



December 18, 2024

SENT VIA EMAIL

Bella Ramos  
 Association of Bay Area Governments  
 Bay Area Metro Center  
 375 Beale Street, Suite 800  
 San Francisco, CA 94105

**RE: Request for Time Extension Per Gov. Code § 65584.07(d)(2)(A)**

Dear President Ramos:

Pursuant to Government Code Section 65584.07(d)(2)(A), the City of Santa Rosa and County of Sonoma jointly request an extension of the 90-day deadline to submit a mutually acceptable RHNA transfer agreement after an annexation. On September 25, 2024, Sonoma LAFCO completed an annexation of approximately 41.55 acres in northwest Santa Rosa; the deadline to submit a mutually acceptable RHNA transfer agreement is December 24, 2024, unless extended by ABAG. City and County staff have identified a preliminary agreement which requires approval by the Santa Rosa City Council. A 90-day extension is requested to allow sufficient time for the item to be placed on the earliest available City Council meeting agenda.

Government Code Section 65584.07(d)(2)(A) provides that ABAG may extend the deadline to submit a mutually acceptable RHNA transfer agreement "if it determines an extension is consistent with the objectives of this article." The referenced objectives for the regional housing needs allocation plan are provided in Government Code Section 65584(d)(1)-(5). The 90-day extension requested by the City and County is consistent with the referenced objectives, with the most relevant being subsections (d)(1), (d)(2), and (d)(5), as outlined below.

**65584(d)(1):** *Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

The requested extension is necessary to enable the City of Santa Rosa and the County of Sonoma to finalize a mutually acceptable RHNA transfer agreement

following annexation of unincorporated land to the City. The preliminary agreement reached by City and County staff proposes transfer of a total of 641 units, including 34 units affordable to very low-income households and 607 above moderate-income units. The very low-income RHNA reflects the units and affordability level of the housing development project recently approved by the City for the annexed area.

**65584(d)(2):** *Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to [Section 65080](#).*

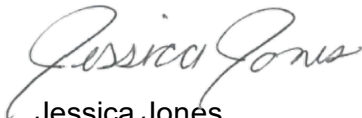
As stated above, an extension is requested to enable the City of Santa Rosa and the County of Sonoma to finalize a mutually acceptable RHNA transfer agreement for an annexation of unincorporated land to the City. The annexed area was an unincorporated island surrounded by incorporated territory of the City, and is located within approximately one-half mile of the North Santa Rosa SMART station. Annexation enables the site to be developed at higher densities due to the availability of City water and sewer services. The contemplated RHNA transfer is consistent with the actual units recently approved by the City for the project site.

**65584(d)(5):** *Affirmatively furthering fair housing.*

The extension would enable a transfer of RHNA units in an amount that tracks the number of units, by income level, recently approved by the City for the annexation area. The 34 very low-income units proposed for transfer are proposed on a 1:1 basis with the number contemplated in project approvals, and the significant majority of units are above moderate-income units. The annexed area is in a CTCAC lower-resource area, and the income mix of the contemplated transfer is consistent with both the City's and County's AFFH obligations.

If you have any questions, please contact Jessica Jones, Santa Rosa Deputy Director of Planning at 707-543-3253 or [jjones@srcity.org](mailto:jjones@srcity.org) or Scott Orr, Permit Sonoma Assistant Director at 707-565-1754 or [scott.orr@sonoma-county.org](mailto:scott.orr@sonoma-county.org).

Sincerely,



Jessica Jones  
Deputy Director of Planning, City of Santa Rosa



Scott Orr  
Assistant Director, Permit Sonoma

EC:

Maraskeshia Smith, City of Santa Rosa, City Manager [cmoffice@srcity.org](mailto:cmoffice@srcity.org)

Gabe Osburn, City of Santa Rosa, Director of Planning & Economic Development [gosburn@srcity.org](mailto:gosburn@srcity.org)

Christina Rivera, County Executive [christina.rivera@sonoma-county.org](mailto:christina.rivera@sonoma-county.org)

Tennis Wick, Permit Sonoma, Director [tennis.wick@sonoma-county.org](mailto:tennis.wick@sonoma-county.org)

Ross Markey, Permit Sonoma, Comprehensive Planning Manager [ross.markey@sonoma-county.org](mailto:ross.markey@sonoma-county.org)