-income households will most likely be facing an overpayment, overcrowding, or substandard housing conditions. Some extremely low-income households could include individuals with mental or other disabilities and special needs. To address the range of needs of ELI households, Sonoma will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 1: Inclusionary Housing
- Program 2: Partnerships with Affordable Housing Developers
- Program 5: Accessory Dwelling Units and Junior Accessory Dwelling Units
- Program 6: Affordable Housing Funding Sources
- Program 8: Housing Choice Voucher Rental Assistance
- Program 10: Mobile Home Park Rent Stabilization and Conversion Ordinances
- Program 12: Preservation of Assisted Rental Housing
- Program 19: Affordable Housing Density Bonus
- Program 21: Affirmatively Further Fair Housing

3. SPECIAL NEEDS POPULATIONS

Government Code Section 65583(a)(7) requires a Housing Element to address special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The needs of these groups often call for targeted program responses, such as temporary housing, preservation of residential hotels, housing with features to make it more accessible, and the development of four-bedroom apartments. Special needs groups have been identified and, to the degree possible, responsive programs are provided. A principal emphasis in addressing the needs of these group is to continue to seek State technical assistance grants to identify the extent and location of those with special needs and identify ways and means to assist them. Local government budget limitations may act to limit effectiveness in implementing programs for this group. Please refer to Section II-H of this Element which provide information related to agencies and programs that serve special needs populations in Sonoma.

SENIOR HOUSEHOLDS

Table 13 below compares senior households and populations in Sonoma between the years 2000, 2010, and 2019. In 2019, there were 2,392 households with a head of household who is 65 years of age or older representing 46.7% of all households in Sonoma.

Overall, it appears that the number of households with a head of household who is 65 years or older has been rapidly increasing over the last two decades. For example, the number of households with a head of household 65 years or older increased by approximately 12.8% (or 205 households) between 2000 to 2010 and about 32.4% (or 586 households) between 2010 to 2019. As shown in Table 13, a large portion of the senior households owned their own homes, with 68.9% or 1,647 senior households living in owner-occupied units and 31.1% or 745 senior living in renter-occupied housing. Additional information related to senior households relative to overall households is provided in Table 14 and Table 7, which summarizes households by age and tenure.

The overall population in Sonoma increased by approximately 7.6% between 2010 and 2019 with the number of 65+ persons increasing by 27.8% or 734, resulting in a total of 3,372 residents 65 years or older. According to 2015-2019 ACS Data (Table ID S1701), it appears that 344 or 10.2% of persons 65 years or older live below the poverty level in Sonoma. Additionally, the median age in Sonoma has been steadily increasing over the past two decades, increasing by nearly 1.5 years between 2000 and 2010 and approximately 4 years between 2010 to 2019. Compared to the state, Sonoma has experienced a greater increase in median age, with that overall state increasing by about 1.8 year from 35.2 in 2010 to 37.0 in 2019. The rapid increase in median age in Sonoma, represents a significantly growing population of persons 65 years or older. As such, this indicates a need to provide more services for this segment of the community.

Table 13. Senior Household Trends and Population – City of Sonoma

Household by Age and Tenure	City of Sonoma		
	2000	2010	2019
Total Owner Occupied:	2,706	2,915	3,124
Owner Householders 65 years and over	1,097	1,083	1,647
Total Renter Occupied:	1,667	1,898	2,001
Renter Householders 65 years and over	504	723	745
Total Occupied Households	4,373	4,813	5,125
Total Householder 65 years and over	1,601	1,806	2,392
Total Population	8,878	10,292	11,075
Total Population 65 years and over	2,244	2,638	3,372

Source:

ABAG 2020 6th Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25007)

ABAG 2020 6th Cycle Housing Element Data Package - Census Bureau, 2010 Census; U.S. Census Bureau, 2000 Census (H016)

Because seniors tend to live on fixed incomes dictated by Social Security and other retirement benefits, those who do not own their homes are significantly affected by rising housing costs. Also, while some seniors may prefer to live in single-family detached homes, others may desire smaller, more affordable homes with less upkeep, such as condominiums, townhouses, apartments, or mobile homes. According to the DOF E-5 Report, in 2021 about 55.7% of Sonoma's housing stock was made up of single-family detached homes, leaving 44.3% of the housing stock for those who choose to or must live in other forms of housing (see Table 25). As described in Chapter 3, the City's zoning and land use regulations accommodate a range of housing types that serve the senior population, including single-family housing, multi-family housing, mobile homes, senior housing, and care facilities.

There are several programs and services for the City's senior citizens; many of which serve the disabled or otherwise underprivileged groups. Programs and services for seniors and their families and caregivers are summarized in Section H of this chapter.

PERSONS WITH DISABILITIES

A "disability" includes, but is not limited to, any physical or mental disability as defined in California Government Code Section 12926. A "mental disability" involves having any mental or psychological disorder or condition, such as mental retardation, organic brain syndrome, emotional or mental illness, or specific learning disabilities that limits a major life activity. A "physical disability" involves having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that affects body systems including neurological, immunological, musculoskeletal, special sense organs, respiratory, speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin and endocrine. In addition, a mental or physical

disability limits a major life activity by making the achievement of major life activities difficult including physical, mental, and social activities and working.

Physical, mental, and/or developmental disabilities could prevent a person from working, restrict a persons' mobility or make caring for oneself difficult. Therefore, disabled persons often require special housing needs related to potential limited earning capacity, the lack of accessible and affordable housing, and higher health costs associated with disabilities. Additionally, people with disabilities require a wide range of different housing, depending on the type and severity of their disability. Housing needs can range from institutional care facilities to facilities that support partial or full independence (i.e., group care homes). Supportive services such as daily living skills and employment assistance need to be integrated in the housing situation.

- Individuals with a mobility, visual, or hearing limitation may require housing that is physically accessible. Examples of accessibility in housing include widened doorways and hallways, ramps, bathroom modifications (i.e., lowered countertops, grab bars, adjustable shower heads, etc.) and special sensory devices including smoke alarms and flashing lights.
- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to convalescent care. Support services can include medical therapy, daily living assistance, congregate dining, and related services.
- Individuals with developmental disabilities and other physical and mental conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.

Table 14 compares the employment status of persons with and without a disability in 2015 and 2019. Between 2015 and 2019 there was 41.0% increase in the number of persons with a disability in Sonoma.

The number of persons employed with a disability increased by 76.4% from 301 persons in 2015 to 531 persons in 2019. Additionally, the number of persons unemployed with a disability decreased by 38.9% from 54 persons in 2015 to 33 in 2019. Conversely, the number of persons with a disability not in the labor force increased by about 9.8% from 204 persons in 2015 to 224 persons in 2019.

Table 14. Persons with Disability by Employment Status – City of Sonoma (2015, 2019)

	2015		2019	
	Number	Percent	Number	Percent
In the Labor Force:	4,876	82.5%	4,807	82.6%
Employed:	4,396	74.4%	4,491	77.1%
With a Disability	301	5.1%	531	9.1%
No Disability	4,095	69.3%	3,960	68.0%
Unemployed:	480	8.1%	316	5.4%
With a Disability	54	0.9%	33	0.6%
No Disability	426	7.2%	283	4.9%
Not in the Labor Force:	1,033	17.5%	1,015	17.4%
With a Disability	204	3.5%	224	3.8%
No Disability	829	14.0%	791	13.6%
Total:	5,909	100.0%	5,822	100.0%
With a Disability	559	9.5%	788	13.5%
No Disability	5,350	90.5%	5,034	86.5%

Source: ABAG 2020 6th Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2011-2015, 2015-2019(C18120)

Table 15 presents data on the types of disabilities for Sonoma and Sonoma County residents based on the ACS 2019 Data. According to ACS 2019 Data, 1,821 residents in Sonoma and 58,940 residents in Sonoma County have a disability. It is noted that persons may have more than one disability resulting in the total number of disabilities tallied in Table 15 exceeding the total number of disabled persons identified above. For persons ages 0 to 64, the most common disabilities are Cognitive Difficulty (37.1%), Vision Difficulty (18.9%), and Hearing Difficulty (18.5%). For the population of ages 65 and over, the most common disabilities are Hearing Difficulty (25.2%), Ambulatory Difficulty (24.9%), and Independent Living Difficulty (24.1%).

Table 15. Persons with Disabilities by Disability Type and Age (2019)

	City of Sonoma		Sonoma County	
	Number	Percent	Number	Percent
Total Disabilities Tallied	3,363	100.0%	110,465	100.0%
Total Disabilities for Ages 0–64	1,242	36.9%	55,419	50.2%
Hearing Difficulty	230	18.5%	6,511	11.7%
Vision Difficulty	235	18.9%	5,716	10.3%
Cognitive Difficulty	461	37.1%	15,481	27.9%
Ambulatory Difficulty	153	12.3%	12,149	21.9%
Self-Care Difficulty	48	3.9%	5,767	10.4%
Independent Living Difficulty (Ages 18-64)	115	9.3%	9,795	17.7%
Total Disabilities for Ages 65 and over	2,121	63.1%	55,046	49.8%
Hearing Difficulty	534	25.2%	11,766	21.4%
Vision Difficulty	129	6.1%	3,552	6.5%
Cognitive Difficulty	140	6.6%	6,244	11.3%
Ambulatory Difficulty	529	24.9%	16,107	29.3%
Self-Care Difficulty	278	13.1%	6,154	11.2%
Independent Living Difficulty	511	24.1%	11,223	20.4%

Source: ABAG 2020 6th Cycle Housing Element Data Package - U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019, S1810)

As described in Chapter 3, the City's zoning and land use regulations accommodate a range of housing types that serve the disabled population, including residential care facilities for six or fewer persons which are treated as a single-family home, care facilities, and various housing types including multi-family housing and mobile homes. To address the range of needs of households with disabilities, Sonoma will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 2: Partnerships with Affordable Housing Developers
- Program 6: Affordable Housing Funding Sources
- Program 8: Housing Choice Voucher Rental Assistance
- Program 20: Fair Housing Services
- Program 21: Affirmatively Further Fair Housing
- Program 22: Universal Design
- Program 23: Reasonable Accommodation Procedures

PERSONS WITH DEVELOPMENTAL DISABILITIES

A developmental disability is a disability which originates before an individual attains age 18, continues or can be expected to continue indefinitely, and constitutes a substantial disability for the individual. This term includes intellectual disability, cerebral palsy, epilepsy, and autism. This term also includes conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with an intellectual disability, but shall not include other handicapping conditions that are solely physical in nature. (Lanterman Act, Welfare and Institutions Code, Section 4512.)

North Bay Regional Center (NBRC) is one of 21 Regional Centers for persons with developmental disabilities in California, and serves developmentally disabled residents living within the geographic boundaries of Napa, Sonoma, and Solano counties. In fiscal year 2019-2020, the average per capita expenditure in NBRC is \$26,331. While the US Census reports on a broad range of disabilities, the Census does not identify the subpopulation that has a developmental disability. The NBRC maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments, and reports that about 9,058 developmentally disabled persons in Sonoma County were served (Source: Performance Report for North Bay Regional Center 2021).

The California Department of Developmental Services (DDS) maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments. The DDS data is reported by zip code, so the data reflects a larger area than the City of Sonoma, however, approximately 31.3% of the population within the zip code resides in the City of Sonoma based on 2015-2019 ACS population data. As shown in Table 16, the DDS data indicates that a total of 102 developmentally persons reside in zip code 95476; applying Sonoma's share of the population in the zip code results in an estimate of 32 living in the City.

Table 16. Developmental Disabilities by Age (2020)			
	0 to 17 Years	18+ Years	Total
95476/Sonoma	102	132	234
City of Sonoma	32	41	73
Source: ABAG 2020 6 th Cycle Housing Element Data Package - DDS, 2020 Developmental Disabilities by Zip Code; De Novo Planning Group, 2021			

Table 17 breaks down the developmentally disabled population by residence type for the 95476 zip code as well as an estimate for the City based on the City's share of the total population in zip code 95476. Of these persons living in Sonoma, the majority (83.3%) live at home with a parent or guardian, while 16.7% live independently or with support, 4.5% live in a community care environment, 4.5% live in an intermediate care facility, 4.5 % live in foster/family home, and 4.5% live in another residence type. These distributions are fairly consistent with the client statistics for the NBRC service area, which notes 72.0% of developmentally disabled persons reside in homes of their families or private guardians and 14.0% of developmentally disabled persons reside in independent living or supported living situations.

Table 17 Developmental Disabilities by Residence Type (2021)

Zip Code	Home of Parent, Family, or Guardian	Independent / Supported Living	Community Care Facility	Intermediate Care Facility	Foster / Family Home	Other	Total
95476/Sonoma	176	36	<11	<11	<11	<11	>212
City of Sonoma	>55	>11	<3	<3	<3	<3	>66
Source: ABAG 2020 6 th Cycle Housing Element Data Package - DDS, 2021 Developmental Disabilities by Zip Code; De Novo Planning Group, 2021							

While the majority of developmentally disabled persons in Sonoma and the County live with their parents, many need a supportive living environment, such as in-home care, a residential care home, or a community living facility. While many persons with developmental disabilities are eligible for various subsidy and assistance programs, many are unable to secure needed subsidized housing. Many of the individuals living with their parents will need alternative housing options as their parents age. This cycle triggers a need to explore other feasible housing alternatives, including in-home supportive care and adult residential care homes and facilities. Resources for persons with developmental disabilities are described in Section H of this chapter.

As described in Chapter 3, the City's zoning and land use regulations accommodate a range of housing types that serve the developmentally disabled population, including single-family housing, multi-family housing, and mobile homes for persons living with their family or guardian. To address the range of needs of households with developmental disabilities, Sonoma will implement several programs including the following programs (refer to the Housing Plan for more detailed descriptions of these programs):

- Program 2: Partnerships with Affordable Housing Developers
- Program 6: Affordable Housing Funding Sources
- Program 8: Housing Choice Voucher Rental Assistance
- Program 20: Fair Housing Services
- Program 21: Affirmatively Further Fair Housing
- Program 22: Universal Design
- Program 23: Reasonable Accommodation Procedures

LARGE HOUSEHOLDS

Government Code Section 65583(a)(C) requires an analysis of housing needs for large families, those with five or more members. Large family households comprised 3.8%, or 196, of the total households in Sonoma according to the 2015–2019 ACS (see Table 18 below). As shown in Table 18, approximately 49% of large households in Sonoma owned their own homes. Additionally, 5-person households make up nearly 82.7% of the large family households in Sonoma with households with 6 or more persons accounting for the remaining 17.3% of large households.

Table 18. Large Households in Sonoma (2019)

Householder Type	City of Sonoma	
	Number	Percent
Owner Households	3,124	60.96%
5-Person Household	62	1.21%
6-Person Household	19	0.37%
7-or-more Person Household	15	0.29%
Renter Households	2,001	39.04%
5-Person Household	100	1.95%
6-Person Household	0	0.00%
7-or-more Person Household	0	0%
Combined Total	5,125	100.00%

Table 18. Large Households in Sonoma (2019)		
Householder Type	City of Sonoma	
	Number	Percent
5-Person Household	162	3.16%
6-Person Household	19	0.37%
7-or-more Person Household	15	0.29%
Source: U.S. Census Bureau, ACS 5-Year Estimates, 2015-2019 (B25009)		

The needs of large families are unique in that they require more space to satisfy minimum household needs. The increase in average household size Statewide is, to some extent, linked to the subject of overcrowding. Overcrowding is defined as more than one person per room; as shown in Table 29, 1.5% of households in Sonoma live in overcrowded conditions. While it appears that overcrowding is not a significant issue in Sonoma, according to ABAG/MTC's Sonoma Housing Needs Data Report, communities of color are more likely to experience overcrowding similar to how they are more likely to experience poverty, financial instability, and housing insecurity. People of color tend to experience overcrowding at higher rates than White residents. In Sonoma, the racial group with the largest overcrowding rate is Hispanic/Latinx residents, which may be linked to the increase in permanent farmworkers living in Sonoma County. To ameliorate this impact in Sonoma, an increase in the number of affordable housing units with four bedrooms or more is needed. In many cases, housing units of this size constitute a small portion of the total housing supply, forcing families to continue to live in what may be considered as overcrowded units. To address this large household need, Program 6: Affordable Housing Funding Sources in the Housing Plan, ensures the City will continue to pursue available and appropriate State and Federal funding sources to support efforts to meet new construction needs of extremely low-, low-, and moderate-income households, as well as households with special needs, including large families. Additionally, Program 25 provides for fee reduction or deferral opportunities for affordable and special housing projects that address the needs of large families.

FARMWORKERS

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farm laborers work in the fields, processing plants, or support activities on a generally year-round basis. When workload increases during harvest periods, the labor force is supplemented by seasonal workers, often supplied by a labor contractor. For some crops, farms may hire migrant workers, defined as those whose travel prevents them from returning to their primary residence every evening.

Estimating the size of the agricultural labor force can be problematic as farmworkers are historically undercounted by the census and other data sources. For instance, the U.S. Census Bureau does not track farm labor separate from mining, fishing and hunting, and forestry, nor does the U.S. Census Bureau provide definitions that address the specific nuances of farm labor (e.g., field laborers versus workers in processing plants), length of employment (e.g., permanent or seasonal), or place of work (e.g., the location of the business versus agricultural field). Data supplied by the United States Department of Agriculture, National Agriculture Statistics Service (USDA) reveals the breakdown of farm labor employment and the labor expense for Sonoma County as shown in Table 19. The 2017 USDA data is the most recent available data that provides a focused analysis of farming activities and employment in the County. Table 20 provides a breakdown of farm labor employment by days worked. The data from this table indicates that Countywide, there were 14,379 farmworkers in 2017. Of these farmworkers, 6,715 worked more than 150 days a year and 7,664 worked less than 150 days per year and are likely seasonal workers.

Table 19. Sonoma County Farmworkers – Countywide (2017)			
Hired Farm Labor	Farm Operations	Workers	Total Payroll
Sonoma County	1,713	14,379	\$230,410,000
Source: 2017 USDA Agricultural Census Data, Table 7			

Table 20. Sonoma County Farm Labor Employment (2017)

Hired Farm Labor	Farm Operations	Workers
150 Days or More	965	6,715
Less Than 150 Days	1,228	7,664

Source: 2017 USDA Agricultural Census Data, Table 7

Agricultural workers are a significant special needs population in the greater Sonoma County area, playing an important role in the region's wine industry. Although agriculture is an important part of the Sonoma County economy, with over 7,000 farm-related jobs in Sonoma County, as shown in Table 5, only 105 persons (2.0 % of Sonoma residents in the labor force) were estimated to be employed in the agriculture, forestry, fishing, hunting, and mining industry based on 2015-2019 ACS data.

The City acknowledges the important role farmworkers play in the regional economy, and is committed to assisting in the provision of housing for this special needs group. Farmworkers and day laborers are an essential component of the region's agriculture industry. Farmers and farmworkers are the keystone of the larger food sector, which includes industries that provide farmers with supplies and equipment and industries that process, transport, and distribute products to consumers. Sonoma is located in the heart of the world's premier wine producing region. Grapes are the primary cash crop in the county. Grapevines account for a significant portion of the regional agricultural economy and the region's overall financial stability. According to the most recent Sonoma County Agricultural Crop Report, the gross value of agricultural production in the County reached \$958,546,600 in 2019, with the top three crops for the region consisting of wine grapes, milk, and miscellaneous livestock and poultry, respectively.¹

With only six parcels zoned Agriculture within the city (including the sphere of influence) and no farms of significant size, the city's farmworker population is predominately non-migratory, and as such, their housing needs are best addressed through year-round affordable rental and ownership housing. On a regional scale, there is a larger demand for seasonal housing and a clear mismatch between housing costs and low farm worker wages, contributing to overcrowding and homelessness. Farmworker households are often comprised of extended family members or single male workers and as a result many farmworker households tend to have difficulties securing safe, decent and affordable housing. Far too often farmworkers are forced to occupy substandard homes or live in overcrowded situations. Additionally, farmworker households tend to have high rates of poverty, disproportionately live in housing that is in the poorest conditions, have very high rates of overcrowding, have low homeownership rates, and are predominately members of minority groups.

La Luz Center is a non-profit organization that provides a variety of community service, education and counseling programs to Sonoma residents. In addition to community service, education, and advocacy programs, the La Luz Center manages a Vineyard Worker Services program to provide seasonal housing for vineyard workers in the Sonoma Valley. Burbank Housing is a local nonprofit dedicated to building quality affordable housing in the North Bay. Burbank Housing has worked to increase affordable home ownership for farmworkers, among other special needs groups, and have partnered with the Vineyard Worker Services program in the past on a permanent farmworker housing project.

Table 21 summarizes the farmworker/employee housing units in the region; there are no employee housing facilities in the City. HCD's Employee Housing database identifies a permanent employee housing facility, Sangiacomo Family Vineyards located at 21543 Broadway, and a seasonal employee housing facility, Shop House located at 21995 Bonness Road. Resources available for farmworkers are described in Section II-H.

Table 21. Regional Farmworker/Employee Housing Units

Facility Name/Address	Facility Type	Employee Count
Sangiacomo Family Vineyards 21543 Broadway	Permanent Employee Housing	20

¹ Sonoma County. *Sonoma County Agricultural Crop Report 2019*. Access: <https://sonomacounty.ca.gov/Agriculture-Weights-and-Measures/Reports/Crop-Reports/PDFs/2019-Sonoma-County-Crop-Report/>

Sonoma, CA 95476		
Shop House 21995 Bonness Road Sonoma, CA 95476	H-2A Seasonal Employee Housing	13
Source: HCD Employee Housing Facility Portal. Access: https://casas.hcd.ca.gov/casas/ehFacilityQuery/onlineQuery		

Agricultural Employee Housing is defined in the Sonoma Municipal Code Section 19.92.020 as “housing as described in California Health and Safety Code Sections 17021.5 and 17021.6, and employee housing as defined in California Health and Safety Code Section 17008.” However, it is noted that the Sonoma Municipal Code Section 19.10.050 does not identify Agricultural Employee Housing as potential use in the allowed land uses and permit requirement tables. Chapter 3, Constraints, provides additional discussion of current requirements of State law related to employee housing, including housing for agricultural employees, and addresses potential constraints to the development of farmworker/employee housing.

FEMALE HEADS OF HOUSEHOLDS

Households with female heads make up approximately 9.3% of households in the Sonoma (See Table 11, Families in Poverty). In 2019, about 13.0% of female-headed households in Sonoma had incomes below the poverty line, and female-headed households make up 17.5% of all households in poverty in Sonoma. Single female-headed households with children present would benefit from affordable housing types, particularly housing targeted at the ELI group, as well as housing located in the vicinity of daycare, schools, and other services. Battered women with children comprise a sub-group of female-headed households that are especially in need.

In Sonoma, there are a number of social service providers and emergency housing facilities serving women in need. For example, The Living Room in Sonoma County is committed to ease adversity, promote stability, and support self-reliance for women and children who are homeless, or at-risk of homelessness. The Living Room works within three primary areas, housing, food, and outreach to women and their children. As described in Section H of this chapter, there are also a number of health service providers, such as CommuniCare, as well as supportive, transitional, and emergency housing providers in the region to assist low-income women and women with children.

HOMELESS AND OTHER GROUPS IN NEED OF TEMPORARY AND TRANSITIONAL AFFORDABLE HOUSING

Government Code Section 65583(a)(7) requires that the Housing Element include an analysis of the needs of homeless persons and families. The analysis must include: (1) estimates of the number of persons lacking shelter; (2) where feasible, a description of the characteristics of the homeless (i.e., those who are mentally ill, developmentally disabled, substance abusers, runaway youth); (3) an inventory of resources available in the community to assist the homeless; and (4) an assessment of unmet homeless needs, including the extent of the need for homeless shelters.

The law also requires that each jurisdiction address community needs and available resources for special-housing opportunities, known as transitional and supportive housing. These housing types provide the opportunity for families and individuals to “transition” from a homeless condition to permanent housing, often with the assistance of supportive services to assist individuals in gaining necessary life skills in support of independent living.

The following discussion addresses the requirements of Government Code Section 65583(a)(7). It should be noted that data on homeless families and individuals is not developed based on jurisdictional boundaries. The Sonoma County Community Development Commission (SCCDC) is the Countywide collaborative effort representing the homeless services system of care; the City participates as a member jurisdiction. The mission of SCCDC is to provide leadership on homelessness and poverty in Sonoma County with a vision to create and sustain a comprehensive, coordinated, and balanced array of human services for homeless and low-income individuals and families within Sonoma County. The SCCDC serves as a convening entity who hopes to achieve a synergistic relationship with the Strategic Plan to End Homelessness Executive Commission to achieve all of the goals in the Sonoma County General and Strategic Plan to End Homelessness and to address issues of homelessness and poverty countywide.

As the primary coordinating body for homeless issues and assistance for a geographic area encompassing the entire county, the SCCDC accomplishes a host of activities and programs vital to the community, including an annual point-in-time “snapshot” survey to identify and assess the needs of both the sheltered and unsheltered homeless, tracking homeless demographics using local service providers throughout the calendar year, and an annual action plan that helps direct community resources and actions in the form of comprehensive programs and activities.

HOMELESS ESTIMATES

According to the SCCDC, an estimate of the County’s homeless population was undertaken in concert with the requirements of the U.S. Department of Housing and Urban Development (HUD) for participating Continuums of Care nationwide. Those mandates require that a point-in-time study be taken. This study allows service agencies and local governments to spot trends in homelessness and to evaluate the success of existing programs. It is also a tool for agencies and their partners to plan for programs and services to meet the needs of homeless individuals and families in the community and to use in applying for grant and other funding.

The SCCDC conducted its 2020 Homeless Count in February 2020. The Homeless Count, also known as the Point-in-Time (PIT) Count, is a survey of individuals and families identified as experiencing sheltered or unsheltered homelessness within the boundaries of Sonoma County on a single night. While SCCDC conducted the majority of count activities on the morning of February 28, 2020, additional count activities occurred over the course of the seven days following the night February 28, 2020. This approach, known as a post-night count, allows enumerators several days to ensure a complete canvassing of the community. The majority of individuals counted in this way were those who had been sheltered in Emergency Shelter or Transitional Housing on the night of February 28, 2020. The one potential drawback to the “post-night count” approach is that it increases the chances of double counting. In an effort to avoid double counting, enumerators collected the initials as well as birth month and year of each participant.

The 2020 PIT Count identified 2,745 total homeless persons Countywide, consisting of 1,043 sheltered and 1,702 unsheltered homeless. Of the 2,745 total homeless persons, 61 (or 2.2%) were located in Sonoma, including 15 sheltered and 46 unsheltered homeless persons. The number of homeless persons in the City increased by 103% or 31 persons between the 2018 PIT Count and the 2020 PIT Count, as shown in Table 22. Conversely, the total number of homeless persons Countywide decreased by 8% or 251 homeless persons between the 2018 PIT and 2020 PIT Counts.

Table 22. Homelessness in Sonoma County (2020, 2019, 2018)						
SCCDC PIT Count	City of Sonoma			Countywide		
	Sheltered	Unsheltered	Total	Sheltered	Unsheltered	Total
Homelessness PIT Count 2020	15	46	61	1,043	1,702	2,745
Homelessness PIT Count 2019	18	32	50	994	1,957	2,951
Homelessness PIT Count 2018	15	15	30	1,067	1,929	2,996
Source: 2020 Sonoma County Homeless Census Comprehensive Report						

Additional demographics for the 2,745 homeless individuals Countywide are shown below in Table 23. Of the 2,745 individuals experiencing homelessness Countywide, 139 were veterans, 648 were over 55 years old, 235 had families with children, and 304 were unaccompanied children and transition-age youth; it is noted that these characteristics are not discrete and there is overlap between these groups. Additionally, approximately 508 of the 2,745 individuals experiencing homelessness met the definition of being chronically homeless. HUD defines a chronically homeless individual as someone who has experienced homeless for a year or longer, or has experienced at least four episodes of homelessness in the last three years and also has a diagnosed disability that prevents them from maintaining work or housing. The 2020 Sonoma County Homeless Census Comprehensive Report also included a survey of 444 individuals experiencing homelessness. Of the 444 survey respondents, 34% had alcohol and drug abuse issue, 40% had psychiatric/emotional conditions, 23% had physical disability, and 29% had post-traumatic stress disorder. Additionally, 77% were reported receiving government benefits.

Table 23. Sonoma County Homeless Characteristics						
Homeless Profile	Sheltered		Unsheltered		Combined	
	Number	%	Number	%	Number	%
Total Homeless Population	1,043		1,702		2,745	100.0%
Male	n/a	n/a	n/a	n/a	1729	63.0%
Female	n/a	n/a	n/a	n/a	906	33.0%
Gender Non-Conforming/Unknown	n/a	n/a	n/a	n/a	110	4.0%
Additional Demographics						
Chronically Homeless	174	16.7%	334	19.6%	508	18.5%
Veteran	47	4.5%	92	5.4%	139	5.1%
Older Adults over Age 55	383	36.7%	265	15.6%	648	23.6%
Families with Children	227	21.8%	8	0.5%	235	8.6%
Unaccompanied Homeless Children and Transition-age Youth	59	5.7%	245	14.4%	304	11.1%
Note: Respondents may be included in more than one subset. For example: a respondent may be a Veteran and also Chronically Homeless.						
Source: 2020 Sonoma County Homeless Census Comprehensive Report						

EMERGENCY SHELTERS, TRANSITIONAL, AND SUPPORTIVE HOUSING

Resource Inventory

Homeless programs are primarily administered at the County-level through SCCDC. SCCDC maintains a list of services for homeless and low-income families. The most recent inventory of resources available within Sonoma County for emergency shelters, transitional housing, and permanent supportive housing units comes from the 2020 Housing Inventory reported to the U.S. Department of Housing and Urban Development by the SCCDC, also known as: Santa Rosa, Petaluma/Sonoma County CoC. Table 24 below shows the total beds offered by homeless facilities in Sonoma County and 2,710 total beds available Countywide, which are described in greater detail in the following paragraphs.

Table 24. Homeless Facilities (2020)						
	Santa Rosa, Petaluma/Sonoma County CoC					
Facility Type	Family Units	Family Beds	Adult-Only Beds	Total Year-Round Beds	Seasonal	Overflow
Emergency Shelter	36	194	537	737	119	90
Transitional Housing	18	74	301	375	n/a	n/a
Permanent Supportive Housing	36	79	744	823	n/a	n/a
Rapid Rehousing	136	285	345	630	n/a	n/a
Other Permanent Housing	14	36	109	145	n/a	n/a
Total Beds	240	668	2,036	2,710	119	90
Source: HUD 2020 Continuum of Care Homeless Assistance Programs - Housing Inventory Count Report						

Emergency Shelters

28 emergency shelters are available to provide services in the SCCDC region. According to the HUD 2020 Continuum of Care Housing Inventory County Report for the Santa Rosa, Petaluma/Sonoma County CoC, a total of 737 year-round beds are available; thus, emergency shelters comprise 27.2% of the total year-round beds in the County. Of the 737 year-round beds available in Sonoma County, 10 shelter beds offered by Sonoma Overnight Support are located in Sonoma at The Haven. The City provides funding for shelter operations under a contractual agreement that was put in place by the Sonoma Community Development Agency prior to its elimination under State law and further the shelter by paying for utilities and maintenance of the City-owned facility in the amount of \$30,000 a year through 2030. The Haven provides 10 beds, including 2 family beds and 8 adult-only beds. The City also funds SOS operation of a Safe Parking Program serving 10 vehicles a night is operated at the City of Sonoma's

Police Department parking lot next to The Haven. The City is working to identify a new location for the Safe Parking Program where the services SOS provides (safe parking, food, day services including showers, washing machines and case-management) can be co-located.

Transitional Housing

11 transitional-housing providers were available to provide services in the SCCDC area, providing a total of 375 beds. No beds are located in the City.

Permanent Supportive Housing

In 2019, the SCCDC area had 13 permanent supportive housing providers that offered the following 833 beds at 30 different facilities. While no facilities are located in the City, 9 of the beds are tenant based and can be located anywhere in the County.

Rapid Re-Housing

In 2019, the SCCDC area had 9 Rapid Re-Housing providers that offered the 638 beds counts through 23 different programs. Several of the programs are Countywide and 26 beds are dedicated to the Sonoma Valley.

Other Permanent Housing

In 2020, the SCCDC area had 5 other permanent housing facilities that offered 148 beds; none of these other permanent housing facilities are located within Sonoma.

Assessment of Need

Based on the available information, there is a Countywide homeless population of 2,745 persons and 2,710 beds, indicating an unmet demand for 35 homeless persons Countywide. It is noted that the 2020 PIT Report identified only 1,043 sheltered homeless persons and 1,702 unsheltered homeless persons. The discrepancy between sheltered homeless persons and the County's total capacity to house homeless persons indicates a need for additional community services resources to assist and match the homeless population with the Countywide shelter and housing resources. Although there are seasonal fluctuations in bed counts, these figures demonstrate a demand for supportive housing. Reviewing the eligible populations for the County's various shelter opportunities indicates 668 beds are limited to occupancy by single adults with children or families with children. However, only 235 or 8.6% of the identified homeless persons during the 2020 PIT Survey were part of a family with children.

On a local-level, the 2020 PIT Report identified 46 unsheltered homeless persons in Sonoma compared to 32 unsheltered homeless persons in 2019, representing a 43.8% increase in unsheltered homeless individuals in Sonoma. Based on a review of the 2020 Housing Inventory reported to the U.S. Department of Housing and Urban Development by the SCCDC, it appears that there are only 25 beds of emergency shelters and no transitional housing or permanent supportive housing units located in or provided by Sonoma, indicating a demand and need for housing to assist the rising unsheltered homeless population in the City. To address this, Program 24 (Homeless Support Program) of the Housing Plan ensures the City will continue its agreement with Sonoma County SCCDC to provide ongoing homeless services and will continue to participate in the Sonoma County Homeless Plan Executive Commission, working cooperatively with other County jurisdictions to identify and address the needs of the homeless and at-risk population.

Spurred by national models and the drive to remain competitive for CoC funds, the Sonoma County CoC adopted its first 10-Year Homeless Action Plan in early 2007. Three key strategies were established in the updated 10-Year Plan in 2014: Increasing permanent affordable housing to meet the need, ensuring access to integrated health care, and increasing incomes. The 10-Year Plan also provides policies to support the creation of needed housing, strategies of homeless prevention and diversion, and a performance measurement plan.

The City is in the process of creating a Homelessness Task Force comprised of City Staff, Council Members, local stakeholders, and County representatives. The City is evaluating the availability of combined resources from local fundraisers, healthcare providers, the City, and the County to hire a Sonoma Valley Social Safety Net "Czar". The Safety Net "Czar" will then convene local partners (including the Task Force), facilitate collaboration, and represent the Valley's interests to the rest of the County and begin

creating a workplan so that County, City, and Sonoma Valley service providers can align resources and services. In addition, the work plan will need to include steps to establish a shared database of users to ensure adequate services and progress towards coordinated entry, case management, and housing needs are being met.

Zoning for Emergency Shelters, Transitional and Supportive Housing

Chapter 3, Constraints, addresses zoning to accommodate emergency shelters, transitional housing, and supportive housing. As discussed in Chapter 3, Program 15: Development Code Amendments – Housing Constraints, in the Housing Plan requires the Development Code to be updated to accommodate supportive housing as required by AB 101, which includes allowing supportive housing by right in nonresidential zones that allow multi-family residential uses and in mixed use zones.

E. HOUSING STOCK CHARACTERISTICS

This section identifies the characteristics of Sonoma's physical housing stock. This includes an analysis of housing types, housing tenure, vacancy rates, housing conditions, and overcrowding.

1. HOUSING TYPE

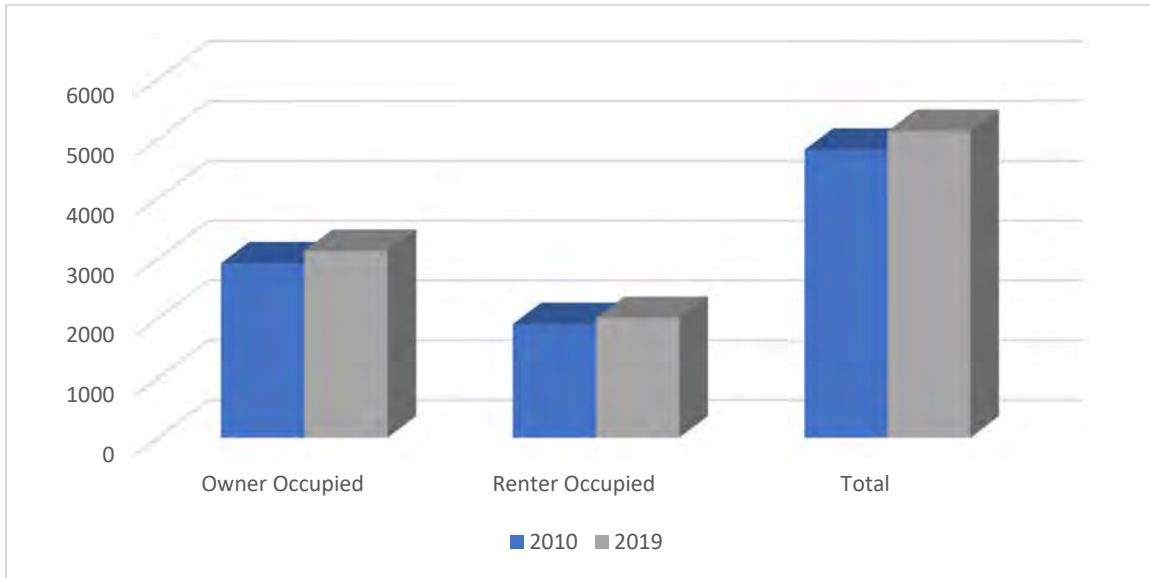
As shown by Table 25, in 2000 there were 4,332 housing units in Sonoma. By 2010, the number increased to 5,544 units, most of which was due to single-family construction. During this time period, the number of 5+ unit buildings also increased significantly by 345 units resulting in an increase rate of 66%. Additionally, 2 to 4-unit buildings saw a slight increase (6%) between 2010 and 2021 resulting in 50 new units for a total of 558 units in 2021. During this same period, single-family detached units saw a slight increase of 98 units or 3%. The number of mobile homes increased from 388 in 2000 to 484 in 2021. The DOF E-5 Report indicates that the number of total housing units in Sonoma increased from 5,544 in 2010 to 5,725 in 2021, most of which was due to an increase in single-family detached buildings and 5+ unit buildings.

Table 25. Housing Units by Type within Sonoma				
	2000	2010	2021	Change 2010-2021
Single-Family Detached	2,435	3,088	3,186	+98 / 3.2%
Single-Family Attached	598	566	583	+17 / 3.0%
2 to 4 Units	392	538	558	+20 / 3.7%
5+ Units	519	864	914	+50 / 5.6%
Mobile Homes	388	488	484	-4 / -0.8%
Total:	4,332	5,544	5,725	+181 / 3.3%
Source: ABAG 2020 6 th Cycle Housing Element Data Package - U.S. Census Bureau, 2000 Census; Department of Finance, E-5 Population Estimates for Cities, Counties, and the State, 2010&2021				

2. HOUSING TENURE

Housing tenure refers to the status of occupancy of a housing unit and whether it is an owner-occupied or a rental unit. Chart 2-2 below compares the distribution of housing tenure in Sonoma between 2010 and 2019. Of the total occupied housing units in Sonoma in 2010, 60.6% (2915 units) were owner-occupied and 39.4% (1898 units) were renter households. In 2019, the distribution of occupied housing units in Sonoma generally stayed the same with 61.0% (3124 units) of the occupied housing units as owner-occupied and 39.0% (2001 units) as rental units. This is noteworthy when addressing viable strategies to expand the range of affordable housing in the rural areas.

Chart 2-2. Distribution of Housing Tenure – City of Sonoma (2010, 2019)



Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25003)

3. VACANCY RATES

The vacancy rate in a community indicates the percentage of units that are vacant and for rent/sale at any one time. It is desirable to have a vacancy rate that offers a balance between a buyer and a seller. Vacancy rates often are a key indicator of the supply of affordable housing options, both for ownership and rental purposes. Housing literature suggests that a vacancy rate in the range of 2–3% for owner-occupied housing is considered desirable while for rental housing the desirable range is 5–6%. Table 26 indicates the vacant housing stock by type in Sonoma as listed in the ACS 2015-2019 5-Year Community Survey. The 2019 ACS data indicates that there were 653 vacant units (11.3%) in Sonoma. Of the total vacant units, 452 units were classified as for seasonal, recreational, or occasional use, 84 were classified as for rent, and 46 were classified as for sale (not occupied), and 35 were classified as other vacant.

Table 26. Vacancy by Type in Sonoma (2019)

Housing Type	City of Sonoma	
	Number	Percent
Total Vacant Units	653	100.0%
For Rent	84	12.9%
Rented, Not Occupied	0	0.0%
For Sale	36	5.5%
For Sale, Not Occupied	46	7.0%
For Seasonal, Recreational, or Occasional Use	452	69.2%
Other Vacant	35	5.4%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25004)

Table 27 compares the vacancy status of housing in Sonoma in 2000, 2010, and 2018. Sonoma showed an overall increase in vacancy rate between 2000 to 2019 from 6.4% to 11.3%. The other vacancy rate column represents the vacancy rate for all seasonal, recreational, and occasional use units, as well as all units classified as other vacant units by the ACS. The other vacancy rate makes up the majority of the total vacancy rate in Sonoma. It should be noted that the total vacancy rate in Sonoma without all other vacant types is only 2.9%, with a homeowner vacancy rate of 1.4% and a rental vacancy rate of 1.5%. This reflects a need for both rental and owner-occupied housing production to increase the vacancy rates to the desired range of 2–3% for owner-occupied housing and 5–6% for rental housing.

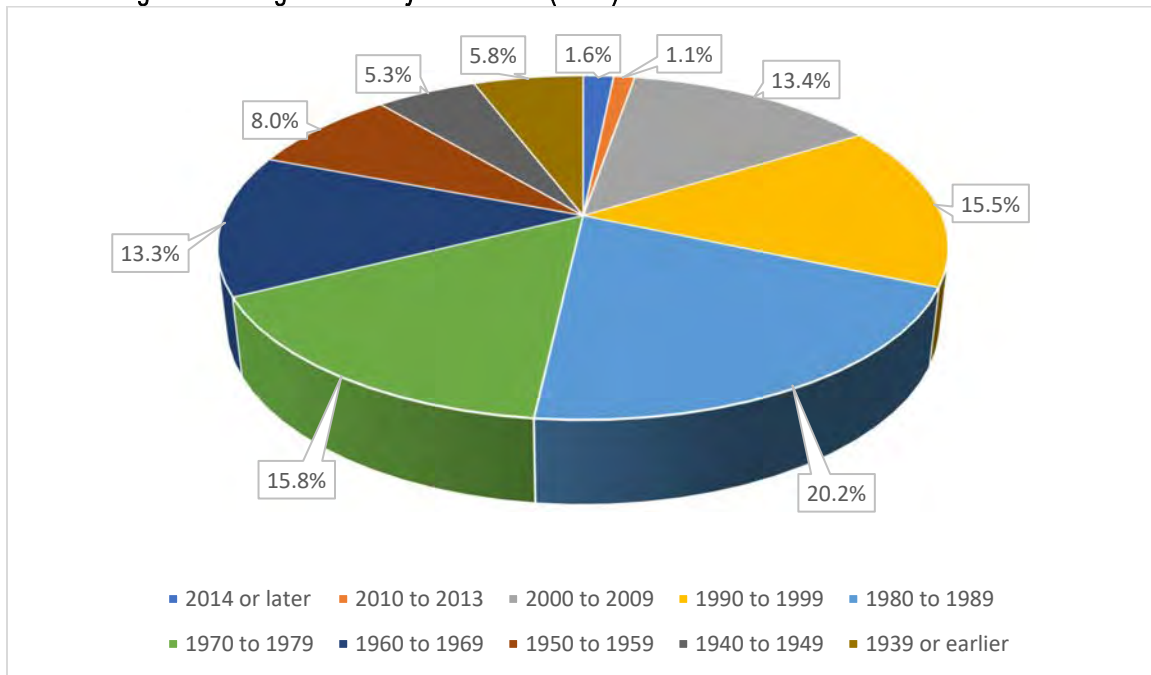
Table 27. Vacancy Rates in Sonoma (2000, 2010, and 2019)							
Year	Total Housing Units	Occupied Housing Units	Vacant Housing Units	Overall Vacancy Rate	Homeowner Vacancy Rate	Rental Vacancy Rate	Other Vacancy Rates
2000	4,671	4,373	298	6.4%	1.9%	0.9%	3.6%
2010	5,219	4,813	406	7.8%	0.0%	2.2%	5.5%
2019	5,778	5,125	653	11.3%	1.4%	1.5%	8.4%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25002 and B25004); U.S. Census 2000(H006&H008)

4. HOUSING AGE AND CONDITIONS

Related to the condition of the housing stock in Sonoma is the age of the housing units. Generally, structures older than 30 years begin to show signs of deterioration and require reinvestment to maintain their quality. Unless properly maintained, homes older than 50 years may require major renovation to remain in a good, livable condition. Chart 2-3 illustrates the age of the housing stock in the City.

Chart 2-3. Age of Housing Stock –City of Sonoma (2019)



Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (DP04)

Housing Conditions

In the absence of a detailed housing conditions survey, existing ACS data, building inspection staff observations, and responses to the community housing needs and priorities survey are used to identify housing conditions and related needs in the City.

Limited data is available from the ACS that can be used to infer the condition of Sonoma housing stock. The ACS data identifies whether housing units have complete plumbing and kitchen facilities and whether units lack a source of household heat. Since only a very small percentage of all housing units in Sonoma lack complete plumbing facilities or kitchen facilities (see Table 28), these indicators do not reveal any significant needs associated with housing conditions. Additionally, only 2.1% of housing units rely on wood fuel or do not have a heating source, which also does not reveal any significant needs associated with the housing conditions.

Table 28: Age of Sonoma Housing Stock & Housing Stock Conditions

Housing Stock Indicators	Number	Percent
Total Housing Units	5,778	100.0%
Built 1970 or earlier	1,875	32.5%
Units Lacking Complete Plumbing Facilities	0	0.0%
Units Lacking Complete Kitchen Facilities	20	0.3%
No house heating fuel or wood fuel only	123	2.1%
No Phone Service Available	64	1.1%
Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (DP04)		

Since housing stock age and condition are generally correlated, one ACS variable that provides an indication of housing conditions is the age of a community's housing stock. The majority of the housing units in Sonoma (3,953 or 68.4%) were built before 1990 with 32.5% or 1875 units built before 1970 and 36.0% or 2078 built between 1970 to 1990. Over 16.1% of Sonoma's housing stock was built after 2000 and another 15.5% was built between 1990 and 1999. These statistics reflect tremendous growth in the area during the 1970s and 1980s. The age of housing stock often indicates the potential for a unit to need rehabilitation or significant maintenance. As shown in Figure II-3 on the previous page, most of the Sonoma's housing stock is more than 30 years old (approximately 68.4%) and 32.5% is over 50 years old, meaning these units may need moderate to significant rehabilitation, including replacement or refurbishing of roofs, siding, and windows as well as interior improvements including replacing or upgrading the plumbing and electric wires and outlets.

The housing needs and priorities survey conducted by the City in 2022 addressed housing conditions, desired housing improvements, and housing challenges. Regarding housing conditions, 57% of Sonoma residents indicated their home is in sound (very good to excellent) condition, 23% indicated their home shows signs of minor deferred maintenance, 11% indicated that their home needs one or more modest rehabilitation improvements, 8% indicated their home needs one or more major upgrades, and 0.9% indicated their home was dilapidated. When asked to identify desired improvements to their home, 36% of respondents identified exterior improvements such as roofing, painting, and general home repair, 27% identified landscaping, and 26% identified heating/air conditioning, solar, and electrical upgrades. When asked about housing challenges, 26% of survey respondents indicated that their home is in poor condition and needs repair.

Based on discussions with the City's Planning Department staff and windshield surveys via google earth of a sampling of areas in the city, the City's Planning staff and De Novo Planning Group estimates that the majority of the housing stock in the City is in good condition and requires limited or modest repairs. However, older homes in the City often need one or two minor or moderate repairs, including re-roofing, window replacement (to increase efficiency), plumbing repair or upgrades, electrical repair or upgrades, and siding repair or replacement. It is estimated approximately 20% of the housing stock may require significant repairs that involve replacement of a roof, siding, windows, electric, or plumbing but do not require replacement of the unit or significant rehabilitation of the unit. Approximately 2% to 10% of housing units in the City may require substantial repair, with up to 1% potentially requiring replacement. The City's Community Development Department has identified that there are no concentrations of dilapidated housing in need of substantial repair within the City.

Program 9 in the Housing Plan ensures that the City monitors the condition of its housing stock and continues to participate in the County-administered housing rehabilitation program.

Overcrowding

Overcrowding is a measure of the ability of existing housing to adequately accommodate residents. The U.S. Census Bureau defines overcrowding as a household that lives in a dwelling unit with an average of more than 1.0 person per room, excluding kitchens and bathrooms. A severely crowded housing unit is one occupied by 1.5 persons or more per room. Too many individuals living in housing with inadequate space and number of rooms can result in deterioration of the quality of life and the condition of the dwelling unit from overuse. Overcrowding usually results when either the costs of available housing with a sufficient number

of bedrooms for a family exceeds the family's ability to afford such housing or unrelated individuals (such as students or low-wage single adult workers) share dwelling units because of high housing costs.

The number of overcrowded households in the City does not appear to be a significant issue compared to the State and surrounding areas. According to the 2015–2019 American Community Survey, overcrowding in the Sonoma was 1.5 percent (76 housing units), compared to 5.2 percent (9769 housing units) Countywide. The State average during this same period was 8.2 percent. Among renters in Sonoma, approximately 0.4 percent of housing units (or 18 housing units) were in overcrowded conditions, and none were in severely overcrowded conditions. Among homeowners, approximately 1.1 percent of housing units (or 58 housing units) were in overcrowded conditions, and none were in severely overcrowded conditions. Table 29 provides information on overcrowded housing in Sonoma.

Table 29. Overcrowded Housing in Sonoma (2019) – by % of units occupied		
	Units	Percent
Owner Occupied:	3,124	61.0%
<i>0.5 or less occupants per room</i>	1,237	24.1%
<i>0.51 to 1 occupants per room</i>	706	13.8%
<i>1.01 to 1.5 occupants per room</i>	58	1.1%
<i>1.51 to 2.0 occupants per room</i>	0	0.0%
<i>2.01 or more occupants per room</i>	0	0.0%
Owner Occupied Overcrowded (1.01+)	58	1.1%
Owner Occupied Severely Overcrowded (1.5+)	0	0.0%
Renter Occupied:	2,001	39.0%
<i>0.5 or less occupants per room</i>	2,555	49.9%
<i>0.51 to 1 occupants per room</i>	551	10.8%
<i>1.01 to 1.5 occupants per room</i>	18	0.4%
<i>1.51 to 2.0 occupants per room</i>	0	0.0%
<i>2.01 or more occupants per room</i>	0	0.0%
Renter Occupied Overcrowded (1.01+)	18	0.4%
Renter Occupied Severely Overcrowded (1.5+)	0	0.0%
Total Units	5,125	100.0%
Total Overcrowded	76	1.5%
Total Severely Overcrowded	0	0.0%
Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (B25014)		

F. HOUSING COSTS AND AFFORDABILITY

1. HOUSING PRICES AND TRENDS

As indicated by Table 30, housing costs changed for some more than others in Sonoma through the years 2000 – 2019. From 2010 to 2019, renters saw a large rent increase of 32.9% while homeowners experienced a 17.5% increase in housing costs.

Table 30. Median Homeowner/Renter Costs (2000-2019) - City of Sonoma					
Cost Type	Year				% Change
	2000	2010	2015	2019	2010-2019
Median Monthly Ownership cost	n/a	\$1,536	\$1,526	\$1,805	17.5%
Median Gross Rent*	\$959	\$1,382	\$1,507	\$1,836	32.9%
*Not adjusted for inflation					

Source: U.S. Census, 2000 Table DP4; 2006-2010 American Community Survey Table S2503; and 2015-2019 Table DP04

Table 31 indicates median housing value for homes in Sonoma. Value is defined as the amount for which property, including house and lot, would sell if it were on the market at a given point in time. As shown in Table 31, the median value for housing units in Sonoma in 2001 was \$471,378 and increased in value to \$483,117 in 2010. In 2015, the median value for housing units increased sharply to \$685,723. The value has since increased by 24.5 percent since 2015 to a median home value of \$853,551 in 2020.

Table 31. Median Home Values (2001-2020) – City of Sonoma

Location	Median Home Values*					% Change
	2001	2005	2010	2015	2020	2015–2020
City of Sonoma	\$471,378	\$781,282	\$483,117	\$685,723	\$853,551	+24.5%
Sonoma County	\$382,894	\$633,791	\$382,617	\$543,351	\$691,582	+27.3%
Bay Area Average	\$444,501	\$698,759	\$531,581	\$831,074	\$1,077,233	+29.6%

*Not adjusted for inflation
Source: ABAG 6th Cycle Housing Element Data Package (Table HSG-08)

Table 32 indicates the value of owner-occupied housing units as reported on the ACS within Sonoma in 2019. Of the 3,124 owner-occupied units, 81 (2.6 percent) were less than \$50,000, 92 (2.9 percent) were in the \$150,000 to \$199,999 price range, 43 (1.4 percent) were in the \$200,000 to \$299,999 price range, and 328 (10.5 percent) were in the \$300,000 to \$499,999 range. Additionally, there were 1,425 units (45.6 percent) valued in the \$500,000 to \$999,999 price range and 966 units (30.9%) valued in the \$1,000,000 or more price range.

Table 32. Value of Owner-Occupied Housing Units (2019) – City of Sonoma

Value	Number of Units	% of Total
Less than \$50,000	81	2.6%
\$50,000 to \$99,000	146	4.7%
\$100,000 to \$149,999	43	1.4%
\$150,000 to \$199,999	92	2.9%
\$200,000 to \$299,999	43	1.4%
\$300,000 to \$499,999	328	10.5%
\$500,000 to \$999,999	1,425	45.6%
\$1,000,000 or more	966	30.9%
Total	3,124	100.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates (DP04)

Single-Family Units

Table 33 indicates the median sales price of single-family residences housing units throughout Sonoma County in July 2000 and July 2021. Sonoma saw the fifth highest increase in median sales price than among jurisdictions in Sonoma County and had the second highest median sales price in July 2021. The median sales price of a single-family home in Sonoma in July 2021 was \$850,000 or about 13.7% greater than the median sales in July 2020 of \$747,500. Only the City of Healdsburg and the City of Sebastopol saw decreases in median sales price of a single-family home from July 2020 to July 2021.

Table 33. Sales Price by Jurisdiction – Sonoma County

City/Area	Median Sales Price 2020	Median Sales Price 2021	Percent Change
City of Sonoma	\$747,500	\$850,000	13.7%
Sonoma County	\$662,000	\$715,000	8.0%

City of Santa Rosa	\$590,000	\$650,000	10.2%
City of Petaluma	\$715,500	\$805,000	12.5%
City of Rohnert Park	\$555,250	\$650,000	17.1%
City of Cloverdale	\$560,000	\$646,000	15.4%
City of Cotai	\$620,000	\$776,000	25.2%
City of Healdsburg	\$1,109,250	\$925,000	-16.6%
City of Sebastopol	\$875,000	\$850,000	-2.9%
City of Windsor	\$657,000	\$750,000	14.2%
Source: CoreLogic California Home Sale Activity July 2021			

Mobile Homes

Mobile homes offer a more affordable option for those interested in homeownership. The median value of a mobile home in Sonoma County in 2019 was \$152,200 (*US Census Bureau, ACS 2015-2019 Table B25083*). Overall, there are 11,501 mobile homes in Sonoma County with 484 located in Sonoma. (*DOF, Table E-5, 1/1/2021*). As shown by Table 34, there are 3 mobile home parks in Sonoma with a total of 473 permitted mobile home spaces. As a means of preserving the affordability of its mobile home parks, primarily occupied by seniors, the City has implemented a mobile home park rent control ordinance since 1992 (Chapter 9.80 of the Municipal Code). This ordinance limits rent increases to a maximum of 80 percent of the increase in the consumer price index, but no greater than five percent in a 12-month period. The ordinance ensures stable rents for those residents of the mobile home parks who are not on long-term leases (in excess of 12 months).

There are 3 rent-controlled mobile home parks in Sonoma. According to the Confirmation of Calculation of Automatic Annual Rent Increase Letters in January 2020, Moon Valley's 247 spaces have a rent range from \$698.91 to \$1,436.33 and Pueblo Serena's 127 spaces have a median rent of \$700.60.

Table 34. Mobile Home Parks – City of Sonoma	
Name	Spaces
Moon Valley Mobilehome Park	247
Rancho De Sonoma	99
Pueblo Serena	127
Total Spaces	473
Source: HCD 2020 Mobile Home Park Listings	

2. HOUSING AFFORDABILITY

According to HCD and HUD, housing is considered affordable if a household spends no more than 30% of its income on housing. Table 35 identifies housing affordability levels, including gross rents and home purchase price, by family size based on the HCD's 2021 *Income Limits* for Sonoma County.

Table 35. Ability to Pay for Housing Based on Income Group/Household Size (2021) *						
Number of Persons	1	2	3	4	5	6
Extremely Low-Income Households - 30% of Median Household Income						
Income Level	\$24,450	\$27,950	\$31,450	\$34,900	\$37,700	\$40,500
Monthly Income	\$2,038	\$2,329	\$2,621	\$2,908	\$3,142	\$3,375
Max. Monthly Gross Rent**	\$611	\$699	\$786	\$873	\$943	\$1,013
Max. Purchase Price***	\$90,276	\$102,509	\$114,741	\$126,798	\$136,584	\$146,370
Very Low-Income Households - 50% of Median Household Income						
Income Level	\$40,750	\$46,550	\$52,350	\$58,150	\$62,850	\$67,500

Table 35. Ability to Pay for Housing Based on Income Group/Household Size (2021) *

Monthly Income	\$3,396	\$3,879	\$4,363	\$4,846	\$5,238	\$5,625
Max. Monthly Gross Rent**	\$1,019	\$1,164	\$1,309	\$1,454	\$1,571	\$1,688
Max. Purchase Price***	\$152,069	\$172,340	\$192,610	\$212,881	\$229,307	\$245,559
Low-Income Households - 80% of Median Household Income						
Income Level	\$65,150	\$74,450	\$83,750	\$93,050	\$100,500	\$107,950
Monthly Income	\$5,429	\$6,204	\$6,979	\$7,754	\$8,375	\$8,996
Max. Monthly Gross Rent**	\$1,629	\$1,861	\$2,094	\$2,326	\$2,513	\$2,699
Max. Purchase Price***	\$243,425	\$276,097	\$308,768	\$341,439	\$367,612	\$393,784
Moderate-Income Households - 120% of Median Household Income						
Income Level	\$86,750	\$99,150	\$111,550	\$123,950	\$133,850	\$143,800
Monthly Income	\$7,229	\$8,263	\$9,296	\$10,329	\$11,154	\$11,983
Max. Monthly Gross Rent**	\$2,169	\$2,479	\$2,789	\$3,099	\$3,346	\$3,595
Max. Purchase Price***	\$330,703	\$374,489	\$418,276	\$462,062	\$497,021	\$532,156
Notes: *Based on Sonoma County FY 2021 Annual Median Income (household) **Assumes that 30% of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowner's insurance. ***Maximum affordable sales price is based on the following assumptions: 4.1% interest rate, 30-year fixed loan, Down payment: \$5,000 – extremely low, \$10,000 – very low; \$15,000 – low, \$25,000 – moderate, property tax, utilities, and homeowners insurance as 30% of monthly housing cost (extremely low/very low), 28% of monthly housing cost (low), and 25% of monthly housing cost (moderate/above moderate). Closing costs: 3.5% (extremely low/very low), 3.0% low, and 2.5% moderate) Calculation Illustration for 3 Bedroom, 4-person, Low Income Household 1. Annual Income Level: \$74,000 2. Monthly Income Level: \$74,000/12 = \$6,166.67 3. Maximum Monthly Gross Rent: \$6,166.67 x .030 = \$1,850.00 4. Max Purchase Price: a. Gross monthly income = \$7,754.17 b. Down Payment and Closing Costs \$15,000; Closing Costs 3.0% c. Monthly housing costs \$7,754.17 x .030 = \$2326.25 d. Principal and Interest plus utilities/taxes/mortgage/insurance: \$697.87 + \$1628.38 = \$2326.25						
Sources: HCD FY2021 State Income Limits, De Novo Planning Group						

OVERPAYMENT

A household is considered to be overpaying for housing (or cost burdened) if it spends more than 30% of its gross income on housing. Severe housing cost burden occurs when a household pays more than 50% of its income on housing. The prevalence of overpayment varies significantly by income, tenure, household type, and household size. Table 10 identifies overpayment levels by income range. As shown in Table 10, approximately, 40.8% of all households in Sonoma overpaid for housing. Renters were more likely to overpay than homeowners; 56.7% of renter households paid more than 30 percent of their income for housing. Of the 2,005 households overpaying for housing in Sonoma, 1,100 were renter households, and 905 were owner households.

In general, overpayment disproportionately affects lower income and minority households; 81.2% of lower income households (0-80% of AMI) and 88.6% of extremely low income households (0-30% of AMI) paid more than 30% of their income for housing. Additionally, 100% of American Indian or Alaska Native households, 61.5% of Other Race or Multiple Races households, and 50% of Asian or Pacific Islander households paid more than 30% of their income for housing, while 41.8% White households and 26.4% Hispanic or Latinx households paid more than 30% of their income for housing.

AFFORDABILITY – RENTERS

Table 36 identifies the Fair Market Rent (FMR) for Sonoma County in 2020 and 2021 as determined by the U.S. Department of Housing and Urban Development (HUD). HUD determines the FMR for an area based on the amount that would be needed to pay the rent (and utilities) for suitable privately-owned rental housing. HUD uses FMRs for a variety of purposes, such as determining the rental prices and subsidy amounts for units and households participating in various Housing Choice Voucher assistance programs.

According to Sonoma County Housing Authority's Fiscal Year 2021 Annual Agency Plan, the Sonoma County Housing Authority has issued approximately 3,125 Housing Choice Vouchers providing monthly rental assistance payments to lower income families. It is noted that the Sonoma County Housing Authority accepted applications for its Housing Choice Voucher waitlist lottery from October 1 until November 1, 2021. 750 applicants will be randomly selected, screened for eligibility, and notified in early December that they have a place on the new waitlist. Those who are not selected will be notified and are welcome to reapply when the waitlist reopens in approximately 24 months. The Sonoma County Housing Authority is committed to expanding its voucher program, applying for new vouchers each time they have been made available. During 2020, the Sonoma County Housing Authority was awarded 111 new Mainstream vouchers and 59 new Family Unification Program.

Table 36. HUD Fair Market Rents Sonoma County (2021, 2022)		
Bedrooms in Unit	Fair Market Rent (FMR) 2021	Fair Market Rent (FMR) 2022
Studio	\$1,340	\$1,373
1 Bedroom	\$1,519	\$1,549
2 Bedrooms	\$1,996	\$2,038
3 Bedrooms	\$2,825	\$2,851
4 Bedrooms	\$3,254	\$3,163
Source: HUD 2022/2021 FMR Sonoma County		

As of October 2021, there were 18 rental listings posted on Zillow.com in the City and its vicinity, including 7 two-bedroom single family homes available between \$1,995 to \$5,500 a month, 7 three-bedroom single-family homes available between \$3,190 to \$5,700 a month, and 2 four-bedroom single-family homes between \$4,300 to \$5,700 a month, most of which are above the 2021 FMR. Table 37 identifies the recent homes listed for rent in the City, including type of housing unit (single-family, townhome, mobile home, etc.) and whether the rental unit is affordable to lower income households. The affordability of the recent homes is based on the max monthly rent identified in Table 33.

Table 37. Sonoma Rents and Affordability (2021)¹						
Address and Type of Unit	Bed	Bath	Listed Rent	Affordable to²:		
				Extremely Low Incomes	Very Low Incomes	Low Incomes
(Undisclosed Address) Apartment	1	1	\$1,650	No	Families of 6+	Families of 2+
(Undisclosed Address) Single-Family Detached Home	2	2	\$1,995	No	No	Families of 3+
133 Andrieux St Apartment	2	1	\$2,150	No	No	Families of 4+
742 1st St W #11 Apartment	1	1.5	\$2,200	No	No	Families of 4+
19323 Sonoma Hwy #5 Apartment	2	1	\$2,500	No	No	Families of 5+

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840 W Napa St #G Townhome	2	2	\$2,775	No	No	No
836 2nd St W, Sonoma Single-Family Detached Home	3	2	\$3,190	No	No	No
1375 Bainbridge Ln Single-Family Detached Home	3	2.5	\$3,700	No	No	No
139 Malet St, Sonoma Single-Family Detached Home	4	2	\$4,300	No	No	No
616 Austin Ave Single-Family Detached Home	3	2	\$5,200	No	No	No
(Undisclosed Address) Single-Family Detached Home	3	2	\$5,700	No	No	No
<p>Note: ¹ This table includes the listed rental price of housing units on Zillow.com in October 2021.</p> <p>² Affordability is based on affordable home purchase prices amounts by income level and household size identified in Table 33</p> <p>Source: Zillow.com</p>						

As shown in Table 30, the median gross rent in Sonoma was \$1,836 in 2019, an increase of 32.9% from 2010. Standard management practices require that a household have three times their rent in income. Under this scenario, a household would need to earn approximately to earn \$6,120 per month or \$73,440 per year to afford the average 2019 rental price in Sonoma. Therefore, for households of one person, the average 2019/2020 rents in Sonoma and currently available single-family home on Zillow.com would be unaffordable to the extremely low- (< \$24,450 per year), very low- (\$24,450 - \$40,750 per year), and low-income (\$40,750 - \$65,150 per year) households, but would be affordable to some moderate-income (\$72,300- \$86,750) households.

AFFORDABILITY - HOMEOWNERS

As shown in Table 31, the median home value in Sonoma was \$785,900 in 2019, which was a 37.7% increase from \$570,900 in 2015. Recent median sales data in Table 33 shows that the median sales price in Sonoma increased 13.7% from \$747,500 to \$850,000. Reviewing the median sales data in Table 33 along with the affordable home purchase price amounts by income level and household size in Table 35 indicates that median home sales prices in Sonoma are not affordable to lower income households nor moderate-income households.

According to Zillow.com as of October 2021, there are currently 27 three-bedroom single-family homes for sale in Sonoma and the vicinity listed between \$645,000 to \$4,950,000 and 15 four-bedroom single-family home listed between \$850,000 to \$8,495,000. Comparing the current listing prices to Table 35, it appears that these single-family homes in Sonoma are not affordable to lower-income households nor moderate-income households. While none of the current listings in Sonoma are affordable, a review of recent sale data for housing in Sonoma reveals that 264 homes sold in the past year were below the median sale price of \$850,000 but only 33 of them are affordable to lower income households.

Table 38 identifies homes sold in October 2021 in the City Sonoma that were affordable to lower income households, including type of housing unit (single-family, townhome, mobile home, etc.) and the level of affordability of homes in the lower price range. The affordability of the recent homes is based on affordable home purchase prices identified in Table 35.

Table 38. Affordable Homes Sold in Sonoma (2021)						
Address and Type of Unit	Unit Type	Bed / Bath	Sold Price	Affordable to ² :		
				Extremely Low Incomes	Very Low Incomes	Low Incomes
720 3rd St W	Single Family	3/2	\$50,500	Families of 1 +	Families of 1+	Families of 1+
198 Del Rio Paseo	Manufactured	2/2	\$150,000	No	Families of 1+	Families of 1+
160 Chiquita Camino	Manufactured	2/2	\$160,000	No	Families of 2+	Families of 1+
779 W Spain St	Condo	1/1	\$385,000	No	No	Families of 6+
1254 Broadway APT 4	Condo	2/2	\$510,000	No	No	No
920 5th St W UNIT T	Condo	2/2	\$575,000	No	No	No
847 W Spain St #K	Condo	2/2	\$595,000	No	No	No
857 2nd St W	Townhome	3/2	\$699,000	No	No	No
825 2nd St W	Single Family	3/2	\$745,000	No	No	No
Note: ¹ This table includes the sold housing units on Zillow.com in October 2021.						
² Affordability is based on affordable home purchase prices amounts by income level and household size identified in Table 33						
Source: Zillow.com						

As indicated by Table 38, among 21 housing units sold in Sonoma, there was only 1 housing unit affordable to extremely low income households, 4 housing units affordable to very low income households, and 5 housing units affordable to low income households. Overall, mobile homes offer the more affordable alternatives for these income groups. Also, new manufactured homes on vacant lots can provide another affordable solution.

3. ASSISTED HOUSING AT-RISK OF CONVERSION

Government Code Section 65583(a)(8) requires that a housing element shall contain an analysis of existing assisted housing developments, which are defined as multi-family rental housing that receives governmental assistance, and identify any assisted housing developments that are eligible to change from lower-income housing uses during the next ten years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. Assisted housing development means multi-family rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, State and local multi-family revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees.

Units at risk of conversion are those that may have their subsidized contracts terminated (“opt out”) or that may “prepay” the mortgage, thus terminating the rental restrictions that keep the unit affordable to lower income tenants. There are several reasons why the property owner may choose to convert a government-assisted unit to a market-rate unit, including a determination that the unit(s) can be operated more profitably as a market-rate development; difficulties in dealing with HUD oversight and changing program rules; the depletion of tax advantages available to the owner; and the desire to roll over the investment into a new property.

California Housing Partnership uses an at-risk category for assisted housing developments in its database. Very-High Risk assisted housing are those affordable homes that are at-risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. High Risk assisted housing are those affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Moderate Risk assisted housing are those affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Low Risk assisted housing are those affordable homes that are at-risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

The ABAG 6th Cycle Data package provided a list of assisted housing developments in Sonoma County. 4 subsidized projects are located in Sonoma. Table 39 identifies each multi-family rental housing development receiving governmental assistance in Sonoma, the subsidy programs that are in place for each project, and the likelihood of each housing development to convert to market-rate units that would not provide assistance to lower-income residents.

Project/Address	Total Units	Subsidized Units	Type	Source	Risk of Conversion
Firehouse Village 548 Second Street West Sonoma, CA 95476	30	23	Family	LIHTC	Low Risk (placed in service in 2001; affordable to 2056)
Valley Oak Homes 19344 Sonoma Highway Sonoma, CA 95476	43	42	Family	LIHTC	Low Risk (placed in service in 2013; affordable to 2068)
Village Green II 650 West Fourth Sonoma, CA 95476	34	34	Senior	USDA 515	Low Risk (LIHTC acquisition/rehabilitation underway; LIHTC funding committed in 2021 will provide affordability for 55 years upon completion of rehabilitation and additional City/Community Development Agency restrictions require permanent affordability)
Altamira Family Apartments 20269 Broadway, Sonoma, CA 95476	48	47	Family	LIHTC	Low Risk (placed in service in 2021, affordable to 2076)
Source: ABAG 2020 6 th Cycle Housing Element Data Package – Sonoma County; LIHTC List of Projects, California Tax Credit Allocation Committee, 2022; Rural Development (RD) Dataset, USDA, 2021					

As identified in Table 39, all of the affordable units in Sonoma have a low risk of conversion, meaning that the affordable properties are not at-risk of converting to market rate for at least 10 years; projects within the City are not anticipated to be eligible to convert to market rate until after 2050. Each of the projects in the City is operated by a stable non-profit or affordable housing provider. Sonoma takes an active and supportive role in the preservation of associated rental housing. The cost of conserving assisted units is significantly less than the cost required to replace units through new construction. Conservation of assisted units generally requires rehabilitation of the aging structure and re-structuring the finances to maintain a low debt service and legally restrict rents. Construction costs, land prices and land availability are generally the limiting factors to development of affordable housing, it is estimated that subsidizing rents to preserve assisted housing is more feasible and economical than new construction.

Cost Analysis. State Housing Element law requires that all Housing Elements include additional information regarding the conversion of existing, assisted housing developments to other non-low income uses (Statutes of 1989, Chapter 1452). This was the result of concern that many affordable housing developments would have affordability restrictions lifted when their government financing was soon to expire or could be pre-paid. Without the sanctions imposed due to financing restrictions, affordability of the units could no longer be assured.

In order to provide a cost analysis of preserving “at-risk” units, costs must be determined for rehabilitation, new construction or tenant-based rental assistance. The following costs anticipate rehabilitation, construction, or rental assistance of unit sizes comparable to those in the Oak Ridge Senior Apartments, which have primarily one-bedroom units and some two-bedroom units.

1. *Rehabilitation* – The primary factors used to analyze the cost of preserving low-income housing include: acquisition, rehabilitation and financing. Actual acquisition costs depend on several variables such as condition, size, location,

existing financing and availability of financing (governmental and market). The acquisition cost assumption is based on an average cost of a multi-family unit within the region. This option would result in a cost of \$8.9 million to preserve 48 replacement units for a 55-year or longer affordability term, depending on the financing program and specific affordability restrictions. The estimated per unit preservation costs for Sonoma are summarized below.

<u>Costs</u>	
Acquisition	
(based on 671 5 th St W, 18 units, \$2,999,500 sales price, 10/2021)	\$166,639
Rehabilitation	\$40,000
Financing/Other (10% of Costs)	\$20,664
Total Per Unit Cost	\$227,303

2. *New Construction/Replacement* – New construction implies construction of a new property with the same number of units and similar amenities as the one removed from the affordable housing stock. Cost estimates were prepared by using regional information and data. The construction of new housing can vary greatly depending on factors such as location, density, unit sizes, construction materials and on-site and off-site improvements. The recently constructed Altamira project cost \$28,771,537, or \$599,407 per unit (California Tax Credit Allocation Committee Project Staff Report, June 12, 2019, Project CA-19-042).
3. *Tenant-Based Rental Assistance* – This type of preservation largely depends on the income of the family, the shelter costs of the apartment and the number of years the assistance is provided. If the very low income family that requires rental assistance earns \$41,325 (50% of median income for a 2-person household), then that family could afford approximately \$1,033 per month for shelter costs. According to the ACS 5-Year Estimates 2015-2019, the median rental price in Sonoma was \$1,836 in 2019. The difference between the \$1,033 that a family of 4 can afford and the average rent of \$1,836 would result in necessary monthly assistance of \$803 a month or \$9,636 per year. For comparison purposes, typical affordable housing developments carry an affordability term of at least 55 years, which would bring the total cost to \$529,980 per household.

Summary. As demonstrated above, the most cost-effective method of providing affordable housing in Sonoma is to acquire and rehabilitate units, which would cost approximately \$227,303 per unit. Providing rental assistance for a 55-year period would cost approximately \$529,980 per household. New construction of affordable units is most expensive, with an estimated cost of approximately \$599,407 per unit. It is noted that the new construction costs do not reflect potential costs savings associated with various federal and State housing grant and loan programs, discussed below under Resources, which reduce the cost to the developer of providing the units.

G. PROJECTED HOUSING NEEDS

California law requires each city and county to develop local programs within their housing element in order to meet their “fair share” of existing and future housing needs for all income groups, as determined by the California Department of Housing and Community Development. The RHNA is a State-mandated process devised to distribute planning responsibility for housing need throughout the State of California. Chapter IV discusses the City’s ability to accommodate the RHNA through approved projects and vacant and underdeveloped sites suitable for residential development. The regional housing needs allocation for Sonoma, as shown by Table 40 below, is allocated by ABAG to address existing and future needs and covers a time period from 2023-2031.

Table 40. Regional Housing Needs Allocation - City of Sonoma (2023–2031 Planning Period)			
Income Group	Income Range¹(Family of Four)	Affordable Monthly Housing Costs²	Sonoma Regional Share (units)
Very Low ³ : <50% AMI	< \$58,150	< \$1,453	83
Low: 50-80% AMI	\$58,150 - \$103,300	\$1,453 - \$2,583	48
Moderate: 80-120% AMI	\$103,300 - \$123,950	\$2,583 - \$3,099	50

Table 40. Regional Housing Needs Allocation - City of Sonoma (2023–2031 Planning Period)

Above Moderate: 120 + AMI	> \$123,950	> \$3,099	130
Total	n/a	n/a	311

¹ HCD has established these income limits for Sonoma County for 2021.
² In determining how much families at each of these income levels should pay for housing, HCD considers housing “affordable” if the amount of rent or total ownership cost (principal, interest, taxes, and insurance) paid does not exceed 30% of gross household income.
³ 50% of the County’s very low-income housing needs (83 units) are for extremely low-income households, which are defined as those families earning less than 30% of median income.
Source: ABAG 2021 6th Cycle Housing Element Data Package – Sonoma County; HCD 2021 State Income Levels

H. HOUSING RESOURCES

Resources available to assist with obtaining housing and services within the City and County, with a focus on assistance for lower income and special needs populations, are summarized below.

1. HOUSING PROGRAMS AND COMMUNITY SERVICES RESOURCES FOR INDIVIDUALS AND HOUSEHOLDS

Accessing Coordinated Care and Empowering Self Sufficiency (ACCESS): Accessing Coordinated Care and Empowering Self Sufficiency (ACCESS) Sonoma is a county initiative that focuses on the critical needs of residents who are experiencing physical and mental health challenges, economic uncertainty, housing instability, substance use disorders, criminal justice engagement and social inequity.

Bucklew Programs: Bucklew Programs helps people with behavioral health challenges lead healthier, more independent lives, strengthening families and communities in the process. Wide range of services for adults and children in the North Bay includes supported housing and employment for people living with mental illness, family support, outpatient counseling, substance use treatment, outreach, education, and suicide prevention.

Burbank Housing: Burbank Housing is a local nonprofit dedicated to building quality affordable housing in the North Bay and operates affordable housing projects in the Sonoma Valley. Burbank Housing create vibrant local communities that are carefully designed, professionally managed, and sustainable both financially and environmentally, to foster opportunities for people with limited-income of all ages, backgrounds and special needs.

California Rural Legal Assistance (CRLA): CRLA provides legal assistance to low-income persons in education, employment & labor, rural health, and housing/landlord-tenant issues including eviction and foreclosure defense. CRLA is committed to fight for justice and individual rights alongside the most exploited communities. CRLA provides a variety of community education and outreach programs including leadership development. CRLA also protects Ingenious Mexican communities, LGBT communities, and farm worker communities.

California Work Opportunity and Responsibility to Kids (CalWORKs): CalWORKs is a public assistance program that provides cash aid and services to eligible families that have a child(ren) in the home. The program serves all 58 counties in the state and is operated locally in Sonoma County by the Health and Human Services Agency. If a family has little or no cash and needs housing, food, utilities, clothing or medical care, they may be eligible to receive immediate short-term help. Families that apply and qualify for ongoing assistance receive money each month to help pay for housing, food and other necessary expenses.

Catholic Charities of the Diocese of Santa Rosa: Catholic Charities of the Diocese of Santa Rosa serves and advocates for vulnerable people of all cultures and beliefs, prioritizing those experiencing poverty. Catholic Charities of the Diocese of Santa Rosa provides over 20 programs of service to nearly 20,000 people each year. Catholic Charities of the Diocese of Santa Rosa serves the entire region the Diocese of Santa Rosa touches – Sonoma, Napa, Mendocino, Lake, and Humboldt counties.

Child Care Planning Council (CCPC): The mission of the CCPC of Sonoma County is to convene and inspire the community through collaboration, leadership, and advocacy to promote and plan for quality childcare and development for the benefit of all children (primarily birth to 12) and their families.

Children's Advocacy Centers of California (CACC): CACC is a membership organization dedicated to helping local communities respond to allegations of child abuse in ways that are effective and efficient – and put the needs of child victims first. CACC provides training, support, technical assistance and leadership on a statewide level to local child advocacy centers and multidisciplinary teams throughout California responding to reports of child abuse and neglect.

Community United Against Violence (CUAV): Founded in 1979, CUAV works to build the power of LGBTQ (lesbian, gay, bisexual, transgender, queer) communities to transform violence and oppression. CUAV supports the healing and leadership of those impacted by abuse and mobilize our broader communities to replace cycles of trauma with cycles of safety and liberation. As part of the larger social justice movement, CUAV works to create truly safe communities where everyone can thrive.

Council on Aging: Council on Aging Services for Seniors is a non-profit organization which has been providing services for Sonoma County citizens over the age of 60 since 1966. Council on Aging provides Meals On Wheels (meal delivery service), social services, including adult day care, assistance connecting persons with appropriate resources, legal and justice services for older adults, and dining and social activities.

Disability Services and Legal Center (DSLCL): DSLCL is a non-profit organization and a primary resource for adults, children, veterans and seniors with disabilities and their families in Sonoma County since 1976. DSLCL is one of California's 28 Centers for Independent Living (CIL/ILC) that promotes the Independent Living philosophy through education, community partnerships and advocacy. DSLCL serves over 2,000 people annually, providing information, advice and assistance on a wide range of disability-related matters.

Fair Housing Advocates of Northern California (FHANC): FHANC provides free comprehensive fair housing counseling, complaint investigation, and assistance in filing housing discrimination complaints with the U.S. Department of Housing and Urban Development (HUD) or the California Department of Fair Employment and Housing (DFEH). FHANC is HUD certified to offer pre-purchase counseling and education programs, as well as foreclosure prevention counseling and workshops in Marin, Sonoma (except the city of Petaluma), Solano, and other counties.

Generation Housing: Generation Housing's partnership provides opportunities to increase the supply, affordability, and diversity of homes throughout Sonoma County. Generation Housing is directed by cross-sector leaders representing healthcare, education, environment, and business who agree that a housing advocacy organization to promote housing policy and educate the public is a crucial missing component in local housing development. Generation Housing promotes effective policy, sustainable funding resources, and collaborative efforts to create an equitable, healthy, and resilient community for everyone.

Homeless Action Sonoma Inc.: Homeless Action Sonoma Inc. is a 501c non-profit organization committed to ending homelessness in Sonoma. To fully address the issue, Homeless Action Sonoma Inc. is dedicated to a four-part program: Educate, Integrate, Innovate, and Create.

Legal Aid of Sonoma County (LASC): Legal Aid of Sonoma County (LASC) assists over 3,000 adults and 2,000 children every year with crisis legal needs. Founded in 1958 and incorporated in 1983 as a private nonprofit, LASC provides crisis legal services to low-income families, children, elders, immigrants, and other vulnerable Sonoma County residents. These include domestic violence, child and elder abuse, low-income housing issues, disaster recovery and legal obstacles to health and employment. LASC provides full scope legal services including legal advice, preparation of legal documents, negotiations, and in court representation.

National Alliance on Mental Illness: The National Alliance on Mental Illness has a Sonoma County chapter and dedicated to improving the quality of lives for individuals living with mental illness and their families through support, education and advocacy.

NAMI contracts with Sonoma County to facilitate peer support groups and to offer one-on-one mentoring and provide numerous education programs throughout the community.

North Bay Veterans Resource Center (NBVRC) The NBVRC assists homeless veterans or veterans at risk of imminent homelessness to find and maintain housing through case management, referrals to housing programs, and in some cases financial assistance. The NBVRC also has computers available for veteran use, clothing, and hygiene packs for those in need, as well as coffee and snacks in the waiting room. The NBVRC has the following programs for local veterans:

- Supportive Services for Veterans and Families: A rapid rehousing and homeless prevention program for low-income veterans and their families. Provides case management and temporary financial assistance.
- Hearn House Behavioral Health Treatment Program: A 15-bed residential program for male veterans with a history of mental illness and/or substance abuse.
- Rocca House Transitional Housing Program: An 8-bed transitional housing program for male veterans; residents work toward training, employment, and permanent housing goals.

Partnership Health Plan Care Management Ride Program: Persons with Medi-Cal that receive their benefit through Partnership Health Plan and have complex medical needs can receive additional care management including free transportation assistance.

Redwood Caregiver Resource Center: In operation since 1985, Redwood Caregiver Resource Center continues to provide services to family caregivers throughout the Redwood Empire, including the counties of Del Norte, Humboldt, Mendocino, Lake, Sonoma, Napa, and Solano. Redwood CRC is part of a statewide system of eleven nonprofit Caregiver Resource Centers (CRCs) offering support and assistance to caregivers of adults with brain impairments through education, research, services and advocacy. Funding comes from the California Department of Mental Health, grants, fees for services, and gifts from donors. All services are free or low cost.

Sonoma Valley Community Health Center (SVCHC): SVCHC is a non-profit, federally qualified health center that opened in 1992 as a free-standing primary health care clinic. SVCHC began as a grassroots effort to address the lack of access and disparities of health care for the uninsured and underserved in Sonoma Valley. Since its inception, SVCHC has grown in capacity to serve MediCal, insured, underinsured, private insurance, private pay patients and provides sliding scale fees for those in need. In addition to medical services, SVCHC offers behavioral health, an in-house phlebotomy service, dental clinic, pharmacy services and certified bilingual enrollment professionals to help determine eligibility and enrollment options. SVCHC receives federal funding under Public Health Services Act, Title III, Section 330, Public Health Services Act, Section 330, 42 U.S.C. 254b, the Affordable Care Act, Section 10503 and the Public Health Service Act, Section 330, 42 U.S.C. 254b, as amended.

Sonoma County Continuum of Care Program: The Sonoma County Continuum of Care (CoC) is Sonoma County's collaborative effort representing the homeless services system of care. The City of Sonoma is a member jurisdiction. Governed by a fifteen-member Continuum of Care Board, the countywide effort is responsible for oversight of funds designated to the Continuum of Care and planning/policy development for addressing homelessness. The Board consists of local elected officials, nonprofit representatives, subject matter experts, and individuals with lived homeless experience. The SCCDC serves as the Lead Agency of CoC.

Sonoma County Human Services Department: The Sonoma County Human Services Department strives to support the health, safety and well-being of individuals, families and the community.

- Every day, our programs and services benefit more than 100,000 seniors, veterans, adults, teens, children and people with disabilities, through our four service divisions:
- Adult & Aging helps ensure the safety, independence and well-being of older adults, persons with disabilities, and military veterans and their families.
- Economic Assistance helps low-income and other individuals and families apply for money for food, health care, dental care, financial assistance and other services to meet basic needs.

- Employment and Training provides job search, employment and training services, cash aid, and supportive services for residents, and helps business and other employers find qualified job applicants for positions.
- Family, Youth & Children's Services helps ensure the safety and well-being of children and teens who have been abused, neglected or abandoned.

Sonoma County Family, Youth and Children's Division: The Family, Youth and Children's Division provides services for Sonoma County children and teens to be safe, healthy and supported. The Family, Youth and Children's Division is committed to protect youngest residents from abuse, neglect or parental abandonment. Its staff provide protective and supportive social services to help children and their families to create stable, nurturing homes, a caring, connected community, and a sense of personal empowerment and hope. Housing-related programs and services include:

- Foster care provides temporary shelter for children and youth moved from unsafe homes. Relatives and community caregivers are recruited to provide temporary foster homes since, once home is safe, children may be returned to their parents. For youth who cannot return home safely, permanent adoption may become an option.
- Valley of the Moon Children's Home is the temporary emergency shelter for children removed from unsafe homes. Children stay in this a stable, supportive, nurturing environment while a community foster home is arranged.

Sonoma County Housing Authority (SCHA): SCHA is an award-winning local public agency that provides safe, decent and quality affordable housing and supportive services to eligible persons with limited incomes. SCHA currently assists over 2,700 households, largely comprised of working families, seniors on fixed incomes, veterans, and persons with disabilities. The Housing Authority also offers subsidies and supportive services for residents with particular needs.

Sonoma County Paratransit: Many passengers with disabilities can utilize fixed-route service provided by Sonoma County Transit. For passengers whose disabilities prevent them from using fixed-route service, ADA paratransit service is an option. Paratransit services are provided the same hours and days as fixed-route service. In addition, local transit services are provided in Rohnert Park, Cotati, Sebastopol, Windsor, Healdsburg, Cloverdale, Sonoma, Sonoma Valley and Guerneville/Monte Rio.

Sonoma County In-Home Supportive Services: In-Home Supportive Services (IHSS) provides services to support a person living in their home including personal care, light housekeeping, shopping, meal prep and accompanying to medical appointments. Eligibility: Medi-Cal, blind, disabled or 65 years of age or older, and unable to live at home safely without help.

Sonoma Post Acute: Sonoma Post Acute partners with hospice agencies in the community to offer compassionate end-of-life care. Sonoma Post Acute provides appropriate pain management and comfort to our hospice patients. Sonoma Post Acute is committed to supporting families and caregivers during their loved ones' transitions to hospice.

Sonoma County Community Development Commission (SCCDC): SCCDC is dedicated to creating homes for all in thriving and inclusive neighborhoods. The SCCDC was established in 1978 as the County's public housing authority and is Sonoma County's lead agency for housing and homeless programs. The SCCDC exists to open doors to permanent housing and opportunity. Services include:

- Homeowner Housing Rehabilitation Loan Program. Financial assistance for owner-occupants in need of repairs on their single-family homes or mobile homes, and owners of rental properties where at least half of the tenants are low-income households. The program provides low-interest loans to eligible property owners throughout the unincorporated areas of Sonoma County and in the city limits of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor.
- Rental Assistance
- Housing & Neighborhood Investments
- Strategic Support to Service Providers and Non-profits
- Administration of federal funds for housing development, acquisition and rehabilitation, preservation, housing assistance, emergency and other shelter, community development, and economic development.

Sonoma Hills Retirement Community: Sonoma Hills Retirement Community is an independent living community offering 80 one-level apartments in Sonoma.

The Living Room: The mission of The Living Room is to ease adversity, promote stability, and support self-reliance for women and children who are homeless, or at-risk of homelessness, in Sonoma County. The Living Room works within three primary areas: housing, food, and outreach to women and their children.

The Family Justice Center Sonoma County: The Family Justice Center Sonoma County empowers family violence victims to live free from violence and abuse by providing comprehensive services, centered on and around the victim through a single point of access. Building on strong interagency collaboration, the Family Justice Center Sonoma County protects the vulnerable and works to stop violence and restore hope.

Vintage House Sonoma: Vintage House is a diverse and growing membership-based nonprofit organization. The mission of Vintage House is to help support, preserve, and enhance the quality of life for residents of Sonoma Valley as they age. In addition to a wide range of classes and activities, Vintage House provides services such as myRide, a program that provides local no-cost rides to seniors who no longer drive, the “Soups On” program, support groups for those living with dementia, and much more. Facilities are also available to rent.

2. FINANCIAL RESOURCES TO DEVELOP, REHABILITATE AND PRESERVE HOUSING

Table 41 summarizes financial resources for the development, rehabilitation, and preservation of housing and for housing-related services.

Table 41: Financial Resources		
Program Name	Description	Eligible Activities
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants available to small counties and cities on a competitive basis for a variety of housing and community development activities. The City accesses CDBG funds as part of the Urban County entitlement jurisdiction, administered by Sonoma County Community Development Commission. The funds are used for many housing and community development activities, including acquisition and rehabilitation of housing, fair housing services, including education and outreach, public improvements, and housing construction.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - Home Buyer Assistance - Economic Development - Homeless Assistance - Public Services
Continuum of Care	Grant program available to eligible applicants, including local governments, public housing agencies, and nonprofits, to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - New Construction - Rental Assistance - Supportive Services - Operative Costs

Table 41: Financial Resources		
HOME	Grant program available to County and cities on a competitive basis for housing activities. The City accesses HOME funds as part of the Urban County entitlement jurisdiction administered by the SCCDC. HOME funds are used for a variety of housing activities, including homebuyer assistance, homeowner and multifamily rental rehabilitation, new construction of housing, housing acquisition and rehabilitation, and tenant-based rental assistance.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - Home Buyer Assistance - Rental Assistance
Low income Housing Tax Credits (LIHTC)	Tax credits are available to persons and corporations that invest in low income rental housing. Proceeds from the sales are typically used to create housing.	<ul style="list-style-type: none"> - New Construction - Acquisition - Rehabilitation
Mortgage Credit Certificate (MCC) Program	Income tax credits available to first-time homebuyers to buy new or existing single-family housing.	<ul style="list-style-type: none"> - Home Buyer Assistance
Housing Choice Voucher (HCV) Program	The Sonoma County Housing Authority via HUD administers the HCV Program in Sonoma County. As such, rental assistance payments from the Sonoma County Housing Authority to owners of private market rate units on behalf of very-low income tenants. The Housing Choice Voucher program includes vouchers issued to individual households as well as project-based vouchers issued to a developer to preserve a specified number of units in a project for lower income residents.	<ul style="list-style-type: none"> - Rental Assistance - Home Buyer Assistance
Section 202	Grants to non-profit developers of supportive housing for the elderly.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - New Construction
Section 203(k)	Provides long-term, low interest loans at fixed rate to finance acquisition and rehabilitation of eligible property.	<ul style="list-style-type: none"> - Land Acquisition - Rehabilitation - Relocation of Unit - Refinance Existing Indebtedness
Section 811	Grants to non-profit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - New Construction - Rental Assistance
U.S. Department of Agriculture (USDA) Housing Programs	Below market-rate loans and grants for very low, low, and moderate income multifamily housing, self-help subdivisions, and farmworker rental housing.	<ul style="list-style-type: none"> - New Construction - Rehabilitation
2. State Programs		
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	<ul style="list-style-type: none"> - Home Buyer Assistance

Table 41: Financial Resources

Cal HOME	Provides grants to local governments and non-profit agencies for local homebuyer assistance and owner-occupied rehabilitation programs and new home development projects. Will finance the acquisition, rehabilitation, and replacement of manufactured homes.	<ul style="list-style-type: none"> - Home Buyer Assistance - Rehabilitation - New Construction
California Housing Assistance Program	Provides 3% silent second loans in conjunction with 97% CHFA first loans to give eligible buyers 100% financing.	<ul style="list-style-type: none"> - Home Buyer Assistance
California Self-Help Housing Program (CSHHP)	Provides grants for the administration of mutual self-help housing projects.	<ul style="list-style-type: none"> - Home Buyer Assistance - New Construction
Emergency Housing and Assistance Program (EHAP)	Provides grants to support emergency housing.	<ul style="list-style-type: none"> - Shelters and Transitional Housing
Emergency Shelter Program	Grants awarded to non-profit organizations for shelter support services.	<ul style="list-style-type: none"> - Support Services
Farmworker Housing Assistance Program	Provides State tax credits for farmworker housing projects.	<ul style="list-style-type: none"> - New Construction - Rehabilitation
Golden State Acquisition Fund (GSAF)	GSAF makes up to five-year loans to developers for acquisition or preservation of affordable housing.	<ul style="list-style-type: none"> - Acquisition/Preservation
Joe Serna Jr. Farm-worker Housing Grant Program (FWHG)	Provides recoverable grants for the acquisition, development and financing of ownership and rental housing for farmworkers.	<ul style="list-style-type: none"> - Home Buyer Assistance - Rehabilitation - New Construction
Mobilehome Park Rehabilitation and Resident Ownership Program (MPRROP)	MPRROP makes short- and long-term low interest rate loans for the preservation of affordable mobilehome parks for ownership or control by resident organizations, nonprofit housing sponsors, or local public agencies. MPRROP also makes long-term loans to individuals to ensure continued affordability.	<ul style="list-style-type: none"> - Preservation
Multifamily Housing Program (MHP)	MHP makes low-interest, long-term deferred-payment permanent loans for permanent and transitional rental housing for lower-income households.	<ul style="list-style-type: none"> - New construction - Rehabilitation - Preservation
3. Private Resources/Financing Programs		
Federal National Mortgage Association (Fannie Mae)	<ul style="list-style-type: none"> - Fixed rate mortgages issued by private mortgage insurers. - Mortgages, which fund the purchase and rehabilitation of a home. - Low Down-Payment Mortgages for Single-Family Homes in underserved low income and minority cities. 	<ul style="list-style-type: none"> - Home Buyer Assistance
		<ul style="list-style-type: none"> - Home Buyer Assistance - Rehabilitation
		<ul style="list-style-type: none"> - Home Buyer Assistance
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. County provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	<ul style="list-style-type: none"> - Home Buyer Assistance

3. HOUSING CONSTRAINTS

Constraints to housing development are defined as government measures or non-governmental conditions that limit the amount or timing of residential development.

Government regulations can potentially constrain the supply of housing available in a community if the regulations limit the opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (Government Code Section 65583(a)(4)). Sonoma is undertaking many changes to its Development Code as part of its work program to implement this Housing Element and is also addressing potential constraints identified during the preparation of this Housing Element.

Non-governmental constraints (required to be analyzed under Government Code Section 65583(a)(5)) cover land prices, construction costs, and financing. While local governments cannot control prices or costs, identification of these constraints can be helpful to Sonoma in formulating housing programs.

This section addresses these potential constraints and their effects on the supply of affordable housing.

A. GOVERNMENTAL AND ENVIRONMENTAL CONSTRAINTS

Sonoma's policies and regulations play an important role in protecting the public's health, safety, and welfare. However, governmental policies and regulations can act as constraints that affect both the amount of residential development that occurs and housing affordability. State law requires housing elements to "address and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Government Code Section 65583).

Therefore, the City is required to review its regulations to ensure there are no unnecessary restrictions on the operation of the housing market. If the City determines that a policy or regulation results in excessive constraints, the City must attempt to identify what steps can be taken to remove or minimize obstacles to affordable residential development. Sonoma's primary policies and regulations that affect residential development and housing affordability are land use controls; development processing procedures, fees, and improvement requirements; and building and housing codes and enforcement.

The governmental constraints analysis focuses on factors that are within the City's control, not on state, federal, or other governmental policies or regulations that the City cannot affect or modify. There are many such policies and regulations that could affect the City's ability to meet future housing needs and secure adequate funding to construct very low- and low-income housing. These are among other governmental constraints:

- Land use and environmental policies and regulations that could limit the City's ability to designate land in its planning area for future residential development. Examples include agricultural open space and natural habitat preservation, protection of endangered species, and flood control.
- Fiscal and financial constraints related to regional, state, or federal funding for housing, transportation, infrastructure, and services needed to support new residential development.
- State and federal requirements that add to the cost of constructing affordable housing, when public funds are used (such as so called "prevailing wage" requirements).
- Construction codes and regulations that the City must follow for new residential construction that could restrict the use of cost-saving techniques or materials.

1. LAND USE CONTROLS

Land use controls guide local growth and development. Sonoma applies land use controls through its General Plan and Development Code. All residential land use classifications pose a constraint on residential development in the sense that various conditions, building requirements, and limitations restrict a pure free market ability to construct housing. Land use regulations also have the potential of adding costs to construction, which indirectly may constrain housing. These impacts are measured against the general health and public safety served in the adoption of such regulations. Standards have been determined by the City to establish minimum constraints to provide for adequate separation of buildings for fire protection, air and light between structures, and the intensity of development. Implementation of these standards has not resulted in a serious constraint in providing housing to households of various income levels.

GENERAL PLAN LAND USE DESIGNATIONS

By definition, local land use controls constrain housing development by restricting housing to certain sections of the City and by limiting the number of housing units that can be built on a given parcel of land. In 2006, the City of Sonoma completed a comprehensive update of its entire General Plan, except the Housing Element. The 2020 General Plan is committed to responsible development aligned within natural resource limitations, providing a diversity of housing that is available and affordable to residents and the local workforce. In furtherance of this goal, the General Plan increased permitted residential densities in Sonoma's multifamily, commercial and mixed use districts. The Plan provides expanded opportunities for multifamily housing, including encouraging residential uses in the Town Center and along Broadway through mixed use development. Furthermore, the City requires new development to include a residential component of at least 50% the total building area on parcels zoned Commercial that are larger than 1 acre, a policy that has proven effective in integrating housing within walking distance of commercial uses. Table 42 identifies the different land use designations in the Sonoma General Plan that accommodate residential development. Sonoma's General Plan land use designations provide for a wide range of residential development types and densities.

Table 42. Residential Land Use Categories, Density, and Intensity			
Land Use Category	Description	Residential Density	Residential Intensity
Hillside	This designation is intended to preserve Sonoma's hillside backdrop, while allowing limited residential development in conjunction with agricultural uses. Crop and tree farming are allowed.	1 unit per 10 or more acres (excluding second units)	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 20%
Agriculture	This designation is intended to protect remaining tracts of productive agriculture within city limits, including grazing land, truck farms, vineyards, and crop production areas.	1 unit per 10 or more acres	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 30%
Rural Residential	This designation is intended to preserve areas of lower density development within the city limits, especially adjacent to hillsides and in established low density neighborhoods. Day care facilities, fire stations, post offices, and similar activities may be allowed subject to use permit review. Home occupations are allowed, but retail and office uses are not.	0 to 2 dwelling units per acre (du/ac)	Height Limit: 35 feet (two stories) Maximum Lot Coverage: 40% FAR: 0.2
Low Density Residential	This designation is intended primarily for single-family housing and duplexes, with attached or clustered development allowed by use permit, in association with related public improvements such as streets. Other uses compatible with the primary use may be allowed subject to use permit review, including transitional housing, schools, day care facilities, churches, fire stations, post offices, nursing homes, convalescent hospitals, and parking areas. Home occupations are allowed, but retail and office uses are not.	2 to 5 du/ac	Height Limit: 35 feet (two stories) Maximum Lot Coverage: 40% FAR: 0.35
Sonoma Residential	This designation, which usually applies to properties at least 3 acres in size, has three purposes: 1) to ensure a variety of unit types and lot sizes in new development, 2) to provide sufficient flexibility in site planning	3 to 8 du/ac	Height Limit: 35 feet (two stories)

Table 42. Residential Land Use Categories, Density, and Intensity			
	and design to allow individual developments to respond to site and neighborhood conditions, and 3) to ensure a range of housing prices and living opportunities for middle-income households. Through this designation housing units of different price ranges are mingled rather than segregated. Home occupations are allowed, but retail and office uses are not.		Maximum Lot Coverage: 40% FAR: 0.35
Medium Density Residential	This designation is intended to provide opportunities for multifamily housing and related public improvements, especially in transition areas between higher density and single-family development. Transitional housing, schools, day care facilities, churches, fire stations, post offices, nursing homes, convalescent hospitals, parking areas, and similar activities may be allowed subject to use permit review. Home occupations are allowed, but retail and office uses are not.	7 to 11 du/ac	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 50% FAR: 0.5
High Density Residential	This designation is intended to provide opportunities for relatively dense multifamily housing and related public improvements, especially close to commercial centers and mixed use development. Transitional housing, schools, day care facilities, churches, fire stations, post offices, nursing homes, convalescent hospitals, parking areas, and similar activities may be allowed subject to use permit review. Home occupations are allowed, but retail and office uses are not.	11 to 15 du/ac	Height Limit: 30 feet (two stories) Maximum Lot Coverage: 60% FAR: 0.7
Housing Opportunity	This designation identifies sites suitable for higher density and affordable development, especially close to commercial centers and mixed use areas, and is intended to provide opportunities for low and very low income households. Uses other than housing and associated improvements are not allowed. Home occupations are allowed.	15 to 25 du/ac	Height Limit: 36 feet (two stories) Maximum Lot Coverage: 60% FAR: 0.7
Mobile Home	This designation is intended to acknowledge existing mobile home parks. Home occupations are allowed, but retail and office uses are not.	0 to 7 mobile homes per acre	Height Limit: 16 feet (one story) Maximum Lot Coverage: 50% FAR: 0.3
Commercial	This designation is intended to provide areas for retail, hotel, service, medical, and office development, in association with apartments and mixed-use developments and necessary public improvements. Schools, day care facilities, fire stations, post offices, emergency shelters, and similar activities may be allowed subject to use permit review.	0 to 20 du/ac	Height Limit: 36 feet Maximum Lot Coverage: 70% to 100% FAR: 0.6 to 2.0
Gateway Commercial	This designation is applied specifically to the Four Corners area and the Verano triangle. It is intended to promote high-quality neighborhood- and visitor-serving office and retail development while implementing a coordinated design program for these areas, in keeping with their status as gateways to the community and in recognition of the need to buffer residential development. Building coverage is limited compared to other commercial areas to allow for landscaping and transition areas. Cultural and recreational facilities, hotels, and small-scale agricultural support facilities are allowed in association with apartments and mixed use developments and necessary public improvements. Schools, day care facilities, fire stations, post offices, emergency shelters, and similar activities may be allowed subject to use permit review.	0 to 20 du/ac	Height Limit: 36 feet Maximum Lot Coverage: 50% FAR: 0.8
Mixed Use	This designation is intended to accommodate uses that provide a transition between commercial and residential districts, to promote a pedestrian presence in adjacent commercial areas, and to provide	0 to 20 du/ac	Height Limit: 36 feet

Table 42. Residential Land Use Categories, Density, and Intensity

	neighborhood commercial services to adjacent residential areas. It is also intended to provide additional opportunities for affordable housing, especially for low and very low income households. The Mixed Use designation also is intended to recognize the continued existence of uses that contribute to the character or function of their neighborhood and to allow for the possibility of their expansion. Day care facilities, fire stations, post offices, transitional housing, and emergency shelters may be allowed subject to use permit review. A residential component is required in new development, unless an exemption is granted through use permit review.		Maximum Lot Coverage: 70% to 100% FAR: 0.6 to 1.2
Source: City of Sonoma General Plan (adopted October 2006)			

DEVELOPMENT CODE

Title 19 (Integrated Development Regulations and Guidelines) of the City of Sonoma Municipal Code carries out the policies and implementation measures of the General Plan by classifying and regulating the use of land and structures in the City. Specifically, Title 19 of the Sonoma Municipal Code (“Development Code”) contains standards and provisions to:

- Encourage the use of land as designated by the General Plan Land Use Plan and ensure compatibility between neighboring land uses;
- Retain the unique small-town character of the community and the integrity of its neighborhoods through detailed prescriptions for block form, site planning, and building design for specific geographic areas of the City;
- Conserve and protect the City’s natural beauty, including scenic views, hillside open space, creeks, and trees;
- Retain and create small pockets of open space and natural areas and require adequate, park, open space, landscaping, and tree planting in new development;
- Protect historic buildings and sites, and carry the historic character of the Plaza and old Sonoma into the rest of the City through careful attention to urban design;
- Minimize automobile use and congestion by promoting pedestrian- and bicycle-oriented development, safe and effective traffic circulation, and adequate off-street parking facilities, and by expanding bicycle and pedestrian connections; and
- Support continued agricultural opportunities.

Periodically, the Development Code is reviewed to ensure its consistency with the policies of the General Plan, as required by Government Code Section 65860, and amendments are initiated to enhance its value in accommodating new development. The Development Code provides for an array of residential districts throughout the City that allow a variety of different residential uses. The Development Code also permits residential uses in certain commercial zones. Table 43 identifies the zoning districts in Sonoma that allow residential uses and the corresponding General Plan land use designations.

Table 43. Land Use Categories and Zoning

Land Use Category	Zoning District
Hillside	Residential – Hillside (R-HS)
Agriculture	Agricultural (A)
Rural Residential	Residential – Rural (R-R)
Low Density Residential	Residential – Low Density (R-L)
Sonoma Residential	Residential – Sonoma (R-S)
Medium Density Residential	Residential – Medium Density (R-M)
High Density Residential	Residential – High Density (R-H)
Housing Opportunity	Residential – Housing Opportunity (R-O)

Table 43. Land Use Categories and Zoning	
Mobile Home	Residential – Mobile Home Park (R-P)
Commercial	Commercial (C)
Gateway Commercial	Commercial – Gateway (C-G)
Mixed Use	Mixed Use (MX)
Source: City of Sonoma Development Code (Title 19)	

Additionally, Sonoma is comprised of 13 Planning Areas with individual characteristics and features representing different periods in the City's history. Chapter 19.16 of the Development Code establishes the Planning Areas within the City and specific site planning and design standards for each area to ensure that projects are designed to enhance and maintain the development and environmental characteristics of each unique Planning Area. The Planning Areas are described in terms of three subtypes – areas, districts, and corridors – depending upon their function, their geography, and the range of land uses within them. Table 44 provides a description of each of the Planning Areas and identifies the applicable zoning districts within each.

Table 44: Sonoma Planning Areas		
Planning Area	Existing Conditions / Potential Changes	Applicable Zoning Districts
Northeast Area <i>(See Sonoma Municipal Code Chapter 19.18 for a complete description)</i>	The Northeast planning area lies immediately to the north and east of the Plaza and downtown, and extends to the northeast city boundary. The planning area, which encompasses 230 acres, includes many historical structures and diverse land uses. The general objective for this area is to preserve the quality and context of land uses and buildings, with an emphasis on residential mixed use development with some small-scale office or other compatible commercial land uses.	Residential – Hillside (R-HS) Residential – Rural (R-R) Residential – Low Density (R-L) Residential – Medium Density (R-M) Mixed Use (MX) Wine Production (W) Public (P) Agricultural (A)
Central-East Area <i>(See Sonoma Municipal Code Chapter 19.20 for a complete description)</i>	The Central-East planning area is located at the eastern edge of the city, between East Napa Street and East MacArthur Street, and includes some of the oldest residential areas in the community, with mature landscaping and street trees. The general objective of this area is to preserve the existing quality and fabric of residential neighborhoods in the Central-East planning area. This area, portions of which are currently outside of city limits, has an R-S designation, which calls for somewhat higher densities and a greater variety in lot sizes than what is found in the development to the west (Armstrong Estates), which features lots having a minimum area of 20,000 square feet.	Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Public (P)
Southeast Area <i>(See Sonoma Municipal Code Chapter 19.22 for a complete description)</i>	The Southeast area is roughly bounded on three sides by major collector streets, with Nathanson Creek forming the western boundary. The smaller lot sizes and street improvements associated with the three single-family subdivisions within the city contrast with the rural lands of the unincorporated sphere of influence, with little transition between the two. Future development in this area is required to be based on elements found in traditional Sonoma neighborhoods, including grid streets, a mix of lot sizes, and variation in the size and style of homes.	Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Public (P) Agricultural (A)
Northwest Area <i>(See Sonoma Municipal Code Chapter 19.24 for a complete description)</i>	The Northwest planning area is a predominantly residential district bounded by the West Napa Street/Sonoma Highway commercial corridor on the west and south and the Vallejo Home State Park on the east. Verano Avenue forms the	Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Mixed Use (MX)

Table 44: Sonoma Planning Areas

	<p>northern boundary. In general, residential development within the area is of three types:</p> <ol style="list-style-type: none"> 1. Older tracts of single-family residences on long, narrow blocks arranged in a grid pattern (east of Fifth Street); 2. (2) newer tracts of single-family residences arranged on curvilinear streets and cul-de-sacs (west of Fifth Street); and 3. (3) multifamily development, in the form of condominiums and P.U.D.s, along West Spain Street. <p>The largest opportunity for new residential development in this planning area is represented by the Montini property, a 14-acre parcel within the Residential – Sonoma (R-S) zoning district located at the northwest corner of the planning area, adjacent to the Vallejo Home State Park.</p>	Public (P)
<p>Central-West Area</p> <p><i>(See Sonoma Municipal Code Chapter 19.26 for a complete description)</i></p>	<p>The Central-West planning area is large, at 297 acres, and contains a variety of housing types, including low density single-family, mobile home parks, duplexes and fourplexes, as well as large-scale multifamily developments. Sonoma Creek, on the west, represents the area's most distinct boundary. The development of this area is recent in terms of the city's overall history, with the oldest tracts dating back to the 1950s. Within single-family areas, front setbacks tend to be quite consistent (20 feet, usually), less so in the multifamily sections. The general objective for this area is to ensure single-family areas remain single-family with regular setbacks and development in multifamily areas, while having greater flexibility in site design and massing, respond to conditions on adjacent parcels.</p>	<p>Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Residential – High Density (R-H) Residential—Mobile Home (R-P) Commercial (C) Public (P)</p>
<p>Southwest Area</p> <p><i>(See Sonoma Municipal Code Chapter 19.28 for a complete description)</i></p>	<p>The Southwest planning area, which is entirely residential, is marked by sharp contrasts between rural and urban development. Malet Street and Harrington Drive are rural enclaves, developed mainly with older residences. New residential development includes a single-family tract and a series of higher density tracts featuring detached units on small lots. The Southwest area is bounded by rural and agricultural lands outside of the City's sphere of influence on the south and west, with the Broadway corridor and the gateway at Four Corners to the east, and urban residential development to the north. Existing and planned single-family developments within the planning area will inevitably contrast with adjacent rural areas.</p>	<p>Residential – Rural (R-R) Residential – Low Density (R-L) Residential – Sonoma (R-S) Residential – Medium Density (R-M) Public (P)</p>
<p>Gateway District</p> <p><i>(See Sonoma Municipal Code Chapter 19.30 for a complete description)</i></p>	<p>Although the Gateway commercial district encompasses only 59 acres, its future development is crucial to the identity of Sonoma. It forms the southern entrance to the city and marks the division between the rural and agricultural character of the unincorporated area and the urban features of the city. The desired future of the Gateway District is to provide a mix of resident- and visitor-serving uses, along with a substantial residential component.</p>	Commercial – Gateway (C-G)
Broadway Corridor	<p>Connecting the southern gateway to the downtown, the Broadway Corridor provides a grand entrance to downtown Sonoma with its axial view of the Plaza, City Hall, and the</p>	<p>Commercial (C) Mixed Use (MX) Public (P)</p>

Table 44: Sonoma Planning Areas		
<i>(See Sonoma Municipal Code Chapter 19.32 for a complete description)</i>	northern hills. The Broadway Corridor is flanked by residential areas, with Nathanson Creek forming its eastern edge and First Street West its western boundary. The desired future of the Broadway Corridor is to preserve, restore, and re-use historic structures and ensure new development respect and contribute to the character of the area. Mixed use development will be directed so as to retain the predominantly residential character of First Street West while enlivening Broadway with small-scale retail, office, and residential uses.	
Downtown District <i>(See Sonoma Municipal Code Chapter 19.34 for a complete description)</i>	The Downtown District centers on the Plaza and the historic downtown, collectively designated as a National Historic Landmark. The Downtown encompasses a lively concentration of small businesses, including restaurants, bookstores, specialty retail, and offices. Outside of the original downtown area, the western portion of the district contains a mix of single-family, multifamily, retail, and office development, including a modern shopping center. Multifamily development lies at the northwest and southeast edges of the district. While commercial uses will remain preeminent, the downtown's housing stock should be preserved and extended. Higher density residential development at the edges of the district confers similar benefits and establishes a transition to lower density residential areas.	Residential – Low Density (R-L) Residential – Medium Density (R-M) Residential – Housing Opportunity (R-O) Commercial (C) Mixed Use (MX) Public (P)
West Napa Street/ Sonoma Highway Corridor <i>(See Sonoma Municipal Code Chapter 19.36 for a complete description)</i>	The West Napa Street/Sonoma Highway corridor is a commercial strip comprised of segments of State Highway 12. The corridor is punctuated by shopping centers with expansive parking lots, some only lightly landscaped, which break the rhythm established by smaller-scale development. Existing residential uses include small multifamily developments and scattered single-family residences, as well as a mobile home park.	Residential – Medium Density (R-M) Residential – Mobile Home (R-P) Mixed Use (MX) Commercial (C) Commercial – Gateway (C-G) Public (P)
Open Space Districts <i>(See Sonoma Municipal Code Chapter 19.38 for a complete description)</i>	The three open space districts are characterized by large areas of land in public ownership devoted to open space and recreational uses, as follows: <ol style="list-style-type: none"> 1. The Maxwell district has an area of approximately 89 acres; 2. The Vallejo district is dominated by the 57-acre Vallejo Home State Park.. 3. The third open space district is comprised of the Mountain Cemetery. 	Residential – Hillside (R-HS) Residential – Low Density (R-L) Park (PK) Public (P)
Sources: City of Sonoma Development Code (Chapter 19.16); City of Sonoma General Plan (2006)		

Development Standards

Development standards directly shape the form and intensity of residential development by providing controls over land use, heights and volumes of buildings, open space on a site, etc. Site development standards also ensure a quality living environment for all household groups in the City, including special needs groups such as lower income households and senior citizens.

The Development Code contains specific development standards for each zoning district, which vary slightly depending on the specific Planning Area the development is located in. In addition, the Development Code provides different development standards for residential infill/addition projects and residential subdivision projects. The Table 45 shows the allowed densities, minimum lot sizes, and floor area ratios (FAR) of the various residential zoning districts and commercial zones that allow residential uses within the City.

Table 45. Zoning District Density, Minimum Lot Size, and FAR Regulations			
Zoning District	Permitted Density¹	Minimum Lot Sizes (square feet/unit)	Floor Area Ratio (FAR)
Residential – Hillside (R-HS)	Minimum: N/A Maximum: 1 unit per 10 acres	10 acres	0.1
Agriculture (A)	Minimum: N/A Maximum: 1 unit per 10 acres	10 acres	0.05
Residential – Rural (R-R)	Minimum: 0 Maximum: 2 du/ac	20,000 sf	0.2
Residential – Low Density (R-L)	Minimum: 2 du/ac Maximum: 5 du/ac	7,500 sf	0.35
Residential – Sonoma (R-S)	Minimum: 3 du/ac Maximum: 8 du/ac	5,000 sf ²	0.35
Residential – Medium Density (R-M)	Minimum: 7 du/ac Maximum: 11 du/ac	5,000 sf ³	0.5 ⁶
Residential – High Density (R-H)	Minimum: 11 du/ac Maximum: 15 du/ac	3,500 sf	0.7
Residential – Housing Opportunity (R-O)	Minimum: 15 du/ac Maximum: 25 du/ac	4,500 sf	0.7
Residential – Mobile Home Park (R-P)	Minimum: 0 du/ac Maximum: 7 du/ac	10 acres	0.3 ⁷
Commercial (C)	Minimum: 0 du/ac Maximum: 20 du/ac	10,000 sf	0.8 ⁸
Commercial – Gateway (C-G)	Minimum: 0 du/ac Maximum: 20 du/ac	10,000 sf ⁴	0.8
Mixed Use (MX)	Minimum: 0 du/ac Maximum: 20 du/ac	7,000 sf ⁵	0.7 ⁹
Notes: ¹ Densities do not include density bonus. See Chapter 19.44 of the Development Code. ² Minimum Lot Sizes requirements in the R-S district differ in the following Planning Areas: <i>Northwest Area = 5,500 sf; Southwest Area = 7,500 sf</i> ³ Minimum Lot Sizes requirements in the R-M district differ in the following Planning Areas: <i>Central-West Area = 4,500 sf; Central-East and Northeast Areas = 5,500 sf; Southwest Area = 7,500 sf</i> ⁴ Minimum Lot Sizes requirements in the C district differ in the following Planning Areas: <i>Broadway Corridor = 8,000 sf; Downtown District = 7,000 sf</i> ⁵ Minimum Lot Sizes requirements in the MX district differ in the following Planning Areas: <i>Broadway Corridor and West Napa Street/Sonoma Highway Corridor = 8,000 sf</i> ⁶ FAR requirements in the R-M district differ in the following Planning Areas: <i>Central-West and Southwest Areas = 0.45; West Napa Street/Sonoma Highway Corridor = 0.45</i> ⁷ FAR requirements in the R-P district differ in the following Planning Areas: <i>West Napa Street/Sonoma Highway Corridor = 0.2</i> ⁸ FAR requirements in the C district differ in the following Planning Areas: <i>Broadway Corridor = 0.6; Downtown District = 2.0</i> ⁹ FAR requirements in the MX district differ in the following Planning Areas: <i>Northeast Area = 0.6; Broadway Corridor = 1.0; Downtown District = 1.2</i>			
Source: City of Sonoma Development Code (Title 19)			

Table 46 provides setback, height, and site coverage requirements for residential infill/addition development within the various zoning districts that allow for residential development.

Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions					
Planning Area	Front Setback	Side Setback	Rear Setback	Height	Site Coverage
Residential – Hillside (R-HS)					
Northeast Area	30 feet	30 feet	30 feet	30 feet	15%
Open Space Districts					10%
Agriculture (A)					
Northeast Area	30 feet	30 feet	30 feet	35 feet	10%
Residential – Rural (R-R)					
Northeast Area	30 feet	20 feet minimum, 50 feet total	30 feet	30 feet	25%
Southwest Area	<u>1-Story</u> 20 feet <u>2-Story</u> 30 feet	15 feet			
Residential – Low Density (R-L)					
Northeast Area	20 feet ¹	7 feet minimum, 18 feet total	25 feet	30 feet	40%
Central-East Area	<u>New Structures</u> 25 feet ¹	<u>1-Story</u> 7 feet minimum, 18 feet total	20 feet		
	<u>Additions</u> 20 feet	<u>2-Story</u> 1-Story Setback, plus 3 feet for every 5 feet of height above 15 feet			
Southeast Area	20 feet ¹				
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Central-West Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Southwest Area	<u>1-Story</u> 20 feet <u>2-Story</u> 30 feet	15 feet	30 feet		
Downtown District	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet		
Residential – Sonoma (R-S)					

Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions

Central-East Area	<u>New Structures</u> 25 feet ¹	<u>1-Story</u> 5 feet minimum, 15 feet combined			
Southeast Area	<u>Additions</u> 20 feet				
Northwest Area	20 feet ¹	<u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet	30 feet	40%
Central-West Area					
Southwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Residential – Medium Density (R-M)					
Northeast Area	15 feet ²	7 feet minimum, 18 feet total	20 feet		
Central-East Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet total	15 feet		
Southeast Area	15 feet	<u>2-Story</u> 8 feet minimum			
Northwest Area		<u>1-Story</u> 5 feet minimum, 15 feet combined	<u>1-Story</u> 15 feet		60%
Central-West Area	<u>2-Story</u> 20 feet	<u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>2-Story</u> 20 feet		
Southwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	20 feet	30 feet	50%
Downtown District	15 feet for additions/replacement structures 10 feet for new development	<u>1-Story</u> 5 feet minimum, 15 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>1-Story</u> 15 feet <u>2-Story</u> 20 feet		60%
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet <u>2-Story</u> 25 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet or 20 feet is abutting the R-L zone		
Residential – High Density (R-H)					
Central-West Area	15 feet	<u>1-Story</u> 5 feet minimum,	<u>1-Story</u> 12 feet	30 feet	60%

Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions					
		12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	<u>2-Story</u> 15 feet		
Residential – Housing Opportunity (R-O)					
Downtown District	N/A	8 feet	12 feet	30 feet	65%
Residential – Mobile Home Park (R-P)					
Central-West Area	20 feet	<u>1-Story</u> 10 feet	20 feet	30 feet	35%
Napa Street / Sonoma Highway Corridor		<u>2-Story</u> 20 feet	10 feet		30%
Commercial (C)					
Central-West Area	<u>1-Story</u> 15 feet <u>2-Story</u> 20 feet	N/A ³		30 feet	60%
Broadway Corridor	15 feet ⁷	N/A ³			
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet <u>2-Story</u> 25 feet	N/A ³	N/A		70%
Commercial – Gateway (C-G)					
Gateway District	<u>Edge Property</u> 20 feet or consistent with existing structure ⁴ <u>Core Property</u> N/A	<u>Edge Property</u> N/A ⁵ <u>Core Property</u> N/A	<u>Edge Property</u> N/A ⁶ <u>Core Property</u> N/A	<u>Edge Property</u> 30 feet <u>Core Property</u> 35 feet	40%
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet <u>2-Story</u> 25 feet	N/A ³	N/A	<u>30 feet</u>	
Mixed Use (MX)					
Northeast Area	N/A	N/A	N/A	N/A	60%
Northwest Area	N/A ⁵			30 feet	60%
Broadway Corridor	20 feet ⁷	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet ³		
Downtown District	15 feet for additions/replacement structures	N/A ³	N/A		70%

Table 46: Zoning District Setbacks, Height, and Site Coverage – Infill and Additions

	10 feet for new development				
Napa Street / Sonoma Highway Corridor	<u>1-Story</u> 15 feet <u>2-Story</u> 25 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet or 20 feet is abutting the R-L zone		60%

Notes:

- ¹ For new construction, the front setback is either the setback identified in the table or the same setback as the closest structure to the street on either side, whichever is greater.
- ² For new construction, the front setback is either the setback identified in the table or the same setback as the closest structure to the street on either side, whichever is smaller.
- ³ Except when abutting a residential zone, in which case the corresponding setback in the residential zone shall apply.
- ⁴ Represents the front setback for additions or renovations. The front setback requirements for new development are as follows:
 - Project fronting Broadway = 30-foot setback
 - Project fronting Napa/Leveroni = 20-foot setback
 - Project fronting internal drives = No setback requirement
- ⁵ None required, except 1) when abutting a residential zone, in which case the corresponding side setback in the residential zone shall apply; 2) when abutting the sphere of influence, in which case a 20-foot side setback is required.
- ⁶ None required, except when abutting a residential zone or the sphere of influence, in which case a 20-foot rear setback is required.
- ⁷ Replacement structures shall use the same front setbacks of the original structures. New development (not including additions to existing structures) may use a front setback of 15 feet or a setback within the range of adjacent structures on either side.

Source: City of Sonoma Development Code (Title 19)

Additionally, Table 47 provides the setback, height, and site coverage requirements for residential subdivisions of 5+ lots within the various zoning districts within Sonoma that allow this type of development.

Table 47: Zoning District Setbacks, Height, and Site Coverage – Subdivisions of 5+ Lots					
Planning Area	Front Setback	Side Setback	Rear Setback	Height	Site Coverage
Residential – Low Density (R-L)					
Central-East Area	Average of 25 feet¹	<u>1-Story</u> 7 feet minimum, 18 feet total	20 feet	30 feet²	40%
Southeast Area	Average of 20 feet¹				
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined			
Central-West Area	Average of 25 feet¹				
Residential – Sonoma (R-S)					
Central-East Area	Average of 25 feet¹	3 feet minimum¹	20 feet	30 feet	40%
Southeast Area					
Northwest Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined			
Central-West Area	Average of 25 feet¹	<u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			
Residential – Medium Density (R-M)					
Northeast Area	<u>1-Story</u> 15 feet	<u>1-Story</u> 5 feet minimum, 15 feet total	<u>1-Story</u> 20 feet	30 feet	50%
	<u>2-Story</u> 20 feet	<u>2-Story</u> 10 feet minimum	<u>2-Story</u> 25 feet		
Central-East Area	20 feet	<u>1-Story</u> 5 feet minimum, 15 feet total	15 feet		60%
Southeast Area	15 feet	<u>2-Story</u> 8 feet minimum			
Northwest Area	<u>1-Story</u> 15 feet	<u>1-Story</u> 5 feet minimum, 15 feet combined	<u>1-Story</u> 15 feet		
Central-West Area		<u>2-Story</u> 20 feet		<u>2-Story</u> 20 feet	
		<u>1-Story</u> 5 feet minimum, 12 feet combined			
		<u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet			

Residential – High Density (R-H)					
Central-West Area	15 feet	<u>1-Story</u> 5 feet minimum, 12 feet combined <u>2-Story</u> 1-Story Setback, plus 2 feet for every 5 feet of height above 15 feet	15 feet	30 feet	60%
Mixed Use (MX)					
Northeast Area	TBD ¹	<u>1-Story</u> 5 minimum, 15 total <u>2-Story</u> 8 minimum on two-story side	<u>1-Story</u> 15 feet <u>2-Story</u> 20 feet	30 feet	60%
Northwest Area	N/A ³				
Notes:					
¹ A variety of setbacks, compatible with neighborhood conditions, shall normally be required at the discretion of the Planning Commission.					
² For Central-East Area, maximum height requirement is 35 feet for parcels 20,000 sf or greater.					
³ None required, except when abutting a residential zone, in which case the corresponding setback in the residential zone shall apply.					
Source: City of Sonoma Development Code (Title 19)					

In addition to the standards presented in Tables 45, 46, and 47, multifamily projects (except duplexes) are required to provide permanently maintained outdoor open space for each dwelling unit (private open space) and for all residents (common open space). Private open space requirements vary depending on unit size, and range from 75 square feet for studio and one-bedroom units, to 150 square feet for two-bedroom units, and 225 square feet for three-bedroom units and larger. Common open space is to be provided at a rate of 300 square feet per unit. A reduced open space requirement of 300 square feet (any combination of common and/or private) has been adopted for residential development within commercial and mixed use districts and 250 square feet for live/work developments; any combination of private and common open space may be used to fulfill these requirements. As a means of encouraging pedestrian-oriented open spaces that exceed the minimum requirements, the City offers reduced parking requirements, increased lot coverage, and reduced front and street-side setbacks.

Overall, the setback and height requirements are comparable to other communities throughout the region. The maximum building height allowed in the residential zoning districts is 30 feet or two-stories while the maximum building height allowed within the commercial and mixed use zoning districts ranges between 30-35 feet, depending on the Planning Area. According to SMC Section 19.40.040, a maximum building height of 36 feet may be allowed in order to accommodate third-floor multifamily residential development within the Commercial, Commercial – Gateway, Mixed Use, and Residential – Housing Opportunity zoning districts, at the discretion of the Planning Commission. Still, the predominant 30-foot, two-story height limit for the zoning districts allowing residential development represents a potential constraint for multifamily projects.

Projects within the R-M and R-S zones have additional side setback requirements compared to the other zoning districts that allow multifamily development. Specifically, the Development Code requires two-story residential projects within the R-M and R-S zoning districts to meet the one-story side setback requirement plus an additional 2-3-foot side setback for every 5 feet (or fraction thereof) of building/structure height over 15 feet. The increased setback requirements represent a potential constraint for multifamily developments, limiting the building footprint available for site development. For example, the side setback requirement for a 30-foot tall, two-story building located within the R-S zone in the Northwest Area would be to provide a side setback of 21 feet in total, with a minimum setback of 5 feet allowed on a side. The City's standards have not constrained development, as evidenced by the City meeting or exceeding its RHNA allocation for all income levels during the 5th Cycle. To ensure that the City's standards continue to accommodate development, Housing Program 15: Development Code Amendments – Housing Constraints Program requires the City to review development standards, including the setbacks associated with existing height restrictions, in all residential districts every three years to identify if standards have constrained potential development and to revise standards when necessary to remove constraints to multifamily residential developments, including mixed use development.

Additionally, projects that qualify under the density bonus provisions of California Government Code Section 65915 may receive a further reduction in site development standards, such as reduced setbacks or increased building heights, which can further reduce development costs. Density bonus provisions pursuant to California Government Code Section 65915 are located in Chapter 19.44 (Affordable Housing and Density Bonuses) of the Development Code. While Chapter 19.44 implements some requirements of State density bonus law, including Government Code Section 65915(f) and (k), it does not address the provisions of Government Code Section 65915(g) and (h) and incorrectly references parking provisions, which are located at Government Code Section 65915(p). I, Therefore, Program 15 of the Housing Plan is included to ensure that the City will review and update the Development Code to reflect the current requirements of State law, including density bonus provisions.

Parking Requirements

Sonoma's parking regulations are set forth in Chapter 19.48 of the Development Code, which identifies the number of spaces required for each land use. Table 48 below shows the parking regulations pertaining to the development of residential units.

Table 48. Residential Off-Street Vehicle Parking Requirements	
Residential Use	Minimum Off-Street Parking
Accessory Dwelling Unit (ADU)	0 spaces
Single-Family	1 space (in garage or carport)/unit
Two-Family/Duplex	1.5 spaces/unit
Multifamily, Condominiums, and Other Attached Dwellings	1.5 spaces/unit ¹ ; and An additional 25% of total required parking spaces for guest parking
Mobile Home Park	1 space/mobile home; and 1 guest space/4 mobile homes
Mixed Use Developments	Determined by Use Permit
Senior Housing Projects	1 space/2 units with half the spaces covered; and 1 guest space/10 units
Senior Congregate Care Facilities	0.5 space/unit; and 1 guest or employee space/4 units
Group Quarters (including boarding houses, rooming houses, and dormitories)	1 space/bed; 1 guest space/8 beds; and 1 space for each employee on largest shift
Emergency Shelter	No parking requirements
Transitional and Supportive Housing	No parking requirements
Notes:	
¹ A minimum of one covered or enclosed space provided per unit	
Source: City of Sonoma Development Code (Chapter 19.48)	

As shown by Table 48, the Development Code requires zero parking spaces for ADUs, one parking space (which must be covered or enclosed) for each dwelling unit for single-family residences, and 1.5 parking spaces per unit for duplexes/two-family dwelling units. The ADU and one or two-family residential parking requirements are not considered a development constraint and are comparable to those in jurisdictions throughout the region.

Additionally, multifamily parking standards require 1.5 spaces per unit and guest parking at a rate of 25% of total required spaces. This requirement is not considered a constraint to multifamily development as it is generally comparable to jurisdictions throughout the region. The parking requirements for mixed use projects are determined as part of the Use Permit review process. Parking for commercial and residential mixed uses located in a commercial zone may be reduced upon determination by the Planning Commission that a reduction is justified. A parking demand study may be required to justify the requested modification. Furthermore, a portion of all of the parking spaces required for the commercial component of a mixed use project need not be provided by the use if an in-lieu fee is approved by the Planning Commission and contributed by the developer to a parking improvement trust fund. Therefore, mixed use projects are given the option to pay in-lieu fees to meet the parking requirements, which provides more flexibility in the overall design of a project.

It is also noted that projects that qualify under the density bonus provisions (Chapter 19.44 of the Development Code) would be eligible for parking reductions. However, the existing multifamily parking standards are comparable to the parking reductions allowed under the density bonus provisions, which would remove the guest parking requirement and require only one space for zero to one bedroom units, two parking spaces for two to three bedroom units, and 2.5 parking spaces for four and more bedroom units for projects that qualify. Therefore, the existing multifamily parking standards are not considered a constraint.

Permitted and Conditional Uses

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. This includes housing to meet the needs of different types of households with incomes ranging from low to above moderate. The City's Development Code allows a range of residential uses within the various zoning districts to accommodate a variety of housing types, such as single-family, duplex, multifamily, mobile homes, residential care facilities, agricultural employee housing, single room occupancy housing, supportive housing, transitional housing, and emergency shelters. As shown in Table 49, a number of zoning districts in Sonoma allow a range of residential uses that are permitted by right while districts also allow additional residential uses with a Use Permit (UP). UPs are discretionary permits that address whether a proposed use complies with applicable zoning standards and is compatible with surrounding uses.

The following describes the permitted and conditional uses allowed by the Sonoma Municipal Code and their consistency with current State laws and regulations:

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Table 49: Zoning Districts Permitting Residential Uses

Housing Type	A	R-HS	R-R	R-L	R-S	R-M	R-H	R-O	R-P	C	C-G	MX ¹	PK	P	W
ADU/Junior ADU	P	P	P	P	P	P	P	P	P	P	P	P			
Single-Family Dwelling	P	P	P	P	P	P	UP					P ²			
Duplex				UP	P	P	UP	UP							
Multifamily (3 to 4 units)					UP	P	P	P		UP	UP	P			
Multifamily (5+ units)					UP	UP	UP	P		UP	UP	UP			
Live/Work Facilities						UP				UP	UP	UP			
Agricultural Employee Housing	P														
Mobile Home Park									UP						
Single Room Occupancy										UP					
Residential Care Homes (6 or fewer beds)				P	P	P									
Residential Care Homes (7 or more beds)						UP						UP			
Senior Residential Care Facilities						UP									
Emergency Shelters						UP	UP	UP		UP	UP	UP		P ⁴	
Supportive Housing ³		P	P	P/UP	P/UP	P/UP	P/UP			UP	UP	P/UP		UP	
Transitional Housing ³		P	P	P/UP	P/UP	P/UP	P/UP			UP	UP	P/UP		UP	
Caretaker and Employee Housing	UP												UP	UP	UP

Notes: P = Permitted use UP = Permitted with Use Permit

*New residential developments are subject to the City's growth management ordinance.

¹ New development in the mixed use zone shall include a residential component unless waived by the planning commission through use permit review (see Development Code Section 19.10.020(C)).

² Limited to single residence on existing lot; otherwise UP required.

³ Supportive and transitional housing shall be subject to those restrictions that apply to other residential dwellings of the same type in the same zone. For example, such housing structured as single-family is permitted in the R-HS, R-R, R-L and R-S residential zones, whereas supportive and transitional housing structured as multifamily is limited to the R-M and R-H residential zones and the mixed use zone.

⁴ Emergency shelters with 16 or more beds shall require a UP.

Source: City of Sonoma Development Code (Chapter 19.10 – Zones and Allowable Uses)

Accessory Dwelling Units (ADU)

Government Code Section 65852.2 establishes State standards for accessory dwelling units (ADUs). Jurisdictions may adopt local ordinances that meet the State standards; however, without a local ordinance, State ADU regulations apply and local governments cannot preclude ADUs. The purpose of an ADU is to provide additional housing options for family members, students, the elderly, in-home health care providers, the disabled, veterans, and others, in existing urban, suburban, and rural residential areas without substantially changing the use, appearance, or character of a neighborhood.

In 2019, the Governor signed a series of bills that significantly limit a local jurisdiction's ability to restrict the development of ADUs. Assembly Bill (AB) 68, AB 587, AB 670, AB 671, AB 881, and Senate Bill (SB) 13 provide revisions to Government Code Section 65852.2 to further lift constraints on ADUs. These recent laws also provide numerous other standards, addressing lot coverage restrictions, lot size restrictions, owner-occupancy requirements, and changes to parking requirements, and addressing certain covenants, conditions, and restrictions that prohibit or unnecessarily restrict ADUs. In general, under these new laws:

- A Junior ADU and ADU are allowed on the same property;
- A local jurisdiction must ministerially approve an attached or detached ADU that is less than 800 feet, is 16 feet in height or less, and has at least 4-foot rear and side-yard setbacks;
- If there is an existing primary dwelling, the total floor area of an attached ADU shall not exceed 50 percent of the primary dwelling;
- The total floor area for a detached ADU shall not exceed 1,200 square feet;
- A local jurisdiction must review and approve compliant ADUs within 60 days instead of 120 days;
- A local jurisdiction is prohibited from imposing development impact fees, excluding connection fees or capacity charges, on ADUs smaller than 750 square feet;
- A local jurisdiction is prohibited from establishing a minimum square footage requirement for either an attached or detached ADU that prohibits an efficiency unit;
- A local jurisdiction may now choose to allow the sale of an ADU in certain circumstances; and
- Homeowner Associations and other common interest developments are prohibited from not allowing or unreasonably restricting the development of ADUs.

Section 19.50.090 of the Sonoma Development Code provides general provisions and development standards for ADUs and Junior ADUs in the City, which are consistent with State laws and regulations. Nonetheless, Program 5: Accessory Dwelling Units and Junior Accessory Dwelling Units, of the Housing Plan is included to ensure that the City will review and update the ADU ordinance as necessary to reflect the current requirements of State law and work with HCD to ensure continued compliance with the law throughout the 6th Cycle. The City will also monitor trends pertaining to the extent of ADU production to ensure that the Housing Element goals can be met.

Single-Family Dwellings

Single-family dwellings are defined in Section 19.92.020 of the Sonoma Development Code as a building designed for and/or occupied exclusively by one family. Also includes factory-built, modular housing units, constructed in compliance with the Uniform Building Code (UBC), and mobile homes/manufactured housing on permanent foundations. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), single-family dwellings are permitted by right in the A, R-HS, R-R, R-L, R-S, and R-M zoning districts and are allowed with an approved Use Permit in the R-H zone. In the MX zoning district, single-family dwellings are limited to a single residence on an existing lot, otherwise a UP is required.

Duplexes

Duplexes are defined in Section 19.92.020 of the Sonoma Development Code as a residential structure under single ownership containing two dwellings. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), duplexes are permitted by right in the R-S and R-M zoning districts and are allowed with an approved Use Permit in the R-L, R-H, and R-O zones.

Multifamily Dwellings

Multifamily dwellings are defined in Section 19.92.020 of the Sonoma Development Code as a building or a portion of a building used and/or designed as residences for three or more families living independently of each other. Includes: triplexes, fourplexes (buildings under one ownership with three or four dwelling units, respectively, in the same structure), and apartments (five or more units under one ownership in a single building); townhouse development (three or more attached single-family dwellings where no unit is located over another unit); and senior citizen multifamily housing. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), multifamily dwellings of 3-4 units are permitted by right in the R-M, R-H, R-O, and MX zoning districts and are allowed with an approved Use Permit in the R-S, C, and C-G zones. Multifamily dwellings of 5 or more units are permitted by right in the R-O zoning district and are allowed with an approved Use Permit in the R-S, R-M, R-H, C, C-G, and MX zoning districts.

Live/Work Facilities

Live/work facilities are defined in Section 19.92.020 of the Sonoma Development Code as an integrated housing unit and working space, occupied and utilized by a single household in a structure, either single-family or multifamily, that has been designed or structurally modified to accommodate joint residential occupancy and work activity. According to Chapter 19.10 of the Sonoma Development Code (see Table 49), live/work facilities are allowed with an approved Use Permit in the R-M, C, C-G and MX zoning districts.

Agricultural (Farmworker) Employee Housing

Section 19.92.020 of the Sonoma Development Code defines “Agricultural employee housing” as housing as described in California Health and Safety Code Sections 17021.5 and 17021.6, and employee housing as defined in California Health and Safety Code Section 17008.

HSC Section 17021.5 requires that employee housing serving six or fewer employees shall be deemed a single-family structure and shall be treated subject to the standards for a family dwelling in the same zone.

HSC Section 17021.6 requires that any employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces shall be deemed an agricultural land use and permitted in the same manner as agricultural uses, with exceptions related to various health, safety, and resource conservation provisions identified in HSC Section 17021.8. As shown by Table 49, agricultural (farmworker) employee housing is allowed by right in the Agriculture (A) zoning district. It is noted that agricultural uses are a permitted use in the Wine Production (W) zoning district, but agricultural employee housing is not addressed in this district.

Further, HSC Section 17021.8 requires streamlined, ministerial approval and application of reasonable objective development standards for eligible agricultural employee housing, which must not contain dormitory-style housing and must be 36 or fewer units or space designed for use by a single-family or household. To qualify for the streamlined, ministerial approval process, an eligible agricultural housing development must meet the health, safety, and resource conservation provisions in HSC Section 17021.8(a). The Development Code currently provides for ministerial approval of eligible developments as required by HSC Section 17021.8; nonetheless, Program 15: Development Code Amendments – Housing Constraints Program will ensure that the City’s provisions for employee housing and agricultural employee housing are consistent with the requirements of HSC Sections 17021.5, 17021.6, and 17021.8.

Mobile Home Parks and Manufactured Homes

Manufactured homes are defined in Section 19.92.020 of the Sonoma Development Code as a dwelling unit including mobile homes and factory-built housing as defined in California Health and Safety Code Sections 18210.5 and 19971, respectively. “Mobile home park” means any site that is planned and improved to accommodate two or more mobile homes used for residential purposes, or on which two or more mobile home lots are rented, leased, or held out for rent or lease, or were formerly held out for rent or lease and later converted to a subdivision, cooperative, condominium, or other form of resident ownership, to accommodate mobile homes used for residential purposes.

Government Code Section 65852.3 requires that a mobile home or manufactured home attached to a permanent solid foundation system be allowed on lots zoned for conventional single-family residential dwellings and, except for architectural requirements for the roof overhang, roofing material, and siding material, shall only be subject to the same development standards applicable to a single-family residential dwelling on the same lot. A mobile/manufactured home shall conform to all of the residential use development standards for the zoning district in which it is located.

The R-P zoning district is applied to the City's three mobile home parks. Only uses consistent with the continued operation of these sites as mobile home parks are allowed. The maximum residential density is seven dwelling units per acre. The R-P zoning district is consistent with the Mobile Home Park land use designation of the General Plan.

Mobile homes and manufactured homes on a permanent foundation are permitted by right in the A, R-HS, R-R, R-L, R-S, and R-M zoning districts and are allowed with an approved Use Permit in the R-H zone, similar to single-family dwellings. In the MX zoning district, they are limited to a single residence on an existing lot, otherwise a UP is required.

Residential Care Facilities

California Health and Safety Code (HSC) Section 1566.3 establishes requirements for the local zoning standards for residential care facilities that serve six or fewer persons. Section 1566.3(e) specifies that no conditional use permit, zoning variance, or other zoning clearance shall be required of a residential care facility that serves six or fewer persons that is not required of a family dwelling of the same type in the same zone, while paragraph (g) indicates “family dwelling” includes, but is not limited to, single-family dwellings, units in multifamily dwellings, including units in duplexes and units in apartment dwellings, mobile homes, including mobile homes located in mobile home parks, units in cooperatives, units in condominiums, units in townhouses, and units in planned unit developments. HSC Section 1569.85 further specifies these same requirements for residential care facilities for the elderly that serve six or fewer persons.

According to Chapter 19.10 of the Sonoma Development Code (see Table 49), residential care homes that serve six or fewer persons are permitted by right in the R-L, R-S, and R-M zoning districts. The current Development Code does not allow residential care homes that serve six or fewer persons in any other residential zone, which is inconsistent with State law and could be viewed as a constraint to the development of residential care facilities. Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to allow residential care facilities for six or fewer persons to be allowed in the same manner as a residential use of the same type in all residential zoning districts.

Additionally, within the R-M and MX zoning districts, residential care homes serving seven or more clients are allowed with a Use Permit granted by the Planning Commission through a public hearing process. Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to allow residential care facilities that serve seven or more people in all zones that allow residential uses, in the same manner as a residential use of the same type, and to ensure all conditions of approval are objective and do not create barriers for housing for seniors, persons with disabilities, or other special needs populations, and to clarify that this type of facility is intended to serve as a residence for individuals in need of assistance with daily living activities.

Single-Room Occupancy Units

Although single-room occupancy (SRO) units are identified as an allowed use in the C zoning district with a Use Permit, the Sonoma Development Code does not provide general provisions or standards for SRO units. Typically, SRO units are intended to provide housing opportunities for lower-income individuals, persons with disabilities, seniors, and formerly homeless individual. Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to define single-room occupancy units and to establish objective standards for SROs.

Emergency Shelters

Government Code Section 65583 requires each jurisdiction to identify one or more zoning districts where emergency shelters are allowed without a discretionary permit, such as a use permit. California HSC Section 50801(e) defines an emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless

person.” The City’s Development Code defines emergency shelters as the meaning set forth in HSC Section 50801(e). According to Chapter 19.10 of the Sonoma Development Code (see Table 49), emergency shelters are permitted by right in the Public Facilities (P) zoning district and are allowed with an approved Use Permit in the R-M, R-H, R-O, C, C-G, and MX zones. In the P zoning district, emergency shelters with 16 or more beds require a UP.

Section 19.50.033 of the Development Code provides objective standards for emergency shelters that address waiting and intake areas, security, concentration (no closer than 300 feet to any other emergency shelter), and management plans, and which are consistent with the requirements identified in Government Code Section 65583(a)(4). Government Code Section 65583(a)(4) limits parking standards to only sufficient parking to accommodate all staff working in the emergency shelter; the Development Code does not contain parking standards for emergency shelters and will therefore be amended to clarify that the parking standards are consistent with the requirements of State law (Program 15: Development Code Amendments – Housing Constraints Program).

The City currently has 14 parcels in the P zoning district that could accommodate shelters of varying size. These sites could accommodate a shelter the size of a single-family home (at least 6 bed capacity) at a minimum; larger shelters are more likely on sites that are 0.25 acres or larger. There are 28 total shelters in the Sonoma County Community Development Commission (SCCDC) region, ranging from 4 to 125 beds; the City’s inventory of sites could accommodate shelters comparable to those in the mid-range. These sites are all in proximity to existing public utilities. The sites have adequate capacity to accommodate emergency shelters that could house the City’s most recent unsheltered homeless population count (61 persons). Recent California Legislation (AB 761) has provided an update to Government Code Section 65583 to authorize vacant armories to be used as emergency shelters; however, there are no armories located in Sonoma.

Transitional and Supportive Housing

Government Code states that transitional and supportive housing shall be considered a residential use and only subject to the restrictions that apply to other residential uses of the same type in the same zone. Transitional housing is defined (Government Code Section 65582(j) and HSC 50675.2(h)) as “buildings configured as rental housing developments, but operated under program requirements that require for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.” Supportive housing is defined (Government Code Section 65582(g) and HSC 50675.14(b)) as “housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.”

The City’s Development Code defines transitional housing as the meaning set forth in HSC Section 50675.2(h) and defines supportive housing as the meaning set forth in HSC Section 50675.14(b). The Development Code addresses both transitional and supportive housing as uses allowed subject only to the requirements and restrictions that apply to other residential dwellings of the same type in the same zone.

Government Code Section 65583(c)(3) and Government Code Article 11 (commencing with Section 65650) were revised in 2019 to implement AB 2162, which requires that specified supportive housing developments shall be a use by right in multifamily and mixed use zones with a streamlined and ministerial review and not be subject to discretionary review (e.g., Use Permit, etc.). For a project to be eligible for the streamlined and ministerial AB 2162 process, it is required to meet specific criteria, including, but not limited to, the following:

- Units within the development are subject to a recorded affordability restriction for 55 years;
- One hundred percent of the units within the development, excluding managers’ units, are dedicated to lower-income households and are receiving public funding to ensure affordability of the housing to lower-income Californians;
- A specified number of units are designated as supportive housing;
- Nonresidential floor areas are used for onsite supportive services in specified amounts; and

- Units within the development, excluding managers' units, include at least one bathroom and a kitchen or other cooking facilities.

The City may require a supportive housing development subject to this article to comply with objective, written development standards and policies; provided, however, the development is only subject to the objective standards and policies that apply to other multifamily developments within the same zone. Housing Plan Program 15: Development Code Amendments – Housing Constraints Program will revise the Development Code in compliance with AB 2162.

Low Barrier Navigation Centers

A “low barrier navigation center” is housing or shelter in which a resident who is homeless or at risk of homelessness may live temporarily while waiting to move into permanent housing. Assembly Bill (AB) 101 was approved on July 31, 2019, which added Article 12 (commencing with Section 65660) to Chapter 3 of Division 1 of Title 7 of the Government Code to address “low barrier navigation centers”. Government Code Section 65660 requires a low barrier navigation center use to be allowed by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. Additionally, AB 101 defines “low barrier navigation center” as a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. Low barrier navigation center developments are essential tools for alleviating the homelessness crisis and are considered a matter of statewide concern. Low barrier navigation centers are a “by right use” in areas zoned for mixed use and nonresidential zones permitting multifamily uses.”

The Sonoma General Plan and Development Code do not address or define low barrier navigation centers; therefore, Housing Plan Program 15: Development Code Amendments – Housing Constraints Program will ensure that the City updates the Development Code to address low barrier navigation centers consistent with Government Code Sections 65660 through 65668.

Density Bonus

Chapter 19.44 of the Development Code (Affordable Housing and Density Bonuses) addresses the provisions of California Government Code Section 65915 (State Density Bonus law), to facilitate the development of affordable housing to serve families of moderate and less-than-moderate incomes within the City through density bonus and other incentives. This section of the Development Code was last updated in 2021 and currently allows a density bonus of up to 50% depending on the proportion of total affordable dwelling units and their level of affordability. In addition to the density bonus, an applicant may request one or more incentives or concessions that may include a reduction of local zoning standards that indirectly increase housing costs, including, but not limited to, development standards for setbacks, lot size, building coverage, open space, parking, building height, and floor area ratio (FAR).

In October 2019, the Governor approved AB 1763, which revised the existing Density Bonus law found in Government Code Section 65915. In general, AB 1763 provides an 80% density bonus and four incentives or concessions for housing projects that contain 100% affordable units (including the density bonus units but excluding managers' units) for low and very low-income households. If the project is located within a half-mile of a major transit stop, all restrictions on density are eliminated and a height increase of up to three stories or 33 feet is allowed. For housing projects that qualify as a special needs or supportive housing development, the legislation eliminates all local parking requirements. Sonoma's Development Code currently does not comply with these most recent revisions to Government Code Section 65915; therefore, Program 19: Affordable Housing Density Bonus Program in the Housing Plan includes measures to update the City's density bonus provisions consistent with State law.

Inclusionary Housing Ordinance

Chapter 19.44 of the Development Code (Affordable Housing and Density Bonuses) also provides for the City's inclusionary housing requirements. The provisions require that at least 25 percent of the total parcels and/or units in a residential development be affordable to varying lower and moderate-income categories depending on whether the project is for rental units or ownership units. Moreover, affordable units must be integrated into the overall project design and distributed throughout the residential development. To prevent the inclusionary requirements from impeding development, a qualifying residential development project is entitled to incentives and/or concessions as provided for by State law. These include:

- **Reduction in Standards.** A modification (reduction or increase) of the site development standards of the Development Code (e.g., parking design requirements, setbacks, site coverage, zero lot line and/or reduced parcel sizes, etc.) that would result in identifiable, financially sufficient, and actual cost reductions;
- **Mixed Use Zoning.** Approval of mixed use zoning in conjunction with the residential development project if nonresidential land uses would reduce the cost of the project, and the nonresidential land uses would be compatible with the project and surrounding development;
- **Other Incentives.** Other regulatory incentives or concessions proposed by the developer or the City that would result in identifiable, financially sufficient, and actual cost reductions; and
- **Alternative Parking Ratios.** Use of the parking ratios that result in a parking reduction in excess of that provided in the parking standards set forth in Government Code Section 65915(c).

The City provides flexibility to developers in implementing the inclusionary housing provisions to ensure that the requirements do not render a development infeasible. The City allows projects to pay in-lieu fees instead of providing affordable units in a residential project of four or fewer units. Additionally, as provided in SMC 19.44.020(D), if the number of affordable units results in a fractional unit below 0.50, an in-lieu fee may be paid instead of providing an affordable unit.

Planned Development Permit

The planned development permit, as described in Section 19.54.070 of the Development Code, is intended to provide a mechanism to allow greater flexibility in site planning and design than afforded by the general development standards of the Development Code, to encourage more innovative and desirable projects, and efficient use of land than may be possible through strict application of conventional zoning regulations. In general, planned development permits are intended to address development under the following circumstances:

- Properties with unique, challenging, or valuable topographic or environmental features;
- Infill properties that are oddly shaped, narrow, or otherwise difficult to design for using normal development standards;
- Site plans or building designs that are clearly responsive to the objectives of the Development Code, but which require variations from the normal development standards in order to achieve a useful innovation or a higher level of design quality than would otherwise be possible; or
- Developments that include affordable housing, where departures from normal development standards are used to reduce development costs while maintaining design quality.

A mixture of residential housing types (i.e. attached, detached, single-family, condominium, senior, etc.) as well as densities can be accommodated through a planned development permit.

ZONING AND LAND USE PROVISIONS FOR A RANGE OF HOUSING TYPES

State and federal housing laws encourage an inclusive living environment, where persons of all walks of life have the opportunity to find housing suited to their needs. As previously described, single-family homes, multifamily homes, single-room occupancies, emergency shelters, transitional housing, supportive housing, employee and agricultural employee housing, accessory dwelling units, residential care facilities, mobile/manufactured homes, and mobile home parks are accommodated by the City's Development Code. As described under the Permitted and Conditional Uses discussion, Program 15: Development Code Amendments – Housing Constraints Program will remove constraints associated with these uses to ensure such uses are allowed consistent with the requirements of State law. Additionally, Housing Plan Program 16: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws Program will ensure that the City monitors the development processes and zoning regulations to identify and remove constraints to the development of housing consistent with federal and state legislation.

PERSONS WITH DISABILITIES (REASONABLE ACCOMMODATION)

On January 1, 2002, SB 520 became effective and required local jurisdictions to analyze local government constraints on developing, maintaining, and improving housing for persons with disabilities. In accordance with SB 520 and Government Code 65583(a)(7), the City recognizes the importance of providing housing for persons with disabilities. Additionally, Government Code Section 65008 requires localities to analyze potential and actual constraints upon housing for persons with disabilities, demonstrate efforts to remove governmental constraints, and include programs to accommodate housing designed for disabled persons. As part of the Housing Element update process, the City analyzed the Development Code, development standards, building code interpretation and enforcement, other regulatory standards, and permit processes for compliance with State accessibility standards. The City determined whether these requirements are constraints to special housing accommodations for persons with disabilities (such as disabled access within required setbacks or yards), whether the City facilitates alternative housing types with supportive services for persons with disabilities who cannot live independently, and whether conditions of approval are reasonable.

The Lanterman Development Disabilities Act (Lanterman Act) is that part of California law that sets out rights and responsibilities of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use of property for the care of six or fewer disabled persons to be classified as a residential use under zoning. According to Section 19.92.020 of the Sonoma Development Code, "Residential care homes" means intermediate care facilities providing residential, social, habilitative, and personal care for children, the elderly, the developmentally disabled, and persons with limited ability for self-care, but where medical care is not a major element. Includes: children's homes; transitional houses; orphanages; rehabilitation centers; and self-help group homes. A residential care facility serving six or fewer clients shall be a self-contained entity located and operated within a single parcel of record and shall not be operated or managed in conjunction with the same or similar use on any adjoining parcel.

As discussed above under Residential Care Facilities, the City's Development Code provides for residential care homes that serve six or fewer persons by right in the R-L, R-S, and R-M zoning districts. As further discussed, Program 15: Development Code Amendments – Housing Constraints Program of the Housing Plan will update the Development Code to allow residential care facilities for six or fewer persons to be allowed in the same manner as a residential use of the same type in all residential zoning districts.

The City provides reasonable accommodations for persons with disabilities from zoning, permit processing, and building regulations to provide those individuals with an equal opportunity to use and enjoy a dwelling. A decision on whether to grant a reasonable accommodation is made by the Planning Director, or his/her designee. If the request for an accommodation is related to another discretionary permit, then the request is processed with the project as a whole. However, no special permit is required for the granting of a reasonable accommodation.

Currently, residential parking standards for persons with disabilities are not different from other parking standards. When a special needs project proponent requests a reduction in parking requirements and can demonstrate a reduced need for parking, the request would likely be addressed during the review of the reasonable accommodation request. The City's Development Code does not have occupancy standards that apply specifically to unrelated adults nor does it require a minimum distance between two (or more) housing facilities that accommodate individuals with disabilities or other special needs. The City permits housing that accommodates individuals with disabilities without regard to distances between such uses or the number of uses in any part of the City.

Permits and Processing

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City consistently applies the requirements of the Development Code to all residential projects and has not noted any impacts which suggest a limitation on the construction of housing units designed for persons with disabilities. The City has received no complaints from local building contractors or lower income and/or senior citizen housing advocates regarding any impacts on the construction or rehabilitation of housing for persons with physical disabilities created as a result of building codes.

The City does not impose special occupancy permit requirements or business licenses for the establishment or retrofitting of structures for residential uses serving persons with a disability.

Building Codes

Sonoma enforces the 2019 California Building Standards Code, including Chapter 11A which addresses the provisions for housing accessibility for people with disabilities and Chapter 11B which addresses the provisions for accessibility to public buildings, public accommodations, commercial buildings, and public housing for people with disabilities. These standards include requirements for a minimum percentage of fully accessible units in new multifamily developments. The City also permits existing and new homes to be retrofitted or fitted for features that provide for accessibility and independent living for persons with disabilities. Further, the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint.

Universal Design

The current Housing Element has a Universal Design Program in place to promote the construction or modification of homes using design principles that allow individuals to remain in their homes as their physical needs and capabilities change. The objective of the program is to promote accessibility principals to accommodate a wide range of abilities including children, aging populations, and persons with disabilities by providing features in residential construction that enhance accessibility. Examples of universal design features include:

- Entrances without steps that make it easier for persons to enter the home;
- Wider doorways that enhance interior circulation and accommodate strollers and wheelchairs;
- Lever door handles that are easier to use, especially by parents with an infant or persons with arthritis; and
- Light switches and electrical outlets that are located at a height more convenient and accessible to the elderly.

The City promotes the program by distributing a brochure on universal design available at City Hall and on the City's website.

STREAMLINED REVIEW AND OBJECTIVE DESIGN STANDARDS

California legislation has been adopted to address the housing shortage within the State, requiring a streamlined and ministerial process for specific residential developments. SB 35 (Government Code Section 65913.4), which went into effect on January 1, 2018, was part of a comprehensive package aimed at addressing the State's housing shortage and high costs. SB 35 requires the availability of a streamlined ministerial approval process for developments located in jurisdictions that have not yet made sufficient progress towards their required allocation of the regional housing need. For a project to be eligible for streamlining pursuant to SB 35, it must:

- Contain at least two multifamily units;
- Provide a specified level of affordability;
- Be located on an eligible site in an urbanized area or urban cluster;
- Comply with residential or mixed use General Plan and Zoning provisions; and
- Comply with other requirements, such as locational and/or demolition restrictions.

A streamlined and ministerial review per State legislation requires projects to be reviewed against existing objective standards, rather than through a discretionary entitlement process, in specified timeframes. Residential development that is a permitted use by right is not required to go through a discretionary process. However, there is potential for multifamily projects with an affordable component to be eligible for the streamlining provisions of SB 35, but to require a degree of discretionary review under current zoning requirements, such as a UP for certain multifamily projects in the residential and commercial zoning districts or projects requiring design review. The City's design review provisions are somewhat subjective in nature and demonstrate preferences or characteristics for consideration while allowing discretion and flexibility, and as such, cannot be enforced through a streamlined

ministerial process. Consistent with existing State law, objective standards are those that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark.

Currently, Sonoma has not adopted objective zoning standards and design standards to allow eligible projects to be permitted through a streamlined ministerial review. A streamlined ministerial review removes multiple constraints to residential development including, financial, time, and environmental constraints. Program 15: Development Code Amendments – Housing Constraints Program in the Housing Plan provides for revisions to the Development Code to identify a streamlined approval process and objective zoning and design standards for eligible residential projects per Government Code Section 65913.4.

SUBDIVISION ORDINANCE

The City's Subdivision Ordinance (Division VI of the Development Code) defines the City's official requirements governing the division of land into separate parcels for future development. The City's Subdivision Ordinance is patterned after the model version recommended by the State Office of Planning and Research and adheres to the requirements of the State Subdivision Map Act. The requirements for adequate roads, lot size dimensions, provisions for water supply and sewage disposal, and drainage improvements are among the key factors addressed in the Subdivision Ordinance. The ordinance has proven valuable in sustaining a cohesive pattern of development with unified street standards that are coordinated with the existing City street network. These regulations ensure that residential building sites can exist in a safe environment to accommodate a wide range of residential building options desired by the public. Annual monitoring of the effectiveness of these regulations is achieved through input received from the City's Public Works Department, Building Department, Planning Department, and the Sonoma Valley Fire & Rescue Authority (SVFRA).

SHORT-TERM RENTALS

Section 19.50.110 (Vacation rentals) of the Sonoma Development Code outlines the requirements for short-term rentals in the City. The purpose of this section is to minimize the potential adverse impacts of transient occupancy uses in residential neighborhoods on traffic, noise, and density to ensure the health, safety, and welfare of renters and guests patronizing vacation rentals in order to ensure the long-term availability of housing stock in compliance with the Housing Element. Short-term rentals in Sonoma are required to obtain a business license, as outlined in Section 19.50.110 of the Sonoma Development Code.

As of June 2022, there were ten short-term rentals listed on *Airbnb.com*. Three of the rentals are limited to a room or loft within a home and six are for the entire house, guest house, or apartment in Sonoma, while one was listed as a hotel room. In addition, there are eight short-term rentals listed in the City on *VRBO.com* for the entire house. These eight rental listings for the entire house minimally decrease the amount of housing stock available for permanent occupancy.

The City's Code Enforcement Officer ensures that all operating short-term rentals are legal vacation rentals or bed and breakfasts. The short-term rental of one room in a single family residence is prohibited.

GROWTH CONTROLS/GROWTH MANAGEMENT

Sonoma's residential growth control system – the Growth Management Ordinance or GMO (SMC Chapter 19.94) – was adopted by City Council in 1980 based on a computer model developed by ABAG that examined various rates of growth against the City's ability to maintain an appropriate level of services. Factors addressed in the model included City revenues, water supply and infrastructure requirements, police and fire service, street maintenance, and capital improvements. The evaluation indicated that an annual average of 100 new units would allow for manageable increases in service without exceeding the available water supply for at least 20 years. In 2005, the average rate of allowed development was reduced to 88 units, and in 2008 reduced to 65 units to reflect the current and projected availability of water and sewer treatment capacity and the actual rate of development experienced, while maintaining sufficient development capacities to accommodate Sonoma's fair share housing allocation (RHNA).

Key provisions of the current GMO are as follows:

- Each September, the City Council distributes allotments from a pool of 65 allocations, as follows:

1. Any unused development or forfeited allocations from the prior year are added to the pool, at the discretion of the City Council, except that the number of allocations available for distribution shall not exceed 165 allocations;
 2. The number of small developments approved during the previous year is subtracted from the available development applications;
 3. Thirty (30) allocations are made available for potential “infill” developments;
 4. Development allocations are distributed to large developments and exempt developments which have received some but not all of their allotments requested through their pre-application (up to 20 per year);
 5. Any remaining development allocations are distributed to the next available pre-applications in the processing queue in order of date received (up to 20 per project). Allotments are distributed until either the pool is used up or there are no more projects in line to receive them.
- Projects of fewer than five (5) units, which are defined as “small developments,” may be processed at any time, but the number of units in such projects is counted against the succeeding year’s available allotment.
 - Developments of five (5) units or more that do not otherwise qualify as “infill developments” (defined as “large developments”) are processed on a first-come/first-served basis depending on their place on a “Pre- Application Waiting List.” There is no fee to get on the list; all that is required is a preliminary development plan and the authorization of the property owner.
 - The 30 allocations for “infill” development are made available for that development year on a first-come, first-served basis to projects of 15 units or fewer that are proposed for sites that have been within city limits for at least three years and that fully develop the site.
 - Large developments may receive a maximum of 20 allotments per development year (in order to prevent one project from taking an entire year’s allocation).
 - Once a potential development on the waiting list receives at least 50% of the requested allotments, the prospective developer has four years to file an application; otherwise, the allotments are forfeited. Forfeited allotments are added to the following year’s allocation pool.
 - In cases where a development is denied or withdrawn, any allotments accumulated by such developments are added to the following year’s allocation pool, except that the number of allocations available for distribution shall not exceed 165 allocations.
 - Although over the long term the 65-unit per year average is maintained, the system may result in some peaks in actual construction because of varying market conditions or a group of approved projects all building at the same time.

The GMO exempts the following types of development from the allocation process in that a qualifying development may apply for a building permit or planning approval, as applicable, at any time:

1. Small projects are exempt from the planning approval allocation process, but the number of small projects approved in any one development year are deducted from the 65-unit allocation of the following year.
2. Condominium conversions where no additional dwelling units are created.
3. ADUs and JADUs.
4. Density bonus units.
5. Inclusionary units provided at the low-income level (except within projects located in the Sonoma residential zone) or at the very low-income level.
6. Inclusionary units provided in numbers in excess of the normal requirement.

7. As determined by the City Council on a case-by-case basis, applications in which at least 60% of the proposed units qualify as affordable housing and which involve City participation in planning, financing, or development.

Since the Growth Management Ordinance allows for 65 units to be built per year, and Sonoma's 2023-2031 RHNA allocation is 311 units, or an average of 39 units per year over the eight year period, the GMO will not prohibit the City from meeting its target housing needs allocation. The GMO is not a voter-approved initiative, allowing City Council the discretion to amend the ordinance over time as appropriate. Further, based on the Housing Accountability Act, City staff has determined that the ordinance is not currently enforceable and has not been limiting units based on the Growth Management Ordinance. As indicated in Housing Program 17: Growth Management Ordinance, upon any reactivation of the Growth Management Ordinance, the Council will annually review the GMO in conjunction with the monitoring of affordable housing production to ensure adequate incentives for the provision of affordable housing and fulfillment of regional housing growth needs. Monitoring will continue in future housing element cycles to ensure the GMO does not impede Sonoma from addressing its regional housing needs for all income levels.

BUILDING CODES AND ENFORCEMENT

Building codes regulate the physical construction of dwellings and include plumbing, electrical, and mechanical divisions. The purpose of the Building Code and its enforcement is to protect the public from unsafe conditions associated with construction. The City enforces the California Building Code (CBC) for existing units, new construction, and residential rehabilitation. State law affords local government some flexibility when adopting the uniform codes; the building codes can be amended based on geographical, topological, or climate considerations. Further, State Housing law provides that local building departments can authorize the use of materials and construction methods other than those specified in the uniform code if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the building codes.

The 2019 California Building Code, Title 24, Part 2, Volumes 1 and 2, published by the International Code Council, was adopted by the City by reference as Title 14 of the City's Municipal Code and subject to the amendments contained in that Title. No local amendment to the CBC has been initiated or approved that directly impacts housing standards or processes.

CEQA (CALIFORNIA ENVIRONMENTAL QUALITY ACT) AND RELATED CONSULTATION

Section 21082 of the Public Resources Code, referred to as the California Environmental Quality Act of 1970 or "CEQA", requires all projects subject to discretionary review by the City adopted guidelines consistent with the CEQA Guidelines to assure compliance with State law pertaining to environmental review. Since there is uncertainty as to what specific environmental impacts a development might have there is also a lack of predictability of how long it can take to negotiate this process before a project can be approved by the City. In some instances, a project can be exempt from environmental review which has very little impact on the timing or costs of review. However, in other instances where a project may be found to have a potential adverse impact on the environment, the environmental review process can take over a year to complete, undergoing thousands of dollars in environmental analysis, before it is ready to be approved.

NATIVE AMERICAN CONSULTATION

AB 52, Consultation with Native American Tribes, took effect July 1, 2015. It seeks to protect a new class of resources under CEQA: "tribal cultural resources." It requires that agencies undertaking CEQA review must, upon request of a California Native American tribe, begin consultation as part of a project review to consider impacts to "tribal cultural resources." A tribal cultural resource is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, which may include non-unique archeological resources. Consultations can have an impact on project budgets and timing. Sonoma regularly consults with local tribes concerning projects, and thus far, these consultations have not resulted in any impediments to the development review process.

SB 18, Local and Tribal Intergovernmental Consultation, requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of general plans (defined in Government Code § 65300 et seq.). To comply with SB 18 for this Housing Element update, Sonoma contacted Native American tribes to provide an opportunity for consultation.

[Tribal notice occurring concurrently with public review; this section will be updated to reflect tribes contacted and their input.]

2. FEES AND EXACTIONS

The City requires a number of permits and development fees to cover the cost of processing development requests, providing public facilities and services to new development, and mitigating the environmental impacts of new development. Although these fees are needed to provide services necessary for health and safety and to meet State environmental mitigation requirements, they can have a substantial impact on the cost of housing, particularly affordable housing.

Residential development is assessed fees by the City, County, and school district to cover the costs of infrastructure improvements and maintenance, and the provision of services. Fees are also charged to cover the costs of City staff's review and processing of applications and permits related to housing development. A number of a project's application fees are estimated upon submittal and the developer pays a deposit covering the estimate. Actual staff time spent on the project is then deducted from the deposit amount and any unspent remainder is refunded. If staff time exceeds the deposit, the project applicant will be required to pay the outstanding fees.

Other types of exactions include land dedication, which may be required of residential development for rights-of-way or as an alternative to the park development fee, in addition to on-site improvements that are necessary for the public health, safety, and welfare. On-site improvements may include water, sewer and other utility line extensions, street construction, and traffic control device installations that are reasonably related to a project.

Table 50 details the City's current planning processing fees for project entitlements. One or more of the entitlements would be required to process a residential project and a building permit is required for each residential structure.

Table 50. Development Project – Planning Fees	
Permits/Entitlements	Fee
General Plan / Development Code Amendment	
General Plan Amendment	\$16,581
Rezoning	\$981
Zoning Permit	\$77
Design Review	
Design Review (Alteration)	\$371
Design Review (Minor)	\$602
Design Review (Major)	\$1,114
Design Review ((Landscaping Plan)	\$371
Design Review (Demolition or Relocation)	\$807
Use Permits	
Temporary Use Permit	\$525
Minor Use Permit/Exception	\$1,995
Major Use Permit	\$10,634
Environmental Review	
Environmental Review (Initial Study)	\$15,281
Environmental Review (EIR)	\$29,045
Subdivisions	
Tentative Parcel Map	\$3,735 plus \$395 per lot plus engineering time
Tentative Subdivision Map	\$10,481 plus \$726 per lot plus engineering time
Lot Line Adjustment /Lot Merger	\$1,253
Miscellaneous Fees	
Prezoning/Annexation	\$15,041
Variance	\$2,279
Planned Unit Development	\$9,830

Modification of an Approved Plan	\$1,908
Building Plan Review	\$162 (per hour)
Source: City of Sonoma, Schedule of Fees (effective 8/23/2021)	

Table 51 describes the City's current fee schedule for residential building permits and Public Works/Engineering fees. Building permit fees are deposited by an applicant at the time an application is made for a building permit. This deposit is applied towards the costs of processing the permit application, plan checking services, training fees, and other permit costs required to be paid by the applicant. Permit processing fees and training fees apply to every permit application. Plan checking fees only apply on those permit applications where plan review services are provided.

Actual City staff time spent in the project is calculated and an invoice is prepared, which includes a \$54.00 permit processing fee. The invoice amount is then deducted from the deposit amount, and any unspent remainder is refunded. If the invoice exceeds the deposit, the project applicant will be required to pay the outstanding fees.

Table 51: Residential Building Permit and Public Works/Engineering Fees	
Building Permit	
Estimated Project Cost	Deposit Rate¹
Design Change for an existing Permit	\$54.00
<\$100,000	\$100 MINIMUM OR \$10.00 for each \$1000 of Estimated Project Cost or portion thereof, whichever is greater
>=\$100,000 but <\$1,000,000	\$1,000 MINIMUM OR \$5.00 for each \$1,000 of Estimated Project Cost or Portion thereof, whichever is greater
>=\$1,000,000	\$5,000 MINIMUM OR \$3.00 for each \$1,000 of Estimated Project Cost or Portion thereof, whichever is greater
Plan Check Fee	\$125 (per hour)
Building Permit Inspection Fee	Based on the valuation of the work to be performed
Grading Permit Inspection Fee	20% of calculated Building Permit Inspection Fee
Public Works	
City Engineer Map and Plan Checking Services	\$157 (per hour)
City Engineer Inspection Fee	\$142 (per hour)
Public Works Inspection Fee	\$95 (per hour)
Stormwater Plan Review and Inspection Fee	\$108 (per hour)
Note: ¹ Deposit is applied towards the costs of processing the permit application, plan checking services, training fees, and other permit costs required to be paid by the applicant. Does not include the Mechanical Permit Fee, Electrical Permit Fee, or Plumbing Permit Fee.	
Source: City of Sonoma, Schedule of Fees (effective 8/23/2021)	

Development impact fees can have a much larger effect than permit fees on the final cost of a residential development. Development impact fees include water and sewer impact and hook-up costs, park fees (in lieu of land dedication), traffic impact fees, and similar charges. Table 52 shows the current residential development impact fee per unit.

With regard to school fees, the Sonoma Valley Unified School District (SVUSD) collects school impact fees, which must be paid prior to building permit issuance, based on the square footage of each residential unit developed. The current fee for residential construction is \$3.36 per square foot. Sonoma Valley Fire Protection District charges an impact fee per square foot of \$1.72 for single family housing, \$2.91 for multifamily housing, and \$1.90 for mobile homes. Sonoma Water/Sonoma Valley Community

Services District charges \$15,547.44 per single family equivalent connection; this fee is estimated to be approximately \$11,660.58 per multifamily unit.

Table 52: City Residential Impacts Fees Per Unit	
Estimated Project Cost	Deposit Rate¹
Capital Improvement Fee	Single-Family Dwelling: \$410 (1-BD) - \$614 (3-BD) Multifamily Dwelling: \$410 (1-BD) - \$614 (3-BD) Additions and Alterations to Dwelling: \$68 Mobile Home Lot: \$152
City Impact Fee	\$966 per residential unit
Non-Residential Affordable Housing Impact Fee	Office: \$4.33 (per square foot) Retail: \$4.33 (per square foot) Hotel: \$16.24 (per square foot)
Parkland Fee (in lieu of land dedication)	(2)
Note: ¹ Deposit is applied towards the costs of processing the permit application, plan checking services, training fees, and other permit costs required to be paid by the applicant. Does not include the mechanical, electrical, or plumbing permit fee. ² The fee shall equal the parkland acreage obligation, less the amount of parkland, if any, offered for dedication by the subdivider, times the average per-acre fair market value for the appropriate park planning area.	
Source: City of Sonoma, Schedule of Fees (effective 8/23/2021)	

Table 53 compares the total City and regional fees, including planning, building, and development impact fees for a 48-unit single-family subdivision, a single-family unit, and a 48-unit multifamily project. This assumes that the 48-unit subdivision and single-family unit is constructed in the Residential – Low Density (R-L) zone and the multifamily project is constructed in the Residential – High Density (R-H) zone. Additionally, the calculations assume that the single-family residential homes average 1,850 square feet and the multifamily development averages 750 square feet per unit.

As shown in Table 53, the City's fees range from approximately \$1,901.17 per unit for a multifamily development of 48 units averaging 750 square feet to \$3,803.47 per unit for a 48-unit single-family subdivision with a typical home size of 1,850 square feet to \$8,341.75 for an individual single-family home on an existing lot. When taking outside agency fees into account, fees per unit are approximately \$18,264.25 for a 48-unit multifamily development and \$28,748.91 for a 48-unit single family development.

Table 53: Development Fees – Single-Family Subdivision, Single-Family Home, Multifamily Development			
Fees	48-Unit Subdivision	Single-Family Unit	48-Unit Multifamily Project
Planning Fees			
<i>Design Review</i>	\$1,114	\$602	\$1,114
<i>Tentative Subdivision Map</i>	\$45,329 ¹	--	--
<i>Environmental Review (CEQA)</i>	\$15,281 ^{1,2}	\$50 ³	\$50 ³
Building Permit Fees ⁴	\$34,898.40	\$1,211.75	\$14,148.00
Public Works/Engineering Fees ¹	\$15,000	\$5,000	\$5,000
City Development Impact Fees	\$70,944	\$1,478	\$70,944
School Developer Fees	\$298,368	\$6,216	\$120,960
Sonoma Valley Fire Protection District	\$152,736	\$3,182	\$104,760
Sonoma Valley CSD (Sewer)	\$746,277.12	\$15,547.44	\$559,707.84
Total Fees	\$1,379,947.52	\$17,739.75	\$876,683.84
Total Fees Per Unit	\$28,748.91	\$33,287.19	\$18,264.25
Notes:			

¹ Estimated cost or recommended deposit.
² Assumes appropriate CEQA document is an Initial Study/Mitigated Negative Declaration.
³ Assumes a single-family unit and 48-unit multifamily project would be exempt from CEQA review.
⁴ Construction valuation assume \$131 per square foot. Single-Family Unit: 1,850 sf x \$131 = \$242,350 per unit; 48-unit Single-Family Subdivision: \$242,350 x 48 units = \$11,632,800; 48-unit Multifamily Project: 750 sf x \$131 = \$98,250 per unit x 48 units = \$4,716,000
Sources: City of Sonoma, Schedule of Fees (effective 8/23/2021); HomeGuide: How Much Does It Cost to Build A House, https://homeguide.com/costs/cost-to-build-a-house

Table 54 compares the development fees for a single-family unit and multifamily unit in Sonoma to the cities of Santa Rosa, Rohnert Park, and Petaluma. Development fees throughout Sonoma County vary widely due to the different needs of individual communities and the different fee programs adopted by local agencies serving the individual communities. The City of Sonoma's fees, which include planning, development impact, and outside agency fees, are the lowest of local jurisdictions as shown in Table 54 below and do not constrain the development of housing.

Table 54: Comparison of Development Fees in Cities within Sonoma County		
Jurisdiction	Single-Family Unit Development Fee	Multifamily Unit Development Fee
City of Sonoma	\$28,748.91	\$18,264.25
City of Napa ¹	\$50,803+	\$31,830
City of Santa Rosa ²	\$51,862 + school fees	\$29,386.46 + school fees
City of Rohnert Park ³	\$24,000 (City impact fees only – no planning or outside agency fees, estimate total fee to be \$33,000+)	\$15,000 (City impact fees only – no planning or outside agency fees, estimate total fee to be \$23,000+)
City of Petaluma ⁴	\$51,376	\$35,160
Sources: ¹ City of Santa Rosa Draft Housing Element, June 2022 ² City of Napa Housing Element, March 3, 2015 ³ City of Rohnert Park, November 25, 2014 ⁴ City of Petaluma, 2015-2023 Housing Element, November 19, 2018		

3. PROCESSING AND PERMIT PROCEDURES

The evaluation and review process required by City procedures contributes to the cost of housing in that holding costs incurred by developers are ultimately manifested in the selling price of the home. The City Council and Planning Commission govern the review process in the City, or depending on the project, it might be reviewed by the Design Review and Historic Preservation Commission (DRHPC).

The time required to process a project varies greatly from one entitlement to another and is directly related to the size and complexity of the proposal, as well as the number of actions or approvals needed to complete the process. Table 55 identifies the typical processing times for most entitlements and the reviewing body for each entitlement. It should be noted that each project does not necessarily have to complete each step in the process (i.e. small scale projects consistent with General Plan and zoning designations do not generally require Environmental Impact Reports (EIR), General Plan Amendments, rezones, or variances). Also, certain review and approval procedures may run concurrently. For example, a design review for a multifamily condominium project would be processed concurrently with the subdivision map.

Table 55: Application Processing Times		
Type of Approval or Permit	Typical Processing Time	Approval Body
General Plan Amendment	24-52 weeks	City Council
Rezoning/Zoning Map Amendment	24 weeks	City Council
Development Code Amendment	24 weeks	City Council

Site Design and Architectural Review	6-12 weeks	DRHPC
Site Design and Architectural Review	6-12 weeks	Planning Commission
Temporary Use Permit	2-4 weeks	City Staff
Use Permit	8-16 weeks	Planning Commission
Tentative Parcel Map	24 weeks	Planning Commission
Tentative Parcel Map with Dedications	52 weeks	City Council
Tentative Subdivision Map	52 weeks	City Council
Variance	16 weeks	Planning Commission
Planned Development Permit	16-24 weeks	Planning Commission
Source: City of Sonoma, 2022		

The City also encourages the joint processing of related applications for a single project. For example, a rezone petition may be reviewed in conjunction with the required site plan, a tentative subdivision map, and any necessary variances. These procedures save time, money, and effort from both the public and private sector and could substantially decrease the costs for a developer. It is important to note that some processing timelines cannot be made shorter without violating State laws, particularly as they relate to public noticing, compliance with CEQA, etc. Table 56 outlines typical approval requirements for a single-family infill project, a 48-unit subdivision, and a 48-unit multifamily project, assuming that the land is zoned appropriately.

Table 56: Typical Processing Procedures by Type			
Approval Requirements	Single-Family Unit	Single-Family Subdivision	Multifamily Project
	Site Plan/Design Review	Tentative Subdivision Map	Design Review
		Initial Study/Negative Declaration	Initial Study/Negative Declaration or CEQA Exemption
		Design Review	
		Final Map	
Estimated Total Processing Time	Up to 30 days	6-12 months	2-4 months with CEQA Exemption 6-8 months with IS/MND
Source: City of Sonoma, 2022			

City staff avoids any unnecessary timing constraints on development by working closely with developers and property owners to expedite approval procedures. In addition, City staff will assist the developer through the permit processing to ensure a rapid processing time. It should be noted that Tables 56 and 57 assume the following:

1. The applicant and staff meet and discuss the project before submitting the application;
2. The applicant provides a complete application and may need to work with staff to adjust the project before it is initially reviewed and considered by the approving authority;
3. There are not significant environmental issues that would require an Environmental Impact Report; and
4. The approval of the project is not appealed to the City Council.

For most proposed projects, the City invites the developer to a pre-application meeting to strategize about project design, City standards, necessary public improvements, and funding strategies (where appropriate).

The next step in the process usually includes submittal of an application for the proposed entitlement. The application includes instructions that are meant to simplify the process for the applicant by providing steps on how to proceed. Once staff is satisfied that all required information has been submitted to the City, and the application is consistent with Sonoma's General Plan and Development Code, an Initial Study in accordance with CEQA may follow depending on the scope of the project. During the Initial Study period, many departments will review the project and provide comments. At the same time, Planning staff is likely to be

preparing other documents to expedite the process as previously mentioned. All scheduling, noticing, and correspondence with interested parties usually coincides with this period. After the project is approved, the Building Department performs plan checks and issues building permits. Administrative approval projects requiring minor permits are approved by City staff. Throughout construction, the Building Department will perform building inspections to monitor the progress of the project. This process does not put an undue time constraint on most developments because of the close working relationship between City staff, developers, and the decision-making body.

PROCESSING PROCEDURES

The City does not normally conduct discretionary design review for single-family units or duplexes, unless such units fall within the Historic Overlay zone. There is, however, design review for all multi-unit projects of more than two units. The following is a summary of the seven (7) steps involved with the planning entitlement and public hearing process for housing development:

Step 1 (Application filed) – The applicant submits a completed Uniform Application along with the necessary plans and materials and application fee as identified on the submittal checklist to Planning Department staff.

Step 2 (Completeness review) – Upon receipt of a complete application, the Planning Department routes the project plans and materials to multiple City departments for their concurrent review and comment, and for recommended conditions of approval. Although the Planning Department is primarily responsible for administering the planning permit process, there is close coordination with all branches of the City government, including the Public Works Department, Building Department, City Engineer, Police Department, and the Fire Department. Outside agencies and organizations may also play a role in the review process, depending upon the circumstances of the application. For example, the State Department of Fish and Game participates in the review of projects involving wetlands, while Caltrans reviews developments involving changes to the right-of-way associated with State Highway 12.

Step 3 (Incomplete notification) – If the application is incomplete, the applicant will be required to submit follow-up information as requested. The time to complete this step varies and is determined by the applicant. If the application was initially found to be complete, this step is skipped.

Step 4 (Environmental review) – The application is reviewed to determine whether the project is exempt from the requirements of the California Environmental Quality Act (CEQA) or if an Initial Study is required. Projects in Sonoma may be found to be exempt from CEQA under the urban infill exemption. If a Negative Declaration is prepared, environmental review may take up to six months.

Step 5 (Staff report and COAs) – Once all departments and agencies have reviewed the project, Planning Department staff prepares Conditions of Approval (COAs), which are included within the staff report that is forwarded to the approving authority for its review and consideration, and for public review.

Step 6 (Noticing) – The Planning Department will prepare a Public Hearing notice for the project (this notice will include the environmental determination).

Step 7 (Public Hearing) – At the Public Hearing, testimony is heard on the project and the approving authority takes final action on the project. Note: Permits for new development that include land use and/or zoning issues such as General Plan Amendments or Rezoning require two public hearings (one Planning Commission meeting and one City Council meeting). In these cases, the City Council is the final approving authority.

SB 330 Application

SB 330 (Housing Crisis Act of 2019) provides for streamlined review and preliminary application for housing development projects in order to increase certainty in the development review process. The City utilizes its standard Housing Development Project, Preliminary Application and Uniform Application forms for processing SB 330 applications, which adequately address the SB 330 submittal requirements.

Use Permit Process

The Use Permit (UP) process is described in Section 19.54.040 (Use permits) of the Sonoma Development Code. The purpose of the Use Permit process is to allow for activities and uses which may be desirable in the applicable zoning district and compatible with adjacent land uses, but whose effect on the site and surroundings cannot be determined prior to being proposed for a particular location. The Use Permit procedures provide for the review of the location, design, configuration, and potential impacts of the proposed use, to evaluate the compatibility of the proposed use with surrounding uses and the suitability of the use to the site. In granting a Use Permit, the Planning Commission must find all of the following general conditions to be fulfilled by the requested use:

1. The proposed use is consistent with the General Plan and any specific plan;
2. The proposed use is allowed with a conditional use permit within the applicable zoning district and complies with all applicable standards and regulations of this development code (except for approved variances and exceptions);
3. The location, size, design, and operating characteristics of the proposed use are compatible with the existing and future land uses in the vicinity; and
4. The proposed use will not impair the architectural integrity and character of the zoning district in which it is to be located.

Where one or more of these findings cannot be made, the UP application shall be denied. The Planning Commission may conditionally approve applications by imposing conditions on the project to allow the findings noted above to be made. However, conditions may not be imposed which by their nature would effectively preclude the development of the project.

Site Design and Architectural Review (Design Review) Process

The Site Design and Architectural Review (Design Review) process is described in Section 19.54.080 of the Sonoma Development Code. The City does not normally conduct design review for single-family units or duplexes, unless such units fall within the Historic Overlay zone. There is, however, design review for all multi-unit projects of more than two units and all planned developments (including landscape review).

When applicable, the design review of new residential development is conducted by the City's Design Review and Historic Preservation Commission (DRHPC), a five-member citizen commission that normally meets once each month. The authority of the DRHPC can differ depending on the scope of a project. If a project is subject to discretionary review by the City's Planning Commission, then the preceding DRHPC review is normally limited to three areas: 1) architectural details; 2) colors and materials; and, 3) landscaping and lighting. This approach is intended to ensure that when a project is subject to Planning Commission review, the preceding design review does not result in changing or revisiting key elements of the project. However, when projects are nondiscretionary, the DRHPC's authority is much broader, including consideration of the project site plan, building massing, and elevation concepts. The applicant is required to submit a one-page application form, the application fee, site plan, and drawings documenting proposed building designs, colors, materials, lighting, and landscaping. The application is evaluated by the DRHPC in a public meeting. The applicant has the option of conducting the review in stages (e.g., having the architecture colors and materials reviewed at one meeting and having the landscaping reviewed at another meeting) or all at once. Usually, only one or two meetings are necessary to receive an approval.

The DRHPC makes use of design guidelines set forth in the City's Development Code that address site plan elements, building types, and materials appropriate to Sonoma. Although they are reasonably detailed and give an applicant practical guidance as to the City's expectations with regard to design, they are necessarily somewhat subjective. The findings required for approval of site design and architectural review are as follows:

1. The project complies with applicable policies and regulations, as set forth in the Development Code (except for approved Variances and Exceptions), other City ordinances, and the General Plan;
2. On balance, the project is consistent with the intent of applicable design guidelines set forth in the Development Code; and

3. The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features.

In addition to the basic findings set forth above, additional findings are applicable for any project located within the Historic Overlay zone:

1. The project will not impair the historic character of its surroundings;
2. The project substantially preserves the qualities of any significant historic structures or other significant historic features on the site;
3. The project substantially complies with the applicable guidelines set forth in Chapter 19.42 SMC (Historic Preservation and Infill in the Historic Zone); and
4. The project substantially complies with any applicable preservation plan or other guidelines or requirements pertaining to a local historic district as designated through SMC 19.42.020.

While the design review requirements have not posed a constraint to development, the design guidelines contained in SMC Chapter 19.42 include a subjective component related to compatibility. Program 15: Development Code Amendments – Housing Constraints Program will ensure the design review criteria are revised to address potentially subjective terminology in order to provide objectivity in the design review process.

Downtown Sonoma Historic Preservation Design Guidelines

The Downtown Sonoma Historic Preservation Design Guidelines were prepared in 2017 in response to community concerns about future growth and development within the Downtown Planning District. The purpose of the Design Guidelines is to supplement Sonoma's existing design review and preservation planning framework by establishing guidelines that manage change while also preserving the qualities that are most important to the Downtown Planning District's historic character – thereby recognizing that historic preservation and urban growth are not mutually exclusive.

The Downtown Sonoma Historic Preservation Design Guidelines impose design guidelines that are not contained in the City's Development Code. Besides the obvious aesthetic issues, one of the goals, or perhaps the focus, of design review is to ensure that the City's historic, small-town character is preserved and enhanced. Thus, the guidelines are subjective; however, to ensure the guidelines are consistently applied to each residential project, a list of design elements or qualities that could be incorporated into the design of projects is included below each guideline to identify how to meet the applicable design guideline.

The use of design review has created minimal cost impact on single-family and multifamily development because the types of architectural styles and embellishments required by the City do not, by themselves, cost significantly more to construct than other types of architectural styles.

4. LOCAL EFFORTS TO REMOVE GOVERNMENTAL BARRIERS

DEVELOPMENT CODE UPDATES

The City periodically updates the Development Code to reduce potential governmental constraints and provide for a variety of housing types. Recent revisions to the Development Code addressed emergency shelters, transitional and supportive housing for those moving from various circumstances, and farmworker/agricultural employee housing. Additionally, the Development Code was revised to address pre-manufactured buildings to allow more mobile/manufactured homes within the community, which are viewed as more affordable. The Development Code was also updated to address ADUs, which provide for higher densities to support senior and lower income housing.

FEE DEFERRALS, WAIVERS, AND REDUCTIONS

The City has previously provided fee reductions for affordable housing when funds were available and when necessary to ensure the affordability of a project. While the City's development fees are necessary to provide services and utilities to the community,

the City reviewed requests for fee reductions on a case-by-case basis. Should funding become available again, the City may resume a program of building and impact fee reductions.

In addition, the application of AB 641 (2007) helps to address the cash flow challenges inherent in many affordable housing projects during the construction phase. For affordable housing developments in which at least 49% of the units are affordable to low or very low-income households, AB 641 prohibits local governments from requiring payment of local developer fees on affordable housing projects prior to receiving a certificate of occupancy.

TRANSPARENCY

Government Code Section 65940.1 requires the City to make the following available on its website:

- A current schedule of fees, exactions, and affordability requirements applicable to a proposed housing development project, presented in a manner that clearly identifies the fees, exactions, and affordability requirements that apply to each parcel and the fees that apply to each new water and sewer utility connection.
- All zoning ordinances and development standards adopted by the city or county presenting the information, which shall specify the zoning, design, and development standards that apply to each parcel.
- The list(s) that specify in detail the information that will be required from any applicant for a development project, pursuant to Government Code Section 65940.
- The current and five previous annual fee reports or the current and five previous annual financial reports, that were required pursuant to subdivision (b) of Section 66006 and subdivision (d) of Section 66013.
- An archive of impact fee nexus studies, cost of service studies, or equivalent, conducted by that city, county, or special district on or after January 1, 2018.

The City of Sonoma provides its fee schedules, development application and permit forms, its General Plan, the Zoning Map, a link to the Development Code, and other applicable planning-related documents on its website to assist interested parties in understanding the fees and requirements associated with development of a parcel (or parcels) in the City. To provide financial transparency, the City also provides current budget and rate information, as well as archived comprehensive annual financial reports prepared since 2011/2012, and City budgets prepared from the 2011/2012 fiscal year to the current budget.

5. VOTER INITIATIVES

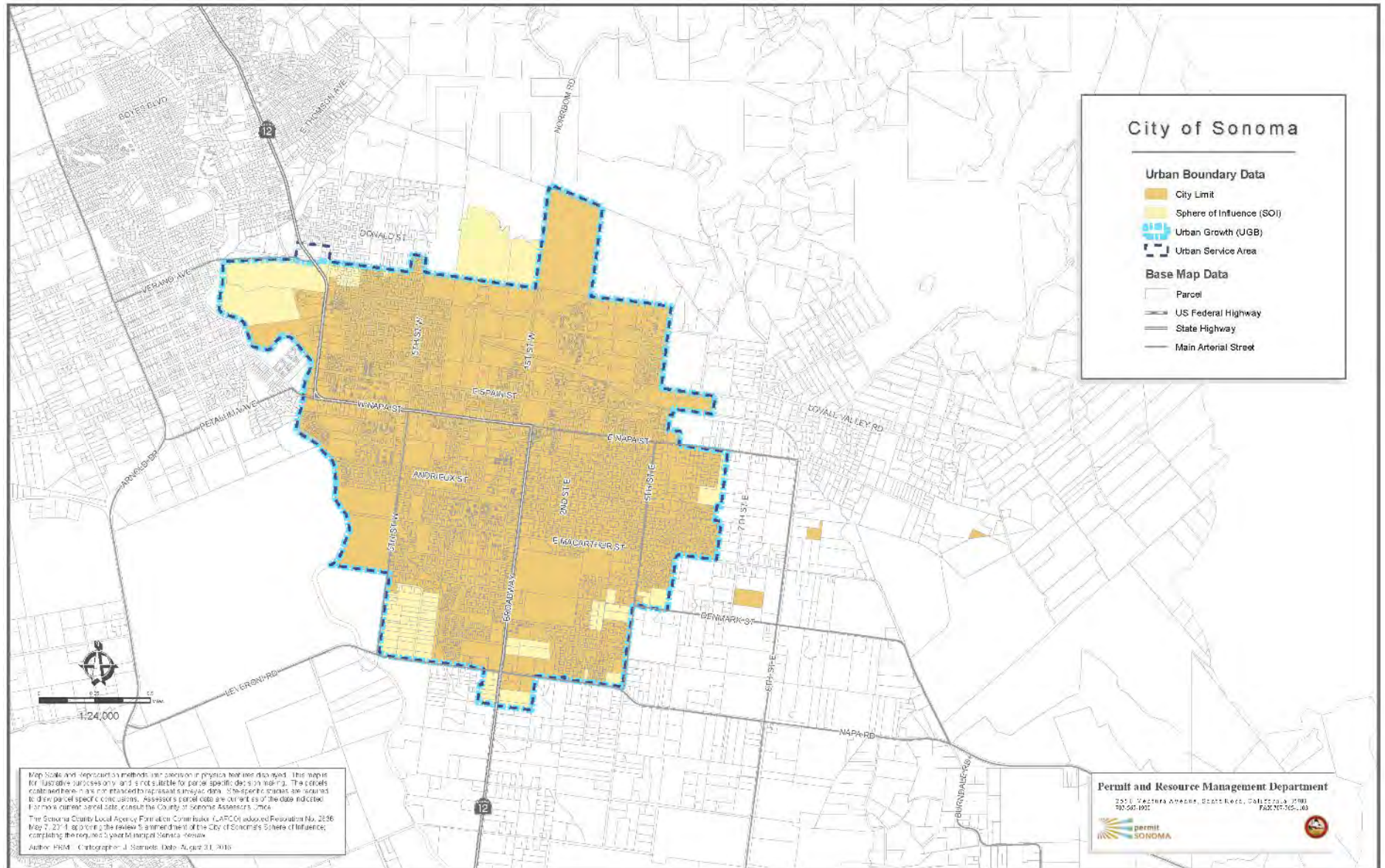
In November 2020, Measure W: City of Sonoma, Urban Growth Boundary Extension, was passed by 78.68% of Sonoma voters. Measure W continued protections provided by the existing Urban Growth Boundary ("UGB"), such as preventing urban sprawl and preserving agricultural land and open space, through December 31, 2040, and requires that future changes to the UGB be approved by the voters except under limited circumstances requiring a 4/5ths vote of the City Council.

The Urban Growth Boundary was created to promote stability in long-term planning for the City of Sonoma by setting a cornerstone policy within the General Plan establishing the geographic limits of long-term development, while allowing sufficient flexibility within those limits to respond to the City's changing needs over time. The UGB is a line beyond which urban development is not to be allowed, except for public schools and public parks. Only uses consistent with the General Plan "agricultural" land use designation as it existed on February 25, 2000 and "open space lands" as set forth in Government Code Section 65560(b) as of February 25, 2000, are allowed beyond the UGB.

Figure 1: Measure W – Urban Growth Boundary (below) shows the City Limits, the Sphere of Influence (SOI), and the approved Urban Growth Boundary (UGB). The areas shaded yellow are those lands within the UGB and not in the City Limits, with the exception of the area extending beyond the northern City Limit ("Montini Preserve" – owned by the City), which is outside the City Limits but within the SOI and outside the UGB.

As discussed in Chapter 4, the City does not rely on lands outside of the City limits to accommodate the 6th Cycle RHNA and the UGB is not an impediment to the City accommodating its fair share of housing.

Figure 1: Measure W – Urban Growth Boundary



B. NONGOVERNMENTAL CONSTRAINTS

Government Code Section 65583(a)(5) requires a housing element to contain an analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction. The cost parameters of these elements fluctuate significantly in response to a wide variety of local, state, natural, and global economic and social events. The influence that city government has on these factors is negligible. As regional and state economic conditions change, the demand and supply of affordable housing is impacted. Historically, the cost of housing in general in Sonoma, relative to Bay Area communities, has been considered moderate; however, the housing market has recently been surging and median home prices in the City are reaching all-time highs.

1. DEVELOPMENT COSTS

LAND COSTS

The price of residential building sites is influenced by fundamental factors such as location, topographical or geographical constraints, natural amenities such as existing streams or lakes, tree cover, and the availability of services (i.e. road systems, public utilities, schools, shopping outlets, etc.). Table 57 shows the land on the market with a Sonoma address and its current listed price as of June 2022 based on *Zillow.com* data.

Table 57: Price of Land			
Address	List Price	Total Acres	Price per Acre
0 W Napa St, Sonoma, CA 95476	\$518,000	0.18	\$2,877,778
471 York Ct, Sonoma, CA 95476	\$579,000	0.22	\$2,631,818
1120 Napa Rd, Sonoma, CA 95476	\$1,800,000	8.16	\$220,588
Source: Zillow.com (as of June 8, 2022)			

As shown in Table 57, the current price of land per acre in Sonoma ranges between \$220,588 to \$2.9M per acre for unentitled land that would require planning entitlements and permit processing prior to development.

COST OF CONSTRUCTION

The cost of construction is primarily dependent on the cost of labor and materials. Construction costs in Sonoma are comparable to costs throughout the Oakland region. Non-union labor is typically used for residential construction and there are no unusual costs with obtaining materials. Many factors can affect the cost of building a house, including site conditions, type of construction, materials, finishing details, amenities, and structural configuration. In recent years, factors such as materials demanded by China for major construction projects and the price of fuel have adversely impacted overall construction costs.

The previous 2015-2023 Housing Element cited construction costs of \$125 per square foot for residential construction. Average residential construction costs in the Oakland region (the closest region to Sonoma with estimated costs from BuildingJournal.com) are estimated to range between \$135.33 – \$200.95 per square foot, with a median construction cost of \$151.84 per square foot, for basic construction.² As shown in Table 58, construction costs for a 1,750 square foot single-family home are estimated to be \$257,736.68, or \$147.28 per square foot. An 850 square foot multifamily unit would cost approximately \$153.37 per square foot; therefore, a 48-unit multifamily development with an average unit size is estimated to have a construction cost of approximately \$6.3 million, with a cost of \$130,360.77 per unit and \$153.37 per square foot.

² Oakland Home Construction Costs & Prices - ProMatcher Cost Report. June 2022. Access: <https://home-builders.promatcher.com/cost/oakland-ca-home-builders-costs-prices.aspx>

Table 58: Construction Cost Estimates – Oakland Region		
	Single-Family (1,750 sq. ft.)	Multifamily (850 sq. ft./unit)
Construction Cost	\$174,146.41	\$88,081.60
Contractor (25%)	\$43,536.60	\$22,020.40
Design Fees (8%)	\$13,931.71	\$7,046.53
Contingency (15%)	\$26,121.96	\$13,212.24
Total Cost	\$257,736.68	\$130,360.77
Per Square Foot	\$147.28	\$153.37
Note:		
¹ 1,750 sq. ft., 2-stories, stucco exterior, no basement, custom grade		
² 850 sq. ft. per unit, 3-stories, stucco exterior, no basement, standard grade		
Source: BuildingJournal.com, 2022		

A residential developer may need to make certain site improvements to “finish” the lot before a home can actually be built on the property. Such improvements could include the installation of water mains; fire hydrants; sewer mains; storm drainage mains; streetlights; and the construction of streets, curbs, gutters, and sidewalks. In addition, the developer may be required to provide other improvements, including, but not limited to, bridges, culverts, fencing of watercourses and hazardous areas, ornamental walls, landscaping, noise barriers, and recreation areas and facilities.

Construction cost increases, like land cost increases, affect the ability of consumers to pay for housing. Construction cost increases occur due to the cost of materials, labor, and higher government-imposed standards (e.g., energy conservation requirements). The development community is currently producing market rate, for-sale housing that is affordable to moderate and above moderate-income households.

COST AND AVAILABILITY OF FINANCING

Financing is critical to the housing market. Developers require construction financing and buyers require permanent financing. The two principal ways in which financing can serve as a constraint to new residential development are the availability and cost of construction financing and the availability and cost of permanent financing.

- If financing is not easily available, then more equity may be required for developing new projects and fewer homebuyers can purchase homes, since higher down payments are required.
- Higher construction period interest rates for developers result in higher development costs. For homebuyers, higher interest rates translate into higher mortgage payments (for the same loan amount), and therefore reduce the purchasing power of homebuyers.

Homebuyer Financing

On June 2, 2022, the reported average rate for a 30-year mortgage was 5.09% with 0.8 points (Freddie Mac). From 2005 through 2021, average monthly mortgage rates have ranged from a high of 6.8% in July 2006 to a low of 2.65% in January 2021. The record low in mortgage rates has been attributed by Freddie Mac to a slowdown in the economic recovery igniting robust purchase demand activity. The intense growth in purchase demand will result in a continued constraint to homeownership due to a lack of housing supply being readily available to support this growth momentum despite low mortgage rates. In addition, for homebuyers, it is necessary to pay a higher down payment than in the immediate past, and demonstrate credit worthiness and adequate incomes so that loan applications meet standard underwriting criteria. While adherence to strict underwriting criteria was not required during the early and mid-2000s, the return to stricter standards is consistent with loan standards prior to 2001.

Landowner and Developer Financing

With respect to landowners and developers seeking to provide housing or retain affordable housing in Sonoma, a variety of federal, state, and local resources are available to help fund affordable housing and reduce financing constraints on housing development, as shown in Table 59.

Table 59: Financial Resources		
Program Name	Description	Eligible Activities
1. Federal Programs		
Community Development Block Grant (CDBG)	Grant program administered by HUD on a formula basis for entitlement communities, and by HCD for non-entitled jurisdictions. Allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - Home Buyer Assistance - Economic Development - Homeless Assistance - Public Services
HOME	HOME funds awarded annually as formula grants to participating jurisdictions. HUD establishes HOME Investment Trust Funds for each grantee, providing a line of credit that the jurisdiction may draw upon as needed. HOME funds can be used for grants, direct loans, loan guarantees, or other forms of credit enhancement or rental assistance or security deposits.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - Home Buyer Assistance - Rental Assistance
Low Income Housing Tax Credits (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sales are typically used to create housing.	<ul style="list-style-type: none"> - New Construction - Acquisition - Rehabilitation
Mortgage Credit Certificate (MCC) Program	Income tax credits available to first-time homebuyers to buy new or existing single-family housing. The Sonoma County Housing Authority does not currently participate in the program, but would be the implementing agency.	<ul style="list-style-type: none"> - Home Buyer Assistance
Housing Choice Voucher Program	Rental assistance payments from the Sonoma County Housing Authority to owners of private market rate units on behalf of very low-income tenants. The Housing Choice Voucher Program includes vouchers issued to individual households as well as project-based vouchers issued to a developer to preserve a specified number of units in a project for lower income residents.	<ul style="list-style-type: none"> - Rental Assistance - Home Buyer Assistance
Section 202	Grants to non-profit developers of supportive housing for the elderly.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - New Construction
Section 203(k)	Provides long-term, low interest loans at fixed rate to finance acquisition and rehabilitation of eligible properties.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - Relocation of Unit - Refinance Existing Indebtedness
Section 811	Grants to non-profit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.	<ul style="list-style-type: none"> - Acquisition - Rehabilitation - New Construction - Rental Assistance
U.S. Department of Agriculture (USDA) Housing Programs	Below market-rate loans and grants for very low, low, and moderate-income multifamily housing, self-help subdivisions, and farmworker rental housing.	<ul style="list-style-type: none"> - New Construction - Rehabilitation

Table 59: Financial Resources		
Program Name	Description	Eligible Activities
2. State Programs		
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	- Home Buyer Assistance
CalHOME	Provides grants to local governments and non-profit agencies for local homebuyer assistance and owner-occupied rehabilitation programs and new home development projects. Will finance the acquisition, rehabilitation, and replacement of manufactured homes.	- Home Buyer Assistance - Rehabilitation - New Construction
California Housing Assistance Program	Provides 3% silent second loans in conjunction with 97% CHFA first loans to give eligible buyers 100% financing.	- Home Buyer Assistance
California Self-Help Housing Program (CSHHP)	Provides grants for the administration of mutual self-help housing projects.	- Home Buyer Assistance - New Construction
Emergency Housing and Assistance Program (EHAP)	Provides grants to support emergency housing.	- Shelters and Transitional Housing
Emergency Shelter Program	Grants awarded to non-profit organizations for shelter support services.	- Support Services
Farmworker Housing Assistance Program	Provides State tax credits for farmworker housing projects.	- New Construction - Rehabilitation
Joe Serna Jr. Farmworker Housing Grant Program (FWHG)	Provides recoverable grants for the acquisition, development, and financing of ownership and rental housing for farmworkers.	- Home Buyer Assistance - Rehabilitation - New Construction
Multifamily Housing Program (MHP)	Provides low interest loans to developers of permanent and transitional rental housing. Funds may be used for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing.	- New Construction - Rehabilitation - Preservation
Project Homekey	Provides grants to local entities to acquire and rehabilitate a variety of housing types – such as hotels, motels, vacant apartment buildings, and residential care facilities – in order to serve people experiencing homelessness.	- Acquisition - Rehabilitation

Table 59: Financial Resources		
Program Name	Description	Eligible Activities
3. Local Programs		
Housing Rehabilitation Program	Sonoma residents are eligible to participate in the Sonoma County Community Development Commission's Housing Rehabilitation Loan Program. This program offers below market rate loans to low-income owner-occupants of single-family homes or mobile homes, and owners of rental properties where at least half of the tenants are low-income households, to make necessary repairs to their dwellings. Loans can offer up to \$50,000 for single-family homes, \$24,000 for mobile homes, and \$25,000 per unit for multifamily rental properties.	- Rehabilitation
4. Private Resources/Financing Programs		
Federal National Mortgage Association (Fannie Mae)	Fixed rate mortgages issued by private mortgage insurers.	- Home Buyer Assistance
	Mortgages which fund the purchase and rehabilitation of a home.	- Home Buyer Assistance - Rehabilitation
	Low down-payment mortgages for single-family homes in underserved low-income and minority cities.	- Home Buyer Assistance
Freddie Mac HomeOne	Provides down-payment assistance to first-time homebuyers and second mortgages that include a rehabilitation loan.	- Home Buyer Assistance

These financing programs are essential to facilitating affordable housing development by providing necessary financial relief. For example, the project site at 20269 Broadway was identified in the previous Housing Element as an important opportunity site. With prior redevelopment funding, the City acquired the property for the affordable housing project that became Alta Madrone. The property was transferred to the Sonoma County Community Development Commission as part of the transition of shifting the Housing Successor Agency role to the County after the dissolution of redevelopment. The City secured \$1.45 million from a 2011 redevelopment bond sale to invest in the project and support affordable housing, and provided a \$100,000 loan for seed money to assist with up-front costs for the entitlement process. The project was also funded with Low Income Housing Tax Credits (LIHTC), which is a federal subsidy used to finance the construction and rehabilitation of low-income affordable rental housing, and which gives investors a dollar-for-dollar reduction in federal tax liability if they finance affordable housing. Additional funding is provided by Project-Based Vouchers through the Sonoma County Housing Authority.

The City has established a number of programs in the Housing Plan to encourage affordable housing development and encourage collaboration with non-profit agencies and affordable housing developers, and to assist affordable housing developers obtain federal, state, and local grant funding.

2. MARKET CONDITIONS

Most developers respond to market conditions, both in the project design in terms of density and unit sizes, and in terms of the timing between receiving entitlements and applying for building permits.

BUILDING PERMIT TIMING

Typically, single-family home developers apply for the first building permits for a subdivision upon receipt of a grading permit. For simple projects or projects that must remain static in their design, building permits may be processed concurrently with

grading plan reviews. Building permits typically take 60-90 days, assuming two to three plan checks. Building permits can be issued in as few as 30 days if there are no corrections, but this is rarely the case for residential subdivisions or multifamily projects. During the 4th and 5th Housing Element Cycles, there was a significant lag between project approvals and requests for building permits. Projects that received approvals in the mid-2000s (2005 and 2006) requested multiple extensions in order to delay development due to the Great Recession and lack of market demand. These projects requested building permits more than ten years after receiving initial entitlements. Project entitlements expired in some cases without any building permit applications.

Building activity has increased, particularly over the 2017-2021 period, and it is anticipated that projects will be quicker to request building permits if the current residential demand and stronger housing market continues. It has also been observed that affordable projects often take longer to request building permits following project approval. This is due, in part, to the need for these projects to assemble funding and financing to make the development feasible. Affordable housing projects will often need to go through several funding rounds in order to procure adequate tax credits and/or project-based rental assistance and may request building permits years after receiving project approval.

APPROVED AND BUILT DENSITIES

As discussed in Section III.A.1, Land Use Controls, the City of Sonoma General Plan and Development Code regulate the residential densities for each land use and zoning designation. Future development must be consistent with the allowed densities anticipated by the City's General Plan, Specific Plans, and Development Code. However, while the City's regulations identify minimum and maximum densities that may be developed in the City, individual developers may opt to build at the lower, mid-range, or higher end of allowed densities. If developers choose to develop at the lower end of allowed residential densities, this could result in significantly fewer units at full buildout of the City and result in an overall lower contribution to the City's RHNA. In recent years, developments in Sonoma have typically occurred at or slightly below the maximum permitted densities, as shown in Table 60. The City's project that is affordable to lower income households – Alta Madrone Family Apartments – proposed units at 120% of the maximum allowed density through a 35% density bonus. Maximum densities in Sonoma are not an obstacle to development, as demonstrated by the majority of projects requesting entitlements at or below permitted densities.

Table 60. Building Permit Timing and Densities				
Project	Building Permit Timing		Densities	
	Project Approval	Building Permit Application	Maximum Allowed	Approved/Built
Approved Projects				
Taub Apartments 19410 Sonoma Highway 0.68 acres Underutilized: Two residences, detached garage	9/2018: 14 units (12 apartments, 2 live/work units)	No building permit application submitted	C/West Napa Street/Sonoma Highway Corridor: 20 units/acre	20.6 units/acre (103% of max.)
Oliva Apartments 655 West Spain Street 1.52 acres Vacant	11/2017: 30 units	10 – 6/29/2018 30 – 2/13/2019	MX/Northwest Area: 20 units/acre	19.73 units/acre (99% of max.)
Alta Madrone Family Apartments 20269 Broadway 1.98 acres Previously underutilized with residence, detached garage, water tower, and barns removed in 2008	11/2017: 48 units w/ Density Bonus	1/2019: 48 units	MX/Broadway Corridor: 20 units/acre	24.24 units/acre (121% of max.)

and two billboards removed in 2017 while the project was under review)				
Jinks Planned Development/Fifth Street West Homes 405 Fifth Street West 0.50 acres Underutilized: Existing residence	2/2015: 7 units w/ Planned Development Permit	2/25/16: 7 units	C/Northwest Area: 20 units/acre	14 units/acre (70% of max.)
Rabbitt Apartments 840 West Napa Street 1.01 acres Underutilized: single family residence, detached accessory structure, and a well	9/2014: 11 units	6/29/2018: 11 units	C: 20 units/acre R-M: 7-11 units/acre	11 units/acre (100% of max.)
Nicora Place 821-845 West Spain St 2.0 acres Underutilized: Eight residential and accessory buildings with a total of 10 housing units	12/16/2016: 18 units	9/26/2013: 18 units	R-M: 7-11 units/acre	9 units/acre (82% of max.)
Mockingbird Lane 853 Fourth Street West 3.54 net acres (1.33 acres of original 4.87-acre parcel was retained as parking for original owner, Sonoma Valley Hospital) Vacant	12/13/2018: 32 units	12/13/2019: 2 units 12/16/2019: 30 units	R-S: 3-8 units/acre	9 units/acre (113% of max.)
Caymus Capital UP 800 West Spain 0.86 acres Underutilized: Residence, water tower, garage, and hatchery buildings	10/9/2014: 7 units	5/2/15: 7 units	R-M: 7-11 units/acre	9.30 units/acre (85% of max.)
Pending Projects				
First Street East Townhomes 216-254 First Street East 2.60 acres	Proposed: 52 units	--	R-O: 15-25 units/acre	19.98 units/acre (proposed) (80% of max.)
Montaldo Apartments 19320 Sonoma Highway 2.15 acres	Proposed: 55 units	--	R-O: 15-25 units/acre	25.6 units/acre (proposed) (102% of max.)
Hummingbird Cottages 19910 Fifth Street West 1.50 acres	Proposed: 15 units	--	R-O: 15-25 units/acre	10.0 units/acre (40% of max.) (proposed)

3. AFFORDABLE HOUSING DEVELOPMENT CONSTRAINTS

In addition to the constraints to market rate housing development discussed above, affordable housing projects face additional constraints. While there is a range of sites available for potential affordable housing projects, as well as projects that focus on special needs populations, there is very little financial assistance for the development of affordable housing.

Multiple funding sources are needed to construct an affordable housing project, since substantial subsidies are required to make the units affordable to extremely low, very low, and low-income households. It is not unusual to see five or more financing sources required to make a project financially feasible. Each of these sources may have different requirements and application deadlines, and some sources may require that the project has already successfully secured financing commitments. Since financing is so critical and is also generally competitive, organizations and agencies that provide funding often can effectively dictate the type and sizes of projects. Thus, in some years senior housing may be favored by financing programs, while in other years family housing may be preferred. Target income levels can also vary from year to year.

This situation has worsened in recent years. Federal and state funding has decreased and limited amounts of housing funds are available, and the process to obtain funds is extremely competitive. Tax credits, often a fundamental source of funds for affordable housing, are no longer selling on a one for one basis. In other words, once a project has received authorization to sell a specified amount of tax credits to equity investors, the investors are no longer purchasing the credits at face value, but are purchasing them at a discount. (Tax credits are not worth as much to investors if their incomes have dropped.)

As previously described, Chapter 19.44 of the Development Code (Affordable Housing and Density Bonuses) requires 25% of the total parcels and/or units in a residential development be affordable to varying lower and moderate-income categories depending on whether the project is for rental units or ownership units. For rental units, 5% are required for the extremely low-income (ELI) household category, 10% for the very low-income (VLI) household category, and 10% for the low-income (LI) household category. For ownership units, 5% are required for the low income (LI) household category; 10% for the moderate-income (M) household category, and 10% for the middle-income (MI) household category. While the City encourages the units to be provided as part of the proposed development on-site, applicants may choose to pay in-lieu fees instead of providing affordable units in a residential project of four or fewer units. These in-lieu fees are subsequently used to provide financial assistance to affordable housing developments.

The City has the lowest fees in the region for residential development, encouraging both affordable and market rate development and reducing the cost of development in Sonoma in comparison to other regional jurisdictions. The City also sponsors funding applications, either for HOME or CDBG funds through the Sonoma County CDC or for State funds administered by HCD, on behalf of affordable housing developers. While the City can support CDBG, HOME, and various State funding applications, there are limited funds available for City projects and there is no guarantee of funding.

C. PUBLIC FACILITIES AND INFRASTRUCTURE

The City requires that developers complete certain minimum site improvements in conjunction with new housing development. Water, sewer, drainage, police, fire, parks, schools, and transportation will require improvements in capacity to treat and distribute water, to treat sewage, to handle run-off, and to provide sufficient space and capacity for public safety, recreation, education, and movement of people and goods. Required improvements include the construction of streets, curbs, gutters, and sidewalks and, where necessary, the installation of water mains, fire hydrants, sewer mains, storm drainage mains, and street lights. These standards are typical of many communities and do not adversely affect the provision of affordable housing in Sonoma. However, whenever a developer advances the costs for improvements not located on the development project, which may be required as a condition of such development project, the developer shall be entitled to reimbursement for that part of the required improvement which contains supplemental size, capacity, number, or length for the benefit of property not within the development project. In each case, the cost of expansion most likely will be financed through development fees, exactions, assessment districts, or some combination of these.

ROADWAY IMPROVEMENTS

The City of Sonoma General Plan Circulation Element outlines the official classification of the existing and proposed streets and roads in Sonoma, including State highway, arterial streets, collector streets, local streets, and rural roads. The following provides a description of the various roadway classifications, including a description of the specific roadway standards for each classification. Pavement width, sight distance, and travel speed generally increase as one moves from local streets to collector streets and arterials to highways. The following provides a description of the various roadway classifications, including a description of the specific roadway standards for each classification.

- **State Highway** – Although in traffic engineering parlance Highway 12 is considered an arterial, it is unique among local roadways. The highway is not only a primary route for through traffic, commuters, and tourists, but it also carries the majority of local trips of any distance. Existing peak hour capacity ranges from 755 – 1,460 vehicles per hour along different roadway segments.
- **Arterial Streets** – These streets carry traffic to and from the highway and to major commercial and public destinations. Volumes are heavy compared to connectors and local streets. Existing peak hour capacity ranges from 685 – 970 vehicles per hour along different roadway segments (excluding SR 12).
- **Collector Streets** – These link arterials to local streets and commercial and public destinations. In some cases, a connector may also serve as a lesser link to the highway. Existing peak hour capacity ranges from 560 – 660 vehicles per hour along different roadway segments.
- **Local Streets** – Typically residential streets, these provide access to neighborhoods and individual parcels within them. They are generally developed with curb, gutter, and sidewalk. Typical existing peak hour capacity is 660 vehicles per hour.
- **Rural Roads** – These carry traffic to outlying districts. They are generally not developed with curb, gutter, or sidewalk. Typical existing peak hour capacity is 545 vehicles per hour.

The Circulation Element identifies the existing (2020) traffic conditions of the local roadways and intersections in Sonoma. The continued development of Sonoma would require an expanded circulation system in order to adequately serve the growing mobility needs of the community. Future changes to traffic patterns in the City will be largely determined by the location of jobs and housing in Sonoma and the region, and by improvements to the local roadway system. Growth will determine future volume, while circulation improvements can only modify its distribution. Traffic projections for the year 2020 (Table CE-2 of the Circulation Element) indicated increased traffic volumes citywide. This traffic was the result of growth in the City, Sonoma Valley, and the greater Bay Area.

WATER SERVICE

Most of the City's water is supplied via connection to the Sonoma County Water system (approximately 95%). Total water allocated annually to the City under its agreement with Sonoma Water is fixed through 2035. Any additional water made available to the City will result from increased pumping of municipal wells (existing and future). The City's contract with Sonoma County Water Agency provides for a peak delivery rate of 6.3 million gallons per day (mgd), with an annual limit of 3,000 acre-feet on total water purchases by the City. However, through consultations between the City and Sonoma County Water Agency, Sonoma County Water Agency clarified that the City was projected to receive a maximum of 2,355 AFY in 2019, increasing in five-year increments to 2,626 in 2035.

The Sonoma Water supply is supplemented by a system of city-owned groundwater wells. These wells would provide a potable water source in the event that aqueduct deliveries are interrupted or are otherwise unable to meet demand. They also serve to help meet peak demands during the summer. The City currently owns eight groundwater production wells, five of which are operational. During a typical water year, the groundwater wells are only used during seasonal high water demand months, and are not operated during the winter except for short-term operation to exercise the pumps. The capacity of the well system is estimated to be 820 gpm. City wells supply an average of 4.4 percent of annual water needs.

On an annual basis, the City has received less than 2,355 AFY from the Sonoma County Water Agency over the past several years, meaning that additional capacity remains available to serve new development. According to the 2020 Urban Water Management Plan (UWMP) prepared for Sonoma Water, the actual amount of water delivered by the Sonoma County Water Agency in 2020 was 2,000 AFY. Projected deliveries increase for the City from 2,168 AFY in 2025 to 2,233 AFY in 2045. The UWMP also compares the total water supply available in multiple dry water years with projected total water use over the next 25 years, in five-year increments, and shows that there is adequate water supply during multiple dry years to meet demands through 2045 across the region, including the City of Sonoma.

The City's current water strategy is to meet the water demands using purchased water from Sonoma Water and use local groundwater supplies to supplement water demand needs during peak periods and also during periods of drought and/or Sonoma Water shortages and shortfalls. The City's local groundwater supply is a key element of its drought contingency plan and it is expected to remain as such throughout the planning horizon of the 2020 UWMP.

The City's 2020 UWMP anticipated an increase of approximately 406 households from 2020 through 2035 and population increase from approximately 11,725 persons in 2020 to 12,582 persons in 2035 and a total of 643 households (1,357 persons) from 2020 through 2045. The City's 2020 UWMP shows a surplus in water supply versus demand in normal dry year conditions, single dry year conditions, and multiple dry year scenarios for all study years (2025, 2030, 2035, 2040, and 2045). The City's planned water supply is adequate to accommodate the RHNA.

SEWER SERVICE

The treatment of wastewater generated within the City of Sonoma and the urbanized unincorporated area of Sonoma Valley is provided by the Sonoma Valley County Sanitation District (SVCSD), which has one treatment plant, located on 8th Street East. The SVCSD is operated and maintained by Sonoma County Water Agency. The SVCSD service area encompasses central Sonoma Valley from Glen Ellen to south Sonoma, including all of the City of Sonoma. The service area, which is approximately eight miles long and two miles wide, is roughly aligned with Sonoma Creek. Not all properties within the service area have been annexed to the SVCSD. As of 2022, the SVCSD served 17,548 equivalent single-family dwellings (ESDs). An ESD is a measure of sewage flow equal to the amount generated by a single-family residence. The District uses ESDs, rather than population, to monitor treatment capacity and estimate future needs.

The SVCSD treatment plant operates under a National Pollutant Discharge Elimination System (NPDES) permit, which was granted by the San Francisco Regional Water Quality Control Board. While the estimated maximum capacity of the treatment plant is 20 million gallons per day (MGD), the NPDES permit limits the permitted average dry weather flow (ADWF) of the treatment plant to 3.0 MGD. Currently, the average dry weather flow at the treatment plant amounts to 2.7 MGD or 90% of permitted plant dry weather discharge limit. When a treatment plant reaches 75 percent of its permitted capacity, the Regional Water Quality Control Board and the State Water Resources Board require the preparation of plans for additional treatment and disposal capacity. The Sonoma Valley Treatment Plant was identified as exceeding the 75 percent threshold as early as 1985. Since that time, the SVCSD has analyzed alternative methods to increase treatment capacity and limit discharge. In this regard, the District has focused on water conservation and the recycling of treated wastewater as the preferred methods of conserving the effective capacity of the plant by limiting discharge in accordance with its NPDES permit limitations. Water conservation benefits capacity by reducing flows into the plant. The recycling of treated wastewater reduces discharge into the Bay. The addition of tertiary treatment capability further assists the District in limiting discharge from the plant by expanding the range of uses for reclaimed water, although storage and distribution improvements are needed to take full advantage of options for recycled water use.

This NPDES permit does not directly cover wet weather flows, which are difficult to estimate due to stormwater infiltration. During the wet weather months, the plant discharges treated water into Schell Slough (no discharge is allowed during the dry weather period, defined as May 1st through October 31st). In addition, the plant has several equalization basins, which can store excess wastewater during wet weather flows. During wet weather months, discharges from the plant are currently limited to approximately 11 MGD by the capacity of the pumps that release water into Schell Slough. Because the equalization basins allow the plant to store excess flows until they can be treated, the plant is currently able to adequately treat all of the wet weather flows.

Since 1994, the District has implemented a number of effective water conservation programs aimed at conserving treatment capacity by reducing flows. In addition, the District has entered into agreements with local farmers and others to use reclaimed water (treated at the secondary level) for the irrigation of nearby dairies and vineyards, as well as wetland enhancement. Currently, the use of recycled water in this manner amounts to 1,000-1,200 acre-feet per year.

The treatment plant has a current unused capacity of approximately 0.3 MGD ADWF (per the NPDES permit). The SVCSD strategy for meeting projected treatment requirements is focused on conservation and recycling. The District estimates that its water conservation programs will successfully conserve treatment capacity within the current allowance of 3.0 MGD during the dry period through 2020-2030. This estimate is based on 2% growth rate within the District, an amount that is consistent with City and County growth management regulations and accommodates the City's share of regional housing needs. To address projected treatment demand through the year 2030 and beyond, the SVCSD has implemented tertiary treatment, which enhances its recycled water programs. Achieving this capability will allow the SVCSD to greatly increase the recycling of treated wastewater while respecting the 3.0 MGD discharge limit, thereby meeting the treatment needs associated with future development within the SVCSD. However, storage facilities will have to be expanded and new users of reclaimed water found in order to take advantage of the tertiary treatment capability. In addition to implementing tertiary treatment capability, the SVCSD is taking the following actions to provide treatment capacity necessary to serve projected growth within the City and the SVCSD as a whole:

- Continuing to implement water conservation programs aimed at reducing flows from existing connections.
- Upgraded the reclamation facility by providing for tertiary treatment and is increasing the amount of reclaimed wastewater use by pursuing additional reclaimed water user contracts.
- Working with the Regional Water Quality Control Board for renewal of the plant's NPDES permit.
- Completing additional engineering and environmental studies on required improvements as needed.

In consideration of these factors, it is anticipated that wastewater treatment will be adequately available to serve development as anticipated in the City's General Plan. Therefore, wastewater will not be a constraint to residential development during this Housing Element planning period.

D. ENVIRONMENTAL ISSUES

Environmental constraints affecting residential development in Sonoma include geologic and seismic conditions, which provide the greatest threat to the built environment, urban fires and wildfires, and flooding hazards. Apart from the larger issues discussed below, there are no known site-specific environmental constraints that would substantially impact development on the identified Housing Opportunity Sites.

1. GEOLOGIC AND SEISMIC HAZARDS

Earthquakes pose the most serious potential threat in the Planning Area, particularly the City, as urban areas are more prone to damage than less developed areas. Although no known faults lie cross the Planning Area, Sonoma County is traversed by seven active or potentially active faults, including the San Andreas fault, the Tolay fault, and the Healdsburg/Rodgers Creek fault. The Rodgers Creek fault, which has been identified as an extension of the Hayward fault, lies closest to the Planning Area and represents a significant earthquake risk. Earthquake hazards in the Planning Area include fault rupture, ground shaking, liquefaction, seismically induced landslides, and subsidence. Each can result in extensive property damage, personal injury, and/or death. The most widespread effect of an earthquake is ground shaking, or movement of the Earth's surface in response to seismic activity. Ground shaking is often the greatest cause of physical damage. Buildings and utility facilities may suffer severe damage or collapse if not properly designed to withstand shaking.

California has a long history of strong earthquakes that have affected communities in the San Francisco Bay Area. The largest earthquake to occur within the area was the 1906 San Francisco Earthquake (7.8 magnitude) that occurred along the San Andreas Fault. The City's proximity to fault zones and other potentially active faults suggests a high probability that a strong earthquake will occur in the future in the City's vicinity.

The Sonoma Planning Area is located within Zone VIII (Very Strong) and Zone VII (Strong) of the Modified Mercalli Intensity (MMI) Shaking Severity Level. The MMI estimates the intensity of shaking from an earthquake at a specific location or over a specific area by considering its effects on people, objects, and buildings. At high intensities ($\text{MMI} \geq 6$), earthquake shaking damages buildings. The severity of the damage depends on the building type, the age of the building, and the quality of the construction. Masonry and non-ductile concrete buildings can be more severely damaged than wood-frame or engineered buildings. Buildings built to older building codes can be more severely damaged than recently constructed buildings using newer codes.

In order to minimize potential damage to the buildings and site improvements, all construction in California is required to be designed in accordance with the latest seismic design standards of the California Building Code. The California Building Code, Title 24, Part 2, Chapter 16 addresses structural design and Chapter 18 addresses soils and foundations. Collectively, these requirements, which have been adopted by the City, include design standards and requirements that are intended to minimize impacts to structures in seismically active areas of California. Section 1613 specifically provides structural design standards for earthquake loads. Section 1803.5.11 and 1803.5.12 provide requirements for geotechnical investigations for structures assigned varying Seismic Design Categories in accordance with Section 1613. Design in accordance with these standards and policies is typical in Sonoma and addresses risks associated with seismic activity.

2. FIRE HAZARDS

Structural fires pose a significant potential threat. The closely packed wood-frame buildings around Sonoma Plaza, many of them without sprinklers, raise a particular concern. The risk of structure fires may increase in the future due to changes in land use patterns, such as an increased emphasis on infill and planned unit developments, if not mitigated through site planning and building design and retrofit requirements. The risk of a widespread structure fire is related to seismic risks in that major earthquakes in urban areas often cause conflagrations and make firefighting more difficult.

With the exception of Sonoma Mountain Cemetery, the entirety of the Planning Area lies within a Local Responsibility Area (LRA) and no properties within the Planning Area are in a fire hazard severity zone.

3. FLOODING

Flooding, even at its worst, presents only localized threats to property and little or no threat to life in Sonoma. Although some local urbanized areas lie within the 100-year floodplain mapped by the Federal Emergency Management Agency, flood water heights rarely exceed one-to-two feet and flood control improvements have eliminated many former problems. Urban development could increase the rate and volume of drainage runoff within the community by increasing areas of impervious surface, which could result in localized flooding in some areas where the existing storm drainage system may not be sufficient. However, mitigations measures would reduce the risk of flooding and may include: requiring development within the Planning Area to document the adequacy of proposed storm drain improvements; requiring development projects to contribute to the cost of implementation of the Sonoma Area Master Drainage Plan; and requiring development within the Planning Area to be designed and constructed consistent with Sonoma Water Flood Control Design Criteria.

4. INVENTORY OF RESIDENTIAL SITES

This section of the Housing Element describes resources available for housing development, rehabilitation, and preservation in Sonoma. Resources include land designated for housing development, financial resources to assist with the development, rehabilitation, and preservation of housing, and resources for energy conservation.

A. AVAILABILITY OF SITES FOR HOUSING

Housing element law requires an inventory of land suitable for residential development (Government Code Section 65583(a)(3)). An important purpose of this inventory is to determine whether a jurisdiction has allocated sufficient land for the development of housing to meet the jurisdiction's share of the regional housing need, including housing to accommodate the needs of all household income levels.

This section documents the availability of sites for future residential development and the adequacy of these sites to accommodate Sonoma's 6th Cycle RHNA. In addition to assessing the quantity of land available to accommodate the City's total housing needs, this section also considers the availability of sites to accommodate a variety of housing types suitable for households with a range of income levels and housing needs. Sonoma will fulfill its share of regional housing needs using a combination of the methods below, as further described in this section:

- Residential projects with development entitlements with occupancy post June 30, 2022
- Sites with zoning in place
 - Vacant and underutilized sites with a proposed project
 - Vacant sites with zoning in place (R-R, R-S, R-L, R-M, R-H, R-O, MX, and C zoned sites):
 - Residential sites (R-R, R-S, R-L, R-M, R-H, R-O) are assumed to develop at 85% of capacity,
 - Mixed use (MX and C) sites are assumed to develop with residential uses at 75% of capacity, and
 - Realistic capacity assumptions are consistent with approved and built densities shown in Table 60.
 - Underutilized sites with zoning in place (R-O, MX, and C zoned sites):
 - Residential sites (R-R, R-S, R-L, R-M, R-H, R-O) are assumed to develop at 85% of capacity,
 - Mixed use (MX and C) sites are assumed to develop with residential uses at 75% of capacity, and
 - It is noted that underutilized sites are only necessary to accommodate 5 of the very low income RHNA units; the remainder of underutilized sites are included to demonstrate additional capacity.
- Projected accessory dwelling units

Table 61 summarizes the residential unit potential from the above methods and provides a comparison with Sonoma's RHNA and inventory parcels are shown on Figures 2 and 3. Parcel-specific site inventories are included in Appendix A.

Table 61: Comparison of RHNA to Inventory of Sites, Approved Projects, and ADUs					
Category	Very Low	Low	Moderate	Above Moderate	Total
2023-2031 RHNA (Table II-39)	83	48	50	130	311
Approved Projects					
Approved Projects with occupancy post June 30, 2022	0	0	3	5	8
Pending Projects					
Pending Projects with occupancy post June 30, 2022	9	12	15	108	144
Vacant Sites by Zoning District					

Table 61: Comparison of RHNA to Inventory of Sites, Approved Projects, and ADUs					
Category	Very Low	Low	Moderate	Above Moderate	Total
C	27	18	8	12	65
MX	0	0	5	7	12
R-H	0	0	1	1	2
R-L	0	0	0	61	61
R-M	0	0	18	20	38
R-O	42	27	0	0	69
R-R	0	0	0	7	7
R-S	0	0	0	3	3
Subtotal Vacant Sites	69	45	32	111	257
Underutilized Sites by Zoning District					
C	0	0	4	4	8
MX	32	21	2	3	58
R-L	0	0	0	19	19
R-M	0	0	2	2	4
R-O	0	0	5	5	10
Subtotal Underutilized Sites	32	21	13	36	102
Accessory Dwelling Units					
ADUs	0	0	64	0	64
Total Capacity (Inventory, plus Approved Projects, plus ADUs)					
TOTAL CAPACITY	110	78	127	264	579
Shortfall	--	--	--	--	--
Excess Capacity	27	30	77	134	268
¹ Moderate income units based on affordability of ADUs produced during the 5 th Cycle. Source: City of Sonoma, 2022; Sonoma County Assessor Data, 2021; De Novo Planning Group, 2022					

As shown in Table 61, Sonoma has a total realistic capacity for 679 units, reflecting an excess capacity of 268 units to accommodate the RHNA.

3. REALISTIC CAPACITY AND AFFORDABILITY

To evaluate the adequacy of the sites identified to address the affordability levels established by the RHNA, State law (Government Code Section 65583.2(c)(3)) provides for the use of “default densities” to assess affordability. Based on its population and location within Sonoma County, the City of Sonoma falls within the default density of 20 units per acre for providing sites affordable to very low and low income households.

Sites suitable for very low and low income households are sites zoned C, MX, and R-O that are sized from 0.5 to 10 acres, based on Government Code Section 65583.2(c)(2), as well as pending projects that propose low income units. Sites anticipated to accommodate very low and low income units include Site J (Pending 1st Street East Townhomes), Site 38 (vacant 3.0-acre site zoned C), Site 80 (underutilized 6.1-acre site zoned MX), Site A (Pending Montaldo Apartments), Site C (Pending 19380 Sonoma Highway Multifamily), and Site 94 (3.25-acre vacant site zoned R-O).

Sites suitable for moderate density households can be provided at 10 or more units per acre (R-M, R-H, C, and MX districts). The City has used these default density thresholds as a guide in allocating its sites inventory by income category, as presented in Table 61 and detailed by site in Appendix A.

Realistic capacity was calculated at 85% of maximum density for residential zoning districts and 75% of maximum density for commercial and mixed use districts that allow residential development. These assumptions are more conservative than development patterns in the City, which reflect development at 97.5% of maximum density for projects built in the C and MX districts and at 93.3% of maximum density for projects built in the residential districts. Where appropriate, additional considerations, such as the need for stream setbacks, are factored into the maximum capacity and are identified in Appendix A.

The City's capacity to accommodate new residential development exceeds the minimum RHNA required within each income category, which will help offset any sites that may be developed with fewer units or at less affordable levels than assumed in the inventory of residential sites.

All identified developable land designated for residential use (all residential land use designations in the General Plan) is considered available for residential development. Additionally, land within the C and MX zoning districts is also considered available for residential development as the Zoning Code permits residential uses by right for these sites. The methodology considers factors including the extent to which existing uses may constitute an impediment to additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites, as discussed below.

4. NONVACANT SITES

State law allows use of underutilized (nonvacant) sites to accommodate the RHNA. The City encourages redevelopment of underutilized uses and infill development. With the exception of 5 very low income units, the City does not need underutilized sites to accommodate the RHNA and the excess underutilized sites are included to encourage development throughout the 6th Cycle by including additional opportunities for development.

The City has completed a detailed assessment of the suitability of all nonvacant sites identified to accommodate its RHNA.

In evaluating the potential for nonvacant sites to accommodate additional residential development beyond the RHNA, the methodology for Inventory of Residential Sites considered a number of factors, including the extent to which existing uses may constitute an impediment to additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Appendix A provides data supporting the methodology to determine nonvacant sites suitable for development, including the existing uses (type of use and amount of development) located at each site, land and improvement values, any known constraints to development, and any other relevant information which supports the City's finding that all sites identified in its inventory are suitable for redevelopment during the planning period at densities and intensities consistent with the realistic capacity assumptions identified for the site, by income level. Each of the underutilized sites in the inventory was selected based on a combination of factors rendering it suitable and likely to redevelop during the planning period.

All non-vacant sites are appropriate for development at the residential densities and intensities identified in this chapter and Appendix A and are anticipated to be developed with urban uses as planned by the City's General Plan and Zoning Ordinance.

EXISTING USES

Existing uses were evaluated based on several factors to determine if the existing uses would render a site suitable and likely to redevelop during the 6th Cycle. Sites are considered to have low utilization if there is physical underutilization of a site or economic obsolescence of the existing use. Physical underutilization of the site is measured by a structure-to-land ratio of less than 0.25. Economic obsolescence of the existing use is measured by an improvement-to-land value ratio of less than 1.0. Existing uses on the sites are limited to single family residential uses. As discussed below, development trends in the City indicate strong support for redeveloping sites with more intense residential uses.

DEVELOPMENT TRENDS

The majority of recently approved and constructed projects in Sonoma, as shown in Table 60, have occurred on underutilized sites, with existing development ranging from individual residences to 10 residential units. As evidenced by Table 60, the housing market in Sonoma has supported development on underutilized sites during the 5th Cycle. It is anticipated that these trends will continue into the 6th Cycle, particularly given the strong demand for housing as reflected by the State's projection of housing needs for the Bay Area and assigned through the 6th Cycle RHNA.

MARKET CONDITIONS

The market demand for housing, including affordable housing, has been well-documented by the State in support of passage of multiple bills in recent years to better accommodate the strong housing demand throughout the State. Development trends in the City during the 5th Cycle demonstrated a strong demand for housing in Sonoma at all income levels (see Chapters 2 and 7), as evidenced by the City meeting or exceeding the RHNA at all income levels 2 years prior to the end of the 5th Cycle. This strong demand and need for housing will continue to encourage redevelopment of underutilized sites and to encourage lot splits and other mechanisms that maximize capacity of sites. The market demand for more housing, including more density housing that takes advantage of opportunities such as underutilized sites in order to intensify development in the midst of a State-identified housing crisis, has been highlighted repeatedly by the Governor and State legislators [bold added for emphasis]:

*"California's severe housing shortage is badly damaging our state, and **we need many approaches** to tackle it," said Senator Wiener.³*

"California needs more housing, and we need it now," said Senator Skinner.²

*"For too long, California has kicked the can down the road when it came to building more housing," said San Francisco Mayor London Breed. "The housing crisis is at the center of our state's biggest challenges – with our children and our most vulnerable bearing the brunt of sky-high costs and **a severe shortage of housing inventory**. Thankfully, Governor Newsom and our legislative leaders are taking bold action to address this shortage with a smart, targeted housing packing that will allow our communities to grow with inclusion and expand the dream of home ownership and housing stability to people across California."²*

*"The **acute affordability crisis we are experiencing in California** was decades in the making, and now we're taking the necessary steps to fix it," said Governor Newsom, who signed the legislation at an affordable housing development in Oakland today. "This package of smart, bipartisan legislation boosts housing production in California – more streamlining, more local accountability, more affordability, **more density**. These bills, plus this year's historic budget investments in affordable housing, will directly lead to **more inclusive neighborhoods** across the state. Creating denser housing near jobs, parks and schools is key to meeting our climate goals as well as our affordability goals."⁴*

*"Administration has advanced \$800 million in new or accelerated funding to build affordable, climate-friendly housing and infrastructure...Since taking office, the Governor has prioritized tackling the housing crisis, signing major legislation to boost housing production, remove barriers to construction of accessory dwelling units and streamline state laws to **maximize housing production**." Office of the Governor³*

Incentives for Residential Development

The most significant incentive Sonoma offers for residential development that it can boast is the lowest fee structure in the region. As shown in Table 54, the City's fees are substantially less than other jurisdictions – even when taking into account school fees

³ Office of the Governor, Gov. Newsom Signs Sb 8, Extending The Housing Crisis Act, September 16, 2021

⁴ Office of the Governor, Governor Newsom Signs Legislation to Increase Affordable Housing Supply and Strengthen Accountability, Highlights Comprehensive Strategy to Tackle Housing Crisis, September 28, 2021

and outside agency fees which are not addressed uniformly and comprehensively in the other jurisdiction fee calculations. Further, the State has committed new and accelerated funding to assist with providing housing to address the current housing shortage throughout the State. Program 2: Partnerships with Affordable Housing Developers in the Housing Plan commits the City to working with developers to access State and other funding available to support development of underutilized sites.

5. PROJECTS WITH ENTITLEMENTS

The City has 9 projects with development entitlements that will have occupancy post June 30, 2022 and will contribute towards addressing its 6th Cycle RHNA, as described below:

- **588 1st St West**, APN 018-213-001 – 1 live/work unit, above moderate
- **515 Lasuen St**, 127-471-038, 2 single family units, above moderate
- **700 W Spain St**, 127-204-011, 2 single family units, above moderate
- **392 Arroyo Way**, 018-393-001, ADU, moderate
- **819 Virginia Ct**, 018-381-040, single family dwelling, above moderate
- **301 First Street West**, 018-161-017, duplex, 1 moderate and 1 above moderate
- **481 York Court**, 018-382-029, single family dwelling, 1 above moderate

6. PENDING PROJECT

The City has 17 pending residential projects that will have occupancy post June 30, 2022 and contribute toward addressing its 6th Cycle RHNA, as summarized below. Additional information regarding each site is provided in Appendix A.

- **1211 Broadway Housing** - 1211 Broadway, APN 128-181-004, 5 multifamily units (2 moderate, 3 above moderate) proposed on a 0.34-acre underutilized site with a single family dwelling
- **19380 Sonoma Hwy Multifamily** - 19380 Hwy 12, APN 127-202-013, 7 multifamily units (1 very low, 1 low, 5 above moderate) proposed on a 1.19-acre underutilized site with a cocktail lounge
- **Jacks Diner Duplex** - 899 Broadway, APN 018-411-012, 2 duplex units (2 moderate) proposed on a 0.55-acre underutilized site with service station
- **Single Family Dwelling** - 470 Harrington Dr, APN 128-162-042, 1 single family unit (above moderate) proposed on a 0.28-acre underutilized site with single family dwelling
- **Single Family Dwelling** - 315 5th St W, APN 127-204-021, 1 single family unit (above moderate) proposed on a 0.65-acre underutilized site with: single family dwelling
- **Sweetwater Spectrum Inc.** - 734 W Spain St, APN 127-204-009, 0.248, 2 duplex units (above moderate) proposed on a 0.25-acre vacant lot
- **Single Family Dwelling**, 420 Patten St, APN 018-273-013, 1 single family unit (above moderate) proposed on a 0.24-acre underutilized site with single family dwelling
- **HSU Residence ADU** - 214 E Napa St, APN 018-222-008, 0.256, , 1 ADU (moderate) proposed on a 0.26-acre underutilized site with single family dwelling
- **DeNova Homes/Hummingbird Cottages** - 19910 Fifth Street West, APN 128-061-001, 15 single family attached units (1 low, 2 moderate, and 12 above moderate) proposed on a 1.50-acre underutilized site with a single family dwelling
- **1st Street East Townhomes** - 216-254 First Street East, APNs 018-131-012, -013, -018, 2.60, 5th, 50 single family attached units (5 low, 5 moderate, and 40 above moderate) proposed on a 2.60-acre underutilized site with two single family dwellings on two of the parcels, industrial uses (5,000 s.f.) on one parcel
- **DeNova Homes/Montaldo Apartments** - 19320 Sonoma Highway, APNs 127-202-006, -007, 2.15, 5th, 50 multifamily units (3 extremely low, 5 very low, 5 low, and 37 above moderate/market rate) proposed on a 2.15-acre underutilized site with single family dwelling on one parcel, other parcel is vacant
- **Single Family Dwelling** - 20029 1st Street W, APN 128-131-016, 1 single family unit (above moderate) proposed on a 0.57-acre underutilized site with single family dwelling
- **Single Family Dwelling** - 114 Malet St, APN 128-071-023, 1 single family unit (above moderate) proposed on a 0.50-acre underutilized site with single family dwelling

- **Single Family Dwelling** - 234 Malet St, APN 128-071-014, 1 single family unit (above moderate) proposed on a 1.36-acre underutilized site with single family dwelling
- **Single Family Dwelling** – 525 Lasuen St, 1 single family unit (above moderate) and 1 ADU unit (moderate)

7. ACCESSORY DWELLING UNITS

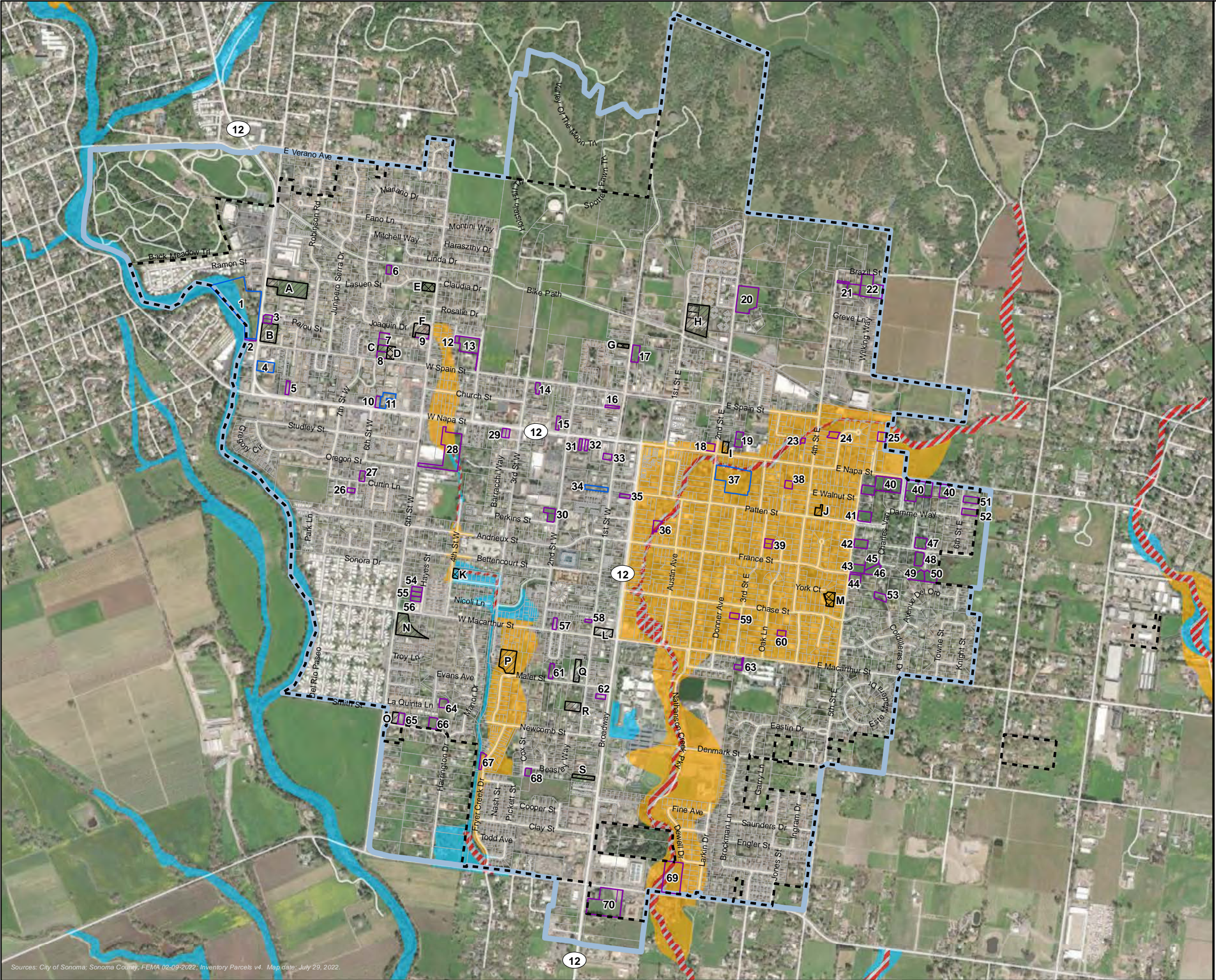
From 2018 through 2021, an average of 8 ADUs were permitted annually (8 moderate income in 2018, 15 moderate income in 2019, 5 moderate income in 2020, and 5 moderate income in 2021). The City collected information regarding proposed rents and applied affordability assumptions to all ADUs constructed during the 5th Cycle as documented in the City Annual Performance Reports. ADU development averaged 8 units per year, which results in 64 ADUs when projected over the 2023-2031 6th Cycle. All ADUs are estimated to be affordable to moderate income households. While it is anticipated that a portion of the ADUs will be affordable to very low and low income households, the Inventory of Residential Sites has assumed that ADUs will be affordable to moderate income households, at a minimum. Program 5: Accessory Dwelling Units and Junior Accessory Dwelling Units in the Housing Plan requires the City to track affordability of ADUs, which will ensure accurate reporting of 6th Cycle progress and will assist the City in assuming affordability of ADUs for the 7th Cycle.

8. SIZE OF SITES

As shown in Table 62, the City has sites in a range of sizes, with the majority of the City's sites in vacant condition. Sites available for single-family development appropriate for above moderate income households range from small lots of 0.05 up to 0.25 acres in existing and approved subdivisions, to infill lots from approximately 0.3 to over 5 acres. Lots for moderate income households accommodate higher density single-family (e.g., townhomes, attached single-family, cluster housing) and medium/high density multi-family units, primarily in the R-M and R-S zones and on smaller lots in the C, MX, and R-O zones. These lots vary in size from smaller lots of 0.12 acres to lots of more than 1 acres. Sites for lower income, multi-family housing are located in the C, MX, and R-O zones and range from 0.5 acres to over 5 acres and are identified with more details in Appendix A. There are no lots over 10 acres in the inventory.

Table 62: Vacant and Underdeveloped Parcels by Size							
Zoning District	<0.25	<0.5	<1	<2.5	<5	<10	Total Parcel County
Pending Projects							
MX	-	1	1	1	-	-	3
R-L	2	2	1	-	-	-	5
R-O	-	3	-	3	-	-	6
R-R	-	1	1	1	-	-	3
Vacant Sites							
R-R	-	1	4	1	-	-	6
R-L	20	23	2	1	-	-	46
R-S	-	2	-	-	-	-	2
R-M	5	1	1	1	-	-	8
R-H	1	-	-	-	-	-	1
R-O	-	-	1	1	-	-	2
C	8	-	-	-	1	-	9
MX	8	0	-	-	-	-	8

Table 62: Vacant and Underdeveloped Parcels by Size							
Zoning District	<0.25	<0.5	<1	<2.5	<5	<10	Total Parcel County
Nonvacant (Underutilized) Sites							
R-L	-	-	-	-	1	-	1
C	-	-	1	-	-	-	1
MX	-	1	-	-	-	1	2
R-O	-	-	1	-	-	-	1
Total	44	35	13	9	2	1	104



Sources: City of Sonoma; Sonoma County; FEMA 02-09-2022; Inventory Parcels v4. Map date: July 29, 2022.

FIGURE 2
Inventory of Housing Sites
Aerial Map

Legend

City of Sonoma

Sonoma Sphere of Influence

Inventory of Housing Sites

Vacant

Underutilized

Project - Pending

Project - Approved

FEMA Designation

100-year Flood Zone

Regulatory Floodway

500-year Flood Zone

Area of Minimal Flood Hazard

0 500 1,000
Feet

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm

FIGURE 3
Inventory of Housing Sites
Zoning Map

Legend

City of Sonoma

Sonoma Sphere of Influence

Inventory of Housing Sites

Vacant

Underutilized

Project - Pending

Project - Approved

Zoning Designation

A: agriculture

R-HS: hillside residential (1 d.u./10 acres, maximum)

R-R: rural residential (2 d.u./acre, maximum)

R-L: low density residential (2-5 d.u./acre)

R-M: medium density residential (7-11 d.u./acre)

R-H: high density (11-15 d.u./acre)

R-S: sonoma residential (3-8 d.u./acre)

R-P: mobile home park (7 d.u./acre, maximum)

R-O: housing opportunity (15-20 d.u./acre)

C-G: commercial-gateway (15 d.u./acre, maximum)

C: commercial (15 d.u./acre, maximum)

MX: mixed use (12 d.u./acre, maximum)

P: public facility

Pk: Park

W: wine production

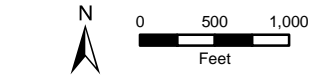
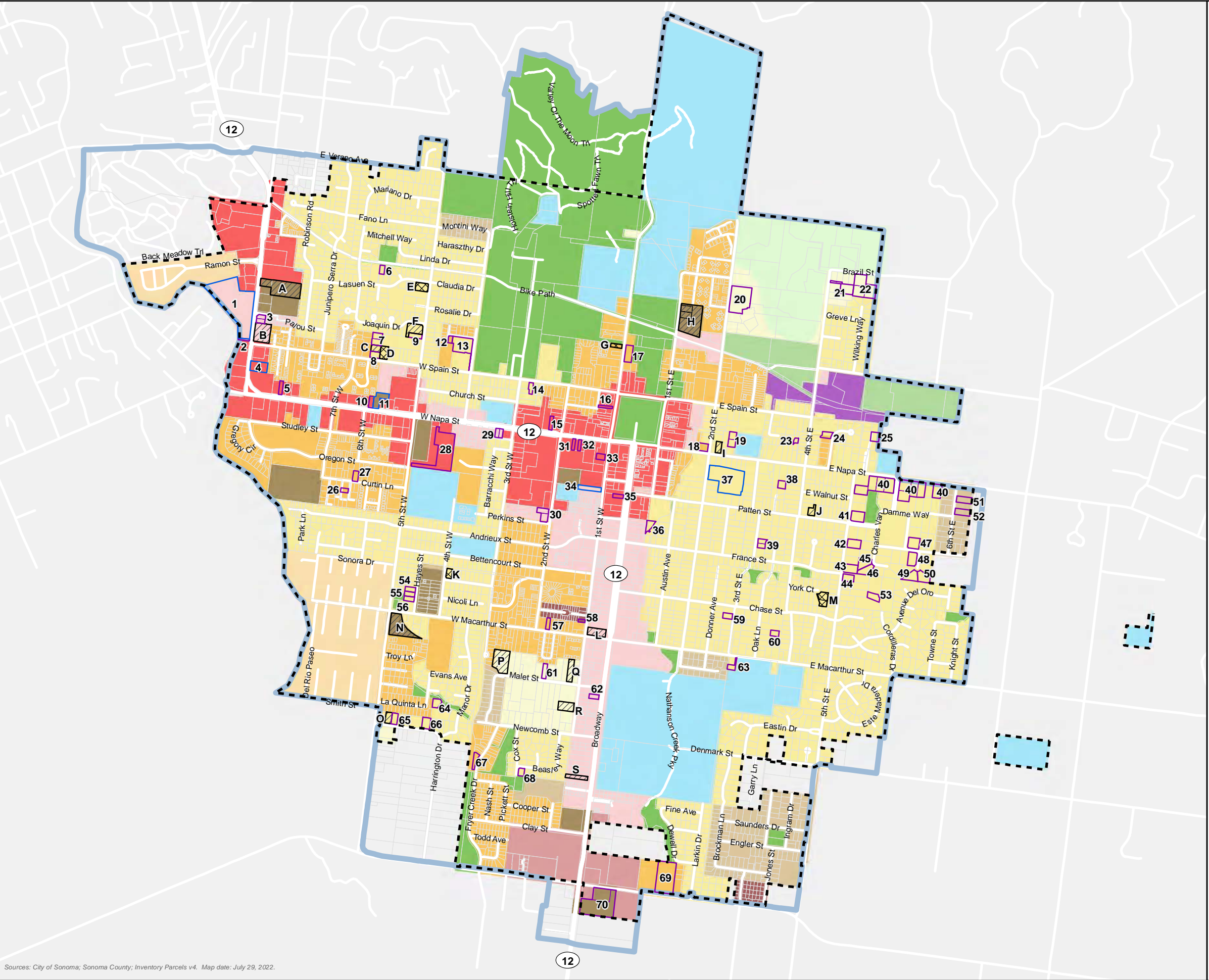


Figure 4: Intentionally left blank.



5. AFFIRMATIVELY FURTHERING FAIR HOUSING ANALYSIS

All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015. Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics”. These characteristics can include, but are not limited to, race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The AFFH analysis must contain the following:

- A: Outreach
- B: Assessment of Fair Housing
 - Key Data and Background Information
 - Fair Housing Enforcement and Outreach Capacity
 - Integration and Segregation Patterns and Trends
 - Racially or Ethnically Concentrated Areas of Poverty
 - Disparities in Access to Opportunity
 - Disproportionate Housing Needs in the Jurisdiction
 - Displacement Risk
- C: Sites Inventory
- D: Identification of Contributing Factors
- E. Goals and Actions

While this section provides a focused analysis of fair housing issues in Sonoma, several other sections of the Housing Element address the issue and are included in this section by reference.

A. OUTREACH

The City of Sonoma deeply values the role of public participation in the planning process and has worked diligently to engage all members of the Sonoma community, including non-English speakers and those typically underrepresented in the planning process. This summary highlights those steps taken as part of the Housing Element Update.

1. PROJECT WEBSITE

A dedicated project website (<https://www.sonomacity.org/housing-element-update/>) serves as the main conduit of information for individuals who can access material online. The project website launched in 2021 and is regularly updated to reflect ongoing community input opportunities, advertise draft work products, and answer commonly asked questions. The website includes the following information:

- Upcoming meeting information
- Project timeline
- Narrated presentation on the City’s Housing Needs, including an animated video explaining Housing Elements (narrated and subtitled in Spanish)
- Contact/sign-up information
- Links to other relevant resources

2. GENERAL MULTI-LINGUAL ADVERTISEMENTS

The City utilized a variety of methods to advertise the project, engage the community, and solicit input on the Housing Element. These efforts are summarized herein to demonstrate the City's meaningful commitment to community collaboration. The City prepared and implemented the following general advertisements:

- Emails to interested individuals
- Virtual workshop flyer (in English and Spanish)
- Social media posts (in English and Spanish)
- Emails to stakeholders requesting involvement and providing flyers and outreach information in English and Spanish

3. WORKSHOPS, POP-UP, AND PUBLIC HEARINGS

CITY COUNCIL/PLANNING COMMISSION WORKSHOP

In January 2022, a public joint workshop was held with the City Council and Planning Commission to provide an overview of the Housing Element Update, invite input on housing-related needs and priorities, and to give the community an opportunity to identify housing-related concerns.

VIRTUAL WORKSHOP

As part of the community outreach, a virtual community workshop was conducted to educate the community about housing issues and opportunities facing Sonoma, and to gather input on housing-related topics. The virtual workshop was hosted on the project website in Spring 2022 from March 23, 2022 through May 8, 2022. The extended timeframe was intended to allow community members and stakeholders to participate at their leisure and in accordance with their schedule and availability. The Virtual Community Workshop consisted of two parts:

- Part A: Overview video describing Housing Elements and why they are important, g existing conditions in Sonoma, and the City's Housing Element Update process
- Part B: Housing Needs and Priorities Survey (described below)

ONLINE PUBLIC ENGAGEMENT TOOL

In 2021, the City of Sonoma was awarded a Balancing Act license through the ABAG Technical Assistance Program. The Balancing Act tool is an online public engagement tool. The Balancing Act tool was hosted on the project website from February 14, 2022 to July 15, 2022. The Balancing Act survey was available in English and Spanish and asked for input from the community by exploring how different housing densities can help Sonoma meet its housing goals, envisioning where that housing might go, and providing input on where they want to see new housing built. A total of 1,173 (765 English speaking and 408 Spanish speaking) individuals visited the site and 14 individuals submitted responses, including 12 residents of Sonoma. Participants identified plans for growth ranging from 315 units to 620 units. The majority of participants focused housing growth in the Gateway District and Southeast Area. Participants planned for an average of 7% of units in the Downtown, 9% in West Napa/Sonoma Corridor, 6% in the Northwest Area, 9% in the Broadway Corridor, 5% in the Vallejo District, 12% in the Central-West Area, 7% in the Southwest Area, 10% in the Gateway District, 13% in the Southeast Area, 12% in the Central-East Area, and 11% in the Northeast Area. Balancing Act submissions are provided in Appendix B.

COMMUNITY POP-UP

To encourage involvement in the Housing Element Update, the City staffed a booth at the Tuesday Night Market on July 19, 2022, sharing information about the City's Housing Element Update and the City's dedicated web page that includes the most up-to-date information on the process.

OPEN HOUSE

During the public review period, the community and stakeholders were invited to attend an open house to learn about the Draft Housing Element and provide feedback. [Update following public review period]

PUBLIC HEARINGS

Prior to adoption of the Housing Element, the Planning Commission and City Council each held a public hearing to provide the community with an opportunity to comment.

4. HOUSING NEEDS AND PRIORITIES SURVEY

The City hosted an online Housing Element survey which was available from March 28 through May 9, 2022. The survey was available in English and Spanish. The surveys asked for input on the community's housing priorities and strategies to address Sonoma's future housing growth needs. A total of 381 individuals, including 343 residents of Sonoma (90%), responded to the survey, which focused on issues of home maintenance, affordability, home type, living conditions and homelessness. A summary of the key survey results is provided in the Housing Element Introduction section, with the complete results included in Appendix C. The City received the following feedback:

- 57% of respondents rated their housing as sound (very good to excellent condition), 23% as showing signs of minor deferred maintenance; 11% as needing moderate repairs or upgrades, 8% as needing two or more major upgrades, and less than 1% as dilapidated.
- 52% of respondents indicated they are happy with the current type of housing available in Sonoma; 44% are unhappy
- 52% of respondents said they are very satisfied with their current housing situation, 28% are somewhat satisfied, and 23% are somewhat dissatisfied or dissatisfied
- 50% of respondents chose to live in Sonoma for its proximity to friends or family
- 32% of respondents indicated they would like to buy a home in Sonoma and cannot find a home in their price range
- 14% of respondents indicated they wish to rent a home in Sonoma and cannot find a home within their rental cost range
- 5% of respondents indicated they have encountered housing-related discrimination
- 43% of respondents indicated they are concerned with their rent increasing to an amount they cannot afford
- 29% of respondents indicated they struggle to pay their rent or mortgage payment
- 30% of respondents indicated they are concerned that if they ask their property manager or landlord to make repairs their rent will increase or they will be evicted

5. STAKEHOLDER INPUT

The City invited representatives from 33 community stakeholders to provide input on housing-related issues in Sonoma; this invitation list included housing developers (affordable and market-rate), religious organizations, school representatives, fair housing service providers, and other social service providers. Stakeholders invited to participate included representatives from:

- Altimira Middle School
- Burbank Housing
- DeNova Homes
- Council on Aging
- Disability Services and Legal Center
- Fair Housing Advocates of Northern California
- Farm Bureau
- FISH of Sonoma Valley
- Housing Sonoma County
- Inclusion Services & Specialized Programs Northern California
- Las Luz
- Legal Aid of Sonoma County
- Lodge at Sonoma
- MacArthur Place
- North Bay Regional Center
- Prestwood Elementary School

- Sassarini Elementary School
- Satellite Affordable Housing Associates
- Sonoma County Agricultural Preservation and Open Space District
- Sonoma County Department of Agriculture
- Sonoma County Human Services Department
- Sonoma Ecology Center
- Sonoma Land Trust
- Sonoma Overnight Support
- Sonoma Valley Chamber of Commerce
- Sonoma Valley Collaborative
- Sonoma Valley Community Health Center
- Sonoma Valley High School
- Sonoma Valley Hospital
- Sonoma Valley Vintners and Growers Alliance
- St. Francis Solano School
- Teen Services Sonoma
- Vintage House Sonoma

3 stakeholders responded to the service provider survey. Survey results are provided in Appendix D.

B. ASSESSMENT OF FAIR HOUSING ISSUES

This section presents an overview of available federal, state, and local data to analyze fair housing issues in Sonoma. This data is supplemented with local knowledge of existing conditions in the community to present a more accurate depiction of fair housing issues in Sonoma, and a more informed perspective from which to base goals, policies and programs to affirmatively further fair housing.

1. KEY DATA AND BACKGROUND INFORMATION

Sonoma is a participating city with SCCDC in the Sonoma County Urban County and is served by the Sonoma County Housing Authority, which provides wide-ranging programs related to affordable housing and community and economic development. The Sonoma County Regional Analysis of Impediments to Fair Housing Choice (AI) was prepared in 2012. In 2019, the SCCDC began preparation of an Assessment of Fair Housing but the effort was suspended. The 2012 AI is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The 2012 AI is one source of information regarding fair housing issues in the region and is the most recent comprehensive regional analysis of fair housing issues. The 2012 AI identified the following impediments to fair housing choice:

1. Residents report high levels of discrimination in Sonoma County
2. Some areas in the county are ethnically segregated; this may be related to lack of affordable housing.
3. There is a shortage of transit opportunities and services for persons with disabilities.
4. Information about fair housing is not available on jurisdictions' websites.
5. In some jurisdictions, Hispanics/Latinos have much higher loan application denial rates than Non-Hispanics/Latinos.

Barriers to fair housing choice specific to the City of Sonoma that were identified in the AI, supplemental data analysis, including use of HCD's Affirmatively Furthering Fair Housing (AFFH) mapping tool, and the commitments of the City to address identified barriers were incorporated into this AFFH analysis. Supplemental data analysis was conducted to further understand potential fair housing issues, within the context of AFFH topics, at the city-level. Figure 5 shows the Tract and Block Group boundaries. The City's demographic and income profile, household and housing characteristics, housing cost and availability, and special needs populations are discussed in previous sections of this Background Report.

2. FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

The City's fair housing services are provided by Fair Housing Associates of Northern California (FHANC). Through a contract with the SCCDC, FHANC provides fair housing education and empowerment services to all residents of Sonoma County, except the cities of Petaluma which funds these services separately. FHANC provides comprehensive fair housing enforcement, education, and outreach services, including:

- Intake, counseling and investigation of housing discrimination complaints
- Mediations with housing providers on fair housing matters
- Referral and support when filing a complaint or lawsuit
- Assistance with reasonable accommodation/modification requests for people with disabilities
- Education programs for tenants and housing providers
- Foreclosure prevention counseling

The City of Sonoma complies with fair housing laws and regulations as described in Table .

Table 63: Compliance with Fair Housing Laws		
Law	Description	Compliance
California Fair Employment and Housing Act (FEHA)	<p>The Fair Employment and Housing Act (FEHA) applies to public and private employers, labor organizations and employment agencies and prohibits discrimination in housing and employment on the basis of protected characteristics.</p> <p>The FEHA prohibits those engaged in the housing business – landlords, real estate agents, home sellers, builders, mortgage lenders, among others – from discriminating against tenants or homeowners on the basis of protected characteristics.</p> <p>It is also illegal for cities, counties, or other local government agencies to make zoning or land-use decisions, or have policies, that discriminate against individuals based on those traits.</p>	<p>In its local practices, the City requires all development projects assisted with City funding to comply with the FEHA. The City achieves compliance with employment requirements through strict enforcement in hiring practices and regular training of and by Human Resources staff.</p> <p>Through the Urban County CDBG annual funding, the City obtains fair housing enforcement, education, and outreach services through FHANC. The City refers all parties with concerns related to housing discrimination to FHANC.</p>
Government Code Section 65008	<p>Covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.</p> <p>For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable development as compared to market-rate developments, or multifamily housing as compared to single family homes.</p>	Compliance is achieved by uniform application of the City's codes, regulations, policies and practices, including development standards, design guidelines, application submittal requirements, fees and approval findings.
Government Code Section 8899.50	Requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.	Compliance is achieved through consultations with community stakeholders and support agencies as part of program evaluating and funding decisions. The 6th Cycle Housing Element Housing Plan describes how each program addresses fair housing issues and contributing factors.
Government Code Section 11135 et seq.	Requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.	Compliance is achieved through promotion/availability of activities and programs to all persons of all backgrounds to participate equally in community programs and activities.

Table 63: Compliance with Fair Housing Laws

Law	Description	Compliance
Density Bonus Law (Gov. Code, § 65915.)	Density bonus law is intended to support the construction of affordable housing by offering developers the ability to construct additional housing units above an agency's otherwise applicable density range, in exchange for offering to build or donate land for affordable or senior units. Density Bonus Law also provides for incentives intended to help make the development of affordable and senior housing economically feasible.	Compliance is achieved by administration of Sonoma Municipal Code Chapter 19.44 – Affordable Housing and Density Bonuses, which provides for compliance with Government Code Section 65915 et seq.
Housing Accountability Act (Gov. Code, § 65589.5.)	Provides that a local agency shall not disapprove a housing development project, for very low, low-, or moderate-income households, or an emergency shelter, or condition approval in a manner that renders the housing development project infeasible for development for the use of very low, low-, or moderate-income households, or an emergency shelter, including through the use of design review standards, unless it makes certain written findings, based upon a preponderance of the evidence in the record.	Compliance is achieved through the development review process consistent with the Housing Accountability Act. Additionally, the City is in the process of preparing objective development standards to facilitate an objective and equitable review of applicable projects.
No-Net-Loss Law (Gov. Code, § 65863)	Ensures development opportunities remain available throughout the planning period to accommodate a jurisdiction's RHNA allocation, especially for lower- and moderate- income households.	The City's draft Housing Element identifies a surplus of sites with a capacity to accommodate the City's RHNA allocation. The City reviews all General Plan and zoning amendment applications to ensure there is no net loss in density or adequate sites to accommodate its housing needs.
Least Cost Zoning Law (Gov. Code, § 65913.1)	Provides that, in exercising its authority to zone for land uses and in revising its housing element, a city, county, or city and county shall designate and zone sufficient vacant land for residential use with appropriate standards, in relation to zoning for nonresidential use, and in relation to growth projections of the general plan to meet housing needs for all income categories as identified in the housing element of the general plan.	Compliance is achieved through implementation of the City's General Plan and the implementation of Housing Element Housing Plan Programs which commit the City to ensuring adequate sites to accommodate the City's RHNA at densities and intensities consistent with those discussed in the Inventory of Residential Sites section.
Excessive Subdivision Standards (Gov. Code, § 65913.2.)	Provides that, in exercising its authority to regulate subdivisions a city, county, or city and county shall: (a) Refrain from imposing criteria for design, as defined in Section 66418, or improvements, as defined in Section 66419, for the purpose of rendering infeasible the development of housing for any and all economic segments of the community. However, nothing in this section shall be construed to enlarge or diminish the authority of a city, county, or city and county under other provisions of law to permit a developer to construct such housing. (b) Consider the effect of ordinances adopted and actions taken by it with respect to the housing needs of the region in which the local jurisdiction is situated. (c) Refrain from imposing standards and criteria for public improvements including, but not limited to, streets, sewers, fire stations, schools, or parks, which exceed the standards and criteria being applied by the city, county, or city and county at that time to its publicly financed improvements located in similarly zoned districts within that city, county, or city and county.	Compliance is achieved through the implementation of a fair and equitable development review process which is administrated consistent with the Excessive Subdivision Standards Act.
Limits on Growth Controls (Gov. Code, § 65302.8.)	Provides that, if a county or city, including a charter city, adopts or amends a mandatory general plan element which operates to limit the number of housing units which may be constructed on an annual basis, such adoption or amendment shall contain findings which justify reducing the housing opportunities of the region. The findings shall include all of the following:	The City's draft Housing Element and the elements in the City's adopted General Plan do not include any provisions which further limits (relative to the current Housing Element and prior General Plan) the development of housing, except such provisions as may be required by state or federal laws.

Table 63: Compliance with Fair Housing Laws		
Law	Description	Compliance
	<p>(a) A description of the city's or county's appropriate share of the regional need for housing.</p> <p>(b) A description of the specific housing programs and activities being undertaken by the local jurisdiction to fulfill the requirements of subdivision (c) of Section 65302.</p> <p>(c) A description of how the public health, safety, and welfare would be promoted by such adoption or amendment.</p> <p>(d) The fiscal and environmental resources available to the local jurisdiction</p>	
Housing Element Law (Gov. Code, § 65583, esp. subds. (c)(5), (c)(10).)	<p>Section 65583 stipulates that the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.</p> <p>Subdivision (c)(5) provides that, in order to make adequate provision for the housing needs of all economic segments of the community, the program shall promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.</p>	Compliance is achieved through preparation and adoption of a Housing Element found to be in substantial compliance with State Housing Element law by the California Department of Housing and Community Development.

Of the five impediments identified by the 2012 AI, three impediments are related to fair housing enforcement and outreach: including #1 (Residents report high levels of discrimination in Sonoma County), #3 (Information about fair housing is not available on jurisdictions' websites), and #5 (In some jurisdictions, Hispanics/Latinos have much higher loan application denial rates than Non-Hispanics/Latinos). The 2012 AI indicated that approximately 25% of residents reported discrimination and respondents to the City's Housing Needs and Priority Survey identified concerns related to discrimination, including discrimination when trying to purchase housing (10%), rent housing (11%), understanding fair housing rights (22%), and concern about potential rent increases or eviction in response to requests for repair (30%). While the City provides information regarding fair housing services on its website and at City Hall, the information could be made more prominent and provide clear guidance to persons with fair housing concerns. Lack of readily accessible information can be an impediment to fair housing if information is not equally available to all protected classes or if the lack of information prevents individuals from understanding their rights and housing providers from understanding their responsibilities.

Legend

Housing Inventory by Income

- Mixed Income
- Above Moderate
- Moderate
- Very Low/Low

City of Sonoma

Census Tract Boundary

Census Block Groups within the City of Sonoma

Other Census Block Groups

The map displays the following census tracts and their median household income values:

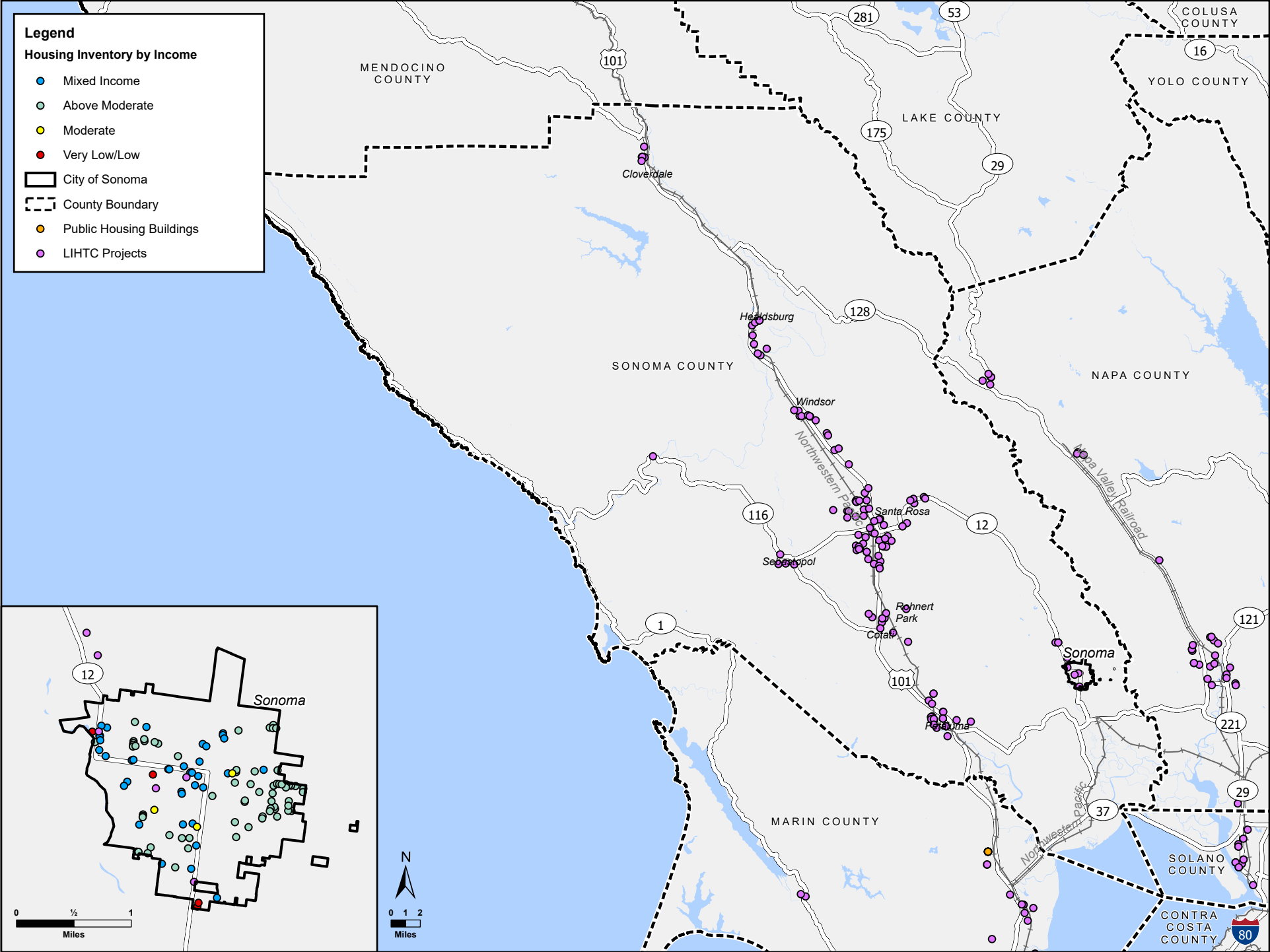
- 1503.06
- 1503.05
- 1503.04
- 1503.03
- 1502.02
- 1502.04
- 1502.03
- 1501

Key streets shown include Hwy 12, Verano Ave, Petaluma Ave, W Napa St, Broadway, E Napa St, 8th St E, Napa Rd, and Arnold Dr.

Block Groups labeled include Block Group 1, Block Group 2, Block Group 3, Block Group 4, and Block Group 5.

A scale bar indicates 0, 500, and 1,000 feet. A north arrow is located in the bottom left corner.

FIGURE 6: HOUSING CHOICE VOUCHERS



Sources: U.S. Department of Housing and Urban Development; California Tax Credit Allocation Committee.
Map date: July 30, 2022.

Figure 7: Intentionally left blank.



3. ANALYSIS OF AVAILABLE FEDERAL, STATE, AND LOCAL DATA AND LOCAL KNOWLEDGE

This section presents an overview of available federal, state, and local data to analyze fair housing issues in Sonoma. These data sources are supplemented with local knowledge of existing conditions in the community to present a more realistic picture of fair housing concerns in Sonoma and a more informed perspective from which to base goals, policies, and programs to affirmatively further fair housing.

OTHER RELEVANT FACTORS

The City of Sonoma works cooperatively with the Sonoma County Housing Authority, which administers the Housing Choice Voucher Program. The program assists very low-income, elderly and disabled households by paying the difference between 30% of an eligible household's income and the actual cost of renting a unit. Figure 6 shows housing choice vouchers and LIHTC-assisted housing by census tract. As shown in Figure 6, there are four LIHTC-assisted housing developments and no Public Housing buildings in census tracts located in Sonoma.

INTEGRATION AND SEGREGATION PATTERNS AND TRENDS

To inform priorities, policies, and actions, Sonoma has included an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Conversely, integration refers to a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. The following analysis will analyze levels of segregation and integration for race and ethnicity, persons with disabilities, familial status, age, and income to identify the groups in Sonoma that experience the highest levels of segregation.

Diversity Index

Tracking the diversity of cities and counties throughout California is crucial to understanding the shifting demographics of race and ethnicity in California and the United States. ESRI, a provider of geographic information system (GIS) software, locational intelligence, and mapping, has developed a Diversity Index, which captures the racial and ethnic diversity of a geographic area in a single number, from 0 to 100. Scores less than 40 represent lower diversity in the jurisdiction while scores of greater than 85 represent higher diversity. Additionally, scores between 40-55 represent low diversity, 55-70 represent moderate diversity, and 70-85 represent high diversity.

Table 1 shows the demographic trends over time for the City and Sonoma County. Since 1990, the percentage of population that are Hispanic or Latinx residents has increased in the City from 5.1% to 20.8% compared to the County which has increased at a slightly higher rate from 10.6% to 26.7%. The percentage of population that are White residents has decreased in the City from 92.5% to 73.4% compared to the County which has decreased at a slightly higher rate from 84.3% to 63.2%. The percentage of population that are Other Races or Multiple Races residents has increased in the City from 0.0% to 3.0% compared to the County which has increased at a higher rate from 0.1% to 3.8%. The percentage of population that are Asian or Native Hawaiian and Other Pacific Islander residents has increased from 1.7% to 2.6% in the City compared to the County which has increased at a higher rate from 2.6% to 4.3%.

Table 1: Demographic Trends				
Racial/Ethnic	1990	2000	2010	Current
Sonoma				
American Indian or Alaska Native, Non-Hispanic	0.3%	0.3%	0.3%	0.1%
Asian / API, Non-Hispanic	1.7%	1.4%	3.0%	2.6%
Black or African American, Non-Hispanic	0.3%	0.4%	0.5%	0.1%

White, Non-Hispanic	92.5%	88.7%	79.2%	73.4%
Other Race or Multiple Races, Non-Hispanic	0.0%	2.5%	1.7%	3.0%
Hispanic or Latinx	5.1%	6.7%	15.3%	20.8%
Total	100.0%	100.0%	100.0%	100.0%
Sonoma County				
American Indian or Alaska Native, Non-Hispanic	0.9%	0.8%	0.7%	0.5%
Asian / API, Non-Hispanic	2.6%	3.2%	4.0%	4.3%
Black or African American, Non-Hispanic	1.4%	1.3%	1.4%	1.5%
White, Non-Hispanic	84.3%	74.3%	66.1%	63.2%
Other Race or Multiple Races, Non-Hispanic	0.1%	3.0%	2.9%	3.8%
Hispanic or Latinx	10.6%	17.4%	24.9%	26.7%
Total	100.0%	100.0%	100.0%	100.0%

Source: 1990 US Census; 2000 US Census; 2010 US Census, 2016-2020 ACS

As shown in Figure 9, there generally appears to be lower to moderate diversity index scores throughout the City of Sonoma (compared to its neighbors), with the highest diversity index scores (55-70) located west of the California State Route 12. From 2010 to 2018, there has been a slight increase to the diversity index in the City, as illustrated by Figures 9 and 10. As shown in Figure 9, communities in Sonoma County with higher diversity scores are somewhat more likely to be located in the central portions of the County generally along the Highway 101 corridor than they are in the eastern and western portions of the County.

Mapped Patterns of Integration and Segregation

Patterns of integration and segregation are considered for people with disabilities, familial status, and income groups. Relying primarily on data available from the US Census, it is possible to map and consider existing patterns which may indicate historical influences and future trends by census tract and census block groups.

As shown in Figure 11, the southern portion of the City has a higher percentage of persons with a disability. As discussed in the Housing Needs Assessment section of this Background Report, approximately 13.5% of Sonoma's population in 2019 had at least one disability and 63.1% of those individuals were seniors. For persons ages 0 to 64, the most common disabilities are Cognitive Difficulty (37.1%), Vision Difficulty (18.9%), and Hearing Difficulty (18.5%). For the population of ages 65 and over, the most common disabilities are Hearing Difficulty (25.2%), Ambulatory Difficulty (24.9%), and Independent Living Difficulty (24.1%).

Looking beyond Sonoma's boundaries, the census tracts in the City exhibit similar level of concentrations of persons with disabilities. As shown in Figure 11, one census tract in the City has a rate of disability that is at less than 10%, one census tract in the City has a rate of disability that is between 10-20%, and one census tracts in the City has a rate of disability that is between 20-30%, indicating that communities in the City of Sonoma with higher percentage of population with disabilities are more likely to be located in north and south portions of the City.

Based on this analysis, the City finds that, in Sonoma, census tracts with higher concentrations of disabilities are also some of the City's census tracts with higher cost burdens of owner households, indicating that households with disabilities may be particularly susceptible to these economic impacts. Moreover, the City recognizes that at a regional level, Sonoma is home to higher concentrations of persons with disabilities than other cities and communities in southern Sonoma County, which can be correlated with the community's older resident profile.

Family makeup, including married couples (with or without children), persons over the age of 18 living alone and female headed households can provide insight into potential segregation issues in the community. As shown in Figure 12, all census tracts in Sonoma have 40 to 60 percent of the population in married households. Countywide, the areas with higher concentrations of

married households are located in less densely developed areas of the County, as illustrated in Figure 12. Dense communities have a lower percentage of married households.

Sonoma is also home to a number of female-headed households located throughout the community with approximately one third of the City's census tracts exhibiting higher proportions than the rest of the City. This pattern is present in the region as well; regional jurisdictions like Cotati, Rohnert Park, Santa Rosa, Windsor, and Healdsburg generally have some census tracts with higher proportions of female-headed households, as shown in Figure 14. In Sonoma, census tracts with higher concentrations of female-headed households are also some of the City's census tracts with vulnerable sensitive communities.

The community's older residents, persons 65 years of age or older, are dispersed throughout the community, as shown in Figure 15. All census tracts in the City are comprised of populations where over 25% of residents are 65 years of age or older. The highest concentrations of senior residents are located in the south portion of the City. As members of the community age-in-place (remain in their residence as they get older), it's possible that some areas of the City will continue to see higher proportions of their neighborhood occupied by senior residents. Safe and convenient access to goods and services is especially important for seniors, who may have mobility limitations or minimum household income. As shown in Figure 15, in Sonoma, census tracts with higher concentrations of senior households are also some of the City's census tracts with higher cost burdens for renter households, indicating that senior households may be particularly susceptible to these economic impacts.

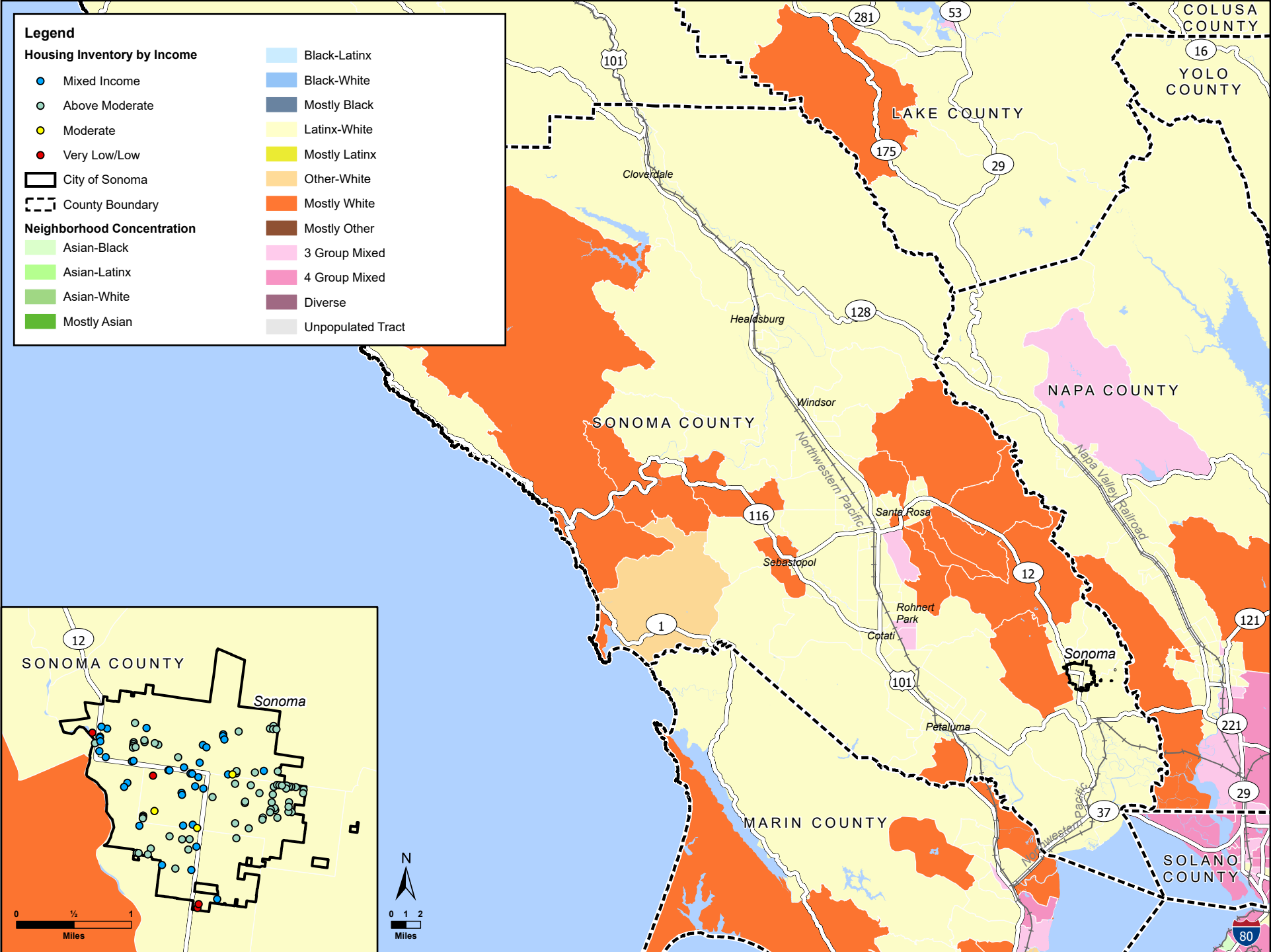
Patterns of moderately segregated economic wealth, as indicated by median household income, do exist in Sonoma, as illustrated on Figure 16. In general, those areas with higher median household incomes are located in the eastern and western portion of the City, and areas with lower median household incomes are more likely located in the central portion of the City. As shown in Figure 16, communities in Sonoma County with lower median incomes are somewhat more likely to be located in the more racially and ethnically diverse portion of the County. In comparison, the median income in Sonoma County (\$103,300) is higher than the Statewide median of \$90,100.

As described throughout this Housing Element, the City is committed to supporting the development of housing affordable to lower income households in locations throughout the City and has identified sites for future growth and development which are designed to promote a more balanced and integrated pattern of household incomes

Findings

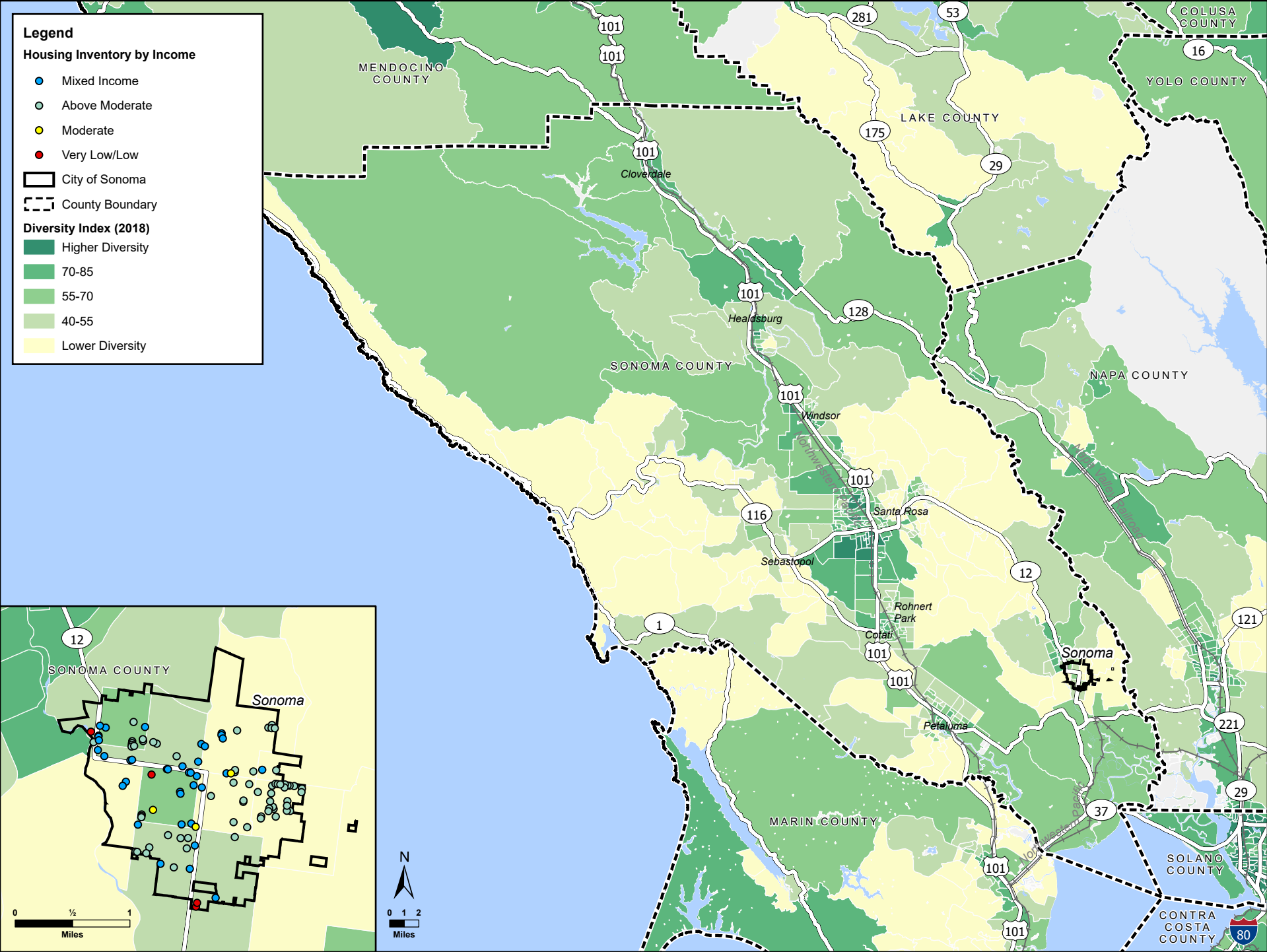
The City has considered trends and patterns related to integration and segregation based on racial and ethnic factors, disability, family status, seniors, and median household income. There are some patterns of isolation or segregation apparent when considering certain characteristics, including population with disabilities, female-headed households, seniors, and households with lower median household incomes. As part of the City's regular participation in the County AI and through implementation of programs in the Housing Plan as summarized in Table 1 of the Housing Plan, the City will continue to consider these patterns to program funding and resources to reduce patterns of isolation and segregation and increase access to housing-related and other resources in these areas in order to effect change from current conditions.

FIGURE 8: NEIGHBORHOOD CONCENTRATION BY CENSUS TRACT



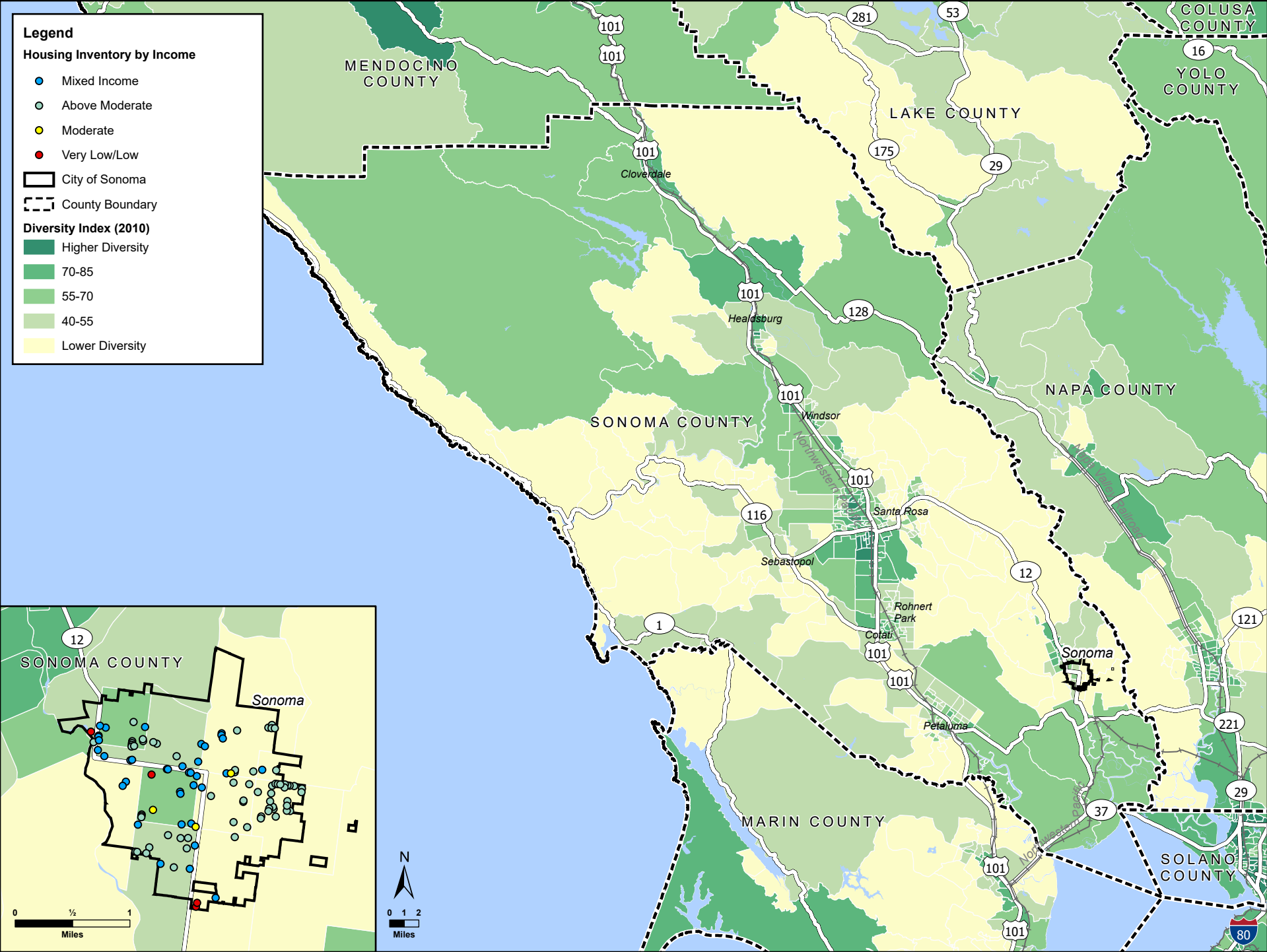
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "NeighborhoodSegregation_Tract_2019."
Map date: July 30, 2022.

FIGURE 9: DIVERSITY INDEX BY CENSUS BLOCK GROUP 2018



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "RaceDemographics_BlockGrp_2018."
Map date: July 30, 2022.

FIGURE 10: DIVERSITY INDEX BY CENSUS BLOCK GROUP 2010



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "RaceDemographics_BlockGrp_2010," Map date: July 30, 2022.

Legend

Housing Inventory by Income

- Mixed Income
- Above Moderate
- Moderate
- Very Low/Low

Percent of Population with a Disability

- < 10%
- 10 - 20%
- 20 - 30%
- 30 - 40%
- > 40%

Map Labels: MENDOCINO COUNTY, SONOMA COUNTY, LAKE COUNTY, COLUSA COUNTY, YOLO COUNTY, NAPA COUNTY, MARIN COUNTY, SOLANO COUNTY, Cloverdale, Healdsburg, Windsor, Santa Rosa, Sebastopol, Rohnert Park, Cotati, Petaluma, Sonoma, Napa Valley Railroad, Northwestern Pacific, Highway 101, Highway 1, Highway 12, Highway 29, Highway 175, Highway 281, Highway 53, Highway 16, Highway 121, Highway 221, Highway 37, Highway 80.

Scale: 0 1/2 1 Miles

North Arrow: N

FIGURE 12: PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING WITH SPOUSE

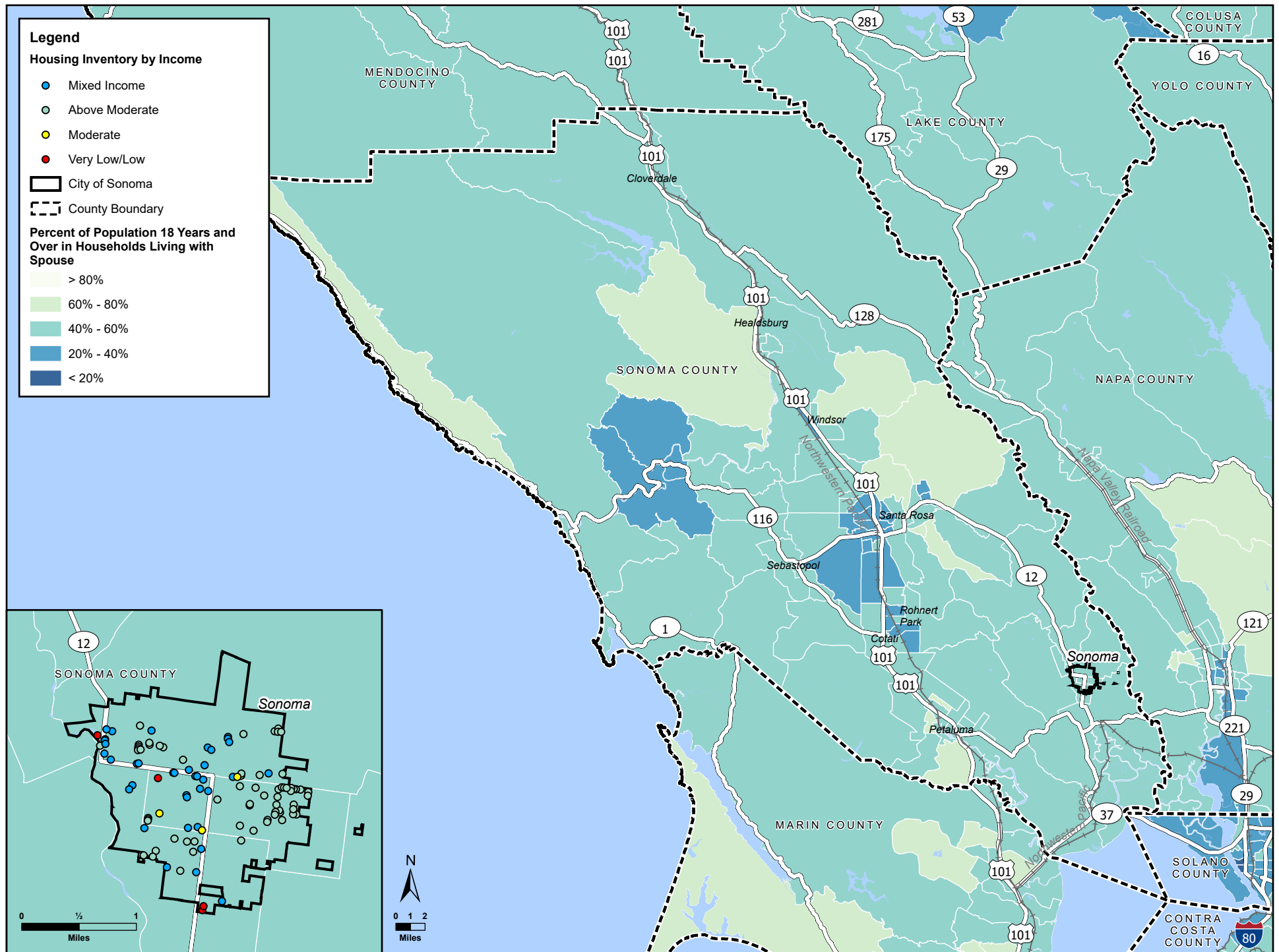
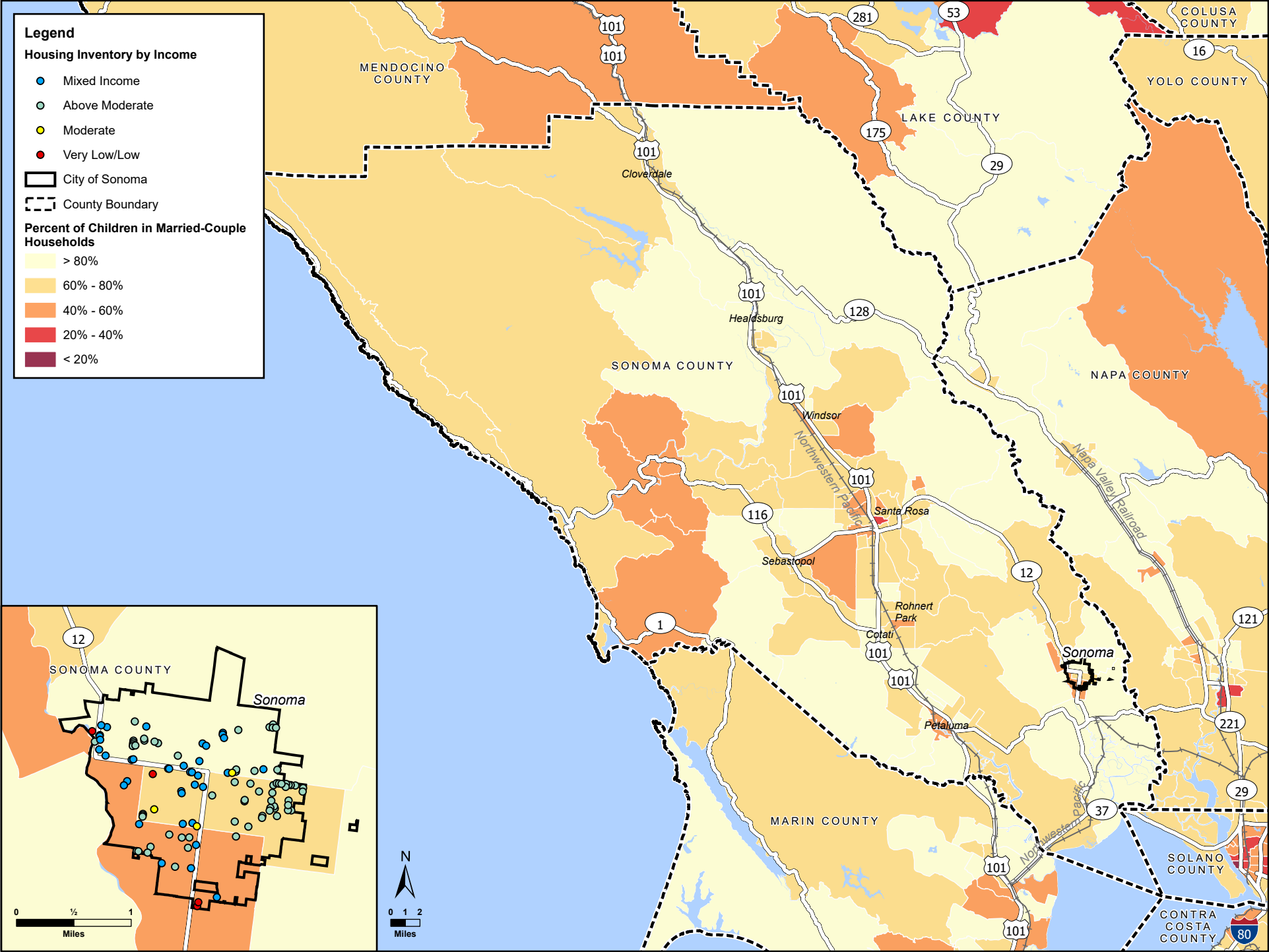
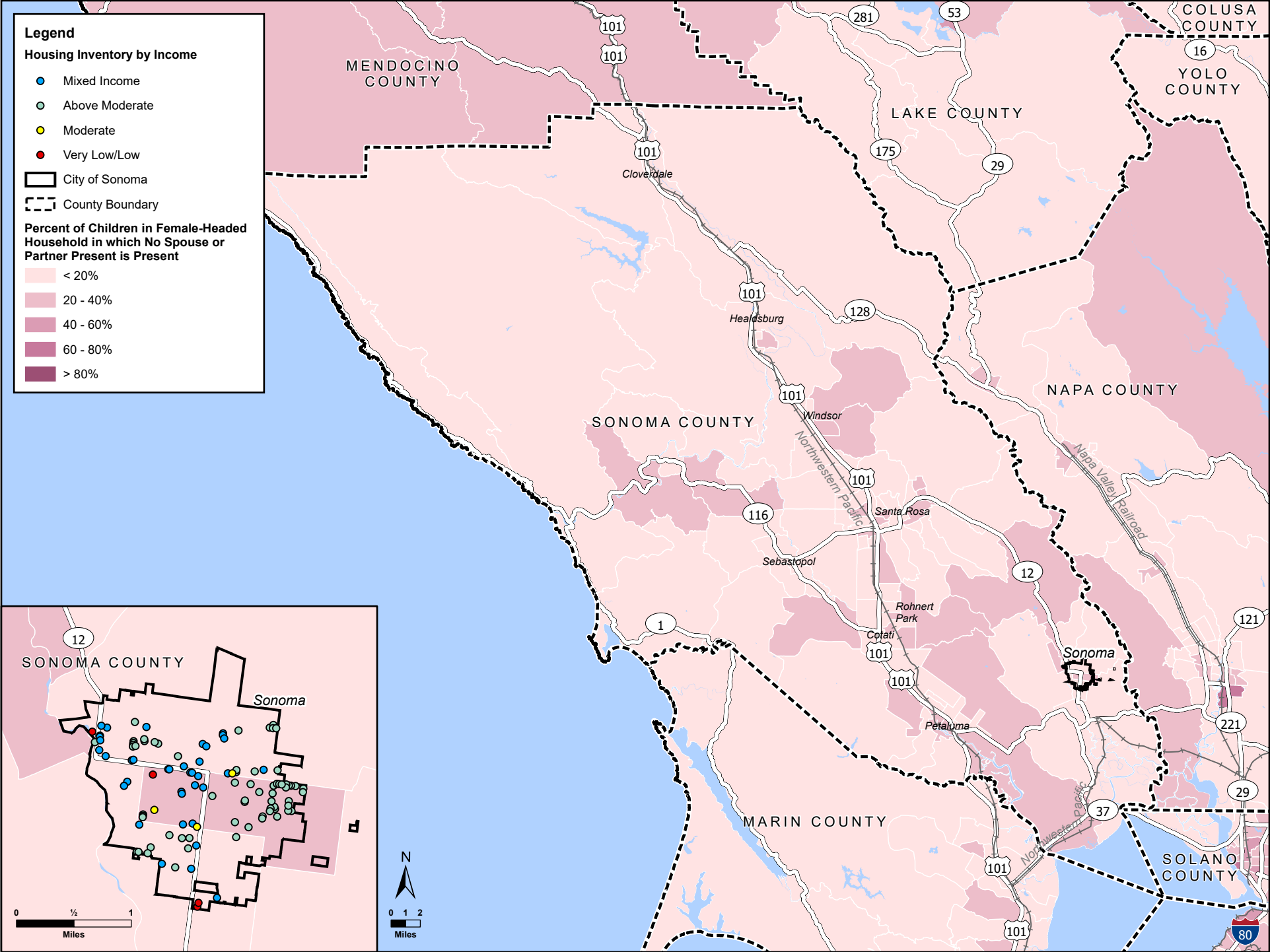


FIGURE 13: PERCENT OF CHILDREN IN MARRIED COUPLE HOUSEHOLDS



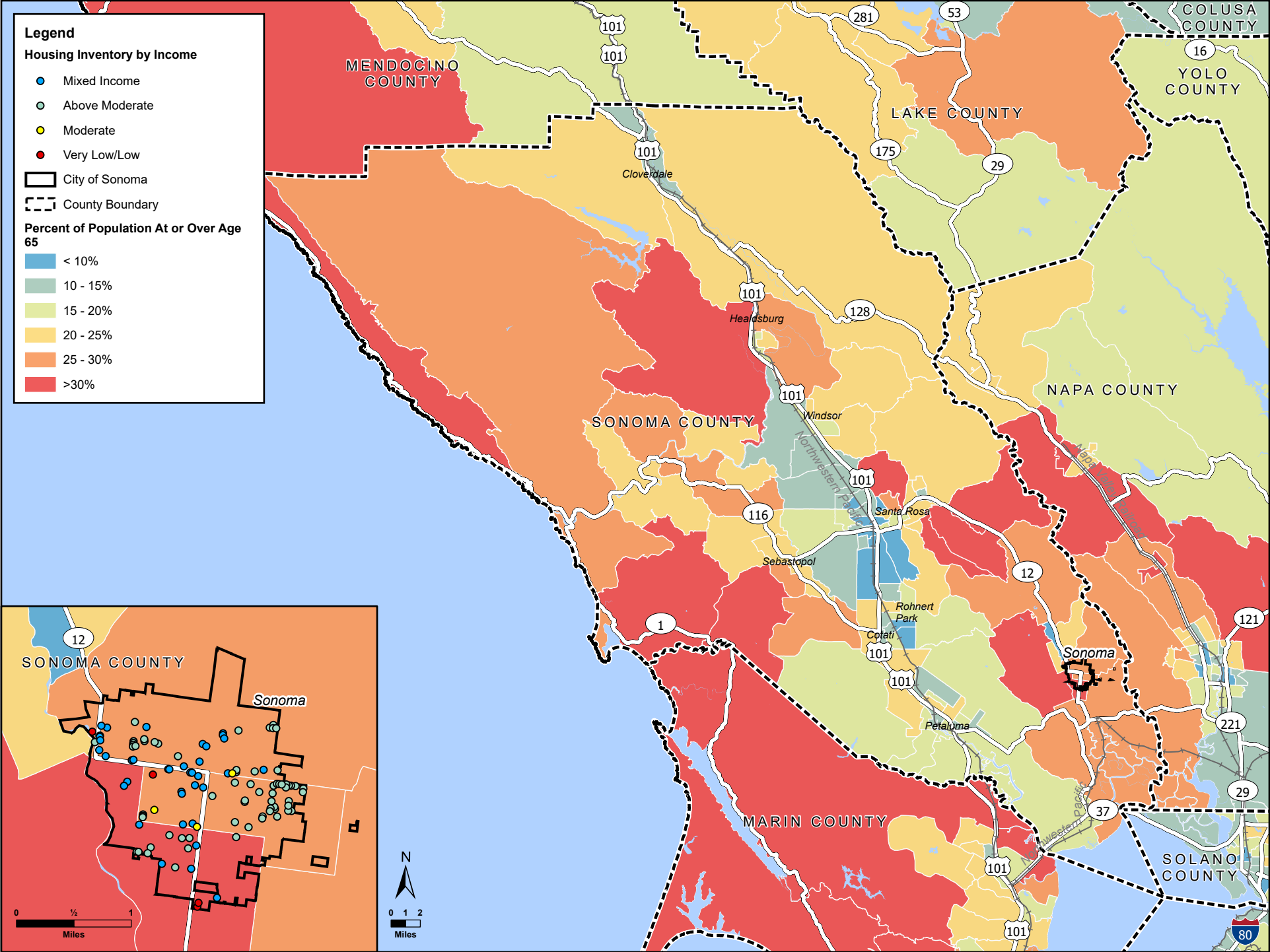
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "FamilyStatus_Tract_2015_19."
Map date: July 30, 2022.

FIGURE 14: FEMALE-HEADED HOUSEHOLDS BY PROPORTION OF CHILDREN PRESENT BY CENSUS TRACT



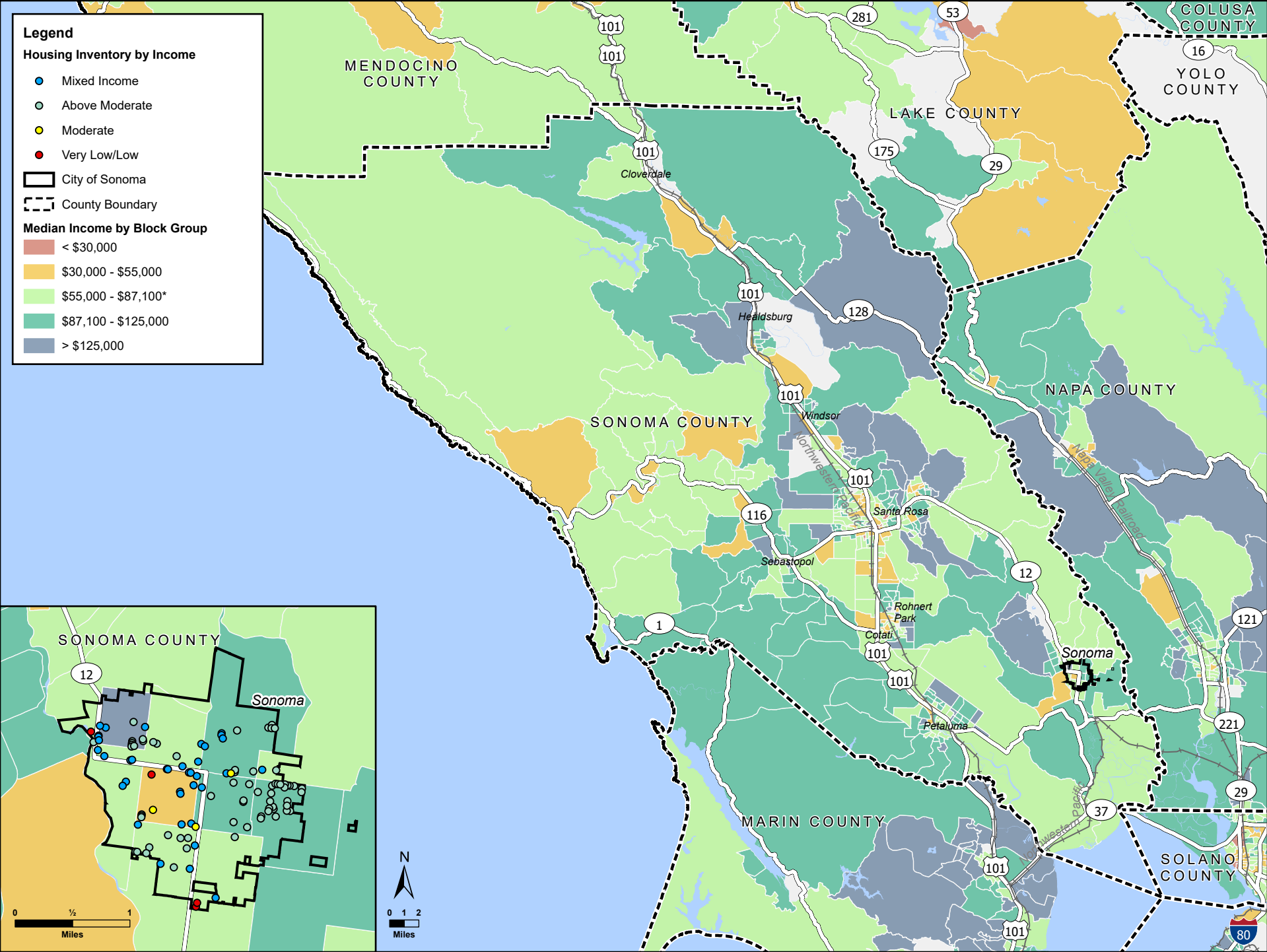
Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "FamilyStatus_Tract_2015_19."
Map date: July 30, 2022.

FIGURE 15: PROPORTION OF SENIOR RESIDENTS BY CENSUS TRACT



Sources: U.S. Census Bureau's American Community Survey (ACS) 2015-2019 5-year estimates, Table(s) B01001.
Map date: July 30, 2022.

FIGURE 16: MEDIAN HOUSEHOLD INCOME BY BLOCK GROUP



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "MedianIncome_BlockGrp_2015_19."
Map date: July 30, 2022.

RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAPs if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. According to the HCD AFFH Dataset, there is no R/ECAP in Sonoma County. The nearest R/ECAPs are in Marin County and Yolo County and do not have any notable geographical or socioeconomic connection to Sonoma.

Comparing Figure 9 (Diversity Index) to Figure 16 (Median Household Income), it appears that areas of high diversity do not generally correlate with lower incomes and that areas of low diversity reflect a range of income levels. However, this pattern is not consistent and there are several areas ranking in the highest diversity index categories that also have lower median household incomes in the County, including areas along Highway 101 in the vicinity of Windsor and Santa Rosa and one census block group in Sonoma located west and south of Highway 12 (census tract 1502.04, block group 1).

As discussed in the Findings section of this Chapter, the Housing Plan includes programs to encourage increased diversity and housing opportunities throughout the City.

RACIALLY/CONCENTRATED AREAS OF AFFLUENCE (RCAA)

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices”. Therefore, both sides of the continuum must be examined. While HCD does not have a standard definition for RCAAs, looking at the percentage of the White population and median household income can provide a good indicator for areas of affluence.

In addition to RECAPs utilized by HUD, scholars at the University of Minnesota Humphrey School of Public Affairs created the Racially Concentrated Areas of Affluence (RCAAs) metric to more fully tell the story of segregation in the United States⁵. RCAAs are defined as census tracts where 1) 80 percent or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016). **Error! Reference source not found.** looks at the median household incomes of White, non-Hispanic residents in Sonoma, as well as the County as a whole. There is no census block in the City with a median household income of \$125,000 and a population that is 80 percent or more white. As such, there is no census tract in Sonoma that fit these criteria, and as such, the City has no RCAAs. Further, in comparing Figure 9 to Figure 16, the most affluent area of the City (census tract 1502.02, block group 5) is also one of the two most diverse block groups in the City.

Table 2: Median Household Incomes		
Median Household Income	City of Sonoma	Sonoma County
White Households	\$84,277	\$ 84,212
All households	\$84,352	\$81,018
% of White population	73.4%	63.2%

Source: US Census, 2015-2019 ACS

5 Goetz, E. G., Damiano, A., & Williams, R. A. 2019. Racially Concentrated Areas of Affluence: A Preliminary Investigation. Cityscape: A Journal of Policy Development and Research, Volume 21(1) [pages 99–124]. Available at: <https://www.huduser.gov/portal/periodicals/cityscape/vol21num1/ch4.pdf>

DISPARITIES IN ACCESS TO OPPORTUNITIES

The Department of Housing and Community Development together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task Force developed the 2021 TCAC/HCD Opportunity Area Maps to understand how public and private resources are spatially distributed. The Task Force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

The opportunity maps are made from composite scores of three different domains made up of a set of indicators. The Task Force analyzed three domains (Economic, Environmental, Education) to establish the resource category for each block group. The Economic Domain (Figure 17) analyzes poverty, level of adult education, employment rates, job proximity, and median home value in each block group, while the Education Domain (Figure 18) analyzes math/reading proficiency, high school graduation rates, and the student poverty rate. The Environmental Domain (Figure 19) looks at the CalEnviroScreen 3.0 Pollution indicators (Exposures and Environmental Effect indicators) and processed values. Each Figure includes the locations of proposed sites to accommodate the 6th Cycle RHNA. Table 66 shows the full list of indicators.

Domain	Indicator
Economic	<ul style="list-style-type: none"> • Poverty • Adult education • Employment • Job proximity • Median home value
Education	<ul style="list-style-type: none"> • Math proficiency • Reading proficiency • High school graduation rates • Student poverty rates
Environmental	<ul style="list-style-type: none"> • CalEnviroScreen 3.0 pollution indicators and values

Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.

Based on the domain scores, census tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. According to the Task Force's methodology, the tool allocates the 20% of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20% to the "High Resource" designation. Each region then ends up with 40% of its total tracts as "Highest" or "High" resource. These 2 categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. The remaining tracts are then evenly divided into "Low Resources" and "Moderate Resource".

Figure 20 identifies the final resource categories of each census block group, as identified on the TCAC/HCD Opportunity Map, as well as the locations of the proposed sites to accommodate the 6th Cycle RHNA. As shown in Figure 20, no census block groups of the City have the highest levels of opportunity and the proposed sites to accommodate the 6th Cycle RHNA are located throughout the City in varying levels of opportunity to the extent feasible, given the City's existing built-out development pattern. **Error! Reference source not found.** identifies the resources levels by census block group and the corresponding scores for economic, educational and environmental indicators.

Table 67: Opportunity Resource Levels by Census Tract

Census Tract	Block Group	Resource Level	Economic Score	Environmental Score	Education Score
1502.02	1	Low Resource	0.76	0.24	0.02
1502.02	2	Low Resource	0.42	0.24	0.12
1502.02	3	High Resource	1.00	0.24	0.15
1502.02	5	Low Resource	0.78	0.24	0.12
1502.03	1	Low Resource	0.59	0.20	0.07
1502.03	2	Low Resource	0.38	0.20	0.03
1502.03	3	Low Resource	0.43	0.20	0.07
1502.04	1	Moderate Resource	0.98	0.33	0.02
1502.04	2	Low Resource	0.18	0.33	0.03
1502.04	3	Low Resource	0.74	0.33	0.00

Source: California Department of Housing and Development, Affirmatively Furthering Fair Housing Data and Mapping Resources, accessed May 13, 2022.

The City of Sonoma has one census block group designated as high resource areas on the TCAC/HCD Opportunity Map. However, only a small portion of the census block group is located within the City. The majority of the City is designated as low resource area, including census tracts 1503.03 and 1502.02. The block group 2 of the census tract 1502.04 located in the central portion of the City is moderate resources area.

Sites to accommodate the City's lower-income 6th Cycle RHNA are generally located in low resource opportunity tracts, with mixed income sites also located in the moderate and high resource tracts. By promoting new development opportunities in low opportunity areas, it is the City's intent to improve the conditions of these census tracts by providing a boarder range of goods and services, bring new residential development closer to transit and jobs, and support community revitalization. Given that the City does not have any significant high or highest resource areas, the City must look to areas with lower to moderate levels of resources in order to accommodate new development, and the City has distributed these units throughout the resource levels to promote more equal and equitable patterns of opportunity. Moreover, the City's promotion of ADUs and Junior ADUs throughout the community, in all resource levels, further supports the City's commitment to distribute housing available at all income levels in different geographic areas of the City.

Economic Opportunity

As described above, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. As shown in **Error! Reference source not found.** above, the overall economic scores in Sonoma range from 0.18 to 1. The economic scores are inconstant in the City. As shown in Figure 21, the job proximity index is generally high in Sonoma. The areas east of California Route 12 freeway have a lower job proximity index. The Association of Bay Area Governments (ABAG) local profile of Sonoma lists 8,062 total jobs in Sonoma in 2018, which was a decrease of 20.4% from 2008.

Educational Opportunity

As shown in **Error! Reference source not found.** above, the overall education opportunity scores in Sonoma range from 0 to 0.15. Generally, most census tracts in the City have an educational opportunity score below 0.15 and all census tracts are below 0.25 as shown in Figure 18.

The City of Sonoma is served by the Sonoma Valley Unified School District (SVUSD). According to the California Department of Education's California School Dashboard, in 2021 SVUSD had an enrollment of 3,503 students. The ethnic/racial make-up was: 63.1% Hispanic, 1.3% Asian, 31.2% White, 0.4% African American, 0.4% American Indian, and 1.5% two or more races. A total of 56.2% of the District's students come from socioeconomically disadvantaged backgrounds, 26.3% are English learners and 16.6% are students with disabilities.

Across all tracts in the County, Sonoma's educational opportunity index scores are generally lower compared to other densely populated areas, particularly Petaluma, Sebastopol, Windsor, and Healdsburg, as well as lower in comparison to areas in Napa County east of the Sonoma County/Napa County boundary.

Environmental Opportunity

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. As shown in **Error! Reference source not found.** above, the overall environmental scores in Sonoma range from 0.20 to 0.33. While the entire community has relatively low environmental scores, central and central/eastern areas of the City have slightly improved scores in comparison with the rest of Sonoma.

Transportation

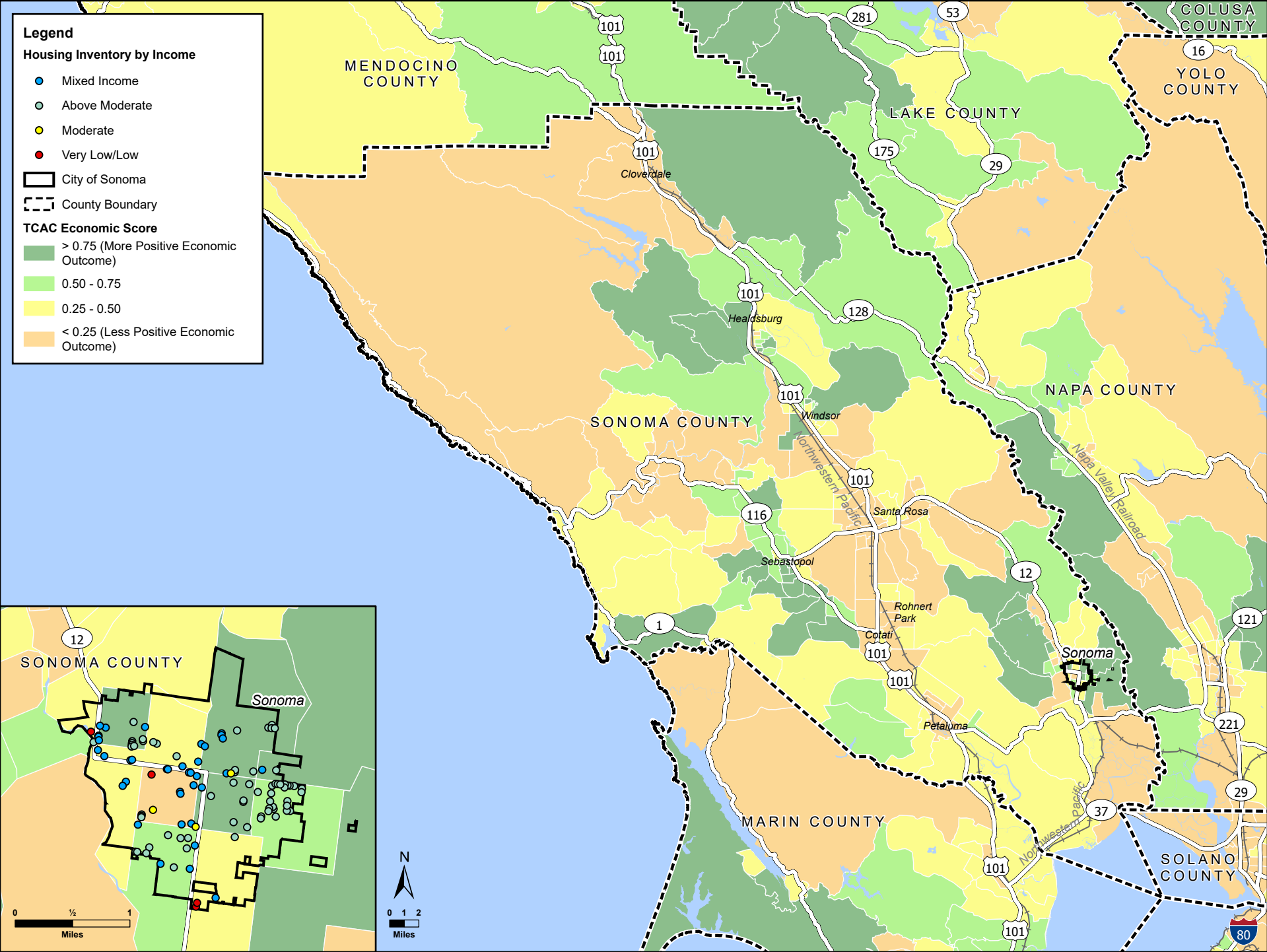
Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. Sonoma County Transit (SCT) is a division of the Sonoma County Department of Transportation and Public Works, serving numerous locations across Sonoma County. Sonoma County Transit (SCT) provides local and intercity public transportation throughout most of the major communities in Sonoma County, as well as Novato and San Rafael, in Marin County.

Findings

Overall, it appears that residents of Sonoma have consistent levels of access to opportunities— Low Resource. As shown in Table 67, the educational and environmental opportunity scores are generally consistent across census tracts in the City, and it is only the economic opportunity score which varies somewhat across census tracts.

Sites to accommodate the City's 6th Cycle RHNA, including its lower-income units, are distributed primarily between low and moderate resource areas. New mixed-use development in the City is envisioned to provide new safe residential housing units, new employment opportunities, and new space for the development of commercial projects offering a variety of goods and services. Moreover, by continuing to improve the ratio of housing to local jobs, the City's contributes to reducing vehicle miles traveled, reducing GHG emissions, and improving regional air quality, thereby working to improve access to higher levels of environmental health.

FIGURE 17: TCAC ECONOMIC SCORE BY CENSUS TRACT



Sources: AFFH Data and Mapping Resources, California Department of Housing and Community Development, "TCAC_OpportunityAreas_Tract_2021."
Map date: July 30, 2022.