

Sonoma County Housing Advocacy Group



1930 Alderbrook Lane
Santa Rosa, California 95404
voice/fax: (707) 780-1585
e-mail: hag@hagster.org

March 21, 2014
Via E-Mail and Mail

Mr. Paul McDougal
Housing and Community Development
2020 W. El Camino, Suite 500
Sacramento, CA 95833

Re: City of Santa Rosa Draft Housing Element

Dear Paul,

Thank you for the opportunity to comment on Santa Rosa's draft Housing Element. As the largest community north of San Francisco, Santa Rosa's decisions on affordable housing have a significant impact for the entire region. The Housing Advocacy Group ("HAG") is a voluntary association which has been advocating for affordable housing in Sonoma County for more than fifteen years.

Housing construction in Santa Rosa during the current planning period has been limited by the recession. In general, market rate housing construction has been slightly above the levels in other nearby jurisdictions. But the city lacks a robust, distributed inventory of sites available and suitable for development of housing affordable to lower income households. Its policies to encourage – and programs to fund – affordable housing are also weak by comparison with other nearby jurisdictions. These weaknesses are reflected in two serious deficiencies in housing production over the past twenty years: the city has failed to create enough deeply affordable housing; and new housing developed for lower income households tends to be concentrated in existing low-income neighborhoods. The draft Housing Element does not address or even acknowledge either of these two major deficiencies.

The City can and should do much better: by providing suitable sites in middle and upper income areas; by revising its "Housing Allocation Plan;" by identifying and tapping additional funding sources for affordable housing; and by analyzing and addressing housing needs of special segments of its population including persons with disabilities, farmworkers, and the homeless.

Public Participation:

Three "workshops" were held concerning the Housing Element revision. These were not widely publicized, and were not well attended. Almost no Spanish language materials or translations were provided in these workshops, although half or more of the City's lower income

residents speak Spanish at home. The draft Element itself was not presented for review or comment at these workshops. Members of the City Council informed us that they were not aware that a draft Element had been prepared and submitted to HCD for review. No public hearings concerning this draft were held. There has not been a “diligent effort to include all economic segments of the community in the development and update of the housing element” as required by Government Code §65583(c)(8).

Review of Progress Under Current Housing Element

The draft Element includes a list of “Housing Accomplishments” at Table 4-53. The Table (at p. 4-149) states that the city has issued permits for 706 units designated for lower income residents. This number is also repeated in the City’s March, 2013 “Annual Progress Report” at page 4. But the Progress report states that “*many* of the low income units” permitted during this Planning Period are not *rent restricted* so as to be affordable to lower income households, but are rather deemed by the City to be affordable to lower income “based on market sales price or rent.” The draft Element does not distinguish between units built with affordability covenants and units “affordable by design.” Nor does it set out what *design criteria* were used to determine which newly constructed units it considers will be affordable to lower income households beyond their initial sale price or rent. This key information is essential to evaluate the efficacy of the City’s housing programs and to implement meaningful improvements to those programs in order to improve affordable housing production.

The draft additionally lacks adequate quantification and analysis of existing and projected housing needs as required by Gov. Code §65583(a)(1 and 2). No analysis or quantification whatsoever is provided with respect to farmworker housing needs, housing stock conditions, and numbers of households forced to overpay for housing costs.¹

Absent this and other information required by statute, the draft Element fails to comply with Gov. Code §65588 and Section 65583(a)(7).

Governmental and Non-Governmental Constraints:

Section 4-3 of the draft Element discusses various governmental constraints to housing construction including infrastructure standards, fees and “resource preservation.” With respect to fees, the City recently *increased* development fees for smaller units and reduced fees for larger single family homes. While it offers *deferrals* of fees for some projects, the draft Element does not analyze the impacts of its fees or the fee increases on developers’ ability to provide affordable units. The only rationale given for the fee increases is that the City feels the new fees are consistent with what other jurisdictions are charging. While the City Housing Authority may in some instances provide “assistance with development fees for affordable projects, that

¹ See p. 4-25 which simply states the obvious: “Many farmworkers do not have access to decent, safe, and affordable housing. Many may live in overcrowded or substandard units or may be homeless. Farmworkers seeking housing in Santa Rosa need housing that is affordable to lower-income households, such as a subsidized apartment or single-family unit.”

allocates very scarce local city funding to itself rather than for actual construction of affordable units.

Unmentioned in the Element's analysis of constraints is local, mostly neighborhood opposition to affordable housing projects, which has seriously delayed or effectively killed (e.g. "Elnoka") several proposed affordable developments in the current planning period. Additionally, the City has attempted to apply its more stringent development standards to development projects proposed for sites within its sphere of influence but outside its current boundaries. The medium density 168-unit "Paseo Vista" project (which was proposed to include 30+ affordable units) was delayed by City officials who insisted that the developer include "planter strips" between the streets and sidewalks in the project, even though the County has no such requirement. That requirement was eventually overruled by the City Council late last year, but the delay has been costly to the developer and may cause the project to be abandoned.

A thorough analysis of actual and potential governmental constraints is required by Government Code §65583(a)(5 and 6). The draft Element fails to include this analysis. And more importantly, it fails to analyze the most significant governmental constraint on affordable housing – the City's failure to adopt funding programs to assist non-profits to leverage state and federal tax credit financing for new developments. This constraint, discussed in more detail below, is neither analyzed nor addressed in the draft Housing Element. There are various ways in which the City can generate additional funding, none of which are discussed or proposed in this draft. Absent new funding sources, very little affordable housing is going to be built in Santa Rosa over the next eight years.

Adequate Sites:

To meet its RHNA for 1,528 lower income units, the City identifies 27 sites 2 acres in size or greater in the draft housing element at Table 4-37 which have a "land use" designation for medium and medium high density housing.² These sites are claimed to have a capacity of 1,515 units. (See Table 4-34) Although we have not had an opportunity to review all of these sites in detail, we are concerned that the city has not analyzed or disclosed constraints which would affect the feasibility of future development of the listed sites. Most or all of these same sites were identified in the City's 2009 Housing Element as suitable for multi-family affordable housing development. *None have been developed for any housing.* Some are not served by water and/or sewer. Unless the City can show that all of these sites are or will, in fact, be served with water and sewer at an early point in the 2014-2022 planning cycle, they should not be included in the city's inventory of sites to meet its affordable housing RHNA.

² The draft Element equates future housing "need" with the RHNA numbers which have been assigned to it by ABAG. HCD has informed ABAG that these assigned RHNA numbers are not based on the statutory criteria in the Government Code for RHNA allocations. HUD has also informed ABAG that the assigned RHNA numbers appear to violate state and federal fair housing laws by overly concentrating lower income housing in jurisdictions which already have disproportionately high concentrations of those numbers. We believe that the City should undertake an independent analysis of its future housing needs and not rely solely on these legally defective and discriminatory ABAG allocations.

In a settlement agreement reached in 10 years ago in a law suit brought by our group, the City agreed to promptly complete the rezoning of all the sites which it designated as available for affordable housing development. Apparently some of these sites were not rezoned and may still lack appropriate zoning classification. A developer of one of these sites sought approval earlier in this current Planning Period for a multi-family project (“Elnoka”) which included some affordable units. The City required *the developer* to process a zoning change for the parcel. That rezoning necessitated preparation of an EIR. The City Council then voted to deny approval of the EIR, and the developer was forced to abandon the project.

Because the City apparently failed to rezone some of these sites designated for multi-family development in its current Element (see Table 4-36), its new Housing Element must include a program to identify and rezone sites to address this unaccommodated RHNA housing need in addition to the sites provided to meet its 2014-2022 RHNA. See Gov. Code §65584.09. The draft Housing Element fails to acknowledge this obligation. Designating and rezoning of sites to meet this unaccommodated need should be completed within the one-year time frame in §65584.09.

A more serious deficiency with the sites of 2+ acres designated in the draft Element for potential affordable housing development concerns their location. All but one of those 27 sites are located in the southeast and southwest quadrants of the City. Those quadrants include most of the City’s lower income residents, and the population of those quadrants is disproportionately non-white. Only one of the 27 sites is located in the wealthier northern quadrants of the City. Over the past 20+ years, most affordable housing development has taken place in areas with already high percentages of lower income residents. Residential development in the City’s wealthier northeast quadrant has been almost exclusively single family detached. Consequently, students in schools serving that northeast area are disproportionately white and from middle or upper income families.³ The City has an obligation under federal law to “affirmatively further fair housing.” Concentrating all but one of its 27 sites for affordable housing development in areas which already have higher concentrations of lower income and non-white households appears to violate that requirement. It also appears to violate Government Code §65008, which prohibits the City from discriminating on the basis of race and income level in its land use and zoning policies.

The draft Element mentions various non-vacant sites as having potential for future housing development. See p. 4-71 *et seq.* These actual development potential for these non-vacant sites, which include a multi-screen movie theater and other active (and profitable)

³ Fewer than 10% of the students at Maria Carrillo High School, which serves this new development are “socioeconomically disadvantaged.” For Elsie Allen High School, which serves the City’s southwest quadrant, over 70% are “socioeconomically disadvantaged.”

business, is not analyzed as required by Gov. Code §65583.1.

Santa Rosa's Housing Allocation Plan

The City has had a 15% inclusionary zoning requirement in effect for close to 25 years. This requirement – set out in the City's "Housing Allocation Plan" – allows developers to pay an in lieu fee.⁴ The City allocates these fees to assist non-profit developers to develop affordable housing. But through its control of these funds, it has steered affordable housing to existing lower income neighborhoods and discouraged affordable housing development in wealthier single-family areas. This has aggravated the trend towards class and race segregation in the City.

Given the draft Element's emphasis on encouraging higher density infill development, if affordable units are to be included in these new infill developments, the City must, at a minimum, revise and strengthen its inclusionary zoning ordinance to insure that new infill development will include a reasonable percentage of affordable units.⁵

Funding for Affordable Housing

The demise of redevelopment and the recession have seriously reduced local funds available to support affordable housing. Local funds are essential to leverage state/federal tax credit financing for new affordable projects. The draft Element points repeatedly to the lack of local funding streams to explain why it has met less than 20% of its current RHNA for lower income housing construction. Yet the draft Element includes *no commitments* to replace the lost funding. Other jurisdictions are allocating redevelopment "boomerang" funding, and funding from the property tax "increments" that continue to be generated by completed redevelopment projects. Under redevelopment law, city redevelopment agencies were required to set aside at least 20% of "tax increment funds" to be used for the construction or rehabilitation of low and moderate income housing. Even though redevelopment agencies no longer exist, cities continue to receive increased property taxes from redevelopment projects, and should in theory continue to

⁴ The Housing Allocation Plan is at Santa Rosa City Code §21-02. Prior to December, 2012, a 15% "on site" requirement for affordable housing was applied to developments over 15 acres in size. That requirement has been changed to eliminate any on site requirement. Developers of more than 70 units in a project now must "consider" providing affordable units. The City Attorney has informed the City Council that the decision in *Palmer v. City of Los Angeles* (2009) 175 Cal.App.4th 1396, prohibits the City from requiring developers to include affordable units in new for sale developments. *Palmer* does not apply to "for sale" housing development projects. It interprets the Costa Hawkins Rental Housing Act (Civ.Code §1954.50 *et seq.*) and explicitly applies only to rental housing projects.

⁵ The draft Element deletes H-C-1, the program in the current Housing Element which commits the City to strengthen its inclusionary zoning ordinance.

allocate a portion of those increased tax revenues to affordable housing.

City voters approved a real estate transfer fee in the 1990's with the understanding that the primary use of the revenue generated by the fee would be for affordable housing. The draft Element proposes that only 20% of the revenue from that fee be used for affordable housing. (See p. 4-51) Clearly the City could and should allocate more.

Unless the City commits to new sources of funding to support affordable housing, very little will be built during the next eight years. The draft Element says the City will *continue to consider* adopting the commercial linkage fee that it has been *considering* under its current Element. See H-C-4 (now H-C-2). In fact, the City has been *considering* adopting a commercial linkage fee for the past *twelve years* since it first asked other jurisdictions in the County to join with it in a “nexus study” to determine what the level of the fee should be. That study confirmed that commercial development had a strong impact on the area's housing market - particularly on affordable housing. The other large jurisdictions in the area – Sonoma County, Rohnert Park, Petaluma, Sebastopol and Sonoma – went ahead and adopted commercial linkage fees, but Santa Rosa has never followed suit. The City's failure to include a commitment in its new Element to *adopt* a linkage fee to offset impacts of new commercial development on housing is difficult to fathom given the drastic decrease in affordable housing funding and given the strong linkage which the nexus survey found between commercial development and the demand for affordable housing.

Other Deficiencies

The draft Element is lacking in various additional respects. Here is a partial list:

- The draft cites the City's Mobile Home Rent Control program (at p. 4-53), but should include a commitment to adopt an ordinance implementing new state legislation (SB 510) concerning mobile home park condominium conversions;

- The number of homeless persons in the City has increased dramatically in recent years. The 2001 Homeless Count found about 1,500 homeless; in 2013, the Homeless Count found 4,280 persons homeless. The draft Element speaks of preserving existing shelters (at p. 4-24 and 57) but fails to mention this increase. It mentions a pending application for a facility for 68 homeless youth (at 4-24), and a new County initiative to allow up to 50 homeless persons to park overnight at the fairgrounds. But it fails to include any commitments to provide additional shelters, transitional housing and permanent supportive housing to address this enormous need.

- The economy of Sonoma County is heavily dependent on agriculture, and employs thousands of lower income farmworkers, most of whom are here year around. The draft Element fails to analyze the need for farmworker housing (see p. 4-158). It says only that the City will

“support development of rental housing” for farmworkers. How? Where? With what resources?

- With respect to senior housing, the draft Element proposes to *delete* the current Element’s requirement that any new senior housing project that taps city resources must set aside at least 25% of its units for lower income. (See p. 4-159 and H-D-14) In a telephone discussion with a City planning official, she said the 25% requirement was deemed to be unnecessary because the City would not ordinarily agree to provide resources to senior projects which did not include a robust affordable component. But by deleting this requirement, the City sends a message and gives itself the authority to help fund projects or amenities in existing senior projects that have no affordable component.

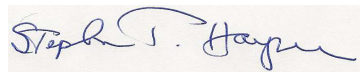
Conclusion

In light of these and other deficiencies in the City’s draft Element, HCD should decline to find that it substantially complies with state Housing Element requirements. At a minimum, the Element should: 1) analyze and propose adoption of additional potential funding sources for affordable housing; 2) designate and commit to rezoning additional sites to accommodate at least 250 additional multi-family housing units in both the northeast and northwest quadrants of the City; 3) strengthen the City’s Inclusionary Zoning ordinance to require (or at least encourage) developers to provide affordable units in all new residential and mixed-use developments; 4) analyze the housing needs of farmworkers in and around Santa Rosa and include programs to address those needs; 5) continue the current affordability requirements for senior housing assisted by the City; and 6) include programs to significantly reduce the City’s homeless population (e.g. a “Housing First” program).

We will be monitoring the process as the final version of the Housing Element proceeds through approvals in the Planning Commission and City Council. We hope that the City Council will be receptive to any changes that HCD would suggest.

If we can provide any further information or if you have any questions, please do not hesitate to contact us.

Sincerely,



Stephen T. Harper, Co-Chair
Sonoma County Housing Advocacy Group



David Grabill, General Counsel
Sonoma County Housing Advocacy Group

cc: Lisa Kranz, City of Santa Rosa

Santa Rosa Office
555 Fifth Street, Suite 300 B
Santa Rosa, CA 95401
(707) 575-3661

April 14, 2014

City of Santa Rosa
Attn: Erin Morris
Senior Planner
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Dear Ms. Morris:

RE: City of Santa Rosa Draft Housing Element

Thank you for the opportunity to comment on Santa Rosa's Draft Housing Element. For over 50 years, Greenbelt Alliance has been the champion of the places that make the Bay Area special. We work to protect the region's open spaces and make sure that the right kinds of development happen in the right places. We advocate for the creation of new homes near jobs and transit and housing solutions to help meet the needs of all residents.

Housing Sites

Greenbelt Alliance approves of the City's policy to promote medium and high density affordable housing development near transit, services, and amenities and within Priority Development Areas. However, we are concerned that the majority of sites identified for affordable housing developments are located in southeast and southwest Santa Rosa. These areas are currently comprised of low income residents and communities of color. With over 2,500 acres available for housing development, housing units that meet the needs of low-income residents should be distributed throughout the city. Thriving neighborhoods include a wide range of people, across income and age spectrums.

Preservation of Affordable Units

The City should prioritize and revise its Condominium Conversion Ordinance to preserve existing affordable rental units. The City has identified 873 low income rentals units at risk of converting to market-rate housing between 2014 and 2022. Over the last 5 years, 299 rental units were converted to condominiums. In addition, the number of rental households in Santa Rosa has increased to 46%. This increase has contributed to low rental vacancy rates and increased rental prices.

Funding

The City lacks local funding sources for the construction of affordable housing and should make a priority of implementing policy H-C-2 that states the City will, "consider adopting a commercial linkage/workforce fee". Greenbelt Alliance strongly encourages the City to commit to adopting a commercial linkage fee, as this will require new commercial developments to pay for their impacts which will help provide needed funding for affordable and special needs housing developments. Commercial development creates housing needs, often at

lower income levels. In addition, other jurisdictions in Sonoma County have adopted commercial linkage fees, including: Petaluma, Rohnert Park, Sonoma, Sebastopol, and the County of Sonoma.

Special Needs Housing

Greenbelt Alliance appreciates that the City recently approved the Social Advocates for Youth Dream Center to help serve up to 63 homeless youth in the city. However, Santa Rosa has over 2,390 homeless in the city. In addition, with the anticipated closing of the Sonoma Developmental Center, the number of homeless and people who need supportive housing in Santa Rosa will likely increase. The City should include additional policies that provide more shelters, transitional housing, and supportive housing and services to better address the needs of the homeless and those with developmental disabilities. We also recommend that the City commit to adopting universal design features in residential housing in order to assist those with special needs. Accessibility features that accommodate persons with disabilities are called for in the Downtown Station Area Specific Plan and should be integrated throughout new development in the city.

Sustainable Development

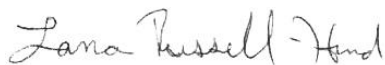
Green buildings not only preserve our natural resources, but also help to reduce greenhouse gas emissions. We are thrilled that the City has adopted CALGreen Tier 1 building standards and a Climate Action Plan. We suggest that the City work toward even more green building practices by providing incentives to housing developments that are LEED certified. Housing units built to green standards will cost less to heat, cool, and maintain, which helps residents with low or fixed incomes.

Natural Resources

Areas designated for housing in northwest and southwest Santa Rosa correspond with critical habitat for rare and endanger plant and animal species, like the California Tiger Salamander. The Santa Rosa Plain Conservation Strategy Planning Agreement, adopted by the County of Sonoma, and the Cities of Santa Rosa, Rohnert Park, Cotati, and the Town of Windsor should be implemented. Greenbelt Alliance urges the City and other jurisdictions to work together to fund and complete the necessary environmental work and to limit development in these naturally rich resource areas.

Thank you for considering our comments. We encourage the City to address these issues in order to create a more socially equitable and sustainable Santa Rosa.

Sincerely,



Lana Russell-Hurd
Regional Representative
Greenbelt Alliance
707-575-3661

Morris, Erin

From: David Grabill <dgrabill@gmail.com>
Sent: Friday, April 18, 2014 11:05 AM
To: Morris, Erin
Cc: roger mcconnell; Kranz, Lisa
Subject: Re: Santa Rosa Housing Element: Response to Sonoma County Housing Advocacy Group Comment Letter

Thanks for meeting with me yesterday afternoon to discuss our concerns with the City's new Housing Element draft. If I can provide any further information or feedback on the points we talked about, please feel free to call me.

One point we didn't cover: [SB510](#) relates to conversion of mobile home parks to condominium ownership. It provides (at Paragraph 6) that local governments may "by ordinance or resolution, implement the requirements of this subdivision." The City should incorporate the requirements of SB 510 into its own code. Mobile home parks are an important source of affordable housing for several thousand families and seniors in Santa Rosa. Condo conversion of parks elsewhere has greatly increased the price(s) of mobile homes, and destroyed any equity which residents may have in their mobile homes. The City deserves credit for fighting (and winning) one such conversion effort here a few years ago. SB510 insures that residents will have a say in any effort to convert their mobile home park to condominiums. We would strongly urge that a program be included in the new housing element to adopt an ordinance incorporating SB510 into the City's code. I've copied our local GSMOL Vice President Roger McConnell with this e-mail. He may have some further thoughts about this.

David Grabill
Law Offices of David Grabill
1930 Alderbrook Lane
Santa Rosa, CA 95405
(707) 528 6839
dgrabill@gmail.com

On Mon, Apr 14, 2014 at 12:14 PM, Morris, Erin <EMorris@srcity.org> wrote:

Hi David,

Thanks for calling me today and setting a meeting date and time. I am hoping to confirm that you can meet at 1:00 PM this Thursday, which means our meeting would start ½ hour earlier than we just discussed. The meeting would still be anticipated to be one hour in length.

Please let me know and thanks again.

Erin Morris | Senior Planner



From: Morris, Erin
Sent: Thursday, April 10, 2014 4:28 PM
To: dgrabill@gmail.com
Cc: Kranz, Lisa; Regalia, Chuck
Subject: Santa Rosa Housing Element: Response to Sonoma County Housing Advocacy Group Comment Letter

Hello David,

Thank you for your comments regarding the draft Santa Rosa Housing Element, as detailed in your letter to Paul McDougall dated March 21, 2014. The attached memo is intended to address your comments by providing clarification and additional information on issues described in your letter and, where appropriate, identifying potential modifications to the draft Housing Element.

We would like to meet with you to discuss these issues. Please let me know if you are available to meet next week. Thanks!

Erin Morris | Senior Planner





Morris, Erin

From: David Grabill <dgrabill@gmail.com>
Sent: Thursday, April 24, 2014 1:21 PM
To: Morris, Erin
Cc: Kranz, Lisa
Subject: Fee waivers for affordable housing

Hi Erin,

I said I'd try to get you examples of jurisdictions that grant fee waivers to affordable housing developers. I haven't had time to look around much, but I believe it's a fairly common housing element program, e.g. Program H-5a in the [Draft Napa County Housing Element](#) ("Continue to provide fee waivers for non-profit affordable housing developers. (Ongoing)")

While the City may not be in a position to offer fee waivers routinely to affordable projects, it's something that should be considered on a case by case basis - perhaps as an incentive to encourage deeper levels of affordability in a project, which is certainly a legitimate city objective.

David Grabill
Law Offices of David Grabill
1930 Alderbrook Lane
Santa Rosa, CA 95405
(707) 528 6839
dgrabill@gmail.com .



July 9, 2014

Dear Ms. Morris,

Thank you for the opportunity to submit a public comment on the Santa Rosa Housing Element Draft. We appreciate the work that has been done on the draft and would like to add one comment to be included in your records:

Housing Land Trust of Sonoma County (HLT) is a nonprofit that has 10 homes in Santa Rosa and 44 county wide; we have 21 more in the pipeline at present. Our model is based on the Community Land Trust model that ensures homes remain affordable to the same income level in perpetuity by implementing a 99-year renewable ground lease. The ground underneath the home is held in trust by HLT and serves as the permanent subsidy in the property; reducing the cost of land makes an impact that drastically lowers the cost of acquiring a home to Very Low to Moderate Income Households. In Santa Rosa we have 10 lots at the Kali Subdivision; the homes are identical but the community of homeowners is economically diverse ranging from Very Low to Moderate Income households. We have had 4 resales at Kali, and the home has remained as affordable to the initial family in 2005 as it has to the subsequent 4 families without any additional subsidy. This model retains the initial subsidy so that it is recycled every time the home is sold, keeping the home affordable generation after generation. We are asking that the initial language in the 2009 Housing Element, be amended in the 2014 Housing Element as our model is now a proven working model with a track record of 44 properties and 10 successful resales, both in a hot and a cold market with zero foreclosures in our portfolio. Land is a finite resource in our County, setting some of it aside through HLT creates both a community asset and an opportunity to retain and recruit the workforce by providing affordable homeownership.

Here is the current language from the 2009 Housing Element and currently in the 2014 Draft:

- 12 Investigate development of a Community Land Trust program for Santa Rosa to determine its feasibility and affordable housing production possibilities.
Time Frame: 2018
Entities: Departments of Community Development and Economic Development and Housing

HLT is proposing the language be changed to the following:

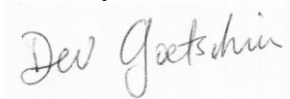
“Utilize the community land trust model for a homeownership program for Santa Rosa to create permanently affordable workforce housing. Implement this program to create new units and retain existing units in the housing stock and insure the units remain permanently affordable to Very Low to Moderate Income Households.”

Santa Rosa needs to provide workforce housing. If those serving the community (e.g., teachers, police officers, fire fighters) don't have a place to live they will leave the community. There is a severe lack of affordable housing for most people who work at the hospital (e.g., nurses, technicians) and only 3.9% of teachers can afford a home in the County. We ask the City to partner with Housing Land Trust of Sonoma County and developers to build workforce housing. The City could use inclusionary requirements to ensure funding or land is dedicated on which to build workforce housing. The land would serve as the subsidy to make the home affordable to Very Low to Moderate Income Households; the resale price would be tied to household income, making the home permanently affordable without additional subsidies at resale, the subsidy would be retained in perpetuity, protecting the public investment to benefit the community.

HLT partners with Cities to meet the City's housing goals, we have the capacity to administer and steward both land and family; we maintain regular monthly communication with each homeowner and offer ongoing financial counseling. The pre-purchase, ownership period and post-purchase phases are monitored by engaging and delivering homebuyer, owner and seller education. HLT manages the initial sales and resales to meet the qualification criteria set by the City, protecting the public investment and serving the workforce in our community.

Thank you for the opportunity to comment, we hope to partner with you in the future.

Sincerely,

A handwritten signature in cursive script that reads "Dev Goetschius". The signature is written in dark ink on a light-colored background.

Dev Goetschius
Executive Director

North Bay Housing Coalition, Inc.

Creating affordable housing for persons with
developmental disabilities



1436 Second Street #178
Napa, CA 94559

July 10, 2014

City of Santa Rosa
Attn: Erin Morris

RE: Housing Element

Dear Ms. Morris:

This letter is to advise the City of Santa Rosa of the struggles a person with developmental disabilities face in finding housing that is affordable in the community.

A "developmentally disabled" person is defined as a disability among a person that develops before a person reaches adulthood, at the age of 18. It is usually expected to continue indefinitely after age 18. These disabilities include intellectual disabilities/mental retardation, Cerebral Palsy, Epilepsy, and Autism.

We are writing in regards to the requirements of the California Senate Bill 812, Chapter 507, Statutes of 2010 (SB 812-Ashburn). As you know, special needs groups spend an exorbitant proportion of their income to find housing and many end up being discriminated due to their circumstances and needs. To address this issue, SB 812 requires that housing elements include an analysis of the disabled with an evaluation of the special housing needs of persons with developmental disabilities. This analysis includes an estimation of the number of people with developmental disabilities in a jurisdiction, an assessment of the housing need and a discussion of potential resources.

Persons with developmental disabilities are faced with financial hardships when searching for housing. It is essential to provide affordable, accessible, and ideally independent housing in integrated communities. The biggest barrier for finding housing to live independently is lack of financial resources. It is important for those

with developmental disabilities to live in stable long term and independent housing, such as renting homes, apartments, mobile homes, or duplexes at affordable rents.

According to the Technical Assistance Collaborative (TAC) of the Priced Out Study of 2012 a person receiving Supplemental Security Income (SSI) in California had to pay 104% of their monthly income to rent a fairly modest one-bedroom unit. This has been a 35% increase from what it was in 1998 at 69%. The average annual income level for individuals receiving SSI is \$8,714. This is 30% below the 2012 national federal poverty level of \$11,170. Those who have successfully found housing are usually living in dangerous neighborhoods, a very moderate unit, sometimes with roommates who do not have disabilities, and are using all SSI income to pay rent each month leaving no money to buy groceries, transportation, clothing, and other necessities.

TAC had a few suggestions for policies that could aid in providing sufficient housing for people with developmental disabilities. Most policies would require funding to prevent homelessness, as well as funding for 4.6 million subsidies in Housing Urban Development (HUD). These rent subsidies include programs like privately owned HUD properties with Section 8 contracted units as well as Housing Choice Vouchers, and deferral housing units. Limitations are affecting these necessary programs to assist households with low-income individuals with developmental disabilities. The funding issue affects close to 65,000 vouchers for people with disabilities. Funding for the Public Housing Agency has been reduced making it difficult to run programs that aim at transitioning individuals with disabilities from institutions to the community. A third policy suggestion would be expanding housing opportunities for individuals receiving SSI with the assistance of the National Housing Trust Fund (NHTF). 90% of the funds go to very low income households and will protect, preserve and rehabilitate housing units. 75% of funds must be appropriated to benefit low income housing units. The NHTF would be an ideal program that would benefit individuals dependent on SSI payments.

The mission at North Bay Housing Coalition is to address housing needs of people with developmental disabilities, by accurately reflecting the magnitude of the housing needs of populations from city to city.

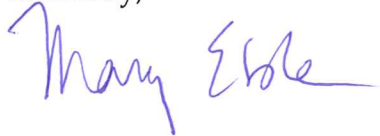
We must account for various critical factors such as inclusionary placements, reasonable accommodation that include safe neighborhoods, close proximity to daily needs, and financing and site identification.

In order to address and assist the housing needs for citizens with developmental disabilities, we would like to encourage the city to implement programs to outreach

with the North Bay Regional Center and North Bay Housing Coalition as well as encourage landlords and other housing providers to select a portion of new affordable housing developments for persons with developmental disabilities.

Thank you very much for your effort and support in meeting the housing needs of persons with developmental disabilities in the City of Santa Rosa.

Sincerely,

A handwritten signature in blue ink that reads "Mary Eble". The signature is fluid and cursive, with the first name "Mary" and last name "Eble" clearly distinguishable.

Mary Eble
Executive Director