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Cc:	Nicholson, Amy; Jones, Jessica; Osburn, Gabe
Subject:	[EXTERNAL] Public comment for 3/26/26 PC meeting on General Plan review, RHNA, and Inclusionary Ordinance
Date:	Tuesday, March 24, 2026 8:41:28 AM

Fred Allebach

3/24/26

Public comment for 3/26/26 PC meeting on General Plan review, RHNA, and Inclusionary Ordinance

According to a WalletHub study, Santa Rosa is ranked in the bottom half of U.S. cities for affordability and as one of the worst places to rent or buy a first home due to high housing costs compared to income.

Questions grab bag

What does **EJ Element** do that has any measurable effects for justice? What are the "advancements in EJ" cited on p. 3 of staff report? One cited is grocery store permit streamlining. However, unless grocery stores match local MHI needs, what's the use? Like housing, a constrained market precipitates higher prices; one more Olivers becomes one more unaffordable thing in Santa Rosa. The Olivers on Montecito does not remotely check the affordable box for the dense low-income Latino population nearby. The city needs to use some intentionality to see more Grocery Outlets get in and not more Olivers.

What is a *sustainable* neighborhood? Please define. p. 4, staff report. When the staff report says "enhance walkability and sustainability" what does *sustainability* mean? Suggestion, don't use sustainability as a weasel word, say environmental, economic, or social sustainability; specify what is sustainable. If there are flavors, when and where does the city use social costs and social sustainabilty?

How does the GP finesse VMT/ GHG reduction with AFFH? These seem to be competing priorities. If the GP has to be internally consistent, planned-for lower VMT futures by putting the bulk of new housing on Santa Rosa Ave means that integrating higher resource opportunity areas with lower-income RHNA allocations gets de-emphasized.

RHNA production

It's very common to have RHNA under-production of VL, L and Mod units, good times or bad.

There is a long-term deficit of VL, L and Mod production, which is why we have a housing crisis.

This leaves a glut of Above Mod/ market rate which then increases prices and housing cost burden.

Of VL, L and Mod there are 1,824 left to satisfy 6th cycle RHNA. When do any HCD penalties kick in for lower-income RHNA under-production and what are the penalties?

There are only 29 units left to satisfy Above Mod in 6th cycle, the out-of-balance pattern of marker rate over-production continues. (According to a WalletHub study, Santa Rosa is ranked in the bottom half of U.S. cities for affordability and as one of the worst places to rent or buy a first home due to high housing costs compared to income.)

It seems to me the City inclusionary ordinance is not really making a dent to produce the most-needed housing types; does the PC think the ordinance is making much of a difference?

The Presentation on RHNA is unclear on how many inclusions have been done for 6th cycle, 661 since 2019? Not clearly presented… It would be good to see how the city did for RHNA production in the 5th cycle, and what the forecast looks like for the 6th.

The inclusions number nevertheless seems paltry compared to the overall VL, L, and Mod RHNA deficit for the past three or four cycles.

6th cycle in-lieu and impact fees so far add up to about the market cost to produce 1.5 Affordable units. This fee and the inclusionary ordinance is not getting the job done, IMHO.

Suggestion: increase the Santa Rosa inclusionary numbers, match the City of Sonoma inclusionary ordinance. The current Santa Rosa ordinance is not impactful enough for Affordable housing. To what level is it reasonable to expect an inclusionary ordinance to have an effect? I'd think 20% at least is a baseline.

The City of Sonoma has a 25% inclusionary ordinance, for rent: 10% VL, 10% L, 5% Mod; for ownership: 10% L, 10% Mod, 5% Above Mod, with a loophole that any units 800sf or less don't count in the formula (this has incentivized market rate condo projects). To date the 25% ordinance has not stopped developers from proposing projects. (I'm not sure the exact % for ownership units)

Penciling issues are cited against the 25% inclusionary ordinance, but there is no objective proof of what pencils or not from any independent, 3rd party accounting/ auditing of developer finances and/or rate of return. Not-penciling claims are all anecdotal.

I don't see why staff is recommending keeping on with business as usual for the in-lieu fee and inclusionary ordinance. They seem like weak tea. At least ask staff to give a policy option to up the ante if the inclusionary and in-lieu fee numbers show a less than moderate impact.

Listen to the needs and cases of the housing burdened as much as to the developer's narrative; the city needs to work for the 40% DACs that are here as much as anybody.

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