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February 11, 2003  
Via Fax and Mail

Cathy Creswell, Deputy Director  
Paul McDougal  
California Department of Housing and Community Development  
1800 3rd Street, Room 430  
P. O. Box 952053  
Sacramento, CA 94252-2053  
Fax: 916 327 2643

Re: City of Santa Rosa Draft Housing Element

Dear Ms. Creswell and Mr. McDougal,

I am writing on behalf of the Sonoma County Housing Advocacy Group, an unincorporated association which advocates on behalf of persons who are in need of affordable housing. We understand that the City of Santa Rosa has recently submitted a draft Housing Element for review pursuant to Government Code §65585(b). We believe the draft addresses each of the concerns listed in HCD's Review Letter to the City dated October 2, 2002, and we recommend that HCD make findings that the draft substantially complies with the requirements of Article 10.6 of the Government Code.

We have been working with Santa Rosa city officials over the past year to have policies included in the City's Housing Element which will help address the lack of affordable housing and housing for persons with special needs. We submitted comments to HCD last September concerning the adopted Housing Element which the City had submitted for review on July 8, 2002. We agreed with your agency's determination dated October 2, 2002 that the City had failed to meet certain statutory requirements for its Housing Element.

HCD found deficiencies in the adopted Element with respect to the City's inventory of land suitable for residential development to meet lower income housing needs. The City's new draft sets out an expanded inventory of sites available to meet the spectrum of housing needs which the City must address during the planning period. (See Table 4-35) Overall, the City has identified ample undeveloped land, currently zoned for residential development and served by utilities, to meet its remaining RHND housing needs for very low, low, moderate and above moderate income households.

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The City is committed to granting priority for water and sewer hookups to proposed housing developments which have at least some units affordable to lower income households. (See page 4-48).

HCD also requested the City to include a more detailed analysis of the "adequacy" of sites available to meet the City's RHND need for lower income households. The draft Element lists specific vacant sites over 2 acres in size which are zoned and serve with utilities and available for development at densities which will accommodate lower income housing (Figure 4-3 and Table 4-36). The City has committed to amending its Zoning Code so that *all* sites in the City which are zoned for medium density (8 to 18 units per acre) or medium high density (18 to 30 units per acre) may be developed as of *right* for housing (no use permit required) where 25% or more of the units are affordable to lower income households. (See Policy/Program H-F-2). This amendment will take effect during this calendar year. We believe that the draft clearly demonstrates that the City has adequate sites to meet its RHND need for lower income and moderate income housing, as well as its need for housing for farmworker households.

The City has also committed to adopting policies, including enabling ordinances, to encourage the preservation and development of SRO facilities serving migrant farmworkers and other special needs groups. (See H-D-4, H-D-5, H-D-6 and H-D-7). We believe this approach will be an effective way to provide housing for seasonal and migrant farmworkers who are in Sonoma County to work in vineyards and orchards. We also see it as an approach to serving persons in need of transition housing and persons with certain kinds of disabilities who might otherwise be homeless. This commitment by the City will also help housing providers to access funding which will soon be available under Proposition 46.

The draft Element sets out other new and significant commitments by the City with respect to housing. The City will investigate establishing a Housing Trust (H-C-5) and consider imposing a linkage fee on industrial and commercial development which will support workforce housing (H-C-4). The City has identified a "preferred site" for an additional emergency homeless shelter at Finley Avenue, and will assist financially with the acquisition and rehabilitation of the site (H-D-12). It will ensure that the City's conditional use permit process encourages and facilitates the development and operation of emergency shelters and transitional housing (H-D-10). The City will consult on a regular basis with Sonoma County planning and development officials to coordinate both governments' policies with respect to sites, infrastructure, special needs housing, funding and impact fees (H-A-6).

In general, this draft Housing Element is a remarkable improvement over the City's previous Housing Elements. We believe it fully complies with the requirements of state law, and adequately addresses the concerns set out in HCD's letter of October 2, 2002. It actually commits the City to providing many more sites for high density housing than would be required to meet the City's remaining RHND need. It commits the City to many other programs which will expand the supply of housing for

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lower income households. And lastly, it includes a number of new initiatives with regard to homeless facilities and special needs housing which were not mentioned in your October 2 letter and which go well beyond the requirements of state law. We urge you to approve this draft quickly so that the City can adopt it and begin the implementation process.

Please feel free to contact me if I can provide any further information or if you have any questions about the above.

Sincerely,

David Grabill

cc: Mayor Sharon Wright  
Wayne Goldberg, Planning Director (via fax;)