_____, 2025

SENT VIA EMAIL

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

RE: Transfer of Regional Housing Needs Allocations and Credits

Dear President Ramos:

Pursuant to Government Code section 65584.07(d), the City of Santa Rosa and County of Sonoma are pleased to present their mutually acceptable agreement for transfer of a portion of Sonoma County's RHNA to Santa Rosa. The City and County agree that the City will accept RHNA responsibility for total of 641 units currently allocated to the County, including 34 units affordable to very low-income households and 607 units affordable to above moderate-income households. This RHNA transfer agreement follows an annexation to the City that was finalized September 25, 2024 (the "Lance Dr. annexation").

Government Code Section 65584.07(d) encourages counties and cities to reach a "mutually acceptable agreement" for transfers of RHNA related to a city annexation of unincorporated land. If such an annexation occurs after the council of governments (here, ABAG) has made its final RHNA allocation, the affected county and city may reach a mutually acceptable agreement to transfer part of the county's allocation to the city. The transfer agreement must be submitted to the council of governments (COG) within 90 days after the annexation, but the COG may extend the deadline if an extension is consistent with the objectives of the Housing Element Law. (Gov. Code, § 65584.07, subd. (d)(2)(A).) A transfer agreement submitted under Section 65584.07(d) "shall be effective immediately upon receipt by the council of governments." (Gov. Code, § 65584.07, subd. (d)(2)(A).) A transfer under Section 65584.07(d) "shall be based on the RHNA methodology adopted by the COG pursuant to Government Code section 65584.04. (Ibid.) However, the statute specifies that the transfer "shall not be made" if the COG confirms that the annexed land was fully incorporated into the RHNA methodology used to allocate the city's share of the regional housing needs. (Gov. Code, § 65584.07, subds. (d)(2)(A), (d)(3).)

As outlined below, the City of Santa Rosa and Sonoma of County believe the RHNA transfer agreement meets all applicable statutory criteria to be effective immediately upon receipt by ABAG, and is as follows:

APN	Very Low~~er~~ Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units
036-111-009, -010, 016 *(only the three affected parcels that are listed in the County's Housing Element Inventory are identified as part of the transfer agreement)*	34	0	0	607
TOTAL UNITS TRANSFERED	**641**			

- Consistent with Section 65584.07(d)(1), the Lance Dr. annexation occurred almost three years after ABAG made the final RHNA allocation for the 2023-2031 cycle. ABAG approved the final 2023-2031 RHNA allocation plan in December 2021. The Lance Dr. annexation was final on September 25, 2024. (See Attachment 1.)

- On December 18, 2024, the City and County jointly submitted a request for extension of the statutory 90-day deadline, as authorized by Section 65584.07, subdivision (d)(2)(A). (See Attachment 2.) The extension request was submitted within the statutory period, and submission of the RHNA transfer agreement is therefore timely and not time-barred.

- The City-County RHNA transfer agreement is ~~based on the RHNA methodology adopted by ABAG~~submitted pursuant to Section 65584.07(d)(1), and the Lance Dr. annexation area was not incorporated in the methodology used to allocate the City's share of the regional housing needs, consistent with Section 65584.07(d)(2)(A) and (d)(3). In ABAG's 2023-2031 RHNA methodology, unincorporated areas in Sonoma County were "assigned" to the County for purposes of RHNA responsibility. The Lance Dr. annexation area was unincorporated County territory until it was annexed by the City as of September 2024, and therefore was not incorporated in the methodology used to allocate the City's RHNA. Further, as required by Section 65584.07(d)(2)(A), the City-County RHNA transfer does not reduce the total regional housing or change the RHNA for any jurisdiction other than the City of Santa Rosa and County of Sonoma.

- Government Code Section 65584.07(d)(2)(B) does not apply. The Lance Dr. annexation area is not subject to a development agreement authorized by Government Code Section 65865 and entered into prior to January 1, 2008.

The City-County RHNA transfer agreement has received all necessary local approvals. On _____, 2025 the Santa Rosa City Council adopted a resolution authorizing the Mayor to sign the City-County RHNA transfer agreement. (See Attachment 3.) Approval by the Sonoma County Board of Supervisors is not required.

Because the City and County believe the RHNA transfer agreement meets all applicable requirements of Government Code Section 65584.07(d), we request that the agreement will be effective upon receipt by ABAG.

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

Sincerely,

Mark Stapp
City of Santa Rosa Mayor

Lynda Hopkins
Sonoma County Supervisors Chair

EC:
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