



427 Mendocino Ave  
Suite 100  
Santa Rosa, CA 95404

(707) 900-4364  
info@generationhousing.org

13 February 2023

Via Email

**Re: Public Comment on HCD Housing Element Revised Draft**

Dear Mayor Rogers, Vice Mayor MacDonald, Councilmembers, and staff:

Generation Housing would like to start by expressing our utmost appreciation to everyone who helped us navigate the once-in-eight-years challenging task of updating the Housing Element. Through this iterative process, we have been able to collect public input and define goals, policies, and programs that will be foundational to creating the change we need to realize a more equitable, sustainable, and compact development form, a diversity of housing typologies accessible to those across the Area Median Income ("AMI") spectrum, and a vibrant economic hub in the heart of Santa Rosa.

In this newest draft iteration (posted 01/06/23), we are pleased to see the inclusion of **Program H-19: Essential Housing Bond Financing Program**. Challenging market conditions necessitate creative financial solutions to help us continue delivering apartment home units that are affordable for low- and moderate-income households. We're excited to see a concerted focus from the City to provide more upward mobility for lower-income residents by identifying units for conversion in predominately higher-resource, affluent neighborhoods in the eastern portions of the city.

In addition to our comment above, we would like to summarize our recommendations from prior letters to better enable our elected officials with decision-making around the anticipated final adoption of this Housing Element. We urge our leaders to include language that commits the City to the exploration and implementation of the follow policies:

- + We recommend that the City extend its ADU fee structure to multi-family units of the same size or a general commitment to incentivizing affordable-by-design units through fee revisions and certainty commitments; and
- + We recommend that the City adopt County of Sonoma's [residential unit equivalency](#) definition (see Table 8-3). Under this framework, a one-bedroom (<750 sq. ft.) dwelling would be classified as 0.5 of a density unit. Similarly, a two-bedroom (<1,000 sq. ft.) dwelling would be counted as 0.75 of a density unit.

Through lowering the fees associated with building smaller units while adopting a practical, common-sense density standard, the City can meaningfully help catalyze the development of affordable by design units capable of accommodating our struggling workforce population.

Accordingly, to support the expedited processing of affordable, affordable-by-design, and workforce housing projects generally, we recommend including a program that



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explicitly commits the City to maintaining adequate staffing levels and, if necessary, commits them to utilizing outside planning or plan review services to facilitate expedited processing.

We appreciate and acknowledge the recent hiring of several new staff to the Planning Division and hope the inclusion of this policy helps commit the City to further investing in the success of this department and the success of our community in building more, more affordable, and more diverse housing. **We request that a program be added committing the City to maintaining adequate staffing across departments to ensure the effective implementation of the Housing Element programs. See Rohnert Park's Housing Element Program HO-1.6 (Page 11-30) linked [here](#).** Last year during the [City Council Priority Setting Workshop](#) (Page 11) the first goal was "Delivering housing for all." Ensuring adequate staffing is paramount to realizing this vision.

We also encourage adoption of a policy empowering a high-level staff person to align and coordinate departments with an eye toward increasing efficiency in the entitlement and permitting processes. It is critical that these streamlined policies are implemented with oversight for consistency at a department level to be sure they are being prioritized as intended and to maintain the trust and certainty they were meant to create.

We are pleased to see that Program H-20 includes language that commits the city to exploring a development fee exemption for 100 percent affordable housing projects. We ask that the City prioritize action around this particular proposal before the end of 2023. This proposal could mirror the resolution that the Petaluma City Council adopted on November 21, 2022 ([Item 7](#)). As contemplated in the Housing Element, City fees can add considerable cost to the total development cost of affordable housing, upwards of \$20,000 per unit. By reducing the need to pay these city fees, the savings to an affordable housing development is significant, \$1 million or more project per project. Hiring more staff, grant writers, or consultants to aid with backfilling any loss of funding from this action would be something we would strongly support.

**We would like to offer a special acknowledgement and note of appreciation to the Planning Division staff for offering an extended period of public review for the Housing Element Revised Draft.** The City of Santa Rosa is the ONLY city in Sonoma County thus far to respond to the [coalition letter](#) we sent on November 1, 2022 with regional partners requesting among other things, 30 days for public comment on revised drafts.

We're grateful to weigh in on this important process once again. Our thanks goes out to staff for diligently reviewing our comments and bringing them forward to our elected leaders for consideration.



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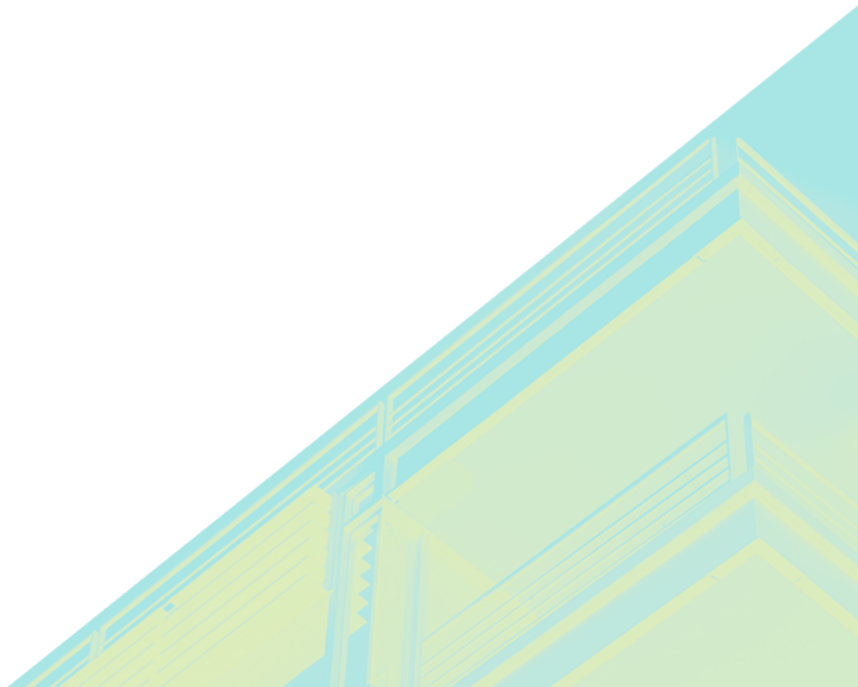
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Please direct any questions or concerns regarding the content of this letter to our Policy Director Calum Weeks at [calum@generationhousing.org](mailto:calum@generationhousing.org).

Respectfully,

A handwritten signature in blue ink, appearing to read "Jen Klose", is written over the word "Respectfully,".

Jen Klose  
Executive Director, Generation Housing



**From:** [Liza Graves](#)  
**To:** [Rogers, Natalie](#); [MacDonald, Dianna](#); [Rogers, Chris](#); [Councilmember Alvarez](#); [Okrepkie, Jeff](#); [Stapp, Mark](#); [Fleming, Victoria](#); [\\_CityCouncilListPublic](#)  
**Subject:** [EXTERNAL] SR Housing Element Comment Letter submitted by Sonoma County Hospitality Association  
**Date:** Tuesday, February 14, 2023 3:25:42 PM  
**Attachments:** [SR Housing Element Comment Letter Sonoma County Hospitality Association 2.14.2023.docx](#)

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Dear Mayor Rogers and Councilmembers,

Please see the attached letter regarding the SR Housing Element from the Sonoma County Hospitality Association, which represents the interests of the thousands of local residents employed by the hospitality industry and the many locally owned and operated small hospitality businesses in the region.

Thank you.

On behalf of the Sonoma County Hospitality Association,

BeautifulPlaces



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and Valette Wines

**Larry Willis**  
The Gables Inn

February 14, 2023

Re: Santa Rosa Housing Element Update

Dear Mayor Rogers and Council Members:

The Sonoma County Hospitality Association (SCHA) supports the development of more affordable workforce housing and housing for all segments of our community. The creation of more housing is essential to the current and future of the hospitality industry and the ability of small businesses to recruit talent and support the idea of local sustainability by keeping ownership and our workforce local.

SCHA represents the diverse business segments that make up the hospitality and tourism industry in Sonoma County, including restaurants, hotels, bed and breakfasts, vacation rentals, retailers, wineries, recreation providers, transportation providers, attractions, and more. The taxes collected by hospitality establishments from visitors to Santa Rosa and the region and taxes paid by the hospitality workforce contribute to city, county, and regional funding.

The hospitality industry employs 1 in 11 workers in Sonoma County. The overwhelming majority of hospitality businesses are small, locally owned, and locally operated businesses for whom increased housing is vital to the current and future generations of employees and employers. Affordable, safe, and adequate housing is necessary for workers ranging from chefs and servers to lodging managers, front desk staff, housekeepers, vineyard workers, winemakers, and tasting room staff. The lack of diversity of housing and affordable housing limits the ability of employers to recruit talent to fill entry-level, specialty jobs and professional and senior leadership positions. There currently needs to be more housing units in Santa Rosa to provide adequate, affordable, and safe housing for all residents of Sonoma County. Additionally, new housing units are essential to ensure a sustainable economic future for the Santa Rosa and Sonoma Counties.

SCHA supports policies, land use strategies, streamlined entitlement and permit processes, and reduced costs and funding that will result in eliminating obstacles to development and the creation of more units of housing production and eliminating obstacles to development.

SCHA supports facilitating infill housing, including development of infrastructure, consolidation of small lots; incentives for creating residential units in mixed-use projects in the Downtown Station Specific Area Plan; and incentives for ADU citywide. We further encourage the city to implement programs to provide rental assistance to help renters and landlords alike.

Sincerely,

The Sonoma County Hospitality Association Board of Directors

