



Responsible Growth in Marin

September 28, 2021

San Rafael Planning Commission
1400 Fifth Avenue
San Rafael, Ca 94901

Re: Comment on Housing Element
NOTE: PLEASE INCLUDE IN PUBLIC COMMENTS

Dear Planning Commissioners and Mr. Miller,

Responsible Growth in Marin appreciates the opportunity to comment on the commencement of the City of San Rafael's Housing Element 2022-2031 which will be discussed at tonight's Planning Commission Meeting.

Attached is a PDF of RGM's general perspective on housing as well as two relevant newspaper articles we would like you to take into consideration as you begin to work on the Housing Element.

We look forward to tonight's discussion.

Respectfully,
Grace Geraghty, Executive Director
Responsible Growth Marin
info@rgmarin.org

Responsible Growth in Marin (RGM) Perspective for the City of San Rafael Housing Element 2022-2031

- RGM as the name implies has always supported responsible growth. Therefore, we are in favor of making housing sustainable and attainable for all economic classes, races, ethnicities, etc.
- Marin has an aging population, and many seniors are economically secure want to simplify their life, buy a smaller place but stay in the community. This would provide younger families more opportunities to find a home to raise and educate their kids. Unfortunately, there is a dearth of smaller houses or townhouse to buy.
- A healthy thriving community is generally comprised of a heterogeneous society and this doesn't include only race, ethnicity, gender, income, etc. it also includes a combination of home ownership and rental properties. It means integrating market rate, affordable, low income, and senior housing.
- It makes sense for the City, community, developers, and housing organizations to initially focus on infill, vacant lots, surplus of commercial space which has been exacerbated by online shopping and working remotely.

Below are some of the concerns that RGM and frankly the community at large have regarding recent state housing legislation and advocating for housing at all costs:

- We are not in favor of irresponsible building, of the state laws such as SB 9 and 10 making permits "ministerial" thus eliminating local jurisdiction, EIRs, CEQA, any review by Planning Commission, City Council and no public commentary.
- We do not believe that allowing the market to take care of what size building on what size lot will lead to a prosperous attractive city with a good quality of life for its residents.
- There needs to be sufficient infrastructure resources (water, sewage, schools, electrical grid, not in designated flood or wildfire areas, etc.) to support the number of new housing units planned and permitted.
- California is at a major turning point with severe drought for years according to climate scientists, wildfires, and a decline in population in the last two years. It's difficult to understand why the State and our politicians haven't strategically reevaluated and reduced RHNA goals.

Net, net the Housing Element must include strategies to work with other California cities to be intentional regarding growth solutions that will augment and enrich neighborhoods, the environment, public health, safety and residents' quality of life.

<https://www.laprogressive.com/take-away-homeownership/>

Why Do Politicians Want to Take Away Home Ownership from Communities of Color?

By Cynthia Davis and Susie Shannon

May 19, 2021



Cynthia Davis and Susie Shannon

In California, politicians and developers are attacking single-family home zoning. Yet they suspiciously ignore that homeownership is a crucial tool for communities of color to build wealth. Politicians should not take that away by banning single-family zoning: people of color will suffer serious consequences.

For years, AIDS Healthcare Foundation and its housing advocacy division, Housing Is a Human Right, have battled the powerful forces that champion a troubling trickle-down housing agenda. The push to ban single-family zoning is born out of that.

Politicians and developers say that by building more pricey, market-rate apartments, eventually rent prices will drop with the increase of more rental housing. Therefore, they say, government must loosen land-use zoning that prevents developers from building more apartments. The argument is flawed and self-serving.

The trickle-down housing strategy has left behind moderate- and lower-income residents. They can't afford market-rate units, and they are suffering most during the housing affordability crisis. It has also fueled gentrification in working-class communities of color, where new, over-priced apartments are often constructed.

But the trickle-down housing agenda does help developers and corporate landlords generate billions in revenue by charging wildly inflated rents. And since the real estate industry shells out millions in campaign contributions, it wields great influence over politicians.

The housing justice movement has strongly opposed trickle-down housing. In California, for example, activists stopped two state bills, SB 827 and SB 50, that would have implemented trickle-down housing. And we're now fighting new legislation: SB 9 and SB 10, which again pushes trickle-down housing solutions.

We rightly argued that this legislation would fuel gentrification — and did virtually nothing to help moderate- and lower-income residents who urgently need affordable housing.

The real estate industry and politicians understood they needed a new political argument against the housing justice movement to push through trickle-down housing. What did they come up with? A false narrative that single-family zoning is racist. It's based on the horrible history of red-lining that segregated neighborhoods, but it's another argument that's obviously self-serving — and ignores the harm of gentrification and the value of homeownership for communities of color.

A [2013 study by researchers at Harvard University's Joint Center for Housing Studies](#) lays out several valuable points about homeownership for people of color. First, in real-life practice, homeowners are more likely to accumulate wealth than renters. Also, homeownership has meaningful social benefits in which people have control over one's living situation, can put down roots in a community, and people feel a sense of success when owning a home. And, the Harvard researchers noted, policymakers should help people succeed as homeowners.

Banning single-family zoning does nothing to achieve those goals. In fact, it's quite the opposite.

Ending single-family zoning invites predatory developers into working-class communities of color, where properties may be less expensive. Those developers will then construct over-priced apartments, luring more affluent individuals into the neighborhood. Longtime, less affluent residents will then be forced out due to gentrification — they can't afford rising rents.

In addition, demolishing large swaths of single-family housing for apartments will harm renters' ability to become homeowners and build wealth since less single-family housing stock will be available.

Perhaps even most alarming, the aggressive push by politicians and the real estate industry to turn individuals, especially people of color, into permanent renters will create a massive transfer of wealth — and with that political power — that benefits those who will own the apartments: corporate landlords and other major real estate companies.

If anything, politicians should come up with policies that help more people of color enter into homeownership — not subject more people of color to the predatory practices of developers. We need to improve troubling economic disparities, not worsen them.

Marin leaders prepare for housing policy crunch time

(Sherry LaVars/Marin Independent Journal)

By [Natalie Hanson](#) | nhanson@marinij.com |

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Marin's cities and towns are preparing to update key housing policies as a historic housing crisis looms.

Local governments must submit a draft housing element in June and have the document complete by January 2023. The process is expected to pit old pressures to curtail growth against increasing demands to shelter growing numbers of people unable to find a home.

Community leaders say they will move forward this month under the assumption they will have to identify the required number of residences according to numbers prescribed by the state, even as appeal hearings with communities challenging their assignments are [scheduled with Association of Bay Area Governments through October](#). Most Marin [communities filed appeals](#) to the state's housing mandates, citing strained resources.

"It's very difficult to have an entirely suburban, bordering on rural in some places, county, that is part of a bigger urban metropolitan area and be in stuck in the same system," Larkspur City Manager Dan Schwarz said.

"It's not good public policy for us to (create many) units in areas that have to cope with those dangers," he said. "If things play out that we need to accommodate so many more units, then we have to have a discussion with the community about, how do we bring in this level of housing in a way that meshes with our community character?"

Residences stand along the water's edge in Mill Valley on Tuesday, Sept. 7, 2021. (Alan Dep/Marin Independent Journal)

Last week, the Larkspur City Council approved contracts to lead public outreach and appointed a steering committee, although outreach sessions are not set until after the city's ABAG appeal hearing in October. Mill Valley will begin housing element workshops next week. Fairfax has already held a workshop hosted by the town's affordable housing committee and will hold a joint Planning Commission and Town Council meeting Sept. 22.

Fairfax Planning and Building Services Director Ben Berto said, "There's been widespread support for affordable housing in the discussion we've had so far. We're focusing on what is called a 'missing middle' housing strategy."

Berto wasn't specific about that strategy, but said it recognizes the changing needs of homeowners, creating options such as duplexes, small complexes of multiple-unit housing and adding infill in residential neighborhoods "where appropriate."

"We're definitely committed to providing housing, it's just a question of what level and what circumstances. We need to make sure it's safe and appropriate for the town."

San Anselmo Planning Director Elise Semonian said the town is limited on resources and no workshops are scheduled. She expects the Planning Commission and Town Council to consider an ordinance to require a percentage of residences in development projects to be affordable and to consider design and development standards for multifamily housing before the end of the year.

"The town has already zoned all non-open-space land to allow housing and we have sites available for over 1,200 housing units and 9,100 accessory dwelling units," Semonian said. "Our challenge will be finding ways to encourage development of affordable housing units, as half of our draft (Regional Housing Needs Allocation) of 833 units is in the low income category."

Ross Planning and Building Director Patrick Streeter said workshops will begin in October no matter the outcome of the appeal to ABAG. He said Ross, being highly developed with a market dominated by high cost, single-family homes, has to engage people "who do work around here who are interested in living here but right now don't have that opportunity."

"We want to do our part, but we want to make sure it's realistic," he said.

In Marin, only San Rafael and Novato did not appeal the state allocations. San Rafael Community Development Director Alicia Giudice said the city is also adjusting to new state bills on housing. For example, Senate Bill 9, which would allow multiple residences in single-family zoned areas of up to four homes, requires consideration by all jurisdictions if approved by Gov. Gavin Newsom. Incorporating AB 686, designed to affirmatively further fair housing, is also a key concern.

The city has made an offer to a housing program manager to begin work in October, alongside contracted consultant Barry Miller, to open community workshops in October, December and the spring. Miller said the city accounted for the expected housing increases in General Plan 2040's environmental impact report alongside the Downtown Precise Plan, with a focus on developing in downtown "as opposed to putting it in neighborhoods and open space areas."

Cause for slow growth

Marin continues to be a difficult place to afford to live. Home values rose 17% in the last year to historic highs, with August's median price [at \\$1.8 million](#). The average cost for a two-bedroom rental varies by housing type and location, but Marin remains [one of the most expensive counties in California](#) to rent a home. According to the 2021 [National Low Income Housing Coalition's "Out of Reach" study](#), Marin tenants must make \$68.33 an hour, or \$142,120 annually, to rent a modest two-bedroom home estimated to cost \$3,553 a month.

Still, longstanding pushback against growth continues across Marin, particularly as the state's demand to build increases.

“Sacramento really can't plan your city. They don't know your community,” said Grace Geraghty, executive director of Responsible Growth Marin. The organization promotes the use of infill and vacant commercial spaces and encourages cities to increase affordable home percentage requirements and the costs of developer in-lieu fees.

“I don't think disrupting single-family home policy or neighborhoods is the answer,” said Susan Coleman, a board member at the organization. She advocated for “missing middle” housing, such as small homes for seniors selling their larger houses, and young families.

“A combination of new options across the board from owned homes to rental properties is needed to integrate market rate, affordable, low income and senior housing,” she said.

Geraghty argued that building proposals should go before all local groups, such as schools and neighborhood committees, to consider long-term impacts, especially on water and land.

“We do not believe that allowing the market to take care of what size building on what size lot will lead to a prosperous attractive city with a good quality of life for its residents,” she said. “There needs to be sufficient infrastructure resources ... to support the number of new housing units planned and permitted.”

Pushing for equity

Other groups have called for relief from old policies fostering wage and racial discrimination. Historically segregated areas in the county continue to face [high rates of poverty and overcrowding unevenly affecting](#) the county's Black and Latino residents.

Omar Carrera, executive director of Canal Alliance in San Rafael, said affordable housing for Marin's workforce should come first.

“We are expecting the private sector to fix the housing problems we have. I think that is very idealistic,” he said. “I think we do need to prioritize housing for low-income families.”

Caroline Peattie of Fair Housing Advocates of Northern California said she was disappointed that so many Marin jurisdictions appealed increased requirements for building new housing.

“If you look at the history of segregation in this country, and you look at segregated living patterns and the way it looks today, I think it makes total sense that there be additional requirements like those on Marin County, to make up for some of those inequities,” she said.

“I understand there are issues related to the drought and related to the lack of water,” Peattie said. “However, I think the time is past where you can say, oh, we've got the environmental concerns and therefore we can't deal with it. We also know that [climate change is impacting Black and brown people disproportionately.](#)”

She added that cities must discuss how many mandated homes built will be affordable, especially for very low and extremely low income people, “making sure it’s not so expensive that it pushes everybody out.”

Peattie said she hopes to see those discussions at housing element workshops, with conversations about racial equity on an ongoing basis, to “put our money where our mouth is” on working toward racial and income equity.

“Rather than thinking about all the barriers to building affordable housing, and coming up with reasons why the jurisdiction can’t build, it would be, I think, far more fruitful to see how it can be done,” Peattie said.