

From: [Paul, Ashley](#)
To: [Paul, Ashley](#)
Subject: RE: [EXTERNAL] 5/18/26 Santa Rosa Housing and Community Services/ Housing Authority Meeting public comments
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Subject: [EXTERNAL] 5/18/26 Santa Rosa Housing and Community Services/ Housing Authority Meeting public comments

Fred Allebach
5/14/26

5/18/26 Housing and Community Services/ Housing Authority Meeting public comments

Hello Staff and Commission,

General comment on Santa Rosa housing

I've been paying attention to HA matters to educate myself on housing issues in Santa Rosa. I realize that I am like a broken record and keep pushing out the same points. I'm aware I have room to grow and I don't have as big a picture as I'd like. I also represent fundamental fairness and equity issues that always need reminding of and deserve to be brought to the table.

I've come to the general conclusion that the Housing Authority (HA) is a good outfit with noble goals that is primarily struggling with issues stemming from lack of money. The HA seems more a nuts and bolts implementation agency than a policy making agency. On housing, Santa Rosa is light years better than Sonoma Valley where I lived for 18 years and where an entrenched NIMBYism and systemic segregation was near impossible to break through.

I am glad to be in Santa Rosa! There is a more dynamic playing field here and more opportunity to move the public policy needle. Rather than the haves and have nots separated by incorporation status like in Sonoma Valley, Santa Rosa has much socio-economic diversity all in the same incorporated boat. In Santa Rosa, neighborhoods and quads are the significant socio-econ units.

In Santa Rosa there are HA policy issues that run up against what I might call housing market/capitalism business as usual inertia and assumptions. I feel these assumptions could be challenged more from a progressive policy standpoint, by whoever makes the policy that the HA implements. Why would that not be happening in a nominal deep blue area of the US?

Could be that federal and state law determines a lot and that level of gov't is hard to influence by someone like me.

One reason may be that the electorate in Santa Rosa is not that strong on social justice issues,

especially if the dominant, older, wealthier, white voter cohort is asked to sacrifice anything materially. This is why NIMBYism is such a big problem in housing. “I’m for AH, just not here...” IMHO, the city may be held back in enacting a more progressive housing policy by a center-right government that reflects the parameters of what the dominant electorate will support.

According to this thesis, the bulk of new housing development in Santa Rosa is placed in areas of town that have the highest people of color and the most low-income percents, not in predominantly white, single-family home-zoned areas, that in many cases are also much higher in MHI and fire danger. WUI areas are identical to high MHI areas, thus making it hard to push for AFFH and TCAC inclusions in higher resource opportunity areas.

Why is land more expensive in wealthy, white neighborhood strongholds? Because property values are aggressively defended. Every argument possible (inclusion of brown-skinned people and associating them with crime) is brought to bear for the city to not act in any way to lower property values. The reason why land costs more in higher resource opportunity areas is because the city props it all up with land use and zoning. This is the anatomy of modern segregation and redlining.

If they don’t, they get voted out.

In cases where multi-family housing does go into city higher resource opportunity areas (the NE quad, Bennett Valley), it is almost all on main drags with a lower quality of life and higher noise, light, and air pollution, spun counterfactually as desirable, *revitalized*, close to transit, and in walkable areas (if you like walking near cars going 50 mph...).

There is no breaking into the single-family home fortress with land use changes; that cohort has all the gravy and the bridge is burnt by land use facts ion the ground like UGBs and community separators, for any new homeowners to get the same Leave it to Beaver type of neighborhood. This is the anatomy of modern segregation and modern redlining, and where beneficiaries deny all culpability. Baby Boomer suburban sprawl happened, the new colonists came in and now they burn the bridge to any more of the same.

Santa Rosa and SoCo land use amounts to a *do as I say but not as I do* policy. Is Housing and Community Services a sitting duck for Planning and Economic Development here? I haven’t figured that out yet.

Housing impact fees and in-lieu fees

Why would the city ever allow an in-lieu fee that amounts to way less than the cost of a new Affordable Housing (AH) unit? It looks like in-lieu fees are an end run around the intent of the city inclusionary ordinance, which is low anyway and does not meet RHNA, especially for Very Low units.

IMHO, no in-lieu fees should ever be allowed. The city gets a bad deal every time one is used. Housing impact fees are another animal, the rationale for them being that new market rate housing creates the need for more services provided by lower-income essential workers and those essential workers need a place to live here too. Housing impact fees are a way to not externalize the working class and to keep a healthy, full, and diverse society. It makes sense to waive impact fees for non-profit AH developers, but not for market rate developers unless the inclusion goes to 25% or above for Very Low and Low-income included units only.

The city has a long term RHNA deficit for Very Low-income units. See my attached study with data from the ABAG website on Santa Rosa RHNA performance over the last three cycles.

Inclusions and in lieu fees are not really addressing the city's VL-income housing deficit even as 25% of the city meets a VL-income threshold *thrshe*. It looks like the bottom line for *why* here that the market just does not produce AH, and that the market tries every angle to not do it. Developers claim, without publicly verifiable, objective evidence and data, that producing AH *does not pencil*. I have to call BS on that until we see the books and the profit margins they are shooting for.

An emergent property of social good from a market invisible hand does not work in practice and never has, hence the great systemic inequity that we see today. To some extent the city buys into this by saying that housing impact fees may hinder development of housing in general, which really means market rate projects. This is the volume and over-all underproduction argument, that the more housing is built, the more prices will come down.

If you believe sharks' advice on how to go on a diet, I'll sell you the Brooklyn Bridge.

I suggest that HA actors, to the extent they can, not accept BAU capitalist market assumptions. Challenge them. Take a page from the AOC, Mamdani, and Bernie playbook; look at municipal socialism. Shock the electorate and the council with some innovative, out of the box thinking for ways to generate money to support the 40% of city population that meets DAC-level MHI.

For example: A CEO tax like SF, a mansion and vacant property tax like LA, a living wage ordinance based on United Way's Real Cost Measure; a foothills property tax to pay for the essential worker housing.

A thought: Santa Rosa needs to do something kind of radical for housing or trends to a 1%, 10% and 90% society will ultimately run the whole system under. As Jared Diamond concluded in his book *Collapse: Why Societies Choose to Succeed or Fail*, there are two main factors common to all collapses, great inequity and the running under of critical natural resources. Our leaders have options to choose from to address great inequity. I'm just pulling for ideas of how we can all be adaptive and just.

"We don't know where we're going but we have to stick together in case somebody gets there." Ken Kesey

Fred Allebach

3/30/26, rev. 3/31/26

RHNA Progress Reports, 3rd Cycle through 6th Cycle: cumulative deficits of lower income housing production, Santa Rosa and unincorporated Sonoma County

Added comment 3/31

The City and County are not responsible to address past RHNA deficits, however those numbers are indicative of the current housing crisis. Given overall housing production deficits and the tendency for Above Mod or market rate to outstrip lower income housing production, it's reasonable to conclude that the inclusionary ordinance and in-lieu fee are not working, inadequate and need to be revised to make the numbers higher. For example, current Santa Rosa in-lieu fees collected for the 6th cycle so far amount to the cost to produce 1.5 affordable units; where's the beef? Higher inclusions result in non-penciling claims by developers. These claims need to be independently audited and not taken on faith. A standard, reasonable profit rate, (10%?) can be arrived at. An audit would weed out those seeking 20%+ profit.

Cumulative 3rd - 5th Cycle RHNA production deficits or surplus. The numbers cited immediately below are what's needed to get back to zero before the start of the 6th Cycle in 2023.

Of note, Santa Rosa does not have a large over-production of Above Moderate-income housing like some other county cities. The County is running a small surplus of Above Moderate-income housing but not extreme. Santa Rosa has a significant deficit of Very Low-income housing. According to [US Census Reporter](#), 23% of Santa Rosa's population has a median household income that qualifies as Very Low. Owing to the overall lack of Very Low-income housing, rent and housing cost burden, over-crowding, and displacement are proportionally higher for this Very Low-income cohort, the bulk of whom also happen to be people of color.

VL= Very Low-income housing, 50% or less of area median income or AMI. L= Low-income housing, between 50% and 80% AMI. Mod= Moderate income housing, between 80% and 120% AMI. Above Mod= market rate housing, above 120% AMI.

Santa Rosa cumulative 3rd - 5th cycle RHNA production deficits

VL minus 2,533

L minus 249

Mod minus 917

Above Mod minus 477

Unincorporated cumulative_3rd - 5th cycle RHNA production deficits and surplus

VL minus 884

L minus 582

Mod minus 799

Above Mod plus 794

At approximately half way through the 6th Cycle, the *current plus past* RHNA production deficits and surplus are:

Santa Rosa

VL minus 3,394

L minus 532

Mod minus 1,598

Above Mod minus 506

Unincorporated

VL minus 1,775

L minus 1078

Mod minus 1350

Above Mod plus 217

Below are the data I worked up to arrive at the above conclusions and the links to verify it. The following data are laid out like this: RHNA allocation #/ permitted #

2023-2031 6th Cycle (approximately half way through)

Santa Rosa

Data from Santa Rosa Supervising Planner Amy Nicholson 3/30/26

VL 1252/317 31% minus 861

L 701/418 60% minus 283

Mod 771/90 12% minus 681

Above Mod 2601/2573 98% minus 29

Unincorporated

<https://www.housingreadinessreport.org/unincorporated-sonoma#reported-progress>

VL 990/99 10% minus 891

L 584/88 15.1% minus 496

Mod 627/76 12.1% minus 551

Above Mod 982/405 41.2% minus 577

Data from: RHNA Readiness <https://www.housingreadinessreport.org/santa-rosa#housing-plans>

2015-2023 5th Cycle

<https://abag.ca.gov/tools-resources/digital-library/2015-2023bayarearhnaprogressreport-pdf>

Santa Rosa

VL 1041/653 63% minus 388

L 671/605 90% minus 66

Mod 759/284 37% minus 475

Above Mod 1364/1457 107% plus 93

Unincorporated

VL 126/181 144% plus 55

L 37/313 846% plus 276

Mod 160/631 394% plus 471

Above Mod 192/1483 772% plus 1291

Data from: RHNA Progress Report link, bottom of page below *questions*

<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>

2007-2014 4th Cycle

https://abag.ca.gov/sites/default/files/rhnaprogress2007_2014_082815.pdf

Santa Rosa

VL 1520/323 21% minus 1197

L 996/481 48% minus 515

Mod 1122/646 58% minus 476

Above Mod 2896/ 1110 38% minus 1786

Unincorporated

VL 319/41 13% minus 278

L 217/136 63% minus 81

Mod 264/240 91% minus 24

Above Mod 564/1040 184% plus 476

Data from: RHNA Progress Report link, bottom of page below *questions*

<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>

1999-2006 3rd Cycle

https://abag.ca.gov/sites/default/files/1999-2006_rhna_performance_revised_jan2015.pdf

Santa Rosa

VL 1539/591 38% minus 948

L 970/1338 138% plus 368

Mod 2120/2154 102% plus 34

Above Mod 3025/ 4241 140% plus 1216

Unincorporated

VL 1311/650 50% minus 661

L 1116/339 30% minus 777

Mod 1563/317 20% minus 1246

Above Mod 2809/ 1836 65% minus 973

Data from: RHNA Progress Report link, bottom of page below *questions*

<https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>