

4.14 POPULATION AND HOUSING

This chapter describes existing population and housing characteristics within the Environmental Impact Report (EIR) Study Area and evaluates the potential environmental consequences of potential future development that could occur by adopting and implementing the proposed project. A summary of the relevant regulatory framework and existing conditions is followed by a discussion of potential impacts and cumulative impacts from implementation of the proposed project.

4.14.1 ENVIRONMENTAL SETTING

4.14.1.1 REGULATORY FRAMEWORK

State Regulations

California Housing Element Law

California Housing Element Law¹ includes provisions related to the requirements for housing elements of local government General Plans. Among these requirements, some of the necessary parts include an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. Additionally, in order to assure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goals, this section of the Government Code calls for local jurisdictions to plan for and allow the construction of a share of the region's projected housing needs, known as the Regional Housing Needs Allocation (RHNA). The City of San Rafael's 2015–2023 Housing Element Update was adopted in January 2015.

Regional Regulations

Plan Bay Area

As discussed in Chapter 4, Environmental Analysis, of this Draft EIR, *Plan Bay Area* is the regional transportation plan/sustainable community strategy for the nine-county Bay Area region. *Plan Bay Area* lays out a development scenario for the nine-county Bay Area that works to align transportation and land use planning in order to reduce vehicle miles traveled through modified land use patterns, as mandated by the Sustainable Communities and Climate Protection Act (Senate Bill 375). The current *Plan Bay Area* projects growth and development patterns through 2040 and is currently being updated to extend to 2050.

While *Plan Bay Area* 2040 distributes future growth across the Bay Area region in order to meet its GHG emissions reduction, housing, and other performance targets, it is not intended to override local land use control. Cities and counties are ultimately responsible for the manner in which their local communities continue to be built out. For this reason, cities and counties are not required to revise their land use

¹ Government Code Section 65580-65589.8.

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policies and regulations, including their general plans, to be consistent with the regional transportation plan or an alternative planning strategy.

As described in Chapter 4, Environmental Analysis, *Plan Bay Area* designates Priority Development Areas (PDAs) and Transit Priority Areas (TPAs) throughout the region. PDAs are areas along transportation corridors which are served by public transit that allow opportunities for development of transit-oriented, infill development within existing communities that are expected to host the majority of future development. TPAs are similar in that they are formed within one-half mile around a major transit stop such as a transit center or rail line. Overall, over two-thirds of all regional growth by 2040 is allocated to PDAs and TPAs. As shown on Figure 4-1, the EIR Study Area has three PDAs. The PDAs include the North San Rafael PDA, Southeast San Rafael/Canal PDA, and Downtown San Rafael SMART Station PDA and TPA.

Local Regulations

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to population and housing are primarily in the Land Use (LU) Element, Neighborhoods (N) Element, and Housing (H) Element. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended or substantially changed, and new policies would be added. A comprehensive list of policy changes is provided in Appendix B, Proposed General Plan Policy Amendments, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their effectiveness and potential to result in an adverse physical impact under Section 4.14.3, Impact Discussion, later in this chapter.

San Rafael Municipal Code

Besides the General Plan, the City of San Rafael Municipal Code (SRMC) is the primary tool that regulates physical development in San Rafael. The SRMC contains all ordinances for the city and identifies land use categories, site development regulations, and other general provisions that ensure consistency between the General Plan and proposed development projects. The SRMC is organized by title, chapter, and section.

Title 14 of the SRMC sets forth the City's Zoning Ordinance, the primary purpose of which is to "promote and protect the public health, safety, peace, comfort and general welfare" of the City of San Rafael, with specific purposes listed under:

- **Section 14.01.030, Purposes.** The Zoning Ordinance is the mechanism used to implement the land use goals, policies, and programs of the General Plan and to regulate all land use within the city. The Zoning Ordinance describes zoning designations and contains the zoning map and development standards for the zoning designations.
- **Chapter 14.04, Residential Districts.** This chapter serves to protect and provide a variety of housing opportunities and types, and to promote residential development compatible with environmental constraints and nearby development.

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- **Chapter 14.05, Commercial and Office Districts.** This chapter lists the specific purposes of the Commercial and Office Districts. It includes several districts in the Downtown Precise Plan that allow for residential mixed-use development.

4.14.1.2 EXISTING CONDITIONS

This section describes the existing population and housing conditions in San Rafael, as well as Marin County as a whole, to provide context for the analysis of the proposed project in this EIR.

Population

San Rafael is the largest city in Marin County and has experienced the fastest rate of population growth in the county since 1960. The population in the EIR Study Area reached 75,751 by 2020, including roughly 60,000 people in the city limits and 15,000 in the unincorporated area. Historically, growth in San Rafael has fluctuated significantly, increasing by 90 percent in the 1960s during a period of rapid growth and development, compared to relatively static growth of less than 3 percent from 2000 to 2010. Comparatively, the overall population of Marin County grew from 252,409 in 2010 to 262,240 in 2019, which represents a growth rate of 4 percent. The second largest city in Marin County is Novato, with 54,115 residents. The remaining nine cities in Marin County vary in size, ranging between 2,000 and 15,000 people.²

Housing

In 2020, the EIR Study Area had 29,529 housing units with a 5.1 percent vacancy rate.³ Of the occupied housing units, 52 percent are owner occupied and 48 percent are renter occupied. Marin County's vacancy rate and housing tenure is higher than San Rafael's—7.2 percent, with 63 percent owner occupied units and 37 percent renter occupied units.⁴

Approximately 46 percent of San Rafael's homes are detached single-family homes while 10 percent are attached. Multi-family homes make up 42 percent of housing units in the city, and mobile homes make up 2 percent. These housing unit types are different from the countywide breakdown, which is 61 percent detached single-family homes, 10 percent attached single-family homes, 27 percent multifamily, and 2 percent mobile homes.

Employment

The city of San Rafael accounts for over one-third of the total jobs in Marin County. Major employment sectors in the city include education, health and social services, and research and development.

² State of California, Department of Finance, *Report E-5, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2019, with 2010 Benchmark*, Table 2: City/County Population and Housing Estimates.

³ State of California, Department of Finance, *Report E-5, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2019, with 2010 Benchmark*, Table 2: City/County Population and Housing Estimates.

⁴ State of California, Department of Finance, *Report E-5, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2019, with 2010 Benchmark*, Table 2: City/County Population and Housing Estimates

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Compared to the county, San Rafael has a higher concentration in jobs in the public administration, transportation, warehousing, and utilities sectors. In 2020, San Rafael has approximately 44,200 jobs, an increase of 1.8 percent from 2010. By comparison, Marin County has approximately 124,700 jobs in 2020, of which approximately 80,500 jobs are outside of San Rafael.⁵

4.14.1.3 GROWTH PROJECTIONS

The *Plan Bay Area* includes growth projections to 2040 at 10-year benchmark intervals. Projections are calculated using several sources, including assessments of historical growth, population estimates released by the State Department of Finance, and General Plan buildout projections established by local jurisdictions. As shown in Table 4.14-1, the *Plan Bay Area* projections anticipate that San Rafael's population would increase with a growth rate of 16 percent between 2010 and 2040. The growth projections anticipate the number of housing units to increase by 9 percent, with jobs projected to increase by 13 percent. Total jobs in Marin County are projected to increase by 11 percent over the same time period. Jobs in San Rafael are expected to increase to approximately 42 percent of the county total. However, the forecasts shown in Table 4.14-1 were created with a 2010 baseline, and therefore some of the growth anticipated has already occurred.

TABLE 4.14-1 PLAN BAY AREA REGIONAL PROJECTIONS FOR SAN RAFAEL AND MARIN COUNTY

	2010	2020	2030	2040	Change 2010–2040	
					Number	Percent
San Rafael City Limit						
Total Population	57,850	60,060	64,220	66,880	9,030	16%
Housing Units ^a	23,735	24,035	25,320	25,870	2,135	9%
Total Jobs	43,430	47,835	48,650	49,050	5,620	13%
Marin County						
Total Population	252,920	265,875	274,530	282,670	29,750	12%
Housing Units ^a	111,200	112,540	114,030	115,470	4,270	4%
Total Jobs	121,785	129,900	133,480	134,960	13,175	11%

Notes:

^a Includes both multifamily and single-family dwelling units.

Source: *Plan Bay Area* 2040 Projections, <http://projections.planbayarea.org/>, 2020.

⁵ California Economic Development Department, 2020, Marin County Profile.

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Priority Development Areas

As previously stated, overall, over two-thirds of all regional growth by 2040 is allocated to PDAs and TPAs.⁶ As described in Chapter 4, Environmental Analysis, and shown on Figure 4-4, the Downtown San Rafael SMART Station PDA and TPA is partially located in the Downtown Precise Plan Area. ABAG indicates that this PDA is expected to absorb about 40 percent of the city’s household growth in the next 20 years, although General Plan 2040 is anticipating an even higher capture rate.⁷ As shown in Table 4.14-2, the total population in this PDA is expected to increase by 49 percent while housing units and jobs are anticipated to increase by 46 percent and 10 percent, respectively.

TABLE 4.14-2 PLAN BAY AREA REGIONAL PROJECTIONS FOR DOWNTOWN SAN RAFAEL SMART STATION PDA

	Change 2010 to 2040			
	2010	2040	Number	Percent
Total Population	4,390	6,550	2,160	49%
Housing Units ^a	1,785	2,600	815	46%
Total Jobs	9,100	10,000	900	10%

Notes:

^a. Includes multifamily and single-family dwelling units.

^b. Assumes 2.46 persons per household in 2010 and 2.56 persons per household in 2040.

Source: *Plan Bay Area* 2040 Projections, <http://projections.planbayarea.org/>, 2020.

Since the adoption of *Plan Bay Area* 2040 and its associated growth projections, two new PDAs were designated in the EIR Study Area. As shown on Figure 4-2 and Figure 4-3 in Chapter 4, Environmental Analysis, these PDAs are located in northern and southeastern San Rafael. They are described as follows:

- **Northgate PDA.** This is the northernmost PDA in the Terra Linda neighborhood of San Rafael. The Northgate PDA includes the Northgate Mall, Northgate I Centre, Northgate III, and the Las Gallinas office and gas station areas.
- **Southeast San Rafael/Canal PDA.** This is the southernmost PDA in San Rafael and includes the southeast part of the city, including the Canal neighborhood.

The new designations mean that the Northgate and the Southeast San Rafael/Canal PDAs will be included in *Plan Bay Area* 2050 and will therefore be eligible to apply for MTC funding to conduct focused land use planning and policy development in the designated areas. No direct development or land use changes which would result in direct development are proposed as part of General Plan 2040. Further, because these PDAs were designated after the adoption of *Plan Bay Area* 2040, there were no growth projections available at the time the proposed project was being conducted. However, because *Plan Bay Area* anticipates the majority of growth in the Bay Area will occur in PDAs, both these PDA areas are anticipated

⁶ Bay Area Air Quality Management District, 2017, Final 2017 *Clean Air Plan*, Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area, https://www.baaqmd.gov/~/_media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en, accessed March 18, 2019.

⁷ Metropolitan Transportation Commission and Association of Bay Area Governments, 2017, *Plan Bay Area* 2040 Plan.

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to experience growth through the proposed project’s 2040 horizon year. Population projections for the Northgate PDA and the Southeast San Rafael/ Canal PDA are anticipated to become available in 2021.

These PDA designations were sought in response to requests received from neighborhood representatives to pursue a deeper dive planning effort for these two areas. These representatives have requested that the General Plan 2040 incorporate programs that would commit to pursuing funding and development of a Specific, Precise or Neighborhood Plan for the Canal neighborhood and North San Rafael. In addition, community members have indicated that funding and developing a Specific/Precise Plan for their respective areas should be identified as a high priority, short-term program in the General Plan 2040. The General Plan 2040 Neighborhood Element will incorporate these programs.

Regional Housing Needs Allocation

As the San Francisco Bay Area’s regional agency, MTC/ABAG calculates the RHNA for jurisdictions in Marin County, including San Rafael. Table 4.14-2 shows the RHNA for the current planning period, which is the number of housing units the city of San Rafael would need to accommodate by 2023. As shown in Table 4.14-2, the housing unit allocations are categorized by household size and income. The household income categories are as follows:

- Very Low Income: Households making less than 50 percent of the area median income.
- Low Income: Households making between 50 and 80 percent of the area median income.
- Moderate Income: Households making between 80 and 120 percent of the area median income.
- Above Moderate Income: Households making more than 120 percent the area median income.

Household median income is calculated based on household size. In 2014 the median income for a single-person household was \$72,100. The median income for a family of three in 2014 was \$92,700, and the median income for a family of six in 2014 was \$119, 500.

TABLE 4.14-3 SAN RAFAEL REGIONAL HOUSING NEEDS ALLOCATION

RHNA Planning Period	Dwelling Units by Income Category				Total
	Very Low Income	Low Income	Moderate Income	Above Moderate Income	
2015 to 2023	240 ^a	148	181	438	1007

Notes:

^a. 120 of these are designated for “Extremely Low Income”

Source: City of San Rafael 2015-2023 Housing Element Update.

4.14.2 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines, implementation of the proposed project would result in significant population and housing impacts if it would:

1. Induce substantial unplanned population growth or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

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2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.
3. Result in cumulative impact related to population and housing.

4.14.3 IMPACT DISCUSSION

POP-1 **Implementation of the proposed project could induce substantial unplanned population growth either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).**

General Plan 2040

As described in Chapter 3, Project Description, of the Draft EIR, the proposed General Plan 2040 is a high-level policy document that will replace the existing General Plan 2020 as the city's overarching policy document that defines a vision for future change and sets the "ground rules" for growth. The proposed General Plan 2040 considers growth over a 20-year period but does not include specific development proposals. The General Plan is the policy document that projects the amount of reasonably foreseeable growth given past growth trends and the ability of existing services and infrastructure to support future growth. Potential future development in the city is projected to occur primarily in TPAs and PDAs on a limited number of vacant parcels and in the form of infill/intensification on sites already developed and/or underutilized, and/or in close proximity to existing residential and residential-serving development, and in areas with close proximity to public transportation. Given that future growth would occur in areas currently served by public services and infrastructure, implementation of the proposed General Plan 2040 would require less investment in infrastructure than if development was to occur on "greenfield" sites. Therefore, the proposed General Plan 2040 would not induce substantial, unplanned population growth directly or indirectly in any particular location but instead includes policy guidance for expected incremental growth through 2040.

The EIR Study Area has a population of approximately 75,751 with 29,529 housing units as of 2020. The proposed General Plan 2040 estimates an overall increase of 4,460 housing units and 8,910 residents in the EIR Study Area by 2040. This equates to a 15 percent increase in housing units and a 12 percent increase in total population over the 20-year horizon of the proposed General Plan. However, approximately 20 percent of the total 4,460 housing units anticipated by 2040 are units already accounted for in the City's development pipeline, including projects that are under review or approved. Approximately 23 percent of this residential growth would come from the city's 2015-2023 RHNA allocation of 1,007 units, which is growth dictated by the California Housing Law and not by the City. Moreover, the city's preliminary RHNA for 2023-2031 is nearly 3,000 units, indicating the need to plan for development that exceeds the *Plan Bay Area* 2040 housing forecasts. As shown in Table 4.14-2, regional projections for San Rafael anticipate a 9 percent increase in housing units and an 16 percent increase in population, and development potential under the proposed General Plan 2040 would result in a 15 percent increase in housing units and a 12 percent increase in total population. Therefore, implementation of the proposed General Plan 2040 would slightly exceed current regional projections for

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housing by 6 percent based on these factors alone. By comparison, total population is anticipated to be 4 percent below regional projections due to differing household sizes. Potential future development would primarily occur as infill development in designated PDAs and TPAs, which is consistent with the infill focus of *Plan Bay Area*. Therefore, implementation of General Plan 2040 itself would not introduce a substantial number of unplanned population in the EIR Study Area and is instead the overriding policy document that plans for such growth. Furthermore, the revised growth projections from General Plan 2040 will be integrated into the next round of regional growth projections. At the time the proposed General Plan 2040 was being drafted, *Plan Bay Area* projections through 2050 were being updated but the data were unavailable.

As determined in Chapter 4.17, Utilities and Service Systems, of this Draft EIR, there are no existing infrastructure deficiencies identified in the EIR Study Area, and no future deficiencies are likely to occur as a result of the growth anticipated in the proposed General Plan 2040. Further, Chapter 4.15, Public Services and Recreation, of this Draft EIR determined that population growth as a result of implementation of the proposed General Plan 2040 would not result in a public service deficiency or necessitate the construction of new emergency service facilities. All potential future development would be required to comply with any required site-specific infrastructure improvements and to pay any project-specific impact fees. Therefore, implementation of the proposed General Plan 2040 would not induce substantial unplanned population growth and would not necessitate the construction of additional infrastructure, and the impact is *less-than-significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

A total of 49 percent of the housing units and population growth by 2040 is expected in the Downtown Precise Plan Area, including an estimated 2,200 housing units and 3,570 residents. Existing development includes 1,571 housing units and 2,315 residents within the Downtown Precise Plan Area. As discussed above, growth in the EIR Study Area was projected in *Plan Bay Area* and includes the growth in the Downtown Precise Plan Area. While half the anticipated growth in the EIR Study area is anticipated in the Downtown Precise Plan Area, the Downtown Precise Plan is almost entirely within the Downtown San Rafael PDA and TPA which, as described, are areas of the city that are served by local and regional public transportation. As shown in Table 4.14-2, *Plan Bay Area* projected growth of 815 housing units and 2,160 residents in the Downtown San Rafael SMART Station PDA alone, which exceeds the growth allowed in the proposed Downtown Precise Plan. However, as identified, areas designated a PDA or a TPA by *Plan Bay Area* are expected to absorb the majority of future residential development in the Bay Area due to their proximity to public transportation and such growth in the Downtown Precise Plan Area would not be entirely unexpected or unplanned. Development in the PDA is consistent with the regional planning objectives established for the Bay Area. Further, this additional growth would come incrementally over a period of approximately 20 years and a policy framework is in place to ensure adequate planning occurs to accommodate it.

Therefore, implementation of the proposed Downtown Precise Plan would not induce substantial unplanned population growth in the Downtown Precise Plan Area, and same as the General Plan 2040, impacts would be *less than significant*.

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Significance without Mitigation: Less than significant.

POP-2 **Implementation of the proposed project could displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.**

General Plan 2040

Implementation of the proposed General Plan 2040 would result in an increase of 4,460 housing units in the EIR Study Area over a 20-year horizon. As identified in Impact Discussion POP-1, approximately 20 percent of the total 4,460 housing units anticipated by 2040 are units already accounted for in the City's development pipeline because they have been approved or are under project review. Potential future development would occur on a limited number of vacant parcels and in the form of infill/intensification on sites already developed and/or underutilized and/or in close proximity to existing residential and residential-serving development, and would therefore not necessitate future infrastructure improvements. Because potential future development of housing units could occur through redevelopment activities, it is possible that construction activities could displace an unknown amount of existing residents or housing. Further, it is possible that potential future nonresidential development could displace existing residential development through conversions or redevelopment.

The proposed General Plan 2040 includes the Equity, Diversity, and Inclusivity (EDI) Element and the Housing (H) Element, both of which contain goals, policies, and programs addressing residential displacement in the EIR Study Area. The following goals, policies, and programs would reduce the amount of displacement that could occur in the EIR Study Area:

Goal EDI-3: Housing Stability. Improve housing stability for all San Rafael residents, particularly those with low or very low incomes.

- **Policy EDI-3.1: Preventing Displacement.** Prevent the displacement of lower income residents from their homes due to rising costs, evictions without cause, and other economic factors that make it difficult for people to stay in San Rafael.
 - **Program EDI-3.1A: Anti-Displacement Strategies.** Evaluate anti-displacement strategies in future plans or programs that could result in the direct removal of affordable housing units, the displacement of tenants, or economic hardships due to rapid rent increases
 - **Program EDI-3.1B: Renter Protection Measures.** Continue to explore and promote measures to protect San Rafael renters and facilitate positive communication between landlords and tenants.

Goal H-2: A Diverse Housing Supply. It is the goal of San Rafael to have an adequate housing supply and mix that matches the needs of people of all ages, income levels, and special requirements.

- **Policy H-7: Protection of the Existing Housing Stock.** Continue to protect existing housing from conversion to nonresidential uses. Ensure that affordable housing provided through government subsidy programs, incentives, and deed restrictions remains affordable over the required time period, and intervene when possible to help preserve such housing.

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- **Program H-7B: Preserving Existing Rental Housing Affordable to Low Income Households At Risk of Conversion.** Eight assisted rental projects in San Rafael (totaling 291 units) are technically at-risk of conversion to market rate prior to 2025. However, all eight projects are owned and managed by non-profit organizations with a public purpose to maintain affordable housing for low income and special needs populations. The majority of these developments receive Federal and State funding, rather than local funding, and therefore are not subject to the City's rent and income monitoring requirements. The City will however monitor each project's potential affordability expiration, and contact the non-profit owners within one year of the expiration date to address any future loss of funding which may put these units at risk.
- **Program H-7C: Preserving Existing Rental Housing Affordable to Low Income Households through Ongoing Affordability Restrictions.** The City of San Rafael and the former Redevelopment Agency is responsible for the annual monitoring of over 1,400 units in forty one publicly and privately owned rental developments. In addition, City policies have resulted in the development of 115 affordable ownership units. All of these rental and ownership units have long term affordability covenants.
- **Program H-7D: BMR Resale Regulations.** Continue to require resale controls on ownership Below Market Rate (BMR) units to assure that units remain affordable to very low, low, and moderate-income households. Continue to monitor database with Marin Housing.
- **Program H-7E: Retention of Mobilehomes and Preservation of Existing Mobilehome Sites.** Retain where possible this type of housing, which includes the 400-home Contempo Marin and the 30-home B-Bar-A mobilehome park, and its affordability by continuing to implement the Mobilehome Rent Stabilization Ordinance. Mobilehomes typically provide lower cost housing by the nature of their size and design.

Potential future development as a result of implementation of the proposed General Plan 2040 is anticipated to increase density and utilization of infill or underutilized sites in existing urban areas in the EIR Study Area. Therefore, redevelopment could potentially result in temporary displacement of people. However, displacement in the EIR Study Area would only be considered substantial in cases where major development such as a freeway or a large-scale redevelopment would result in the displacement of large amounts of existing housing. While the proposed General Plan 2040 does focus on infill development which may occur as redevelopment, the proposed General Plan does not include any large-scale development that would be considered to result in substantial displacement of existing housing. Further, redevelopment in the EIR Study Area would occur on sites that are vacant and/or underutilized, and small levels of displacement that may occur would be addressed through compliance with proposed goals, policies, and programs. Therefore, any potential displacement of persons in the EIR Study Area would not be substantial in number, and the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

As described in Chapter 3, Project Description, of this Draft EIR, approximately half of the development anticipated in the EIR Study Area by 2040 would occur in the Downtown Precise Plan Area. Because the Downtown Precise Plan Area is urban and largely built out, it is anticipated that this increase in housing units would occur primarily through redevelopment or infill development on vacant and/or underutilized

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sites. While potential future development in the Downtown Precise Plan Area could result in the temporary displacement of persons on a project site, the proposed Downtown Precise Plan would not result in large-scale redevelopment projects that would cause substantial displacement. Similar to the proposed General Plan 2040, short-term displacement that may occur in the Downtown Precise Plan Area would be addressed through compliance with proposed goals, policies, and programs, and therefore impacts would be *less than significant*. Moreover, Chapter 7 of the Downtown Precise Plan is an “anti-displacement strategy” that includes specific measures to minimize displacement and provide new housing opportunities for persons living in Downtown San Rafael.

Significance without Mitigation: Less than significant.

POP-3	Implementation of the proposed project could result in a cumulatively considerable impact to population and housing.
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The context for the cumulative population and housing impacts would be potential future development under the proposed project combined with development on lands adjacent to the city. As described in Impact Discussions POP-1 and POP-2, implementation of the proposed project would not induce a substantial amount of unplanned population growth or growth for which inadequate planning has occurred, or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The proposed and existing General Plan goals, policies, and programs, and implementing Zoning Ordinance would provide adequate planning to accommodate the proposed new increase in growth in the study area. Therefore, the proposed project would not result in a cumulatively considerable impact to mineral resources and cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

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