

Appendix A: Fair Housing Analysis

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A. Overview

In 2017, the Governor signed Assembly Bill 686, adding a requirement that local housing elements address each community's obligation to "affirmatively further fair housing." AB 686 defined this as:

"...taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."

In April 2021, the California Department of Housing and Community Development issued its formal guidance memo on how local governments should address this new requirement in their housing elements. The guidance memo indicates the ways in which the AFFH mandate affects outreach and community engagement, data collection and analysis, the site inventory, identification and prioritization of "contributing factors," and the goals, policies, and programs of the housing element. It also includes data sources and other resources for local governments.

Chart A-1 summarizes the AFFH mandate; the requirements are extensive. As a result, the City of San Rafael has provided this appendix to address the mandatory components rather than including this information in the body of the Housing Element. The findings of this assessment have informed the policies and programs in the Housing Element and cross-references are provided as appropriate.

B. Analysis Requirements and Sources

The remainder of this report provides the data that is generally referred to as the Fair Housing analysis. This includes trends and patterns related to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity (including persons with disabilities), and disproportionate housing needs. The analysis must address patterns at a regional and local level and patterns over time. It also must compare the locality at a county level or even broader regional level (where appropriate) for the purposes of promoting more inclusive communities.

**Chart A-1:
Summary of AB 686 Requirements**



Source: HCD, April 2021

The City used a variety of data sources for the assessment of fair housing at the regional and local level. These include:

- Housing Needs Data Packets prepared by the Association of Bay Area Governments (ABAG), which rely on 2015-2019 American Community Survey (ACS) data by the U.S. Census Bureau for most characteristics.
 - Note: The ABAG Data Packets also referenced the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports (based on the 2013-2017 ACS)
- U.S. Census Bureau's Decennial Census (referred to as "Census") and American Community Survey (ACS)
- Marin County Analysis of Impediments to Fair Housing Choice in January 2020 (2020 AI).
- Local Knowledge

Some of these sources provide data on the same topic, but because of different methodologies or base years, the resulting data differ. For example, the decennial census and ACS report slightly different estimates for the total population, number of households, number of housing units, and household size. This is in part because ACS provides estimates based on a small survey of the population taken over the course of the whole year.¹ Because of the survey size and seasonal population shifts, some information provided by the ACS is less reliable. For this reason, the readers should keep in mind the potential for data errors when drawing conclusions based on the ACS data used in this chapter. The information is included because it provides an indication of possible trends. The analysis makes comparisons between data from the same source during the same time periods, using the ABAG Data Package as the first source since ABAG has provided data at different geographical levels for the required comparisons. As such, even though more recent ACS data may be available, 2015-2019 ACS reports are cited more frequently (and 2013-2017 for CHAS data).

The City also used findings and data in the 2020 Marin County Analysis of Impediments to Fair Housing Choice (2020 AI) to supplement its local knowledge discussions as it includes a variety of locally gathered and available information, such as surveys, local history and events that have affected or are affecting fair housing choice. In addition, the California Department of Housing and Urban Development (HCD) has developed a statewide AFFH Data Viewer. The AFFH Data Viewer consists of map data layers from various data sources and provides options for addressing each of the components within the full scope of the assessment of fair housing. The data source and time frame used in the AFFH mapping tools may differ from the ACS data in the ABAG package. The City tried to the best of its ability to ensure comparisons between the same time frames but in some instances, comparisons may have been made for different time frames (often different by one year). As explained earlier, the assessment is most useful in providing an indication of possible trends.

¹ The American Community Survey is sent to approximately 250,000 addresses in the United States monthly (or 3 million per year). It regularly gathers information previously contained only in the long form of the decennial census. This information is then averaged to create an estimate reflecting a 1- or 5-year reporting period (referred to as a "5-year estimate"). 5-year estimates have a smaller margin of error than the 1-year estimates due to the longer reporting period and are used throughout the AFFH. The 5-year period is 2015-2019 (Jan 1 2015 through Dec 31 2019).

For clarity, this analysis will refer to various sections of the County as North Marin, West Marin, Central Marin, and Southern Marin. San Rafael is part of Central Marin. These designations are shown in **Figure A-1** and include the following communities and jurisdictions:

- North Marin: Black Point-Green Point, Novato, Lucas Valley-Marinwood
- West Marin: Dillon Beach, Tomales, Inverness, Point Reyes Station, Nicasio, Lagunitas-Forest Knolls, San Geronimo, Woodacre, Bolinas, Stinson Beach, Muir Beach
- Central Marin: Sleepy Hollow, Fairfax, San Anselmo, Ross, Santa Venetia, San Rafael, Kentfield, Larkspur, Corte Madera
- Southern Marin: Mill Valley, Tiburon, Strawberry, Tamalpais-Homestead Valley, Marin City, Belvedere, Sausalito

C. Fair Housing Outreach and Enforcement

C.1 Overview

The City of San Rafael works in partnership with Fair Housing Advocates of Northern California, (FHANC), a non-profit agency whose mission is to actively support and promote fair housing through education and advocacy. FHANC is the only HUD-certified Housing Counseling Agency in Marin County, as well the only fair housing agency with a testing program in the county. They provide fair housing services, including fair housing counseling, complaint investigation, and discrimination complaint assistance to San Rafael's homeowners and renters. FHANC's service area includes Marin County as well as Sonoma County (except Petaluma), and the cities of Fairfield and Vallejo in Solano County.

FHANC also provides fair housing workshops in English and Spanish. Workshops educate tenants on fair housing laws and include information on discriminatory practices, protections for immigrants, people with disabilities and families with children, occupancy standards, and landlord-tenant laws. FHANC also provides educational workshops on home buying and affordable homeownership and hosts an annual fair housing conference in Marin County.

Fair Housing Advocates of Northern California (FHANC) provides free services to residents protected under federal and state fair housing laws. FHANC helps people address discrimination they have experienced, increasing housing access and opportunity through advocacy as well as requiring housing providers to make changes in discriminatory policies. FHANC provides the following services:

- (1) Housing counseling for individual tenants and homeowners;
- (2) Mediations and case investigations;
- (3) Referral of and representation in complaints to state and federal enforcement agencies;
- (4) Intervention for people with disabilities requesting reasonable accommodations and modifications;
- (5) Fair housing training seminars for housing providers, community organizations, and interested individuals;
- (6) Systemic discrimination investigations;

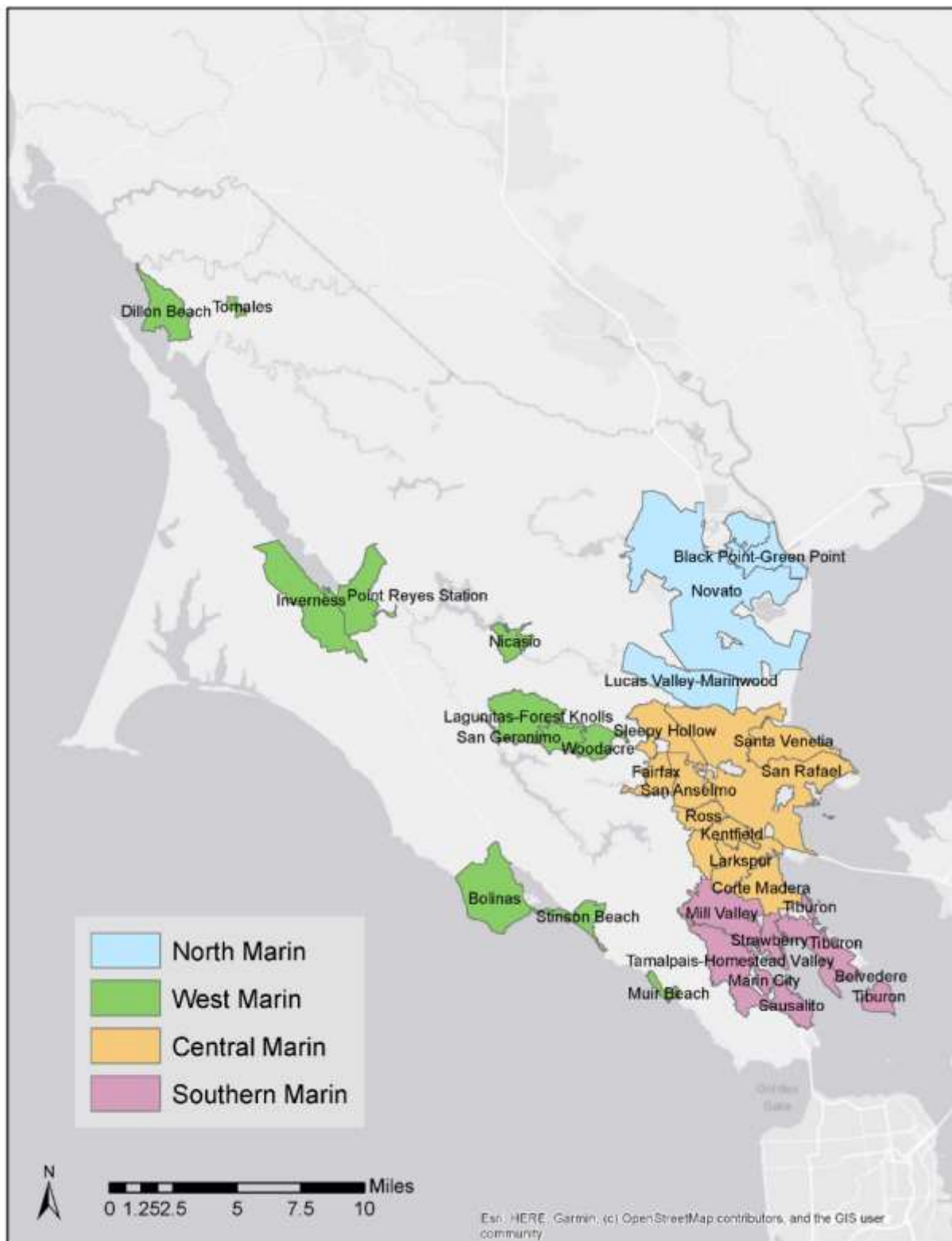


Figure A-1: Marin County Communities

- (7) Monitoring Craigslist for discriminatory advertising;
- (8) Education and outreach activities to members of protected classes on fair housing laws;
- (9) Affirmatively Furthering Fair Housing (AFFH) training and activities to promote fair housing for local jurisdictions and county programs;
- (10) Pre-purchase counseling/education for people in protected classes who may be victims of predatory lending; and
- (11) Foreclosure prevention.

C.2 Fair Housing Enforcement Capacity

C.2.1 Regional Trends

The City of San Rafael and FHANC work collaboratively to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. Data on fair housing enforcement and discrimination is available through the 2020 AI for Marin County. The data reflects discrimination complaints from in-place and prospective tenants, which are filed with FHANC, the Department of Housing and Urban Development (HUD), or the Department of Fair Employment and Housing (DFEH).

As indicated in Table A-1, a total of 301 housing discrimination complaints were filed with FHANC from 2020 to 2021 and 14 were filed with HUD from 2018 to 2019. Table A-1 indicates complaints by protected classes; the data is for all of Marin County, including San Rafael, the other 10 cities, and the unincorporated area. A majority of complaints, including 78 percent of complaints filed with FHANC and 57 percent of complaints filed with HUD, were related to disability status. This finding is consistent with federal and state trends. According to the 2020 State AI, 51 percent of housing-related complaints filed with DFEH between 2015 and 2019 were filed under disability claims, making disability the most common basis for a complaint.

Table A-1 Discrimination Complaints by Protected Class – Marin County, 2018-2021

Protected Class	FHANC (2020-21)(*)		HUD/ DFEH (2018-19)	
	Complaints	Percent of total	Complaints	Percent of total
Disability	235	78%	8	57%
National Origin	38	13%	4	29%
Race	22	7%	3	21%
Gender	19	6%	2	14%
Familial Status	13	4%	1	7%
Source of Income	28	9%	--	--
Total	301	100%	14	100%

Sources: Marin County Analysis of Impediments to Fair Housing, 2020; Fair Housing Advocates of Northern California (FHANC), 2020-21.

(*) Note: Numbers in columns sum to larger numbers than the "total" as some complaints are from members in multiple protected classes. In addition to the FHANC totals shown here, there were also 4 complaints on the basis of age, 3 on the basis of sex, 2 on the basis of color, 1 on the basis of sexual orientation, and 1 on the basis of marital status.

Historically, FHANC's fair housing services have been especially beneficial to Latinos, African-Americans, people with disabilities, immigrants, families with children, female-headed households (including survivors of domestic violence and sexual harassment), and senior citizens. Approximately 90 percent of clients are low-income. FHANC's education services are also available to members of the housing, lending, and advertising industry. Providing industry professionals with information about their fair housing responsibilities is another means by which FHANC decreases incidences of discrimination and helps to protect the rights of members of protected classes.

FHANC also provides assistance to client requests for reasonable accommodation, which is defined as "a change or modification to a housing rule, policy, practice, or service that will allow a qualified tenant or applicant with a disability to participate fully in a housing program or to use and enjoy a dwelling, including public and common spaces." The 2020 AI reported that FHANC requested 35 reasonable accommodations for clients with disabilities between 2018 and 2019, 33 of which were approved. City staff also advises clients on reasonable accommodations requests. FHANC also provides funding for the Marin Center for Independent Living (MCIL). Since 2017, FHANC has provided funding for 13 MCIL modifications.

From 2017 to 2018, FHANC:

- served 1,657 clients (tenants, homeowners, social service providers, and advocates) countywide, a 22 percent increase from the previous year
- provided counseling on 592 fair housing cases (a 26 percent increase)
- intervened for 89 reasonable accommodations granted (a 33 percent increase)
- funded eight (8) reasonable modification requests to improve accessibility for people with disabilities
- investigated 71 rental properties for discriminatory practices
- filed 15 administrative fair housing complaints (a 15 percent increase) and one (1) lawsuit
- garnered \$71,140 in settlements for clients and the agency
- counseled 71 distressed homeowners
- assisted homeowners in acquiring \$228,197 through Keep Your Home California programs to prevent foreclosure.

During Fiscal Year 2018 to 2019, FHANC counseled 393 tenants and homeowners in Marin County, screening clients for fair housing issues and providing referrals for non-fair housing clients or callers out of FHAM's service area. Of the households counseled, 211 alleged discrimination and were referred to an attorney or bilingual housing counselor for further assistance. This assistance included providing information on fair housing laws, interventions with housing providers requesting relief from discriminatory behavior, making reasonable accommodation requests on behalf of disabled tenants, and providing referrals to HUD/DFEH and representation in administrative complaints.

C.2.2 Local Trends

Table A-2 provides data on fair housing enforcement at the local level. FHANC received 406 FHANC received 406 housing discrimination complaints from San Rafael residents from 2017 to 2021. More than half of these (56.1 percent) were related to disability status. Other complaints related to national origin (13.6 percent), race (8.6 percent), gender (6 percent), and familial status (5.7 percent). Of the 406 complaints filed during this period, 512 discriminatory practices were cited, including reasonable accommodation (40.8 percent), different terms and conditions (16.2 percent), refusal to rent/sale (9.4 percent), and harassment (7.4 percent).

The HCD Data Viewer records HUD fair housing inquiries. Fair housing inquiries are not official fair housing cases but can be used to identify concerns about possible discrimination. According to 2013-2021 HUD data, there were 0.49 inquiries per 1,000 persons in San Rafael. The fair housing inquiry rate in the City is higher than the neighboring cities of Fairfax, San Anselmo, and Ross, but comparable to Corte Madera and Mill Valley. There were 30 total inquiries from San Rafael residents during this period: 11 on the basis of disability status, two on the basis of race, one on the basis of familial status, and 16 unrelated to a specific protected class. Of the inquiries filed, 18 failed to respond and 11 were found to have no valid issue.

Table A-2 Discrimination Complaints by Protected Class – San Rafael, 2017-2021

	2017	2018	2019	2020	2021	Total	% of Total
Disability	61.2%	49.0%	56.7%	58.3%	59.3%	288	56.1%
National Origin	10.1%	15.4%	18.6%	11.9%	11.9%	70	13.6%
Race	11.6%	11.9%	7.2%	4.8%	1.7%	44	8.6%
Gender	6.2%	2.8%	5.2%	9.5%	10.2%	31	6.0%
Familial Status	4.7%	9.8%	4.1%	3.6%	3.4%	29	5.7%
Source of Income	0.8%	3.5%	2.1%	8.3%	8.5%	20	3.9%
Sex	0.8%	2.8%	1.0%	1.2%	--	7	1.4%
Religion	0.8%	2.8%	--	--	--	6	1.2%
Sexual Orientation	1.6%	0.7%	1.0%	--	1.7%	5	1.0%
Age	0.8%	0.7%	1.0%	--	1.7%	4	0.8%
Marital Status	1.6%	--	1.0%	--	--	3	0.6%
Color	--	--	--	1.2%	1.7%	2	0.4%
Gender Identity	--	--	1.0%	1.2%	--	2	0.4%
Gender Expression	--	0.7%	--	--	--	1	0.2%
Arbitrary	--	--	1.0%	--	--	1	0.2%
Total Complaints	101	112	83	68	42	406	--
Total Bases	129	143	97	84	59	513	100.0%

Sources: Fair Housing Advocates of Northern California (FHANC), 2020-21.

C.3 Fair Housing Testing

Initiated by the Department of Justice's Civil Rights Division in 1991, fair housing testing involves the use of an individual or individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, state, and federal fair housing laws.

C.3.1 Regional Trends

During the 2018-2019 FY, FHANC conducted email testing, in-person site, and phone testing for the County. FHANC conducted 60 email tests to "test the assumption of what ethnicity or race the average person would associate with each of the names proposed." Email testing showed clear differential treatment favoring the White tester in 27 percent of tests, discrimination based on income in 63 percent of tests, and discrimination based on familial status in 7 percent of tests. Three paired tests (6 tests total) also showed discrimination based on both race and source of income. In 80 percent of tests (24 of 30 paired tests), there was some discrepancy or disadvantage for African American testers and/or testers receiving Housing Choice Vouchers (HCVs).²

In-person site and phone tests consisted of an African American tester and a White tester. Of the 10 paired in-person site and phone tests conducted, 50 percent showed differential treatment favoring the White tester, 60 percent showed discrepancies in treatment for HCV recipients, and 30 percent showed discrimination on the basis of race and source of income.

The conclusions of the fair housing tests included in the 2020 AI are as follows:

- Housing providers make exceptions for White Housing Choice Voucher recipients, particularly in high opportunity areas with low poverty.
- Email testing revealed significant evidence of discrimination, with 27% of tests showing clear differential treatment favoring the White tester and 63% of tests showing at least some level of discrimination based upon source of income.
- Phone/site testing also revealed significant instances of discrimination: 50% of discrimination based upon race and 60% based on source of income.

In Fiscal Year 2018 to 2019, Fair Housing Advocates of Northern California (FHANC) conducted systemic race discrimination investigations as well as complaint-based testing, with testing for race, national origin, disability, gender, and familial status discrimination. FHANC monitored Craigslist for discriminatory advertising, with the additional recently added protection for individuals using housing subsidies in unincorporated parts of Marin. FHANC notified 77 housing providers in Marin during the year regarding discriminatory language in their advertisements.

² The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting very low-income families, the elderly, and persons with disabilities to afford decent, safe, and sanitary housing in the private market. Participants are free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. Participants issued a housing voucher are responsible for finding a suitable housing unit of their choice where the owner agrees to rent under the program. A housing subsidy is paid to the landlord directly by the local Public Housing Agency (PHA) on behalf of the participant. The participant pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. State law prohibits housing providers, such as landlords, from refusing to rent to someone, or otherwise discriminate against them, because they have a housing subsidy, such as a Housing Choice Voucher, that helps them to afford their rent.

The 2020 State AI did not report any findings on fair housing testing. However, the AI concluded that community awareness of fair housing protections correlates with fair housing testing as testing is often complaint-based, like it is for FHANC in Marin County. According to the 2020 State AI, research indicates that persons with disabilities are more likely to request differential treatment to ensure equal access to housing, making them more likely to identify discrimination. The 2020 State AI highlighted the need for continued fair housing outreach, fair housing testing, and trainings to communities across California, to ensure the fair housing rights of residents are protected under federal and state law. The 2020 State AI recommended that the state support the increase of fair housing testing to identify housing discrimination.

The 2020 State AI also reported findings from the 2020 Community Needs Assessment Survey. Respondents felt that the primary bases for housing discrimination were source of income, followed by discriminatory landlord practices, and gender identity and familial status. These results differ from the most commonly cited reason for discrimination in complaints filed with DFEH and FHANC. The State survey also found that most (72 percent) respondents who had felt discriminated against did “nothing” in response. According to the 2020 State AI, “fair housing education and enforcement through the complaint process are areas of opportunity to help ensure that those experiencing discrimination know when and how to seek help.”

C.3.2 Local Trends

While COVID-19 affected the extent of testing and in-person counseling in 2020 and 2021, Fair Housing of Northern California continued to provide counseling and education to over 2,900 tenants, homeowners, homebuyers, housing providers, children, and advocates. Of the clients FHANC assisted in 2020-2021, 94% were extremely low, very low or low income; 27% were Latinx, 13% of whom spoke no English; and 20% identified as Black or African American. Relative to the other areas in FHANC’s service area (Sonoma Co, Fairfield, Vallejo), Marin County had higher rates of complaints related to disability and fewer related to race.

The majority of the cases handled were fair housing rental cases, followed by reasonable accommodation requests. Complaints subject to Federal Protections included:

- 285 related to disability
- 63 related to race discrimination
- 47 related to national origin discrimination
- 24 related to gender discrimination
- 25 related to familial status discrimination
- 5 related to religious discrimination
- 3 related to color discrimination

The number of complaints received that fell under State Protections included:

- 5 related to age discrimination
- 39 related to source of income discrimination
- 2 related to marital status discrimination
- 3 related to sexual orientation discrimination
- 2 related to arbitrary discrimination

C.4 Fair Housing Education and Outreach

C.4.1 Regional Trends

As stated earlier, the 2020 State AI concluded that fair housing outreach and education is imperative to ensure that those experiencing discrimination know when and how to seek help. FHANC organizes an annual fair housing conference and resource fair for housing providers and advocates. Housing rights workshops are offered to landlords, property managers, and community members. Information on federal and state fair housing laws, common forms of housing discrimination, protected characteristics, unlawful practices, and fair housing liability is presented to workshop participants.

The Marin County Housing Authority (Marin Housing) website includes information in 103 languages on the following:

- Public Housing, including reasonable accommodations, grievance procedures, transfer policies, fraud and abuse, resident newsletters, forms and other resources;
- Housing Choice Vouchers, including information for landlords and tenants, fraud and abuse, and voucher payment standards;
- Waitlist information and updates;
- Resident Services, including the Supportive Housing Program and Resident Advisory Board;
- Homeownership opportunities, including the Below Market Rate Homeownership Program, Residential Rehab Loan Program, Mortgage Credit Certification Program and Section 8 Homeownership Program;
- Announcements and news articles
- Agency reports and calendar of events

The County of Marin established a Fair Housing Community Advisory Group in 2016, including representatives from the City of San Rafael and San Rafael-based housing advocates. This Group provides advice and feedback on citizen engagement and communication strategies, participates in discussions on fair housing topics, identifies fair housing issues and contributing factors, and assists in developing solutions to fair housing issues. The County also established a Fair Housing Steering Committee consisting of 20 members representing public housing, faith-based organizations, the Marin County Housing Authority, Asian communities, cities and towns, African American communities, business, persons with disabilities, children, legal aid, persons experiencing homelessness, Latino communities, and philanthropy. The Committee advises on citizen engagement strategies, identifies factors contributing to fair housing impediments, incorporates community input and feedback, and provides information on a variety of housing topics to inform actions and implementation plans.

From 2017 to 2018, Fair Housing Advocates of Northern California (FHANC) educated 221 prospective homebuyers. It also trained 201 housing providers on fair housing law and practice, a 28 percent increase from the previous fiscal year. From 2017 to 2018, FHANC reached 379 tenants and staff from service agencies through fair housing presentations and 227 community members through fair housing conferences (a 37 percent increase). It distributed 4,185 pieces of literature; had 100 children participate in its annual Fair Housing Poster Contest from 10 local schools and 16 students participate in our first Fair Housing Poetry Contest from 11 local

schools. FHANC also offered storytelling shows about diversity and acceptance to 2,698 children.

As of 2021, FHANC reaches those least likely to apply for services through the following:

- Translating most of its literature into Spanish and some in Vietnamese
- Continuing to advertise all programs/services in all areas of Marin, including the Canal, Novato, and Marin City, areas where Latinx and African-American populations are concentrated
- Maintaining a website with information translated into Spanish and Vietnamese
- Maintaining bilingual staff. As of 2021, FHANC has three bilingual Spanish speakers who offer intake, counseling, education and outreach to monolingual Spanish speakers; in addition, they have one staff member who is bilingual in Mandarin and another in Portuguese.
- Maintaining a TTY/TDD line to assist in communication with clients who are hearing-impaired
- Offering translation services in other languages when needed
- Conducting outreach and fair housing and pre-purchase presentations in English and Spanish
- Collaborating with agencies providing services to all protected classes
- Providing fair housing education to staff and eliciting help to reach vulnerable populations – e.g. Legal Aid of Marin, the Asian Advocacy Project, Canal Alliance, ISOJI, MCIL, Sparkpoint, the District Attorney’s Office, Office of Education, and the Marin Housing Authority.

C.4.2 Local Trends

In 2020, the City entered into a cooperative agreement with the County of Marin to manage the City of San Rafael’s Community Development Block Grant (CDBG) funds. As part of this cooperative agreement, the City allocated \$25,000 to support Fair Housing of Northern California (FHANC) to continue to provide fair housing education and counseling, complaint investigation, and fair housing discrimination complaints. Recommendations for San Rafael are overseen by a Countywide Priority Setting Committee, made up of City Council Members, a County Supervisor and residents who represent members of protected classes from all areas of the County. Examples of CDBG funded projects in San Rafael include the Vivalon Healthy Aging complex, which when completed will provide 66 lower income apartments to older adults as well as a senior wellness center. Other examples include the recent Pickleweed Park play structure in the Canal neighborhood.

D. Integration and Segregation

Examining the spatial distribution of different ethnic and racial groups across a city or region is a useful way to identify potential fair housing concerns as well as housing needs. To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides data on racial or ethnic “dissimilarity.” Dissimilarity indices are used to measure the evenness with which two groups (frequently defined on racial or ethnic characteristics) are distributed across a geographic area. The index ranges from 0 to 100, with 0 denoting no segregation and 100 indicating complete segregation between the two groups. The index score can be understood as the percentage of one of the two groups that would need to move to produce an even distribution of racial/ethnic groups within the specified area. For example, if an index score is 60, that means 60 percent of people in the specified area would need to move to completely eliminate segregation.³

HUD uses the following interval scale for expressing dissimilarity within a region:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

D.1 Race and Ethnicity

D.1.1 Regional Trends

Non-Hispanic Whites make up 71.2 percent of Marin County’s population, a significantly larger share than in the Bay Area as a whole⁴, where only 39 percent of the population is non-Hispanic White. The next largest racial/ethnic group in Marin County is Hispanic/Latino, making up 16 percent of the population. Marin County’s Asian population represents 5.8 percent of the total, a much smaller share than the regional average of 27 percent. Only 2.1 percent of Marin County’s residents identify as Black/ African-American, compared to 5.8 percent in the region as a whole.

Table A-3 indicates racial and ethnic distribution in the Bay Area, Marin County, San Rafael, and several other Marin County cities. San Rafael has a smaller share of Non-Hispanic White residents than neighboring cities, although this group still represents a majority of the city’s population. Non-Hispanic White residents comprise 57 percent of San Rafael’s population, compared to 64 percent in Novato, 78 percent in Larkspur and Corte Madera, and 85 percent in San Anselmo. San Rafael has a substantially larger share of Hispanic/Latino residents than the Bay Area, Marin County and nearby cities. Nearly one in three San Rafael residents is Hispanic/Latino. In San Anselmo and Corte Madera, the figure is about 7 percent and in Larkspur it is 11 percent. Novato has the second highest concentration of Hispanic/Latino residents in the county, at about 19 percent.

³ Massey, D.S. and N.A. Denton. (1993). *American Apartheid: Segregation and the Making of the Underclass*. Cambridge, MA: Harvard University Press.

⁴ The “Bay Area” data covers the members of the Association of Bay Area Governments (ABAG) which are the counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma.

Table A-3 Racial Composition in Neighboring Cities and Marin County

	Bay Area¹	Marin Co	San Rafael	Novato	Corte Madera	Larkspur	San Anselmo
White, non-Hispanic	39.3%	71.2%	57.0%	63.5%	78.5%	77.9%	85.9%
Black or African American, non-Hispanic	5.8%	2.1%	1.3%	3.4%	2.3%	0.7%	0.8%
American Indian and Alaska Native, non-Hispanic	0.2%	0.2%	0.1%	0.2%	0.0%	0.4%	<0.1%
Asian, non-Hispanic ²	26.7%	5.8%	6.6%	7.8%	6.1%	5.4%	3.3%
Native Hawaiian and Other Pacific Islander, non-Hispanic	N/A	0.1%	0.1%	N/A	0.0%	0.1%	N/A
Some other race, non-Hispanic	N/A	0.9%	3.8%	6.2%	1.6%	0.5%	2.9%
Two or more races, non-Hispanic	N/A	3.8%			4.4%	4.0%	
Hispanic or Latino	23.5%	16.0%	31.0%	18.9%	7.1%	11.0%	7.1%
Total	7,710,026	259,943	58,775	55,642	9,838	12,319	12,525

Sources: American Community Survey, 2015-2019 (5-Year Estimates). ABAG Housing Needs Data Package.

1. The "Bay Area" data covers the Association of Bay Area Governments (ABAG) region, which includes the counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma.

2. Asian and Pacific Islander combined; ABAG Data Package presented data with some races combined.

Table A-4: Racial Composition in Neighboring Cities and Marin County

	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	31.63	34.08	35.21	42.61
Black/White	54.90	50.87	45.61	57.17
Hispanic/White	36.38	44.29	44.73	49.97
Asian or Pacific Islander/ White	19.64	20.13	18.55	25.72

Sources: HUD Dissimilarity Index, 2020

As explained above, dissimilarity indices measures segregation, with higher indices signifying higher segregation. Table A-4 shows dissimilarity indices for the county over the last 30 years. In Marin County, all minority (non-White) residents combined are considered moderately segregated from White residents, with an index score of 42.6 in 2020. Since 1990, segregation between non-White (all non-white residents combined) and White residents has increased. Dissimilarity indices between Black, Hispanic, Asian/Pacific Islander, and White residents have also increased since 1990, indicating that Marin County has become increasingly racially segregated. Based on HUD's definition of the index, Black and White residents are highly segregated and Hispanic and White residents are moderately segregated, while segregation between Asian/Pacific Islander and White residents is considered low.

In California as a whole, based on the figures provided in the 2020 State AI, segregation levels between non-White and White populations were moderate in both entitlement and non-entitlement areas.⁵ However, segregation levels in non-entitlement areas are slightly higher with a value of 54.1, compared to 50.1 in entitlement areas. Segregation trends Statewide show an increase in segregation between non-White and White populations between 1990 and 2017 in both entitlement and non-entitlement areas. The 2020 State AI found that California's segregation levels have consistently been most severe between the Black and White populations, a trend paralleled in Marin County. As in Marin County, State trends also show Asian or Pacific Islander and White residents are the least segregated when compared to other racial and ethnic groups, but levels are still increasing.

Figures A-2 and A-3 compare the concentration of minority populations in San Rafael and the adjacent region by census block group⁶ in 2010 and 2018. Since 2010, concentrations of racial/ethnic minority groups have increased in most block groups regionwide. In Marin County, non-White populations are most concentrated along the eastern County boundary, specifically in San Rafael, Novato, and the unincorporated communities of Marin City and San Quentin (where a State Prison is located). Red block groups indicate that over 81 percent of the population in the tract is non-White.

While non-White populations appear to be increasing in Marin County, these groups are concentrated within the areas described above. At the regional level, Marin County and the adjacent counties of Sonoma and Napa have lower concentrations of non-White residents than the counties of Solano, Contra Costa, Alameda, and San Francisco.

⁵ An entitlement area is a unit of government designated to receive HOME program funds from the federal government. These are generally communities with 50,000 or more residents in a metropolitan area.

⁶ Block groups (BGs) are the next level above census blocks in the geographic hierarchy (census blocks are the smallest geographic area for which the Bureau of the Census collects and tabulates decennial census data). A BG is a combination of census blocks that is a subdivision of a census tract or block numbering area (BNA). A county or its statistically equivalent entity contains either census tracts or BNAs; it can not contain both. The BG is the smallest geographic entity for which the decennial census tabulates and publishes sample data.

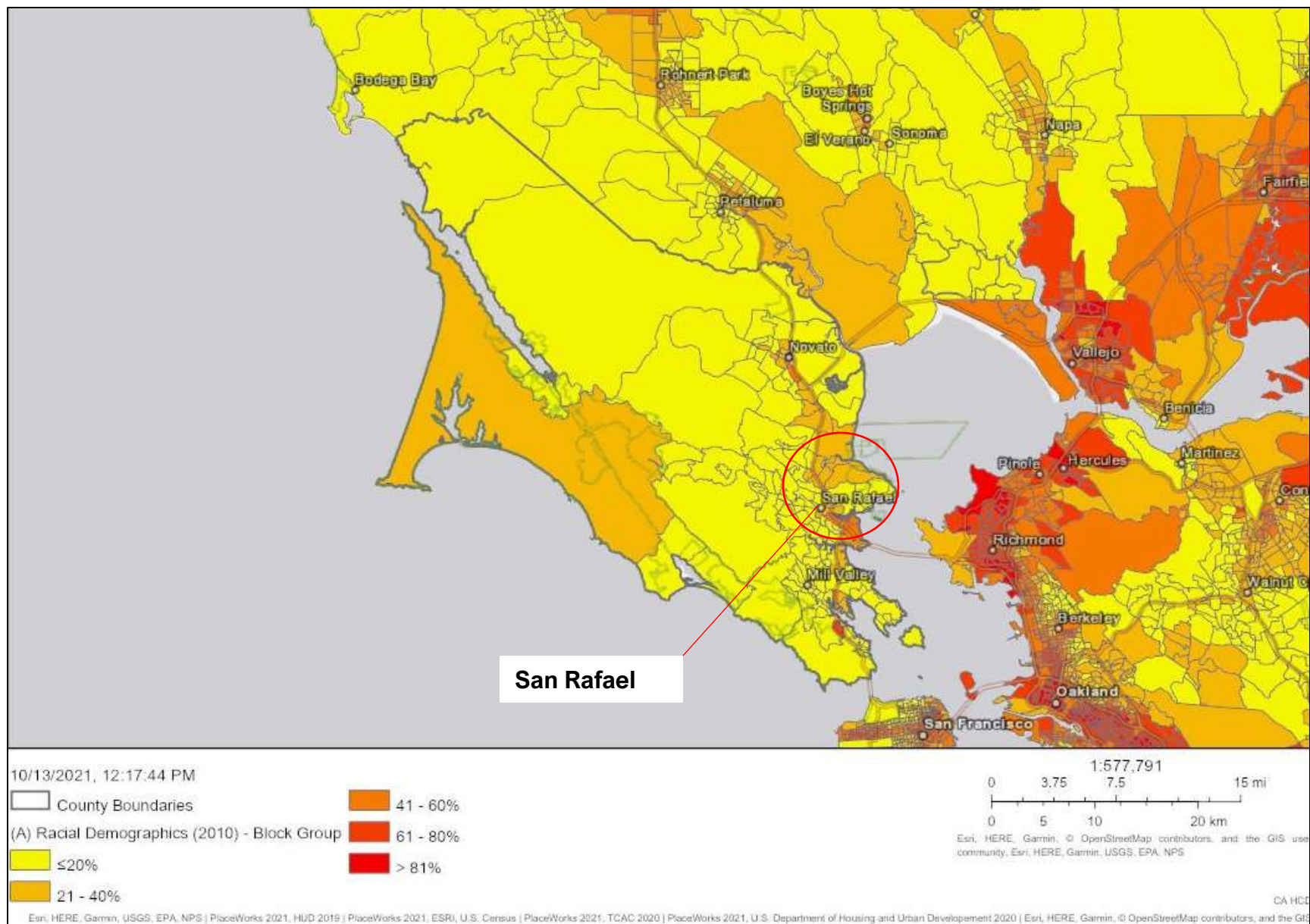


Figure A-2: Percent of Non-White and Hispanic/Latino Residents by Block Group, 2010

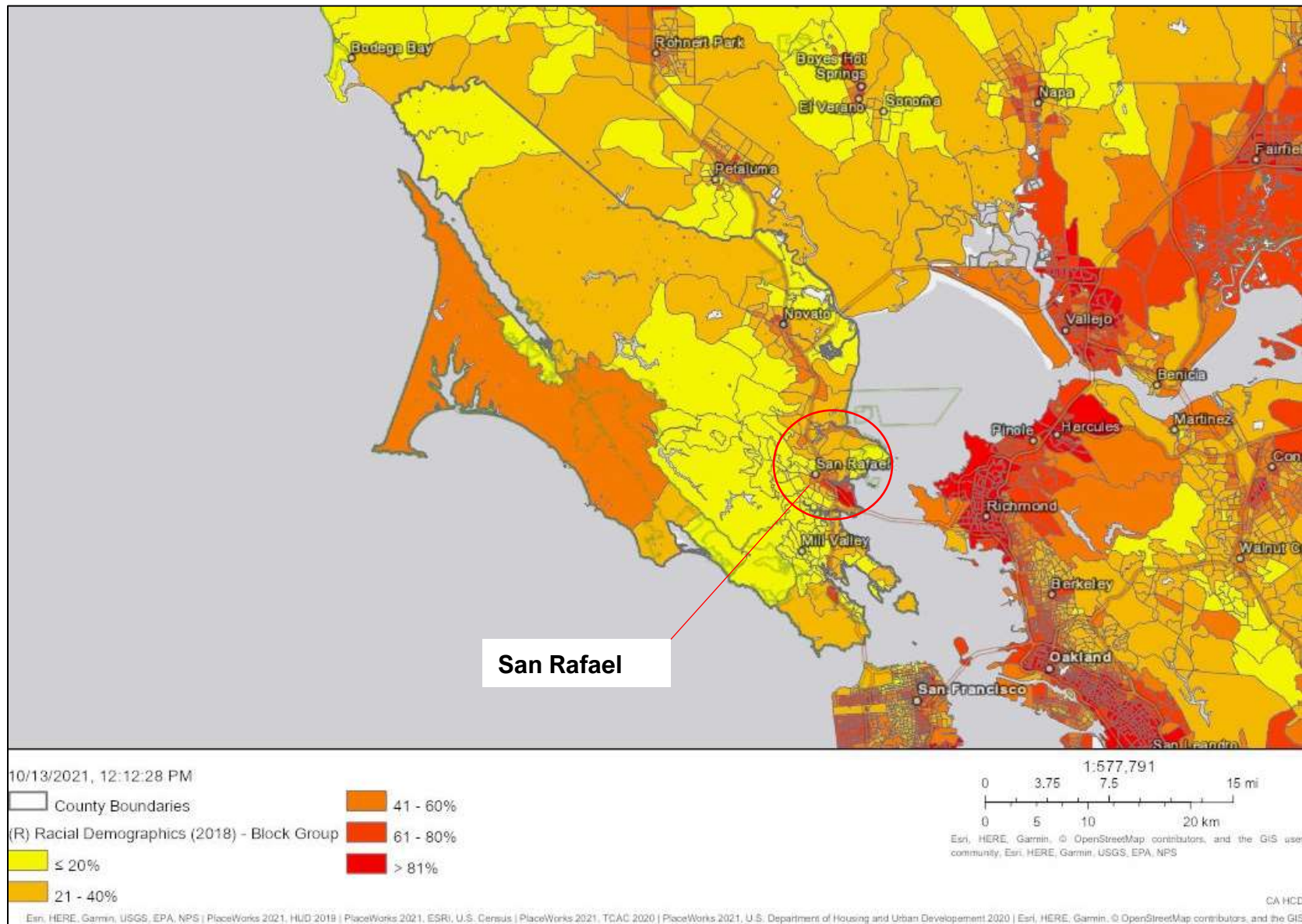


Figure A-3: Percent of Non-White and Hispanic/Latino Residents by Block Group, 2018

There are only four census tracts in Marin County where the non-White population is predominant. Three are located in Central Marin County and one is located in Southern Marin County. Two of the Central Marin County tracts are in San Rafael. One has a Hispanic/Latino population that exceeds 90 percent of the total population and the other has a Hispanic/Latino population exceeding 50 percent (see discussion in next section). The other Central Marin tract is the unincorporated tract containing San Quentin Prison. In Southern Marin, Marin City has a population that is predominantly Hispanic/Latino and Black. However, the Black population has declined from 90 percent in 1990 to about 28 percent today.

The populations in these four tracts represent a disproportionately large share of the County's lower-income population. Hispanic/Latino residents represent about 16 percent of the County population, but 34 percent of Rental Assistance requests, while Black/African American residents represent about two percent of the population, but 8.5 percent of Rental Assistance requests.

D.1.2 Local Trends

San Rafael had a White majority population in 2020 but was transitioning to majority non-White based on trends since 1990. In 2010, the population was 60.9 percent Non-Hispanic White. The 2020 Census reported that the non-Hispanic White population had declined to 51.5 percent of the total.

The data in Table A-5 reflects the 2015-2019 American Community Survey, which indicates that the non-Hispanic White population was 57 percent of the total. The Hispanic/Latino population was 27.7 percent of the total in 2010 and 31% of the population in 2019. The Asian population has increased slightly, while the Black population has declined.

Table A-5: Change in Racial/Ethnic Composition in San Rafael, 2015-2019

	2010		2019	
	Persons	Percent	Persons	Percent
White, non-Hispanic	34,687	60.9%	33,509	57.0%
Black or African American, non-Hispanic	1,568	2.8%	792	1.3%
American Indian and Alaska Native, non-Hispanic	68	0.1%	75	0.1%
Asian, non-Hispanic	3,638	6.4%	3,913	6.7%
Native Hawaiian and Other Pacific Islander, non-Hispanic	138	0.2%	4	0.0%
Some other race, non-Hispanic	48	0.1%	252	0.4%
Two or more races, non-Hispanic	1,024	1.8%	1,988	3.4%
Hispanic or Latino	15,759	27.7%	18,242	31.0%
Total	56,930	100.0%	58,775	100.0%

Sources: 2006-2010 and 2015-2019 ACS (5-Year Estimates)

ABAG provides segregation analyses for Bay Area jurisdictions for the purpose of this AFFH assessment. According to this report, dissimilarity indices in San Rafael are higher than the Bay Area average. However, the White and non-White communities in San Rafael have become less segregated since 2000, and segregation between White and non-White groups citywide is considered low based on HUD's definitions for dissimilarity indices (Table A-6). Segregation between all non-White groups, Asian/Pacific Islander, Black/African American, and Latinx, and the White population have decreased since 2000 according to dissimilarity indices. Using HUD's definition of the index, segregation between Asian/Pacific Islander and Black/African American and White populations is low, while Latinx and White populations are moderately segregated. It is important to note that the Black/African American population in the city is small, therefore dissimilarity index estimates may be inaccurate.

Table A-6: Dissimilarity Indices for San Rafael (2000-2020) and Bay Area (2020)

	San Rafael			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	28.5	22.3	21.8	18.5
Black/African American vs. White	32.8*	27.8*	27.9*	24.4
Latinx vs. White	58.0	52.0	46.2	20.7
People of Color vs. White	46.0	40.7	35.2	16.8

Source: ABAG/MTC AFFH Segregation Report, 2022.

(*) Index based on racial group making up less than 5 percent of jurisdiction population. Estimates may be unreliable.

Figures A-4 and A-5 compare racial/ethnic minority populations by block group in 2010 and 2018. In many San Rafael block groups, the racial/ethnic minority population has increased since 2010. Block in the northeast and western parts of San Rafael, tend to have smaller racial/ethnic minority populations compared to the central and southeast areas of the City. The southeast section of San Rafael has the largest non-White population. Block groups in this area have non-White populations ranging from 70 percent to 94 percent. The block group encompassing the Canal neighborhood has the largest racial/ethnic minority population, at 94.3 percent. All other areas of the city have White majority populations, although early indications from the 2020 Census indicate a block group in Terra Linda also with a growing concentration of Hispanic/Latino residents.

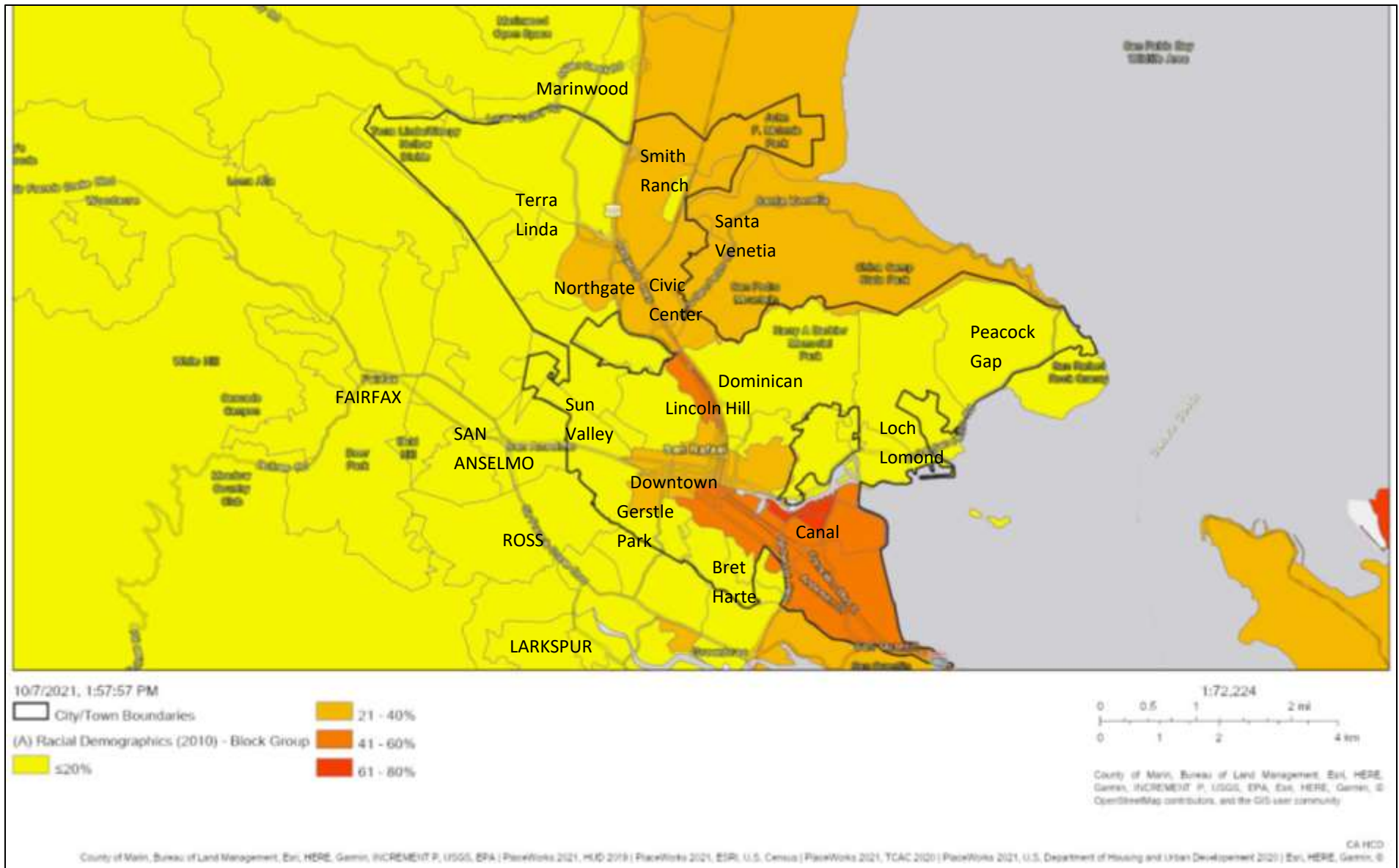


Figure A-4: Percent of Non-White and Hispanic/Latino Residents by Block Group, 2010

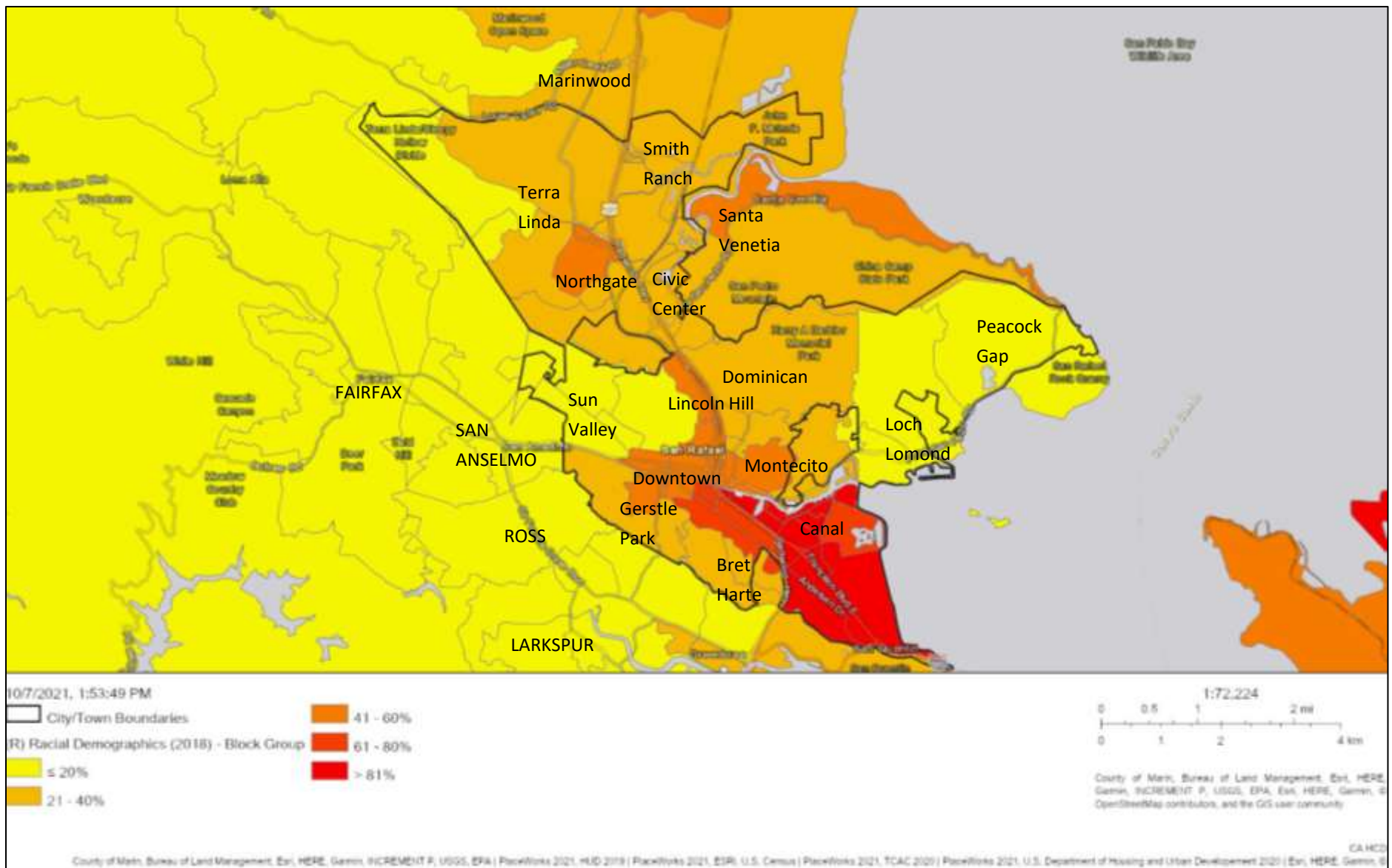


Figure A-5: Percent of Non-White and Hispanic/Latino Residents by Block Group, 2018

D.1.3 Relationship of Sites Inventory to Segregation

As discussed previously, San Rafael is comprised of block groups with variable populations of racial/ethnic minorities. The distribution of units selected to meet the RHNA by racial/ethnic minority population are shown in Figure A-6 and Table A-7 below.

The first column in Table A-7 classifies block groups in San Rafael based on the percentage of non-White residents in the block group. The remaining columns indicate the capacity of housing opportunity sites (mapped in Chapter 4 and listed in Appendix B) located in each category of block group. The table provides an indication of whether housing sites are distributed in a way that increases or decreases segregation. The concentration of lower income units in tracts that are primarily non-White would further segregation while the creation of lower income opportunities in primarily White or racially mixed tracts furthers integration. The table indicates that most units in the city are located in tracts that are racially mixed—60 percent of the housing capacity is in tracts where 40 to 60 percent of the residents are other races. Much of this capacity is associated with Downtown San Rafael and the Northgate areas, which are more diverse than the rest of the city. About half of the city's lower-income capacity is in these two areas. More than a third of the lower-income capacity is in census tracts where non-White residents make up less than 40 percent of the population.

Only 7.6 percent of the city's housing capacity is located in tracts where the non-White population exceeds 60 percent of the population. These sites are located in the Canal neighborhood and are planned for a mix of low, moderate, and above moderate income housing. It is important to note that much of the feedback from Canal community members was that there was an urgent need for more affordable housing in the neighborhood. Thus, the designation of at least a few sites for low and moderate housing is appropriate. Overall, the City's RHNA strategy disperses housing affordable sites across the city, contributing to the deconcentration of poverty and a more inclusive and integrated city.

Table A-7: Distribution of RHNA Units by Racial/Ethnic Minority Concentration

Percent Non-White (block group)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<=20%	101	6.1%	119	19.2%	54	2.2%	274	5.8%
21-40%	520	31.5%	70	11.3%	647	26.8%	1,237	26.4%
41-60%	859	52.1%	396	63.8%	1563	64.7%	2,819	60.2%
61-80%	2	0.1%	0	0.0%	22	0.9%	24	0.5%
>81%	168	10.2%	36	5.8%	128	5.3%	332	7.1%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: ABAG/MTC AFFH Segregation Report, 2022.

(*) Index based on racial group making up less than 5 percent of jurisdiction population. Estimates may be unreliable.

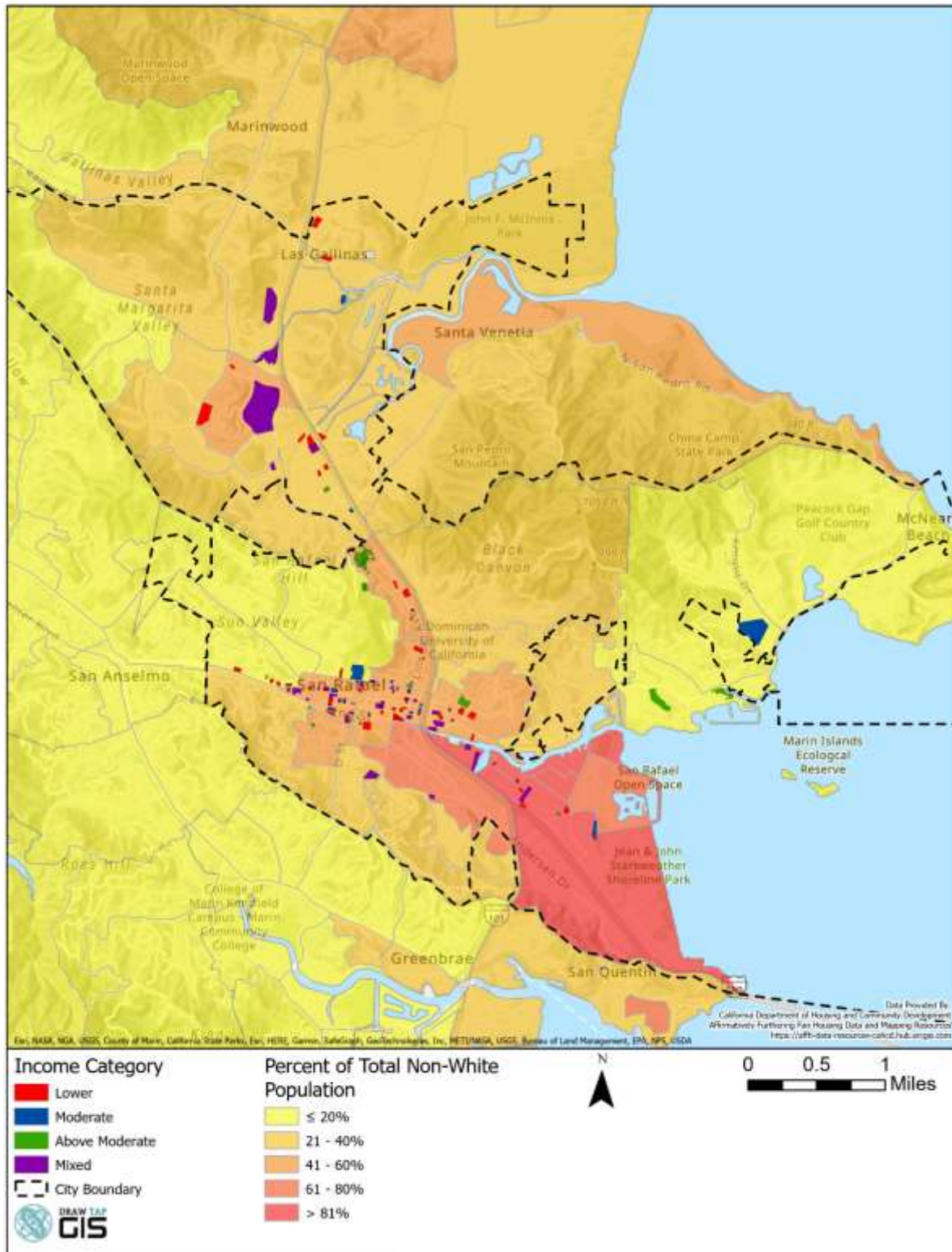


Figure A-6: Distribution of Housing Sites relative to Distribution of Non-White Households

D.2 Persons with Disabilities

Persons with disabilities have special housing needs because of the lack of accessible and affordable housing, and the higher health costs associated with their disability. In addition, many may be on fixed incomes that further limits their housing options. Persons with disabilities also tend to be more susceptible to housing discrimination due to their disability status and required accommodations associated with their disability.

D.2.1 Regional Trends

Marin County's population with a disability⁷ is similarly distributed to that in the Bay Area. As shown in Table A-8, 9.1 percent of Marin County's population has a disability, compared to 9.6 percent in the Bay Area. Black or African American, American Indian and Alaska Native, and non-Hispanic White populations experience disabilities at the highest rates in both the Bay Area and the County (16 percent, 18 percent, and 11 percent in the Bay Area and 15 percent, 12 percent, and 10 percent in Marin County, respectively). Nearly 37 percent of Marin County's population aged 75 and older and 14.6 percent aged 65 to 74 has one or more disability, lower shares than in the Bay Area. Ambulatory and independent living difficulties are the most common disability type in the County and Bay Area.

According to the 2015-2019 ACS, populations of persons with disabilities in Marin County cities are generally consistent, ranging from 7.2 percent in Ross to 10 percent in Novato. Figure A-7 shows that less than 20 percent of the population in all tracts in the County have a disability. Persons with disabilities are generally not concentrated in one area in the region. Figure A-7 also shows that only a few census tracts in the region have a population with a disability that exceeds 20 percent. However, multiple census tracts with a population with disabilities between 15 and 20 percent are concentrated along the Bayshore in Napa and Contra Costa Counties.

D.2.2 Local Trends

According to the 2015-2019 ACS, 8.4 percent of San Rafael residents experience a disability, compared to 9.1 percent countywide (see Table A-9). Disabilities are most common amongst elderly residents aged 75 and older (34.2 percent with a disability), followed by seniors aged 65 to 74 (17.9 percent), and adults aged 35 to 64 (6.1 percent). The most common disabilities in San Rafael are independent living difficulties (4.3 percent) and ambulatory difficulties (4 percent). Ambulatory difficulties, difficulty walking or climbing stairs, and independent living difficulties are typically most common amongst older adults. The population of persons with disabilities has decreased from 9.6 percent during the 2008-2012 ACS. Though the proportion of persons with disabilities has decreased in the city, the older adult (65+) population in San Rafael grew from 15.8 percent to 19.3 percent during the same period.

Figure A-8 shows the population of persons with disabilities by San Rafael census tract based on the 2015-2019 ACS. All tracts in the city have populations of persons with disabilities below 20 percent. In most tracts, fewer than 10 percent of the population experiences a disability.

⁷ The American Community Survey asks about six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Respondents who report anyone of the six disability types are considered to have a disability. For more information visit: <https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html#:~:text=Physical%20Disability%20Conditions%20that%20substantially,reach%20lifting%2C%20or%20carrying.>

Table A-8: Population of Persons with Disabilities, Bay Area and Marin County, 2019

	Bay Area Percent with a Disability	Marin County Percent with a Disability
Civilian non-institutionalized population	9.6%	9.1%
Race/Ethnicity		
Black or African American alone	15.9%	14.8%
American Indian and Alaska Native alone	17.5%	12.1%
Asian alone	7.3%	7.3%
Native Hawaiian and Other Pacific Islander alone	9.3%	0.8%
Some other race alone	6.8%	4.7%
Two or more races	8.2%	8.9%
White alone, not Hispanic or Latino	11.3%	9.9%
Hispanic or Latino (of any race)	7.9%	6.1%
Age		
Under 5 years	0.6%	0.7%
5 to 17 years	3.8%	2.9%
18 to 34 years	4.6%	5.9%
35 to 64 years	8.0%	6.1%
65 to 74 years	19.6%	14.6%
75 years and over	47.8%	36.8%
Type		
Hearing difficulty	2.7%	3.0%
Vision difficulty	1.7%	1.5%
Cognitive difficulty	3.7%	3.2%
Ambulatory difficulty	4.8%	4.3%
Self-care difficulty	2.2%	2.0%
Independent living difficulty	3.9%	4.3%

Sources: American Community Survey, 2015-2019 (5-Year Estimates).

(1) The "Bay Area" data covers the members of the Association of Bay Area Governments (ABAG) which are the counties of: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma.

Table A-9: Population of Persons with Disabilities, San Rafael, 2019

	Total Population	Percent with a Disability
Civilian non-institutionalized population	58,002	8.4%
Race/Ethnicity		
Black or African American alone	712	18.5%
American Indian and Alaska Native alone	500	3.8%
Asian alone	3,977	8.6%
Native Hawaiian and Other Pacific Islander alone	4	100.0%
Some other race alone	11,271	2.6%
Two or more races	2,754	6.6%
White alone, not Hispanic or Latino	33,064	10.8%
Hispanic or Latino (of any race)	18,073	3.9%
Age		
Under 5 years	3,382	1.1%
5 to 17 years	9,552	2.2%
18 to 34 years	11,047	3.9%
35 to 64 years	23,079	6.1%
65 to 74 years	5,861	17.9%
75 years and over	5,081	34.2%
Type		
Hearing difficulty	--	3.0%
Vision difficulty	--	1.4%
Cognitive difficulty	--	3.2%
Ambulatory difficulty	--	4.0%
Self-care difficulty	--	2.2%
Independent living difficulty	--	4.3%

Sources: American Community Survey, 2015-2019 (5-Year Estimates).

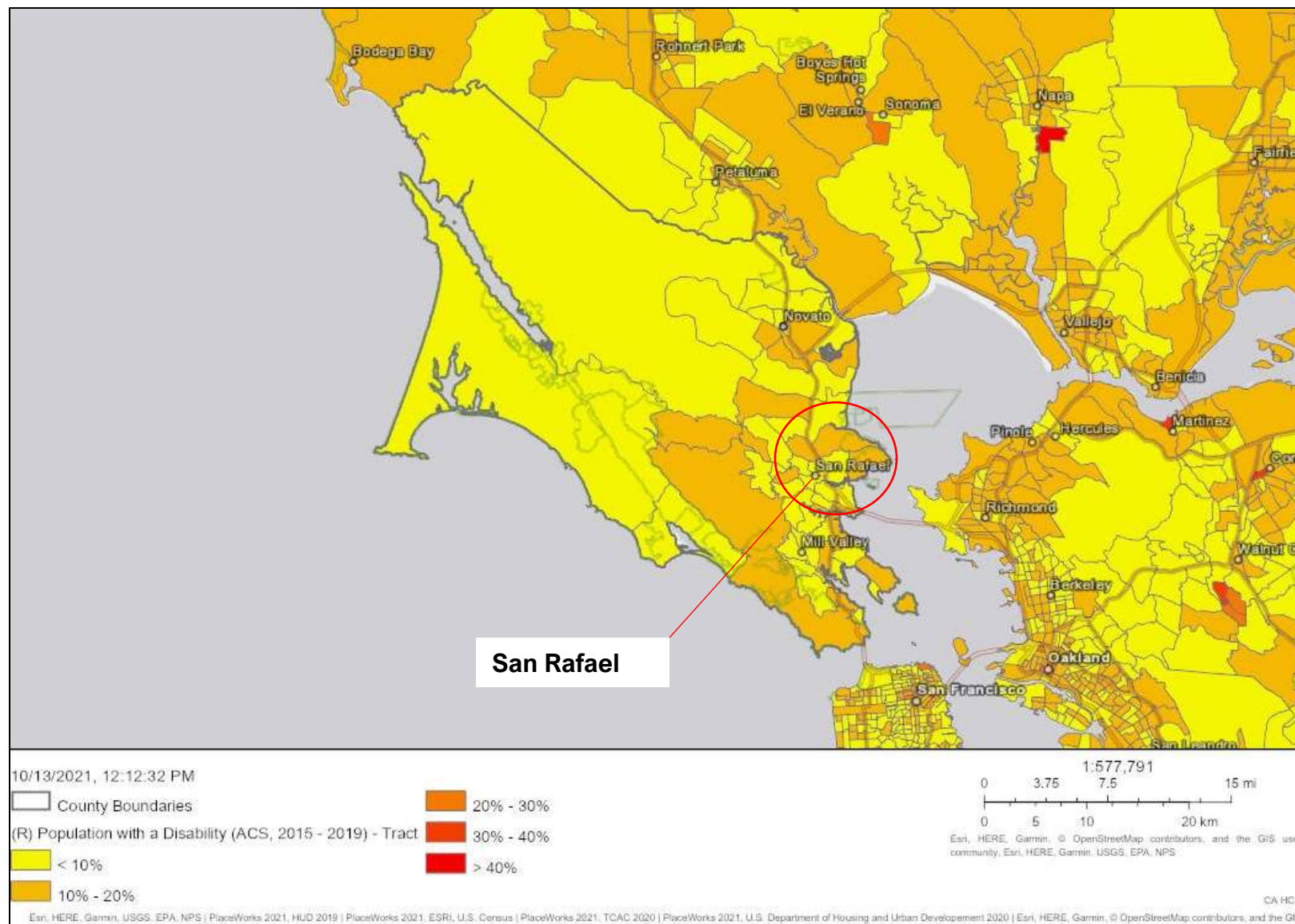


Figure A-7: Percent of Residents with a Disability in Northern Bay Area

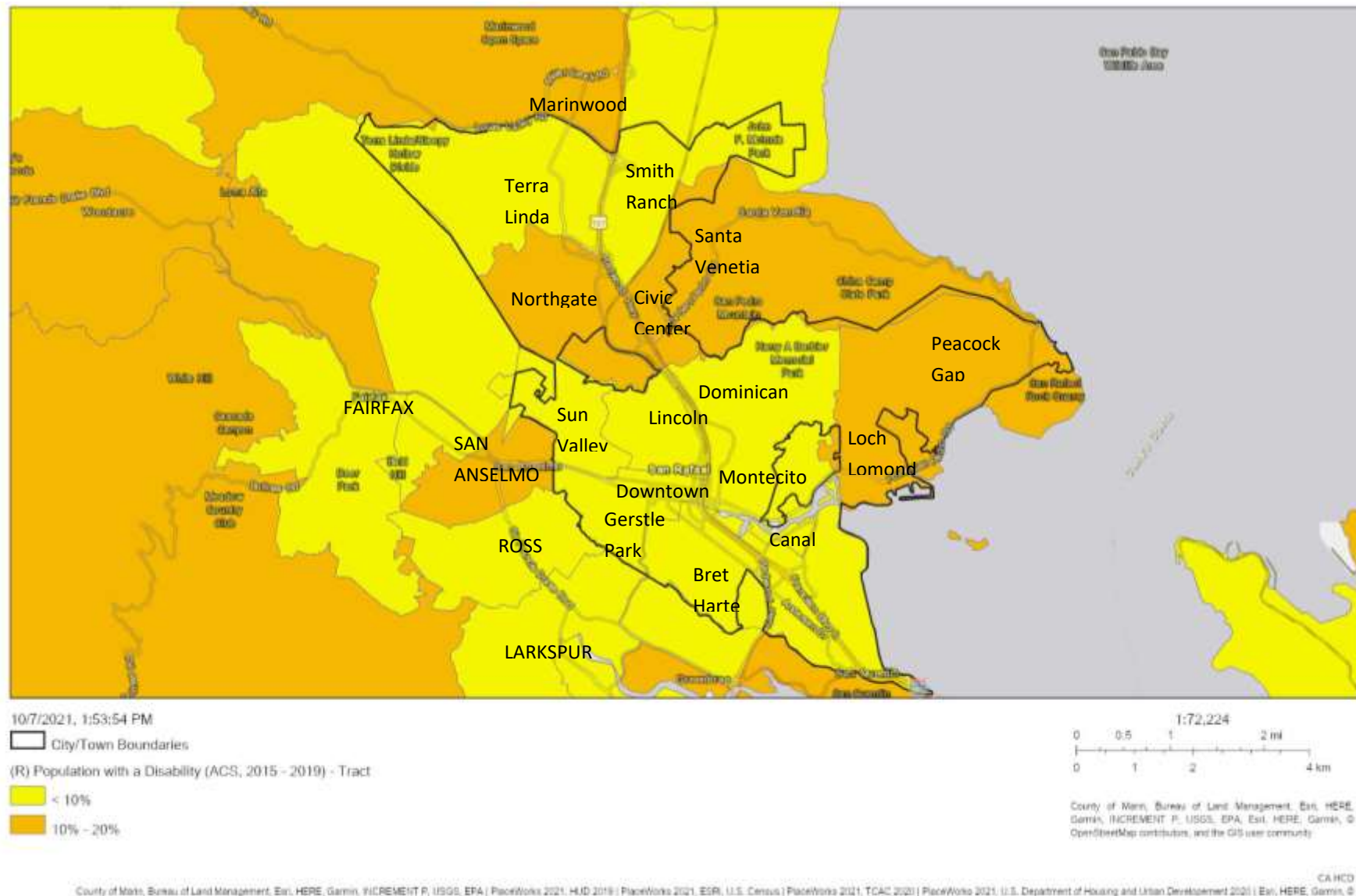


Figure A-8: Percent of Residents with a Disability in San Rafael

Persons with disabilities are generally not concentrated in a single area of the city, although there is a geographic correlation between the percentage of persons with disabilities and the percentage of residents over 65. Specifically, Census Tracts 1082, 1060.02, and 1102 have populations of persons with disabilities exceeding 10 percent. These tracts have older adult populations of 23.9 percent, 25.3 percent, and 31.2 percent, respectively, which is higher than the citywide average of 22 percent. None of the tracts with larger populations of persons with disabilities contain block groups with populations of racial/ethnic minorities exceeding the citywide average.

D.2.3 Relationship of Sites Inventory to Location of Persons with Disabilities

As discussed above, tracts in the City have populations of persons with disabilities ranging from 5.4 to 15 percent. The distribution of units selected to meet the City's RHNA relative to the population of persons with disabilities is shown in Table A-10 and Figure A-9 below.

Most RHNA units (69.7 percent) are in tracts where less than 10 percent of the population experiences a disability. The remaining RHNA units are in tracts where 10 to 15 percent of the population experiences a disability. The distribution of RHNA units is consistent with the citywide trend and does not concentrate sites in areas where populations of persons with disabilities are heightened. Further, San Rafael's RHNA strategy does not disproportionately concentrate lower income units in tracts where there are larger populations of disabled individuals at a rate exceeding moderate- and above moderate-income units.

Table A-10: Distribution of RHNA Units by Concentrations of Disabled Residents

Percent of residents with a disability (block group)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<10%	1,223	74.1%	459	73.9%	1,582	65.5%	3,265	69.7%
10-20%	427	25.9%	162	26.1%	832	34.5%	1,421	30.3%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: ACS 2015-2019

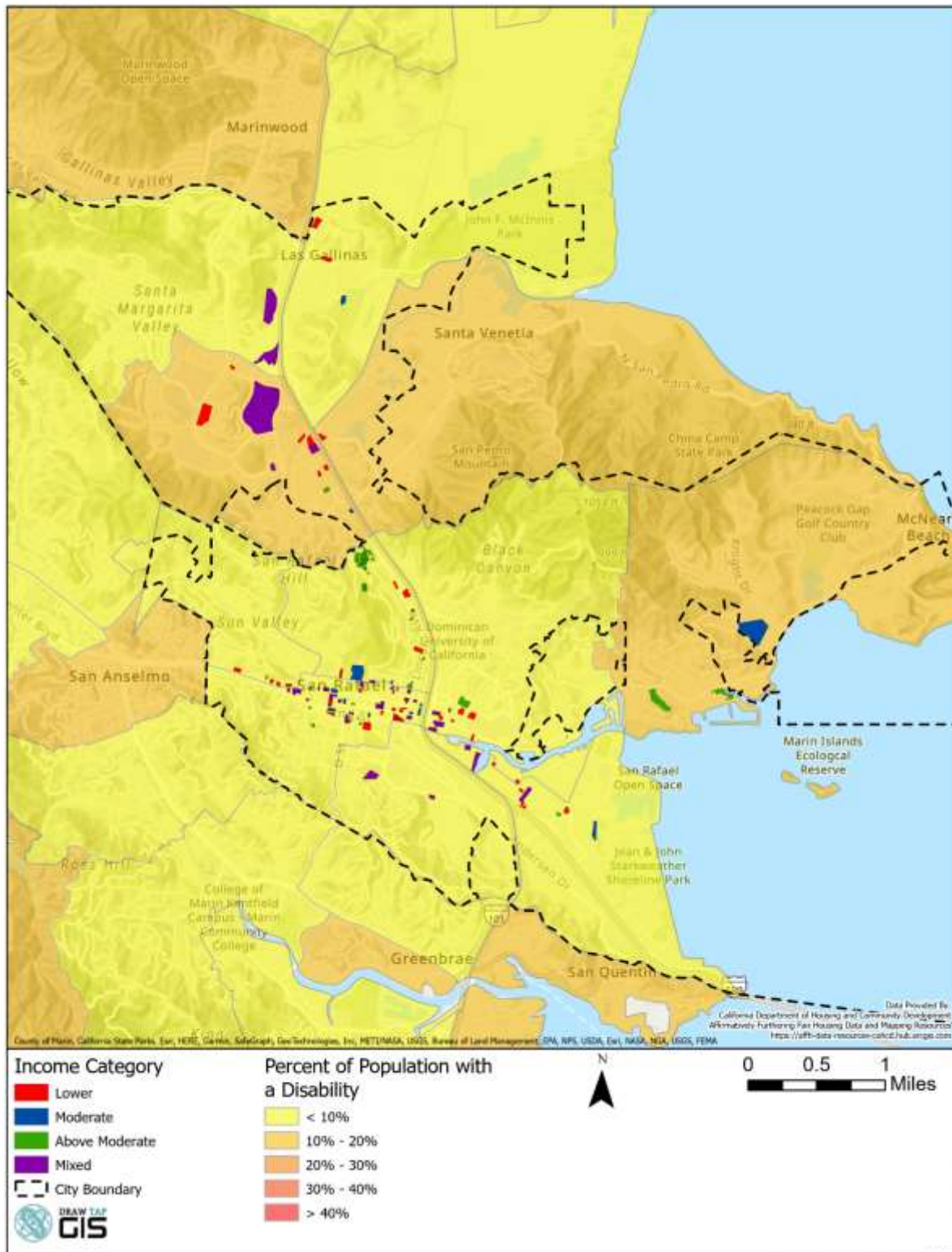


Figure A-10: Distribution of Housing Sites relative to Percent of Residents with a Disability

D.3 Familial Status

Under the Fair Housing Act, housing providers may not discriminate because of familial status. Familial status covers any household with children under the age of 18, pregnant persons, and any person in the process of securing legal custody of a minor child (including adoptive or foster parents). Examples of familial status discrimination include refusing to rent to families with children, evicting families once a child joins the family, or requiring families with children to live on specific floors or in specific buildings or areas. Single parent households are also protected by fair housing law.

D.3.1 Regional Trends

According to the 2019 ACS, there are slightly fewer households with children in Marin County than in the Bay Area as a whole. About 27 percent of households in Marin County have children under the age of 18. Of the households with children, 21 percent are married-couple households and six percent single-parent households. In the Bay Area as a whole, about 32 percent of households have children. As in Marin County, most are married couples. As shown in the Figure A-11 bar-chart, the cities of Larkspur and Ross have the highest percentage of households with children (50.1 percent and 40.6 percent, respectively). Larkspur, Corte Madera, and San Rafael have concentrations of single-parent households exceeding the countywide average.

Figure A-12 shows the regional distribution of children in married households, while Figure A-13 shows the regional distribution of single female headed households. Census tracts with high concentrations of children living in married couple households are not concentrated in any particular area of Marin County. Most census tracts have more than 60 percent of all children living in married-persons households. Regionally, children in married-person households are more commonly found in inland census tracts (e.g., in suburban communities rather than in the more urban communities along the bay). The inverse trend is seen for children living in single-parent female-headed households, who are more likely to live in urban areas.

In most tracts in Marin County, less than 20 percent of children live in female-headed households. However, the percentage of children in female-headed households exceeds 20 percent in Marin City and in the Bolinas area.

D.3.2 Local Trends

San Rafael has seen an increase in the proportion of households with children in recent years (see Table A-11). During the 2006-2010 ACS, there were 5,765 households with children representing 24.7 percent of all City households. The most recent 2015-2019 ACS estimates show there are now 6,342 households with children in San Rafael representing 27.1 percent of households citywide. The number of married couple households with children increased by 14.9 percent during this period, while the population of single-parent female-headed households has decreased 5.4 percent. The population of single-parent male-headed households increased by almost 12 percent during this period but remains much lower than the number of single-parent female-headed households.

As shown in Figure A-14, tracts in the central and eastern areas of the city have larger populations of children residing in married couple households. In these areas, more than 80 percent of all children live in married couple households. Conversely, in four tracts in the southern portion of the city and one tract on the northern end, fewer than 60 percent of children reside in married couple households. Several of the tracts in the southern area also have larger populations of children residing in single-parent female-headed households (see Figure A-15). Tracts in the Canal neighborhood, where more than 20 percent of children live in female-headed households, also have contain larger racial/ethnic minority populations.

Table A-11: Change in Household Type – Households with Children (2006-2019)

	2006-2010		2015-2019		Percent Increase, 2006-2019
	Households	% of total	Households	% of total	
Married-couple family with children	3,964	17.0%	4,555	19.4%	14.9%
Single-parent, male-headed	497	2.1%	554	2.4%	11.5%
Single-parent, female-headed	1,304	5.6%	1,233	5.3%	-5.4%
Total Households with Children	5,765	24.7%	6,342	27.1%	10.0%
Total Households	23,379	100.0%	23,433	100.0%	0.2%

Source: ACS, 2006-2010 and 2015-2019 (5 year estimates)

D.3.3 Relationship of Sites Inventory to Distribution of Single-Parent Households

The distribution of housing sites by population of children residing in married couple households is presented in Figure A-16 and Table A-12. The largest proportion of future housing units are in tracts where 40 to 60 percent of children reside in married couple households. However, a larger proportion of lower (26.2 percent) and moderate (28.5 percent) income units are in tracts where more than 80 percent of children reside in married couple households compared to above moderate-income units (13.8 percent). While there are more units in areas where fewer children reside in married couple households, sites are generally distributed throughout the City and are not concentrated in tracts with populations of children in married couple households of a single range.

Figure A-17 and Table A-12 show the distribution of RHNA units by population of children residing in single-parent female-headed households. More than half (55.6 percent) of the potential housing units are in tracts where fewer than 20 percent of children live in female-headed households. A smaller proportion of lower-income units (38.7 percent) are in tracts where more than 20 percent of children live in female-headed households compared to moderate-income units (44.8 percent) and above moderate-income units (48.2 percent).

The City's RHNA strategy does not disproportionately place RHNA units of any income level in tracts with higher concentrations of children in single-parent households or tracts with lower concentrations of children in married couple households.

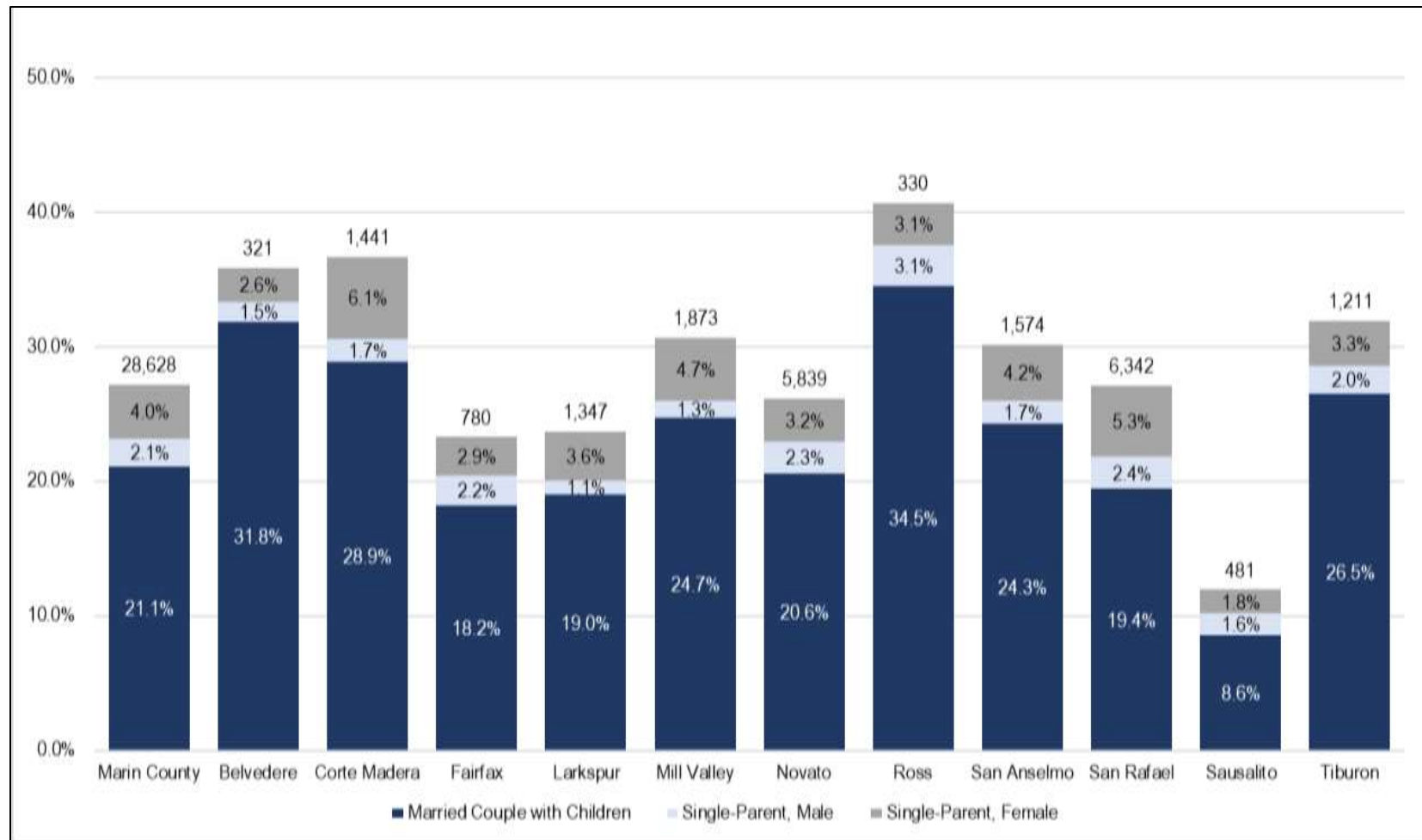


Figure A-11: Percent of Households with Children in Marin County and Incorporated Cities, 2019

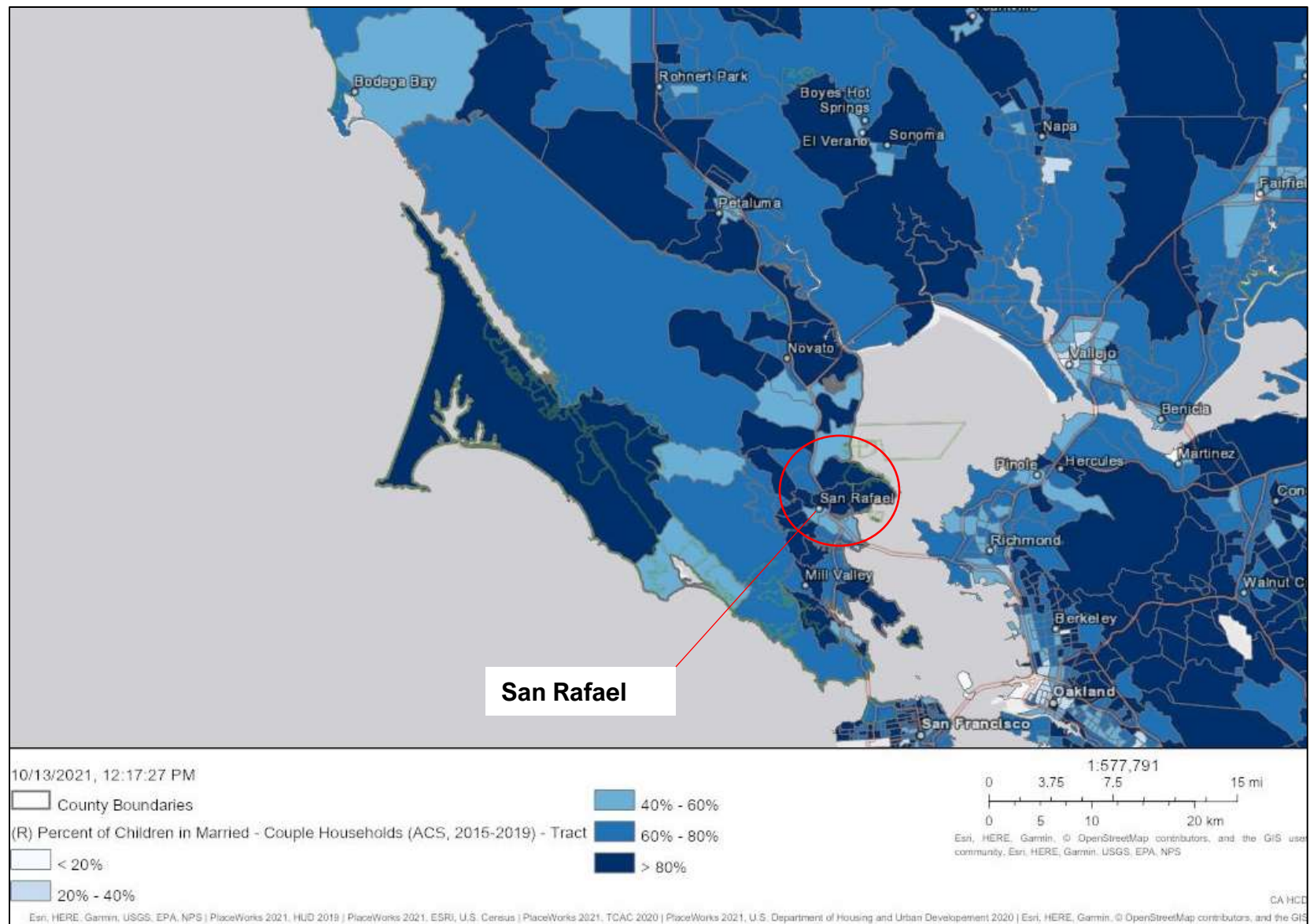


Figure A-12: Percent of Children in Married Couple Households by Tract, 2019

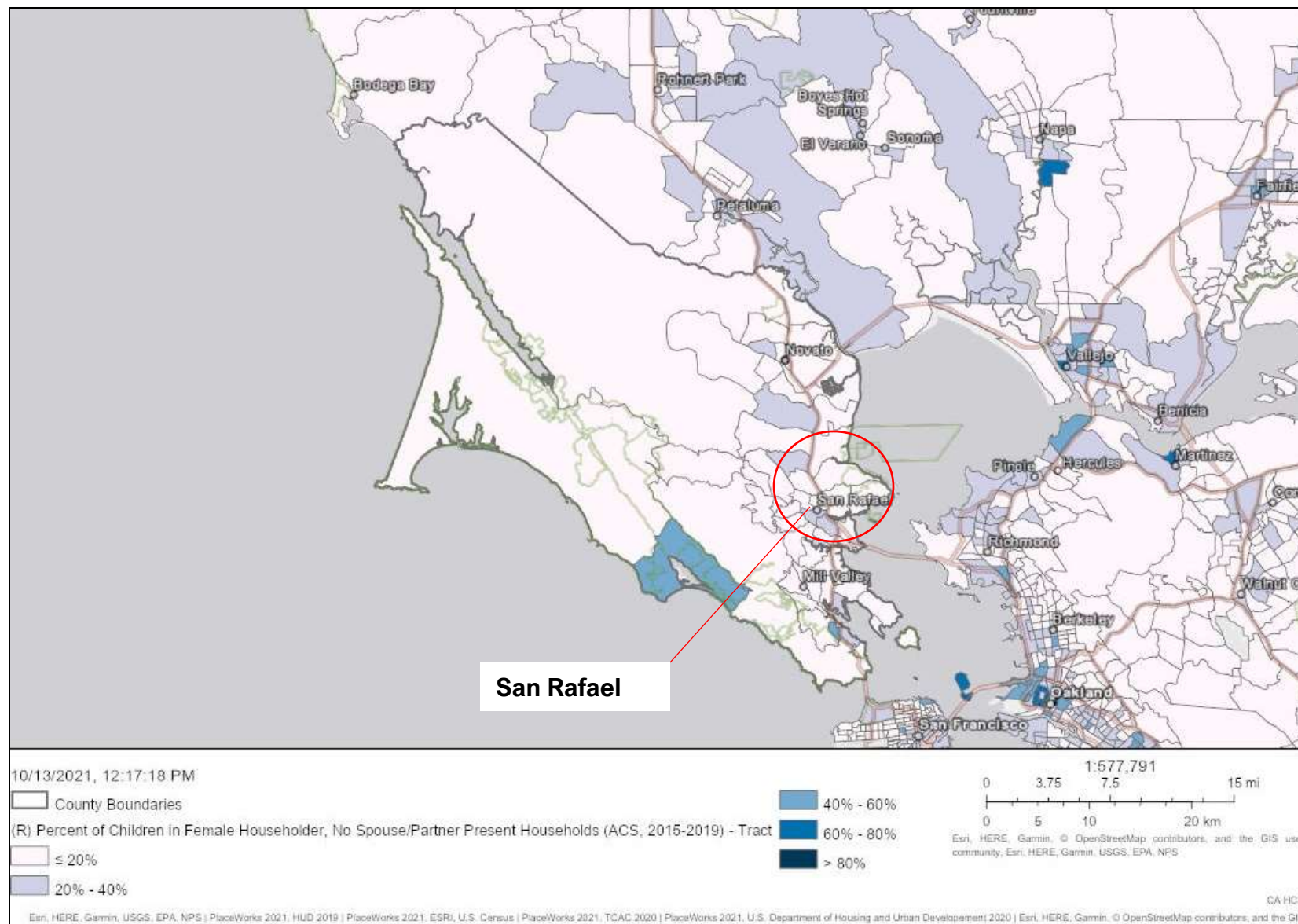


Figure A-13: Percent of Children in Female-Headed Households by Tract, 2019

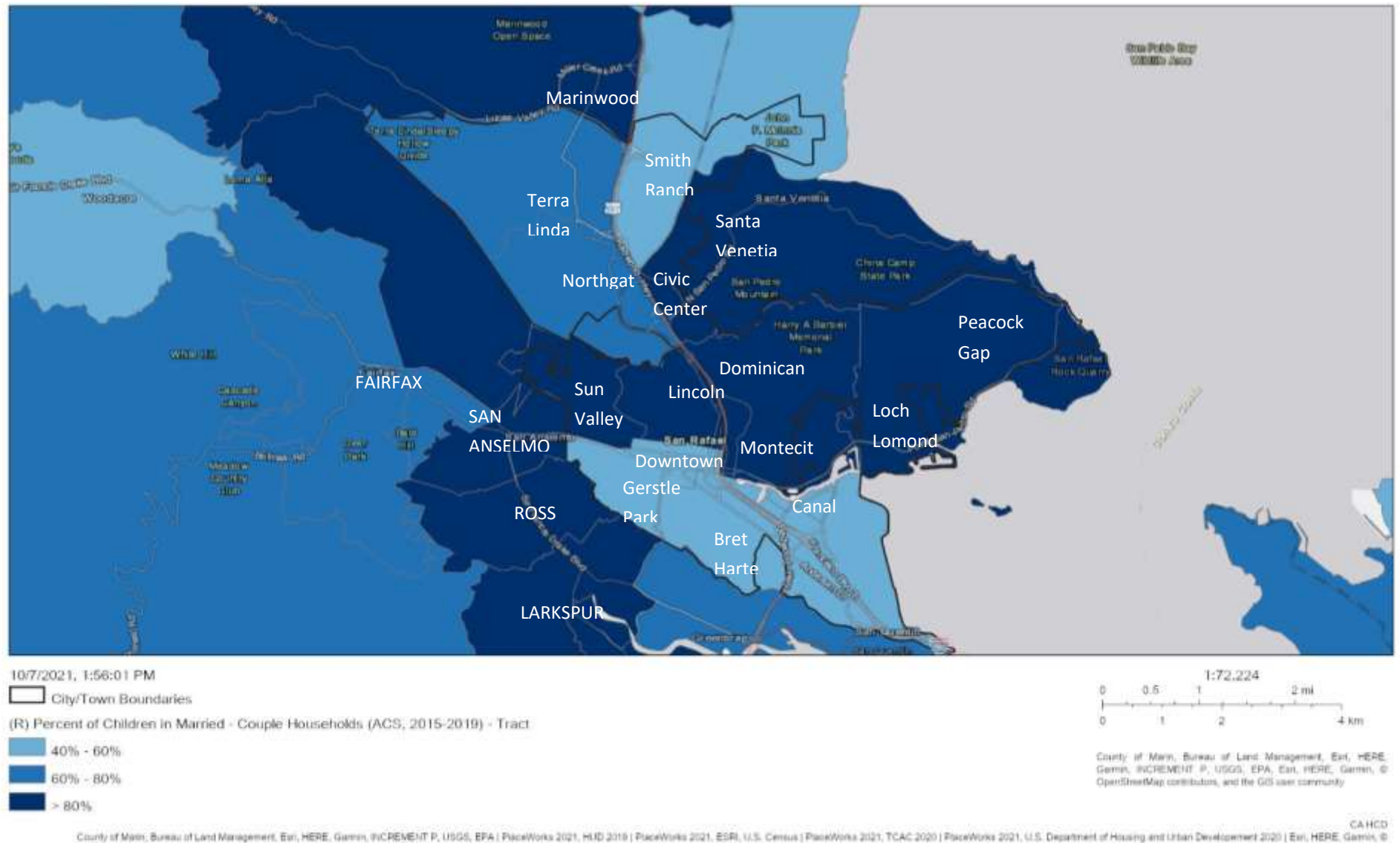


Figure A-14: Percent of Children in Married Couple Households in San Rafael, 2019

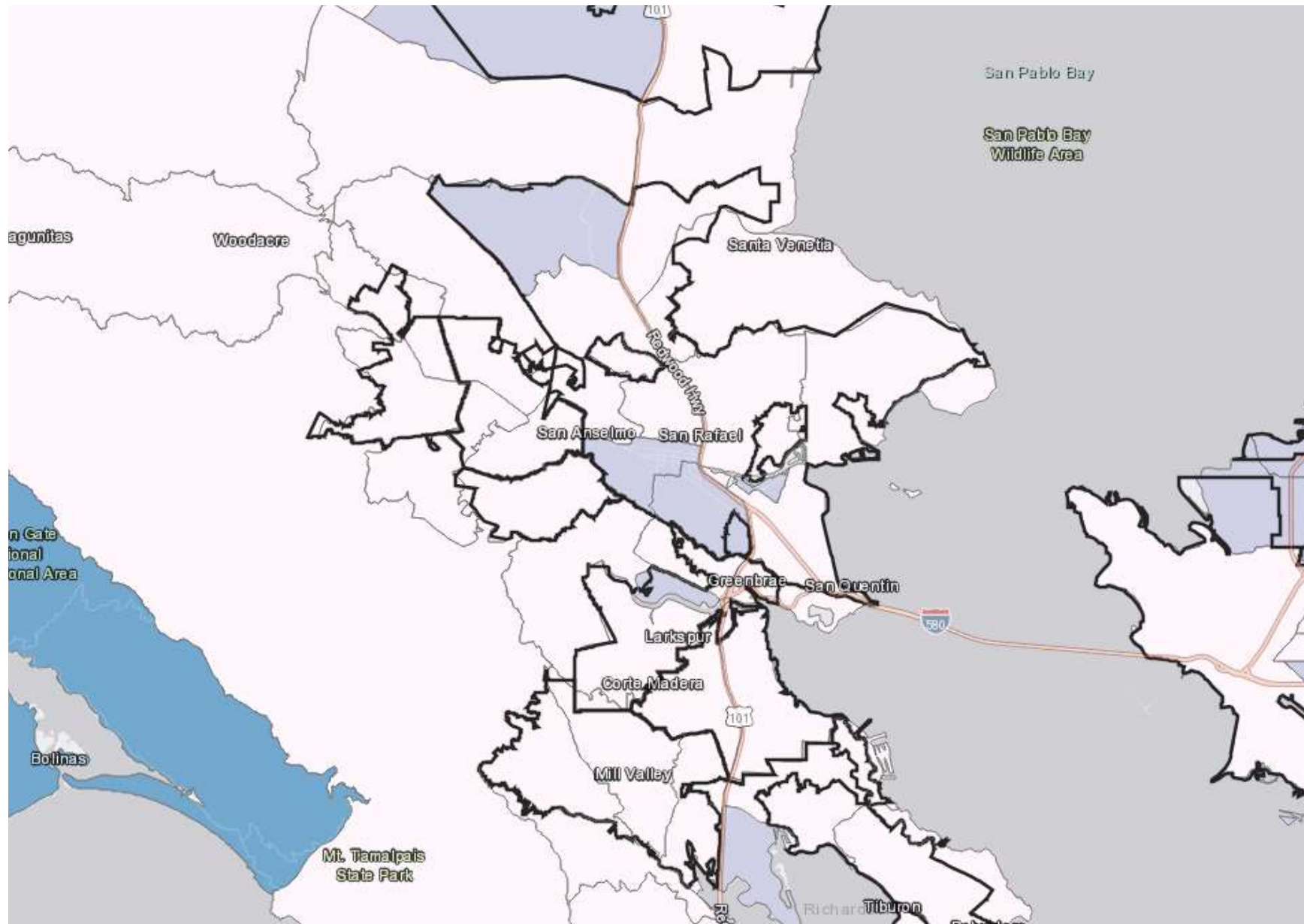


Figure A-15: Percent of Children in Single Mother Households in San Rafael, 2019

Table A-12: Distribution of RHNA Units by Family Status

% of all Children in Married Couple Households	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
40-60%	833	50.5%	334	53.8%	1001	41.5%	2169	46.3%
60-80%	384	23.3%	110	17.7%	1079	44.7%	1573	33.6%
80-100%	433	26.2%	177	28.5%	334	13.8%	944	20.1%
Total	1650	100.0%	621	100.0%	2414	100.0%	4686	100.0%
% of all Children in Female-Headed Households	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	1012	61.3%	343	55.2%	1250	51.8%	2605	55.6%
20-40%	638	38.7%	278	44.8%	1164	48.2%	2081	44.4%
Total	1650	100.0%	621	100.0%	2414	100.0%	4686	100.0%

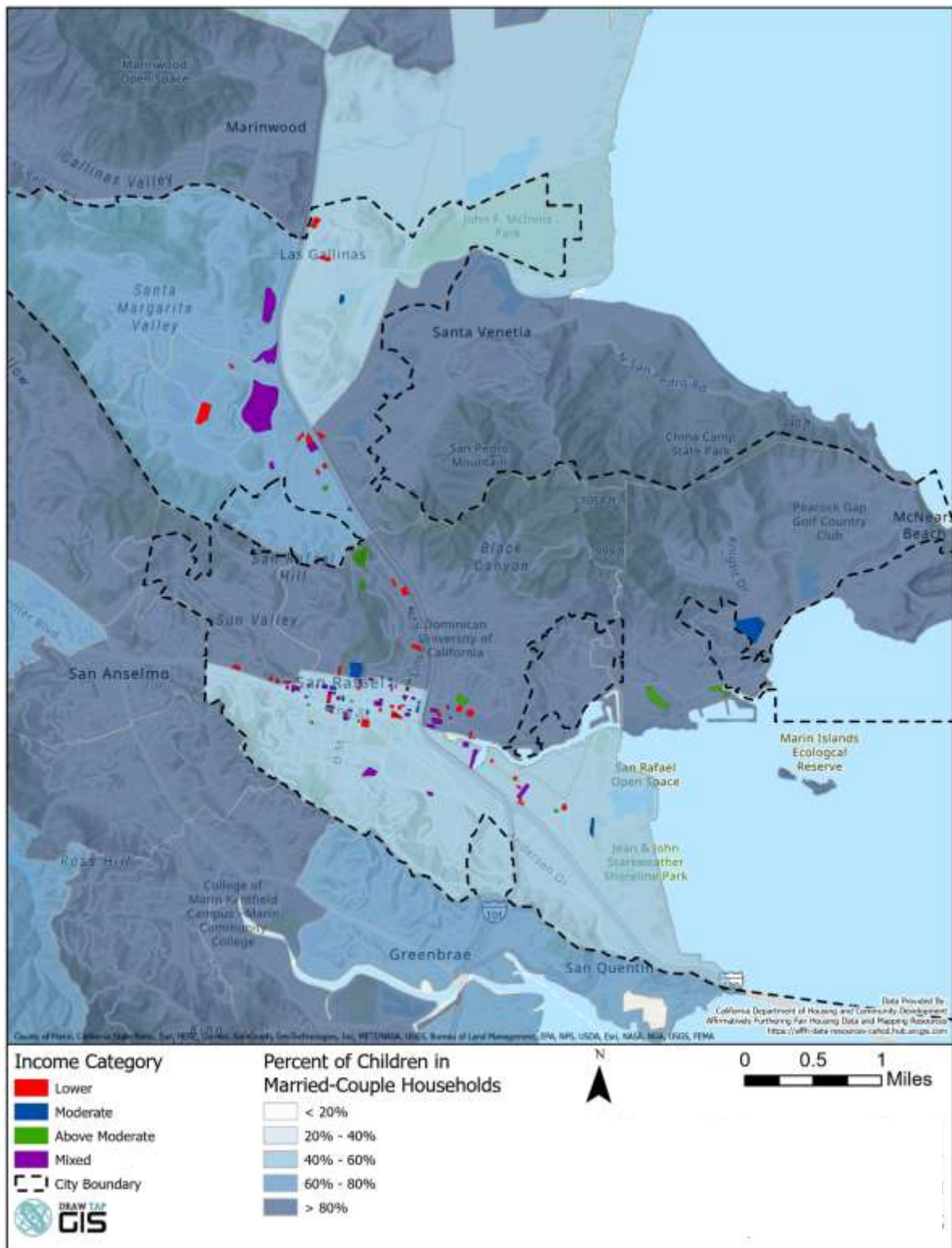


Figure A-16: Distribution of Housing Sites Relative to Married Couples with Children in San Rafael, 2019

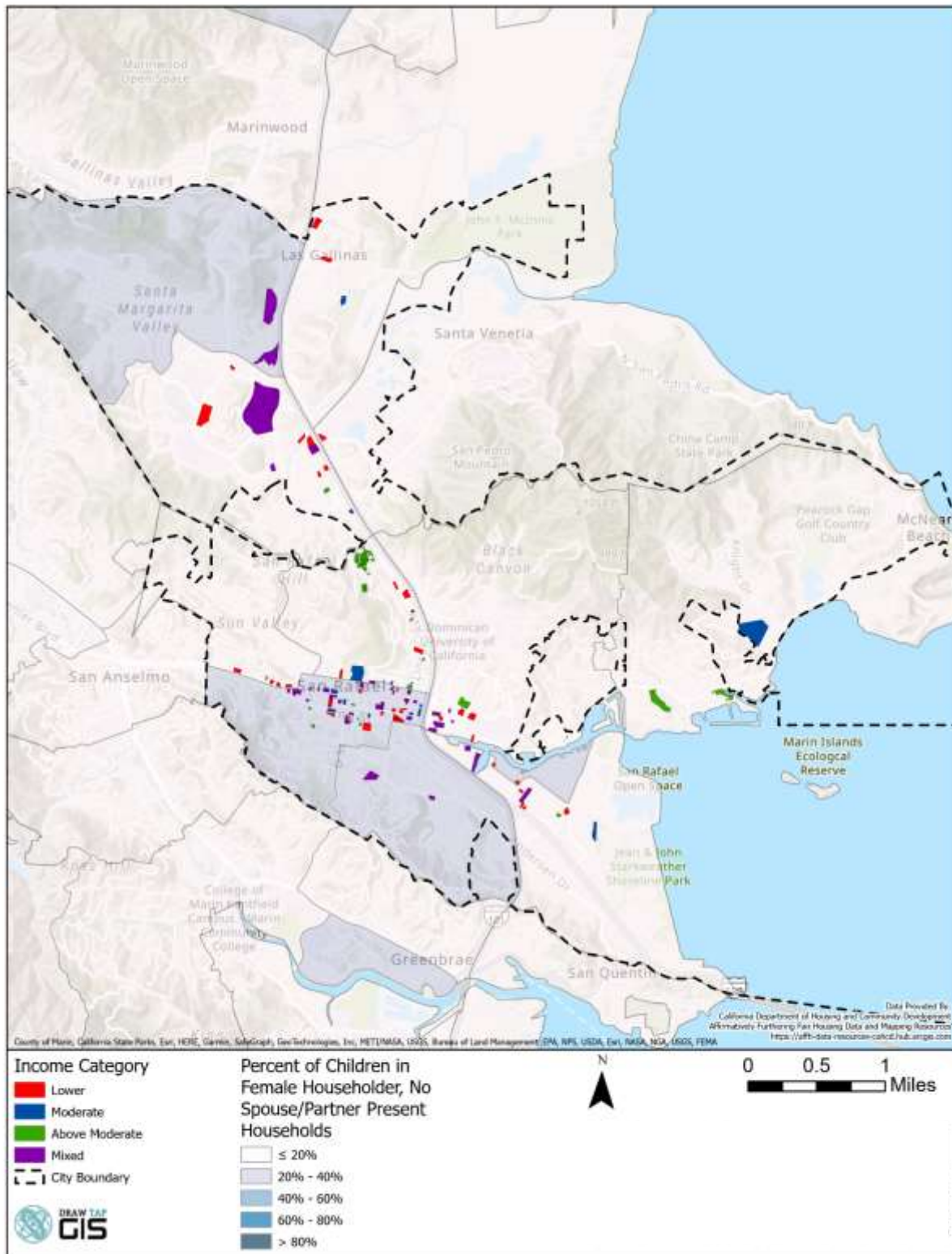


Figure A-17: Distribution of Housing Sites Relative to Concentrations of Single Mother Households in San Rafael, 2019

D.4 Income

Identifying low or moderate income (LMI) areas is an important part of making policy decisions to address patterns of segregation in a community. HUD defines a LMI area as a Census tract or block group where more than 51 percent of the population is LMI. In this instance, HUD uses 80 percent of areawide median income as the upper threshold, rather than the 120 percent used for RHNA purposes.

D.4.1 Regional Trends

According to Comprehensive Housing Affordability Strategy (CHAS)⁸ data based on the 2017 ACS, 40.5 percent of Marin County households meet the LMI criteria (earning 80 percent or less than the area median income, or AMI). As shown in Table A-13, roughly 26 percent of Marin County residents earn less than 50 percent of AMI and another 14 percent earn between 50 and 80 percent of AMI. Nearly 60 percent of renter households are considered LMI compared to only 29.8 percent of owner households.

The spatial distribution of LMI households in the North Bay is shown in Figure A-18. Figure A-18 shows that LMI populations are most concentrated in West Marin, North Marin (Novato), Central Marin (San Rafael), and the unincorporated communities of Marin City and Santa Venetia.

D.4.2 Local Trends

As shown in Table A-14, San Rafael has higher proportions of LMI households than Marin County as a whole. About 48 percent of the city's households meet HUD LMI criteria. Some 32.6 percent of the city's households earn less than 50 percent of AMI and another 15 percent earn 50 to 80 percent of AMI. As in Marin County as a whole, renters are disproportionately more likely to be LMI. About 69 percent of the city's renters are LMI, compared to 28 percent of the city's owners. Compared to the County, San Rafael has a smaller proportion of lower income owners but larger proportion of lower income renters. According to 2015-2019 ACS estimates, the median household income in San Rafael is \$91,742. This is lower than the County (\$115,246) as well as the nearby cities of Larkspur (\$109,426), Corte Madera (\$149,439), Mill Valley (\$163,614), and Tiburon (\$154,915).

Dissimilarity indices from the ABAG AFFH Segregation Report are presented in Table A-15. Household dissimilarity indices for San Rafael reveal that the city is more segregated by income than the Bay Area as a whole. In other words, lower income households in San Rafael are more likely to be geographically concentrated than lower income households in the Bay Area as a whole. The data also shows that segregation between lower income households and higher income households in the city increased between 2010 and 2015.

Figure A-19 shows the LMI populations in San Rafael by block group. In general, the Canal neighborhood has the highest concentration of LMI areas. As noted earlier, this area also has larger proportions of racial/ethnic minority populations and children residing in female-headed households.

⁸ Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of ACS data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households.

Table A-13: Marin County Households by Income Category and Tenure (2017)

Income Category	Owner	Renter	Total
0%-30% of AMI	8.7%	26.0%	14.9%
31%-50% of AMI	8.5%	16.0%	11.2%
51%-80% of AMI	12.6%	17.6%	14.4%
81%-100% of AMI	8.4%	10.0%	8.9%
Greater than 100% of AMI	61.8%	30.4%	50.5%
Total	67,295	37,550	104,845

1. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas and uses San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties) for Marin County.

Sources: ABAG/MTC Housing Needs Data Workbook, 2021; HUD CHAS (based on 2013-2017 ACS), 2020.

Table A-14: San Rafael Households by Income Category and Tenure (2017)

Income Category	Owner	Renter	Total
0%-30% of AMI	7.9%	33.1%	19.9%
31%-50% of AMI	8.2%	17.6%	12.7%
51%-80% of AMI	12.1%	17.9%	14.9%
81%-100% of AMI	10.3%	8.6%	9.5%
Greater than 100% of AMI	61.6%	22.8%	43.1%
Total	12,000	10,939	22,939

Sources: ABAG/MTC Housing Needs Data Workbook, 2021; HUD CHAS (based on 2013-2017 ACS), 2020.

Table A-15: San Rafael and Bay Area Income Dissimilarity Indices (2010-2015)

Income Group	San Rafael		Bay Area
	2010	2015	2015
Below 80% AMI vs. Above 80% AMI	30.0	39.8	19.8
Below 50% AMI vs. Above 120% AMI	37.2	47.3	25.3

Source: ABAG/MTC Segregation Report, 2022

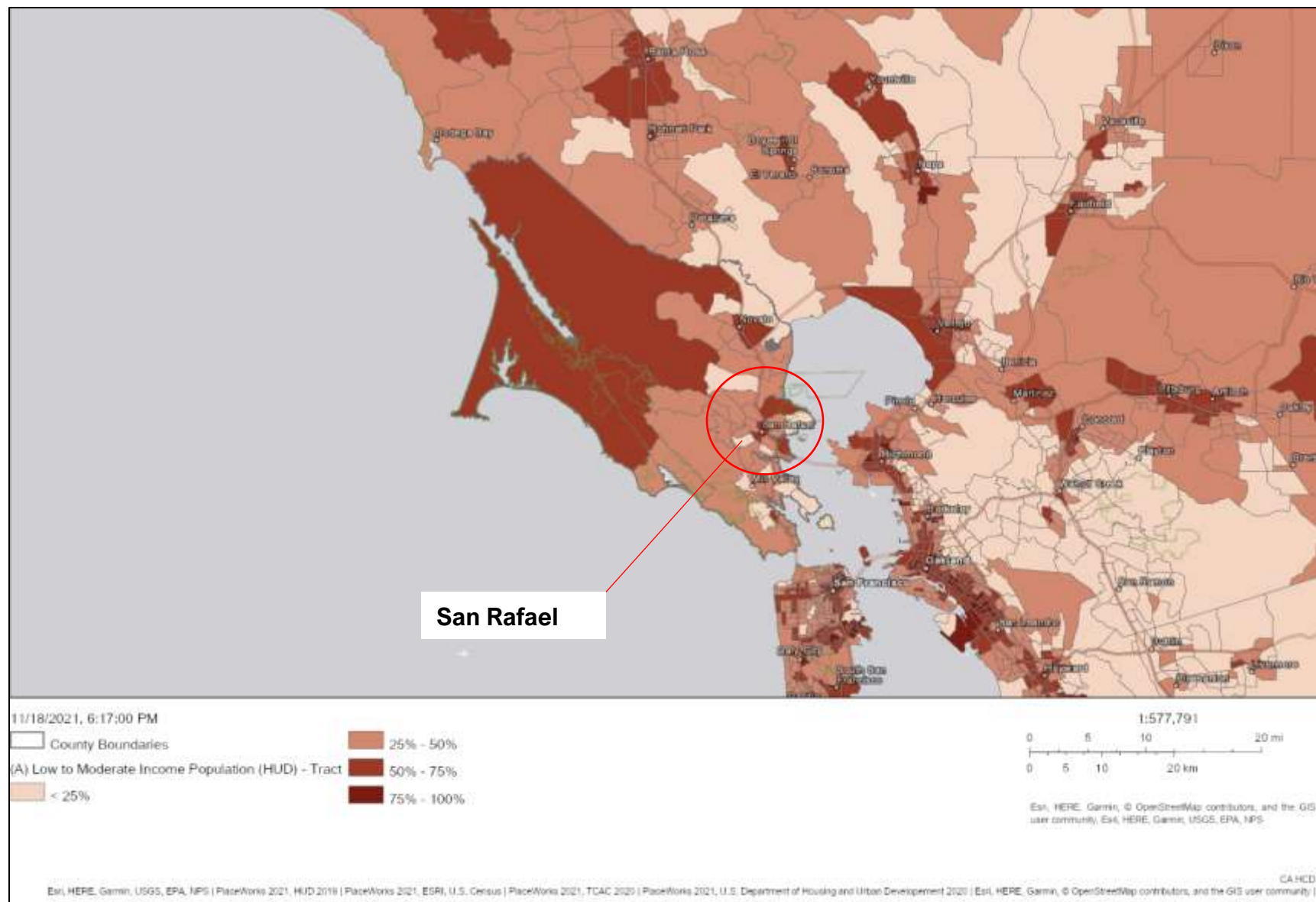


Figure A-18: Regional Concentrations of Low-Moderate Income Households

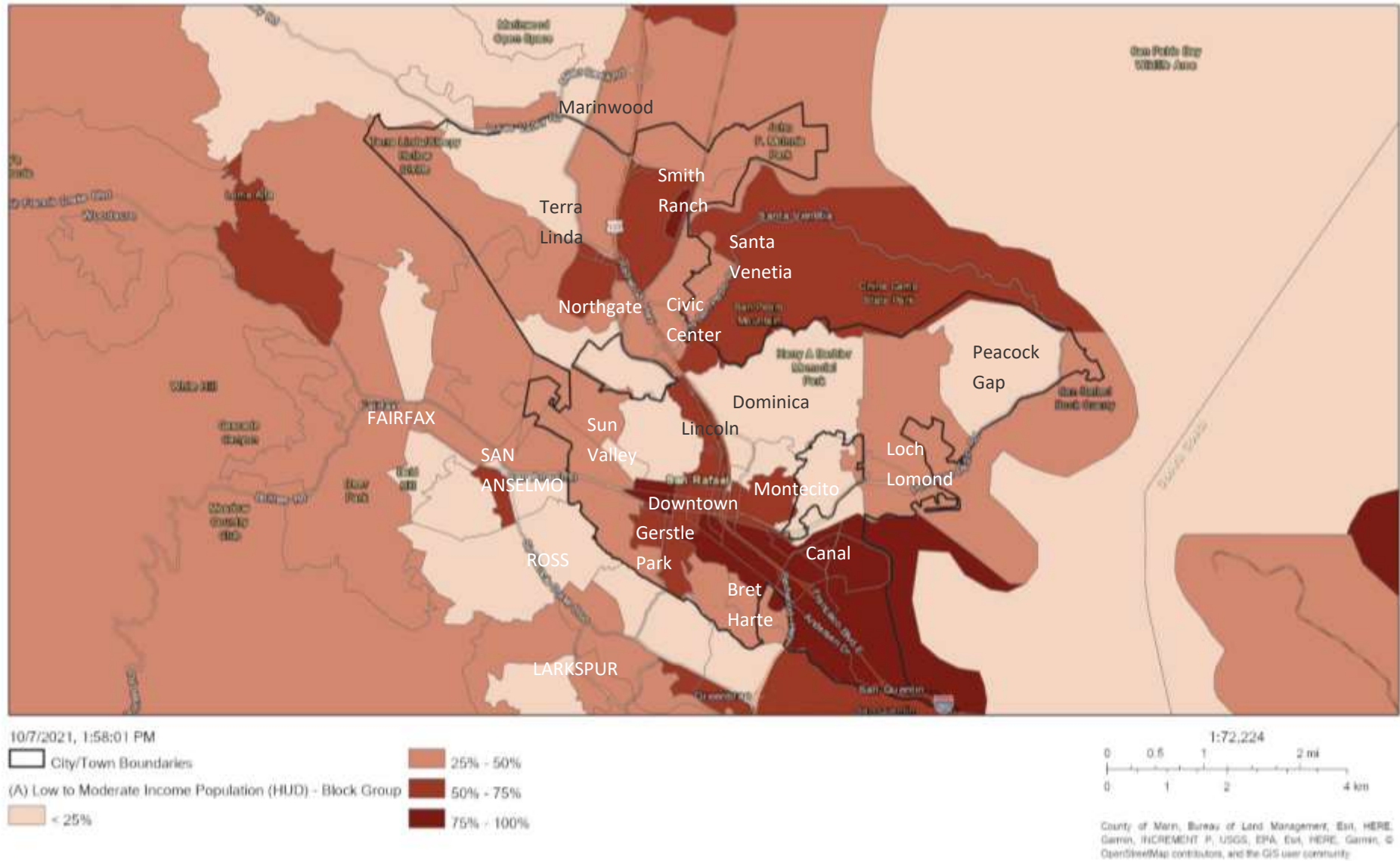


Figure A-19: Local Concentrations of Low-Moderate Income Households

According to the HCD AFFH Data Viewer, there are 14 subsidized housing projects in San Rafael. Of the 14, five are located in block groups where more than 75 percent of households are LMI and six are located in block groups where 50 to 75 percent of households are LMI. The location of subsidized housing units likely contributes to the concentration of LMI households in certain block groups. However, these projects are also located in areas with supportive services, high-frequency public transit, and other amenities that tend to reduce transportation costs and other household expenses.

D.4.3 Relationship of Sites Inventory to Income Distribution

As discussed previously, there are multiple LMI areas in the city. Table A-16 and Figure A-20 show the distribution of RHNA units by LMI population. More than half of city's RHNA capacity (58.1 percent) is in block groups where 50 to 75 percent of households are low or moderate income. However, these block groups are scattered throughout the city and are not clustered in a single part of San Rafael. In total, 78.7 percent of the identified RHNA housing capacity is in LMI areas including 74.7 percent of the lower income units, 74.7 percent of the moderate-income units, and 82.4 percent of the above moderate-income units.

The City's RHNA strategy does not concentrate lower income units in LMI areas at a rate exceeding moderate or above moderate-income units. Only 20 percent of the City's RHNA capacity is in the lowest income tracts (i.e., areas where 75-100 percent of the population is LMI), and this capacity is evenly distributed across income groups. LMI areas in San Rafael tend to correspond to those areas where growth is most logical from a land use, transportation, and public safety perspective. These areas include Downtown San Rafael and the Northgate area, which are both designated Priority Development Areas.

Table A-16: Distribution of RHNA Units by Low-Moderate Income (LMI) Areas

Percent Low Moderate Income HH (block group)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	18	1.1%	95	15.3%	24	1.0%	137	2.9%
25-50%	399	24.2%	62	10.0%	402	16.7%	863	18.4%
50-75%	959	58.1%	316	50.9%	1,447	59.9%	2,723	58.1%
75-100%	274	16.6%	148	23.8%	541	22.4%	963	20.6%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: ABAG/MTC AFFH Segregation Report, 2022.

(*) Index based on racial group making up less than 5 percent of jurisdiction population. Estimates may be unreliable.

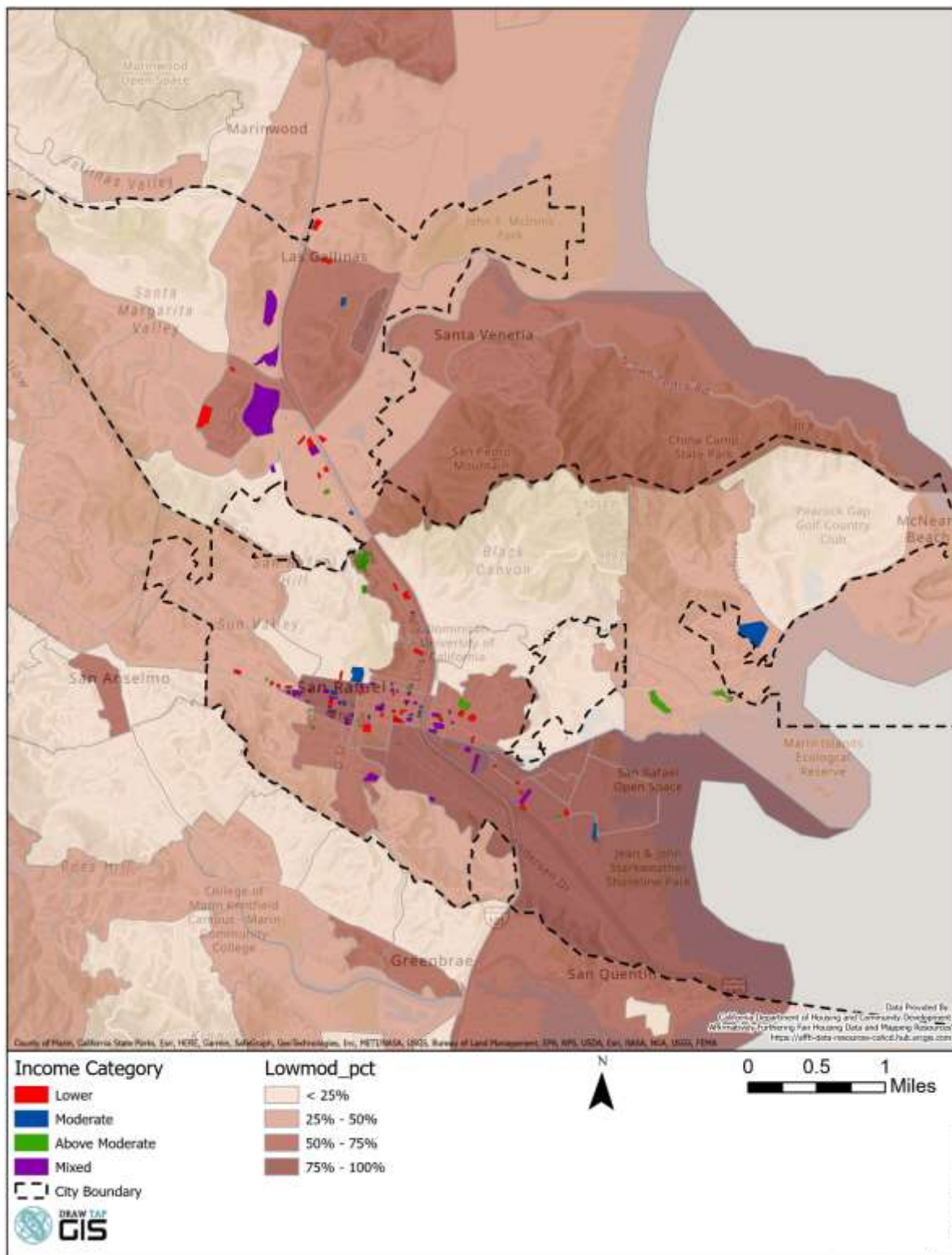


Figure A-20: Distribution of Housing Sites Relative to Low-Moderate Income Areas

D.5 Housing Choice Vouchers (HCV)

An analysis of the trends in HCV concentration can be useful in examining the degree to which the program is achieving its goal of creating opportunities for lower income households to live in high-resource neighborhoods and communities. It is also useful to examine the extent to which landlords in higher resource communities are participating in the program. HCV programs are managed by Public Housing Agencies (PHAs). The program includes an “expanding housing opportunities” indicator that shows whether the local PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration⁹. In Marin County, the Landlord Partnership Program aims to expand rental opportunities for families holding HCVs by making landlord participation in the program more attractive and feasible, and by streamlining program administration.

D.5.1 Regional Trends

As of December 2020, 2,100 Marin households received HCV assistance from the Housing Authority of the County of Marin (MHA). Figure A-21 shows that HCV use is concentrated in tracts in North Marin (Novato). In some tracts, between 15 and 30 percent of the renter households are HCV holders. In most Central Marin tracts and some Southern Marin tracts, between five and 15 percent of renters are HCV recipients. The correlation between low rents and a high concentration of HCV holders holds true in North Marin tracts where HVC use is the highest. Overall, patterns throughout most Marin County communities also show that where rents are lower, HCV use is higher.

Figure A-22 shows rental prices across the region. Most Marin County census tracts have median rents exceeding \$2,000 a month. Rents are generally higher in Marin than in the East Bay and other North Bay counties, but are lower than San Francisco.

D.5.2 Local Trends

Between five and 15 percent of renters in most San Rafael census tracts receive HCVs. Public data pertaining to the locations of HCV program participants are only available as U.S. Census Tract aggregations. The spatial distribution of households with vouchers is shown in Figure A-23. It is worth noting that despite the Canal neighborhood’s high concentration of lower income renters, the neighborhood is comparable to the rest of San Rafael in its percentage of renters using HCVs. Many households in the neighborhood are cost-burdened, as they must pay market-rate rents due to the limited supply of vouchers.

As shown in Figure A-24, the highest rents in San Rafael are in Peacock Gap and northern Terra Linda, where the rental stock consists mostly of single family homes. Tracts in Central San Rafael are more affordable. Rents in the Canal are comparable to the rest of the city, but the renters themselves are predominantly lower income. Again, this results in very high incidences of cost-burden, as well as overcrowding. Cost burden and overpayment is further analyzed in Section 5, *Disproportionate Housing Needs*, of this Appendix.

⁹ For more information of Marin County’s SEMAP indicators, see: the County’s Administrative Plan for the HCV Program. <https://irp.cdn-webside.com/4e4dabof/files/uploaded/Admin%20Plan%20Approved%20December%202021.pdf>

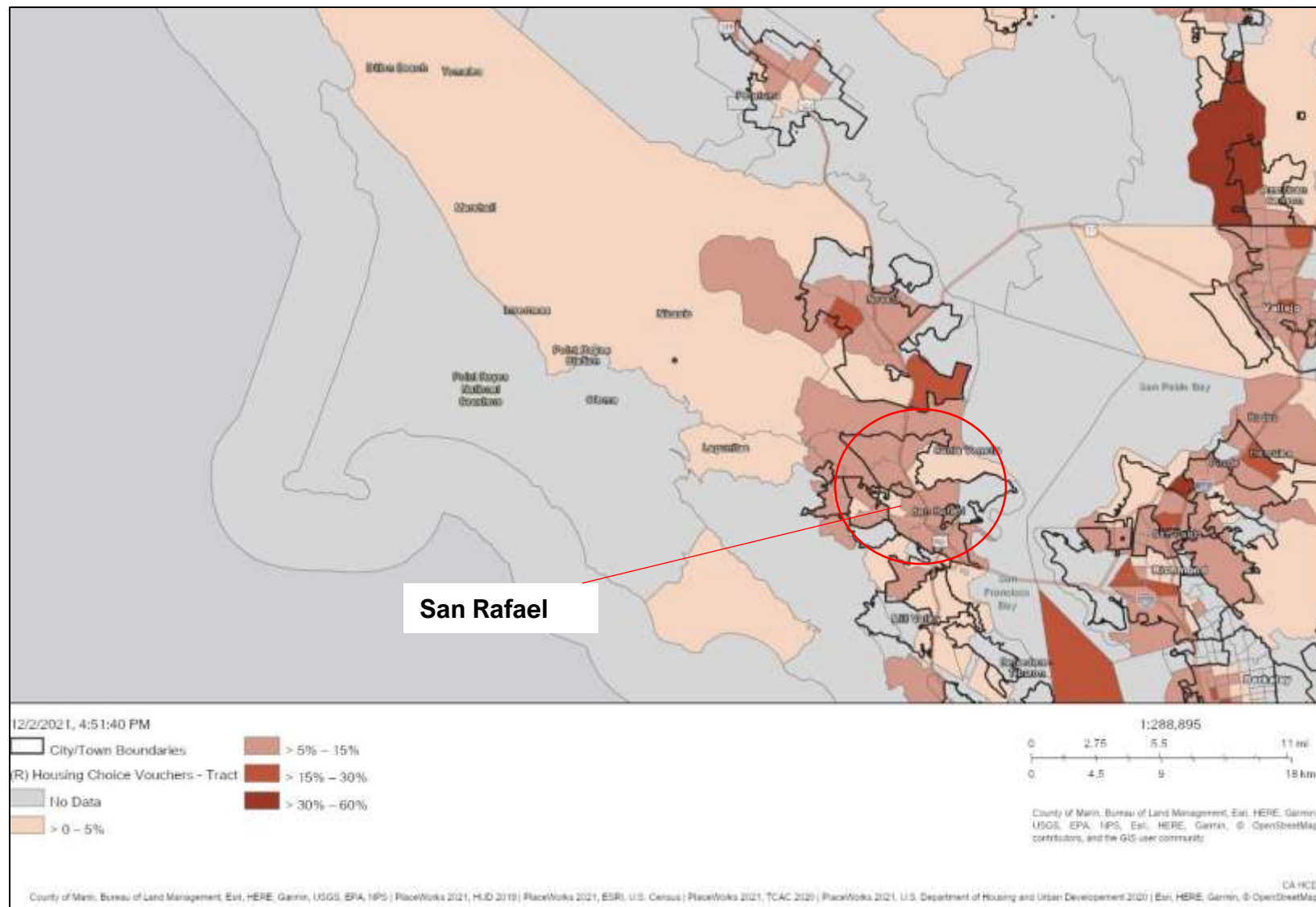


Figure A-21: Percent of Renters Using Housing Choice Vouchers

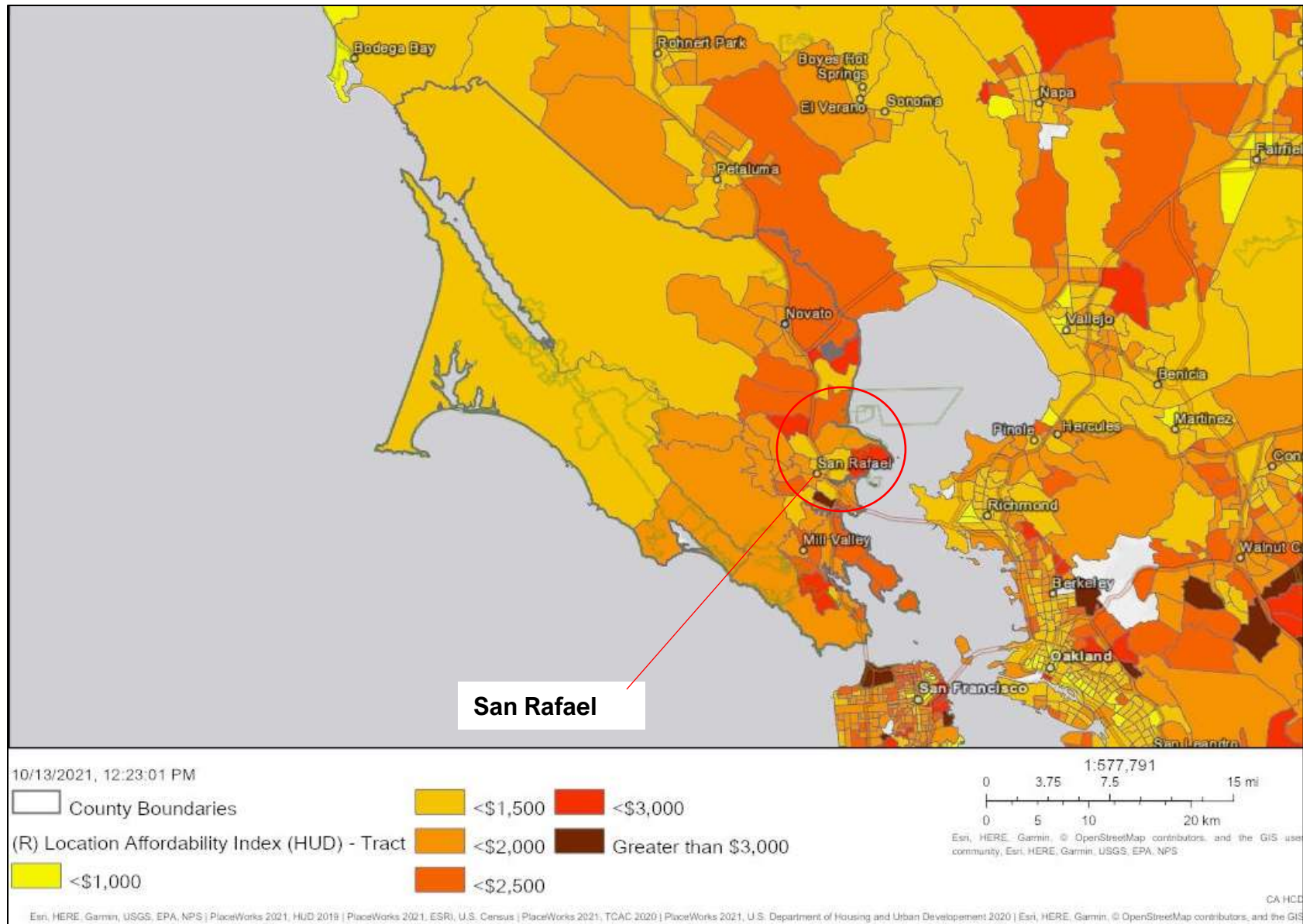


Figure A-22: Regional Median Gross Rent by Census Tract



E. Racially and Ethnically Concentrated Areas

E.1 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has developed a metric to spatially analyze the combined factors of race and poverty. Racially/ethnically concentrated areas of poverty, or R/ECAPs, are census tracts with a majority non-White population and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metropolitan area, whichever threshold is lower.

E.1.1 Regional Trends

As shown in Figure A-25, there is one R/ECAP in Marin County, corresponding to Marin City just north of Sausalito. The Marin City tract has historically been characterized by a concentration of African American residents, but more recently is predominantly Hispanic/Latino. Approximately 22 percent of Marin City's residents are African American. Marin City residents have lower median household incomes (less than \$55,000), especially compared to the neighboring cities of Sausalito, Mill Valley, and Tiburon where median incomes are higher than \$125,000. Marin City also has the highest share of extremely low-income households in the County; about 40 percent of households earn less than 30 percent the Area Median Income, whereas only 14 percent of unincorporated County households are considered extremely low income.



Figure A-25: R/ECAP areas in the Northern Bay Area

E.1.2 Local Trends

There are no R/ECAPs identified in San Rafael. According to the TCAC Opportunity Areas map, there is one tract that is considered an area of high segregation and poverty, encompassing the Canal neighborhood. As shown in Figure A-26, this neighborhood also has the largest concentration of persons below the poverty level (33.6 percent). This tract also has high concentrations of racial/ethnic minorities and LMI households.

As shown in Table A-17, San Rafael has a larger population below the poverty level compared to the County (12.2 percent and 7.2 percent, respectively). In San Rafael, the American Indian/Alaska Native population has the highest poverty rate (30 percent), followed by the population of some other race (29.7 percent), the Black/African American population (27.1 percent), and the Hispanic/Latino population (23.8 percent). Comparatively, only 8.6 percent of the Asian population, 6.1 percent of the population of two or more races, and 6.2 percent of the non-Hispanic White population are below the poverty level.

Figure A-26 indicates the percentage of residents living below the poverty line by Census Tract. The Canal neighborhood (tract 1122.01) stands out as having a particularly high percentage, with 33.5 percent of its residents living in poverty. Other tracts in San Rafael are primarily in the 10-20 percent interval, although the northern Terra Linda and Smith Ranch area, Sun Valley, Gerstle Park, and Loch Lomond-Peacock Gap areas have poverty rates below 10 percent.

Table A-17: Population Below Poverty Level by Race/Ethnicity, 2019

Race/Ethnicity	Marin County		San Rafael	
	Total Population	% below poverty level	Total Population	% below poverty level
Black or African American alone	4,746	16.8%	658	27.1%
American Indian and Alaska Native alone	823	22.1%	500	30.0%
Asian alone	14,859	8.2%	3,748	8.6%
Native Hawaiian and Other Pacific Islander alone	507	65.1%	4	0.0%
Some other race alone	20,879	23.2%	11,137	29.7%
Two or more races	12,199	6.5%	2,737	6.1%
Hispanic or Latino origin (of any race)	39,574	16.9%	17,742	23.8%
White alone, not Hispanic or Latino	182,823	4.8%	32,774	6.2%
Total	253,869	7.2%	57,123	12.2%

Source: ACS, 2015-2019 (5 year estimates)

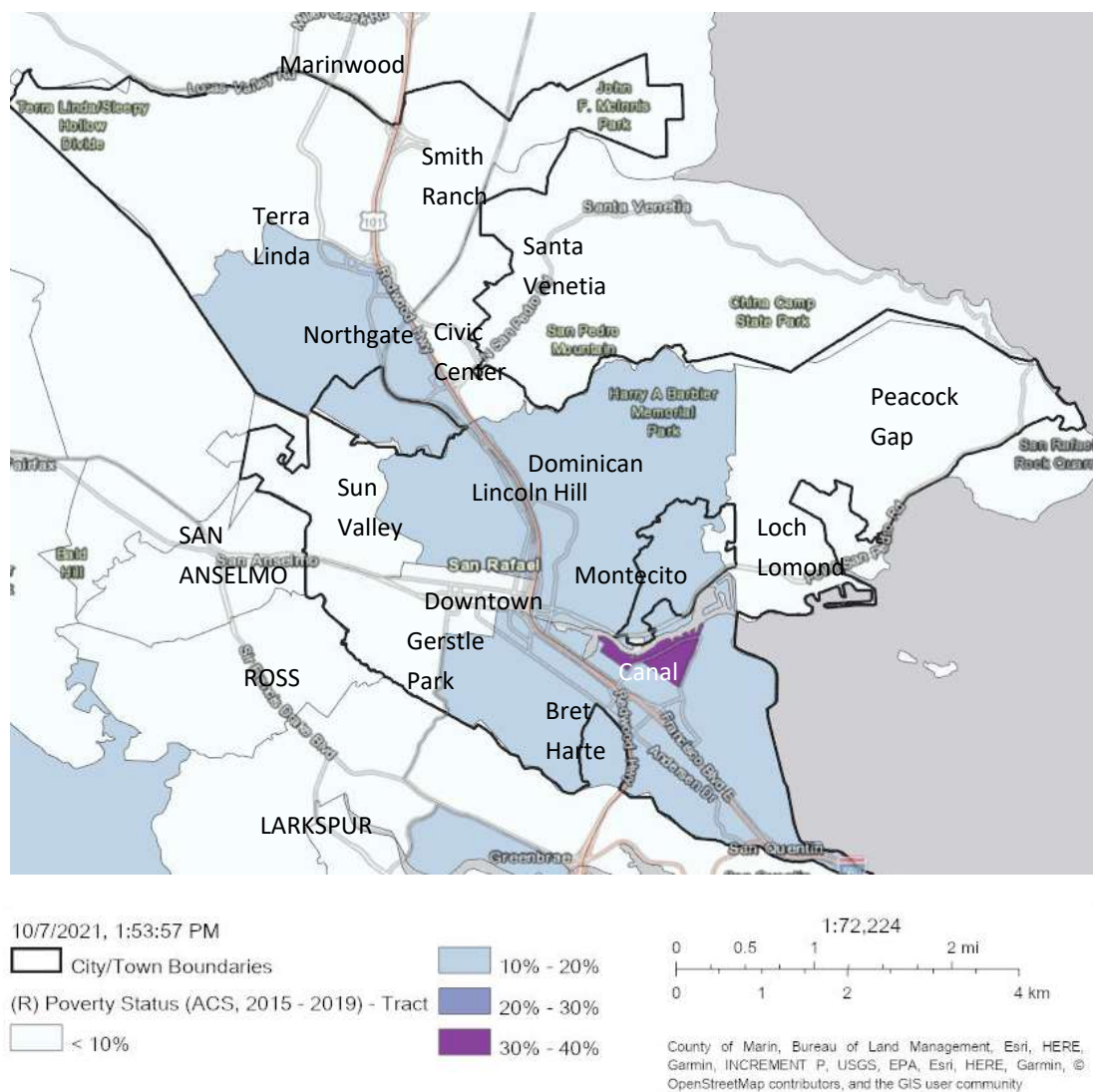


Figure A-26: Percentage of Residents Below Poverty Level in San Rafael, 2019

E.2 Racially Concentrated Areas of Affluence (RCAs)

While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCAs are defined as communities with a large proportion of affluent non-Hispanic White residents. According to HUD's policy paper, non-Hispanic Whites are the most racially segregated group in the United States. In the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with living in affluent, White communities.

The analysis relies on the definition curated by the scholars at the University of Minnesota Humphrey School of Public Affairs: "RCAs are defined as census tracts where 1) 80 percent or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016)."

E.2.1 Regional Trends

Figure A-2, presented earlier in this Appendix, shows the concentration of minority/ non-White population and majority populations across the region. In Figure A-2, census tracts in yellow have less than 20 percent non-white population, indicating over 80 percent of the population is white. There are a few tracts with over 80 percent non-Hispanic White population located throughout the County, especially in Southern Marin, parts of Central Marin, coastal North Marin, and central West Marin. The cities of Belvedere, Corte Madera, Fairfax, Larkspur, Mill Valley, Ross, San Anselmo, Sausalito, and Tiburon are also predominantly white. As shown in Figure A-27, many of these areas also have median incomes exceeding \$125,000.

On July 8, 2022, HCD released a map illustrating census tracts designated as RCAs, in addition to an updated data methodology. Figure A-28 excerpts the portion of this map covering the northern Bay Area. Using HCD's definition, a census tract is considered to be an RCA if its proportions of non-Hispanic White residents and households earning above the region's area median income are both overrepresented. Figure A-28 shows a majority of Marin communities as RCAs.

E.2.2 Local Trends

As presented previously, non-White populations represent less than 20 percent of the population in a few block groups in San Rafael, mostly located on the San Pedro Peninsula and in northern Terra Linda (including Mont Marin). Of the block groups where less than 20 percent of the population belongs to a racial or ethnic minority group, most also have median incomes exceeding \$125,000, making them RCAs. Figure A-29 shows median income and non-White population by block group in the city. Block groups in Downtown San Rafael, around Northgate Mall, along Lincoln Avenue, and in the southeastern area of San Rafael tend to have lower median incomes.

RCA tracts are presented in Figure A-30. The easternmost census tract (Peacock Gap, Glenwood, Loch Lomond), and the northwestern tract (northern Terra Linda, Mont-Marín, San Rafael Park) are considered RCAs. These areas are characterized by the highest owner-

occupancy rates in the city. Moreover, most rental housing in these areas consists of private single family homes or townhomes rented by owner. Conversely, the lowest income tracts in the city tend to have large numbers of rental apartments. These sections of San Rafael also tend to have smaller non-White populations.

Median household income by race/ethnicity in San Rafael and Marin County is shown in Table A-18 below. The median income in San Rafael is significantly lower than the County (\$91,742 vs. \$115,246). The non-Hispanic White population has a significantly higher median income than most of the other racial groups and is roughly equivalent to the countywide average. The American Indian/Alaska Native population has the lowest median income in the City (\$40,343), followed by the Black/African American population (\$48,453). The Hispanic/Latino median income is \$55,332, which is less than half the non-Hispanic white population median income.

Table A-18: Household Income by Race/Ethnicity, 2019

Race/Ethnicity	Marin County		San Rafael	
	Total Population	% below poverty level	Total Population	% below poverty level
White alone, not Hispanic or Latino	80.3%	\$126,501	70.1%	\$115,318
Hispanic or Latino origin (of any race)	9.7%	\$67,125	18.3%	\$55,332
Black or African American	1.6%	\$48,602	1.6%	\$48,453
American Indian and Alaska Native	0.3%	--	0.8%	\$40,343
Asian	5.6%	\$107,849	7.3%	\$95,893
Native Hawaiian and Other Pacific Islander	0.1%	\$18,221	0.0%	--
Some other race	4.5%	\$59,604	10.3%	\$52,006
Two or more races	3.2%	\$104,679	3.7%	\$100,875
Total	100.0%	\$115,246	100.0%	\$91,742

Source: ACS, 2015-2019 (5-year estimates)

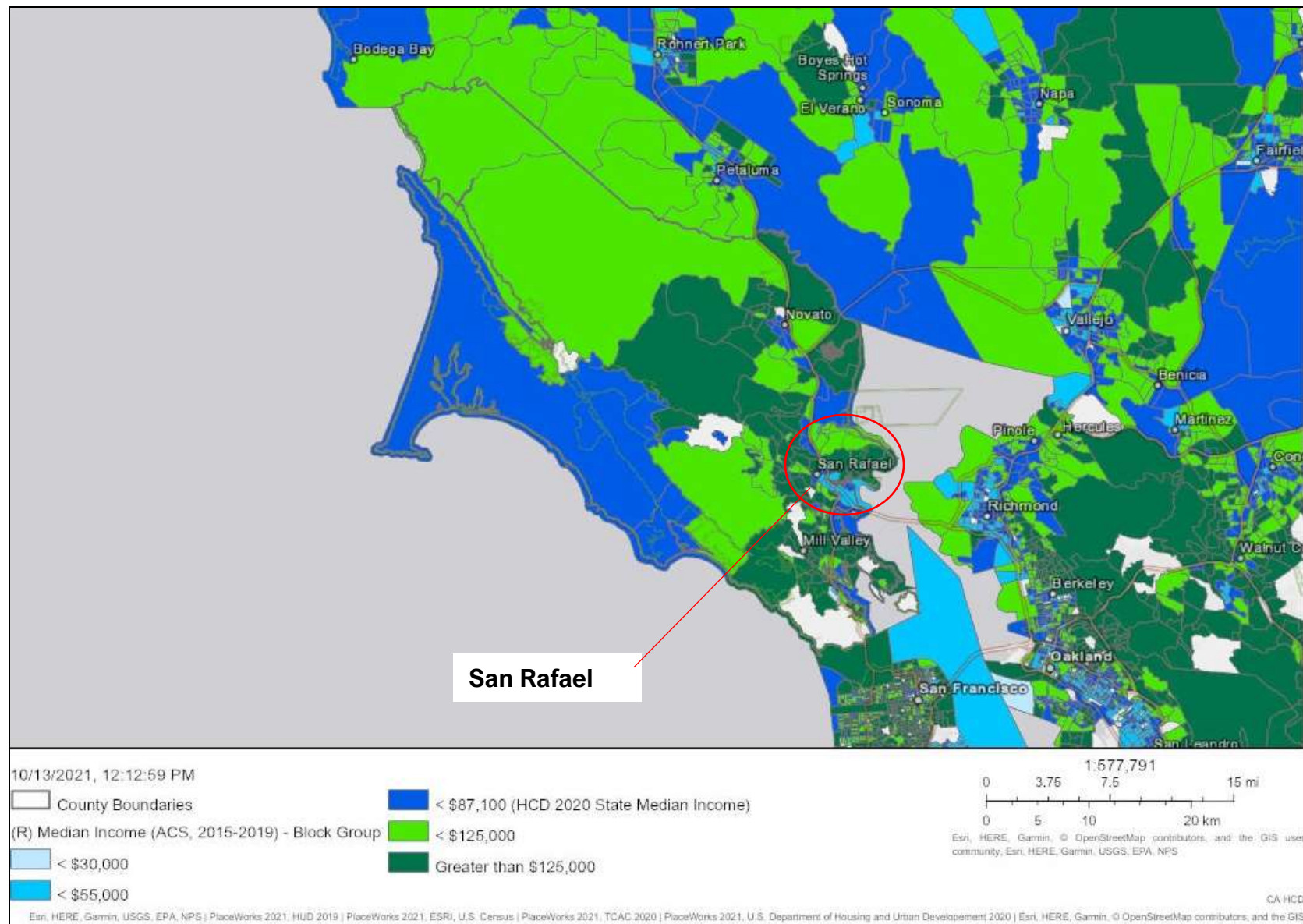


Figure A-27: Regional Median Income by Block Group

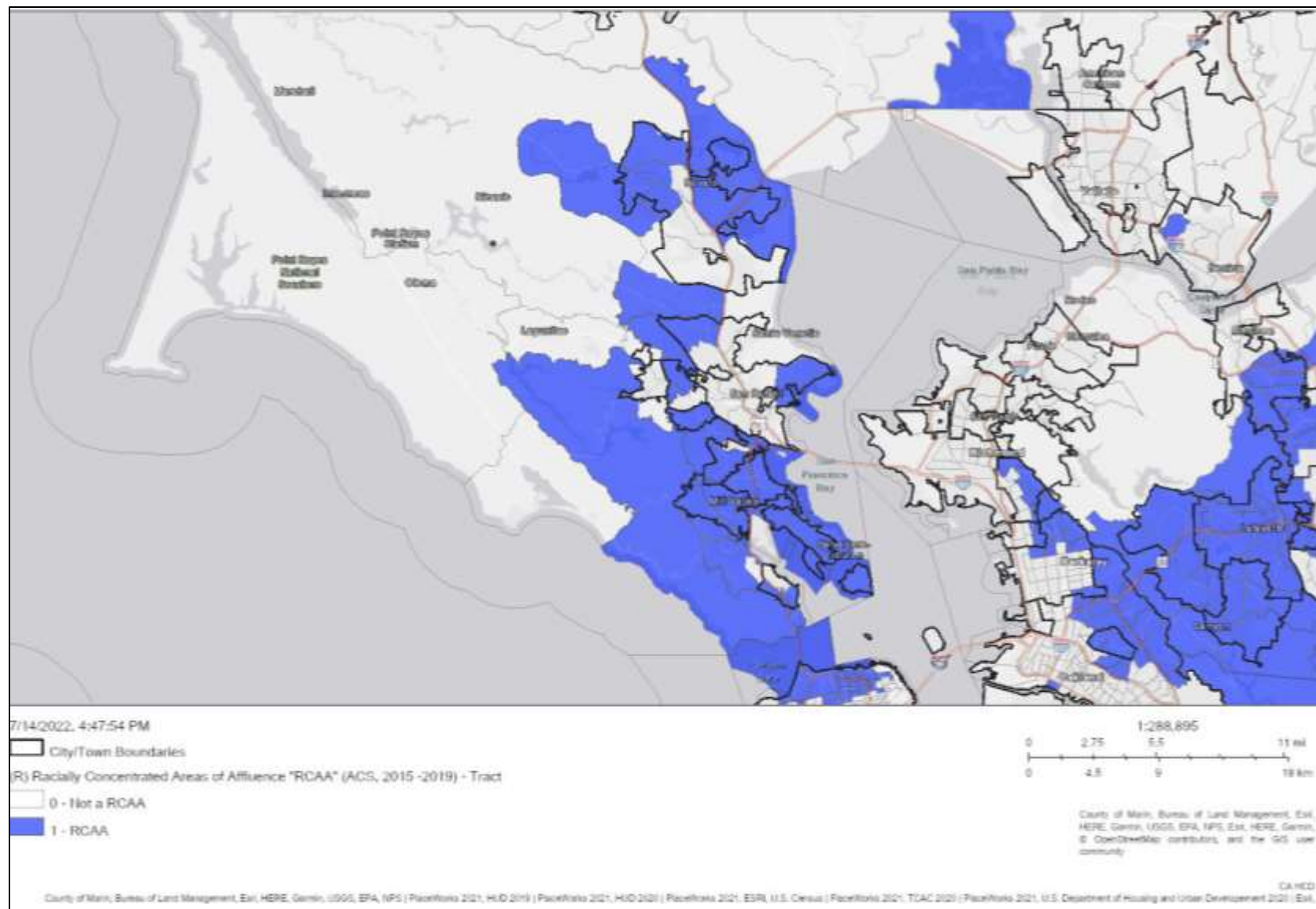


Figure A-28: Racially Concentrated Areas of Affluence in Northern Bay Area

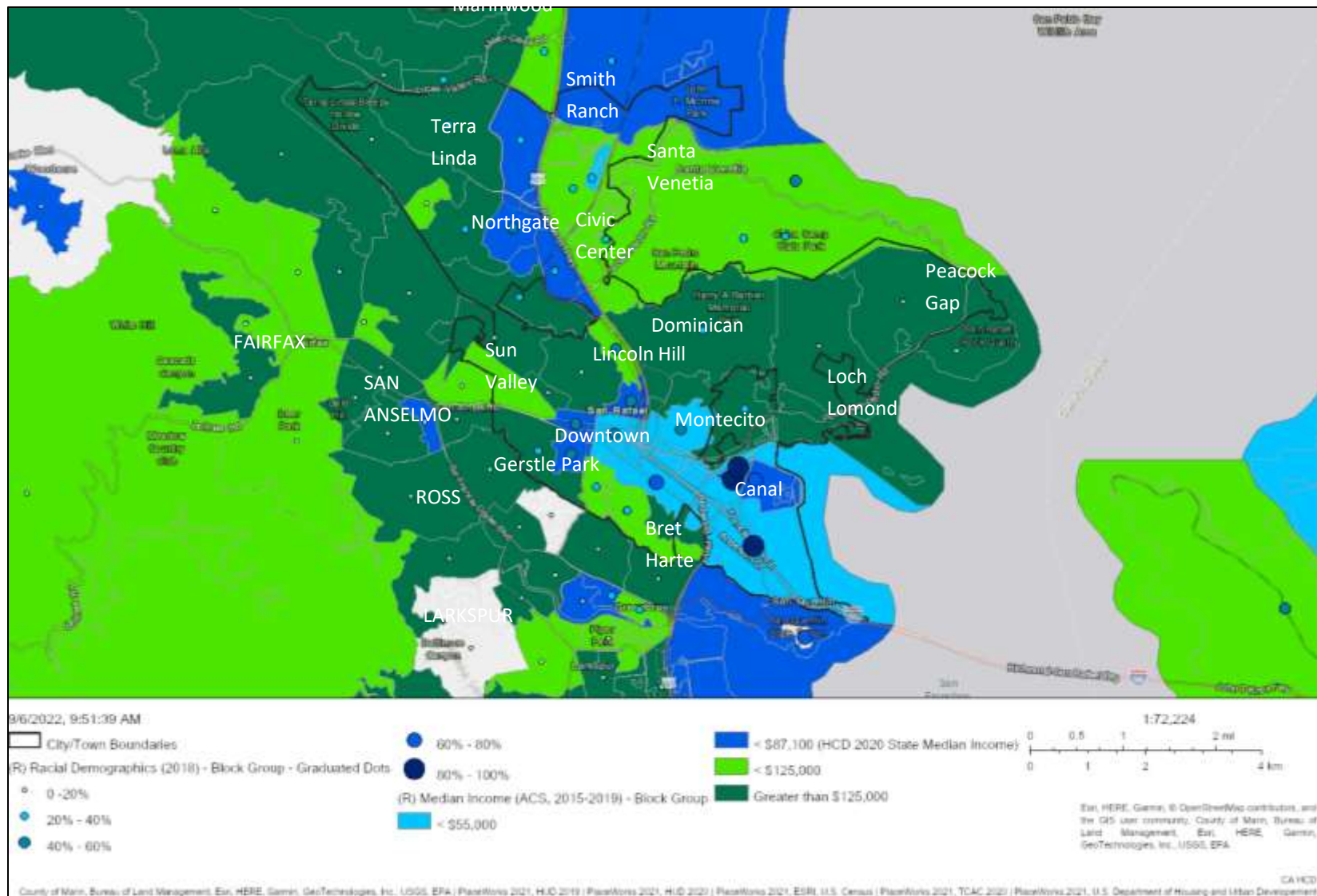


Figure A-29: Median Income and Non-White Population by Block Group, 2019

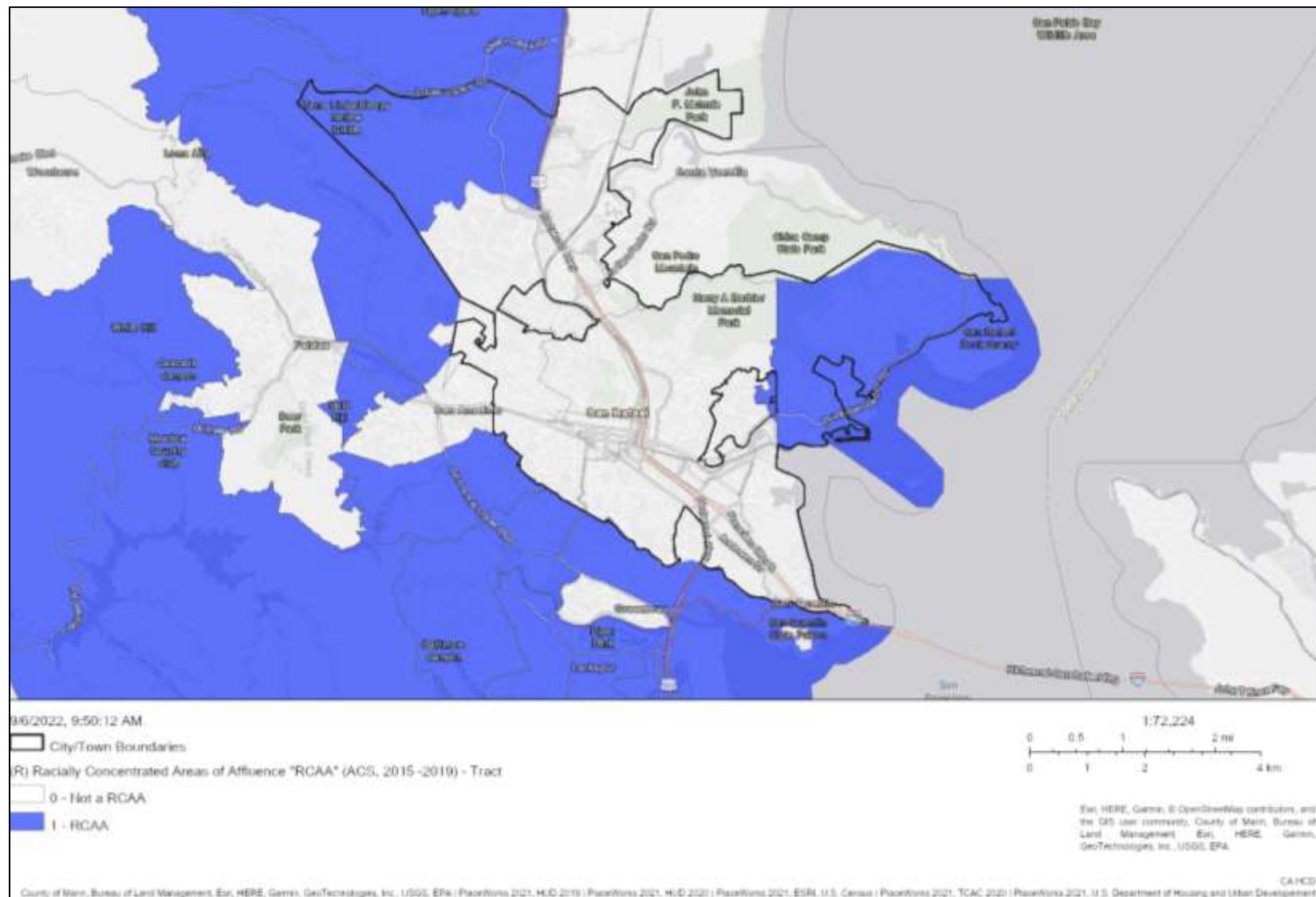


Figure A-30: Racially Concentrated Areas of Affluence (RCAA) in San Rafael

F. Access to Opportunities

F.1 Overview

Significant disparities in access to opportunity are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.”

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/ departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table A-19 shows the full list of indicators.

Table A-19: List of Indicators for Tax Credit Allocation Committee (TCAC) Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

Source: ACS, 2015-2019 (5-year estimates)

The TCAC opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. For poverty, the threshold was areas with at least 30 percent of the population under the federal poverty line. For racial segregation, the threshold was tracts with a location quotient higher than 1.25 for all people of color in comparison to the County as a whole.

TCAC/HCD assigns “scores” for each of the domains listed in Table A-19 by census tract. It also computes “composite” scores that combine the three domains. Scores from each individual domain range from 0-1, where higher scores indicate higher “access” to the domain or higher “outcomes.” Composite scores do not have a numerical value but rather rank census tracts by the level of resources (low, moderate, high, highest, and high poverty and segregation).

The TCAC/HCD Opportunity Maps offer a tool to visualize show areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource, and high segregation and poverty. The maps can help identify areas that provide good access to opportunity for residents or, conversely, provide low access to opportunity. They can also help to highlight areas where there are high levels of segregation and poverty. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low resource areas and areas of high segregation and poverty and to encourage better access for low and moderate income and black, indigenous, and people of color (BIPOC) households to housing in high resource areas.

F.2 Composite Scores

F.2.1 Regional Trends

As explained earlier, TCAC composite scores categorize the level of resources in each census tract. Categorization is based on percentile rankings for census tracts within the region. Figure A-31 shows the composite scores for the northern Bay Area. Counties in the region all have a mix of resource levels. Marin County includes concentrations of high resource tracts. Low resource tracts tend to be located in older central cities, such as San Francisco and Oakland.

There is only one census tract in Marin County considered areas of “high segregation and poverty.” This census tract corresponds to the San Rafael’s Canal neighborhood. Other low resource areas (green areas on Figure A-31) are concentrated in West Marin, from Dillon Beach to Nicasio. This area encompasses the communities of Tomales, Marshall, Inverness, and Point Reyes Station. In Central Marin, low resource areas are concentrated in San Rafael. As shown in Figure A-31, all of Southern Marin is considered a “highest resource” area, with the exception of Marin City which is classified as moderate resource area.

The data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) is a useful tool for informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess County residents’ access to key opportunity assets.

Table A-20 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools and which are near lower performing elementary schools. *The higher the index value, the higher the school system quality is in a neighborhood.*
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and

educational attainment in a census tract. *The higher the index value, the higher the labor force participation and human capital in a neighborhood.*

- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA). *The higher the transit trips index value, the more likely residents in that neighborhood utilize public transit.*
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index value, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher the index value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.*

Table A-20: Opportunity Indices by Race/Ethnicity – Marin County

	School Prof.	Labor Market	Transit Trip	Low Transp. Cost	Jobs Prox.	Env. Health
Total Population						
White, Non-Hispanic	78.73	86.48	61.00	86.45	64.50	81.33
Black, Non-Hispanic	75.59	48.89	68.54	89.57	74.96	76.55
Hispanic	55.96	68.11	68.08	89.65	69.72	83.84
Asian or Pacific Islander, Non-Hispanic	74.41	82.57	64.24	87.81	66.89	81.01
Native American, Non-Hispanic	77.09	67.25	62.28	87.19	69.32	80.55
Population below federal poverty line						
White, Non-Hispanic	74.28	84.68	61.13	87.02	64.01	82.93
Black, Non-Hispanic	66.79	55.04	74.1	91.52	66.84	76.07
Hispanic	38.54	56.82	75.83	91.68	76.48	83.81
Asian or Pacific Islander, Non-Hispanic	68.97	82.89	67.01	89.11	71.69	78.95
Native American, Non-Hispanic	56.77	66.49	71.22	88.33	67.14	85.29

Note: American Community Survey Data are based on a sample and are subject to sampling variability. See text above for index score meanings. Table is comparing the total population of Marin County by race/ethnicity, to the total number of County residents living the federal poverty line, also by race/ethnicity.

Source: AFFHT Data Table 12; Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

F.2.2 Local Trends

Figure A-32 shows the designation of San Rafael neighborhoods by composite opportunity map score. Most San Rafael tracts are categorized as moderate resource tracts. There are also two highest resource tracts (northern Terra Linda-Mont Marin and Sun Valley), two low resource tracts (Montecito/ Dominican and southeast San Rafael outside the Canal), and one high segregation and poverty tract (the Canal). The designation of Montecito/Dominican as a low-resource tract is likely due to the concentration of apartments on the east edge of Downtown and the student population at Dominican University. Actual development patterns in this neighborhood include some of the most affluent neighborhoods in San Rafael. The other low resource tract includes the perimeter of the Canal neighborhood, plus Bahia, Bay Pointe and Spinnaker Point, which are largely owner-occupied neighborhoods. Most of San Rafael, including the Downtown and Northgate PDAs, is designated a “moderate resource” area.

F.2.3 Relationship of Sites Inventory to TCAC Composite Opportunity Scores

The distribution of RHNA units by TCAC Opportunity Area category is shown in Table A-21 and Figure A-33. Most of the city’s housing opportunity site capacity (74.7 percent) is in moderate resource areas. Only one percent of the RHNA units are in the Canal area; these sites are identified for lower income households in response to feedback from the community that this housing type was urgently needed, and in response to concerns about gentrification and displacement. Consistent with the AFFH mandate, lower-income units are also planned in the highest resource neighborhoods and above-moderate income units are planned in low resource neighborhoods. A majority of the city’s lower-income capacity is in moderate resource areas, in keeping with City and regional strategies to focus growth in transit-served areas (Downtown and Northgate) and areas with relatively low hazards. The Canal area (High Segregation and Poverty) is entirely in an area subject to sea level rise and has limited opportunity for infill housing.

Table A-21: Distribution of RHNA Units by TCAC Opportunity Scores

Percent of residents with a disability (block group)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Highest Resource	122	7.4%	0	0.0%	295	12.2%	417	8.9%
Moderate Resource	1,209	73.3%	545	87.8%	1,747	72.4%	3,502	74.7%
Low Resource	271	16.4%	76	12.2%	372	15.4%	719	15.3%
High Segregation & Poverty	48	2.9%	0	0.0%	0	0.0%	48	1.0%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, 2021

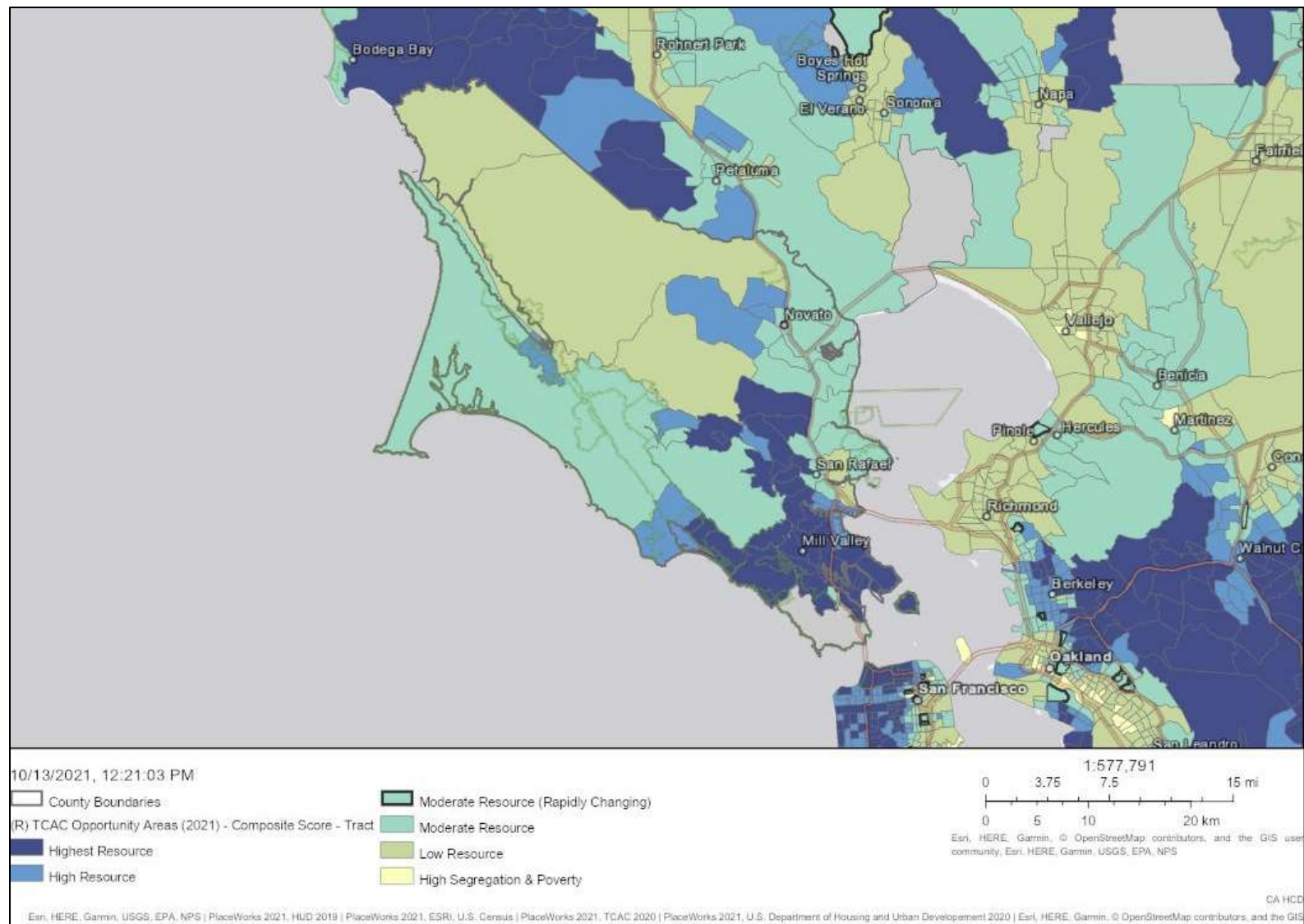


Figure A-31: Regional TCAC Composite Scores (2021)

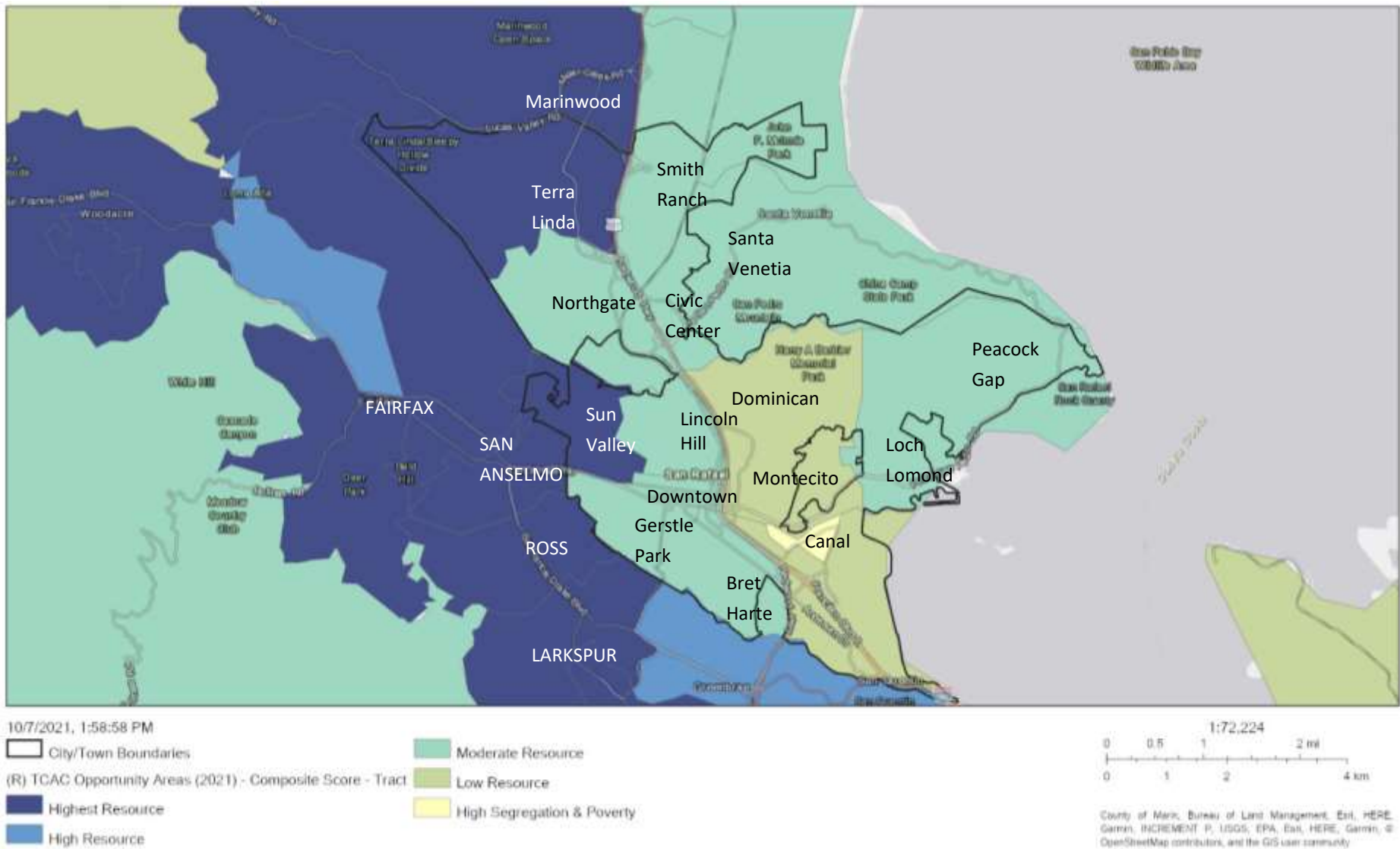


Figure A-32: TCAC Composite Scores in San Rafael (2021)

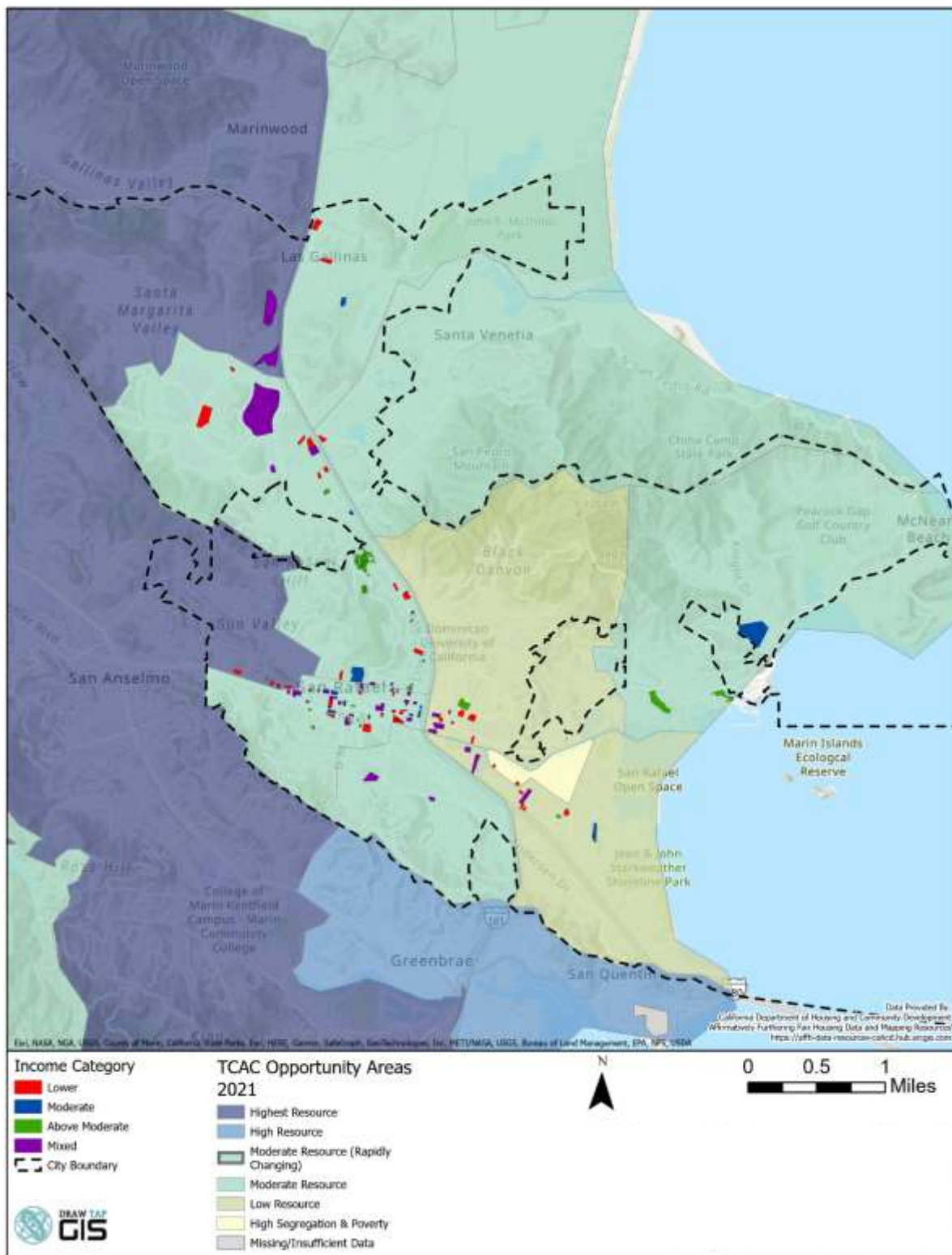


Figure A-33: Distribution of Housing Sites Relative to TCAC Opportunity Scores

F.3 Educational Outcomes

F.3.1 Regional Trends

The school proficiency index is an indicator of school system quality, with higher index scores indicating access to higher school quality. In Marin County, the index value for Hispanic students is 56, compared to 74-78 for all other races. For residents living below the federal poverty line, index values are lower for Hispanic and Native American residents than for persons of other races. White residents have the highest index values, indicating a greater access to high quality schools, regardless of poverty status.

The HCD/TCAC education scores for the region show the distribution of education quality based on education outcomes (Figure A-33). The Education domain score is based on a variety of indicators including math and reading proficiency, high school graduation rates, and student poverty rates. The education scores range from 0 to 1, with higher scores indicating more positive education outcomes. In the northern Bay Area, lower scores are found in central city areas and other areas with lower incomes. In Marin County, lower education scores are concentrated in Novato and San Rafael as well as in parts of rural West Marin. Higher educational scores are found in southern Marin and in other urbanized cities in the 101 Corridor, again including San Rafael and Novato.

According to Marin County's 2020 Analysis of Impediments to Fair Housing Choice [2020 AI], Marin County, "has the greatest educational achievement gap in California." According to data from Marin Promise, a nonprofit of education and nonprofit leaders, from 2017 – 2018:

- 78 percent of White students in Marin met or exceeded common core standards for 3rd Grade Literacy, while only 42 percent of students of color met or exceeded those standards
- 71 percent of White students met or exceeded common core standards for 8th grade math, while only 37 percent of students of color met or exceeded those standards
- 64 percent of White students met or exceeded the college readiness standards, defined as completing course requirements for California public universities, while only 40 percent of students of color met or exceeded those requirements

F.3.2 Local Trends

Greatschools.org is a non-profit organization that rates schools across the States. The Great Schools Summary Rating calculation is based on four ratings: the Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is "below average", 5-6 indicate "average", and 7-10 are "above average." San Rafael schools received scores ranging from 2 to 9.

The spatial distribution of TCAC educational outcome indices is shown in Figure A-35. While the Canal area appears to have lower educational outcomes, so does the high-income San Pedro Peninsula. School attendance areas cross neighborhood boundaries in many instances, resulting in outcomes that do not reflect the true distribution of resources in the community. The northwestern corner of the city has the highest TCAC education scores.

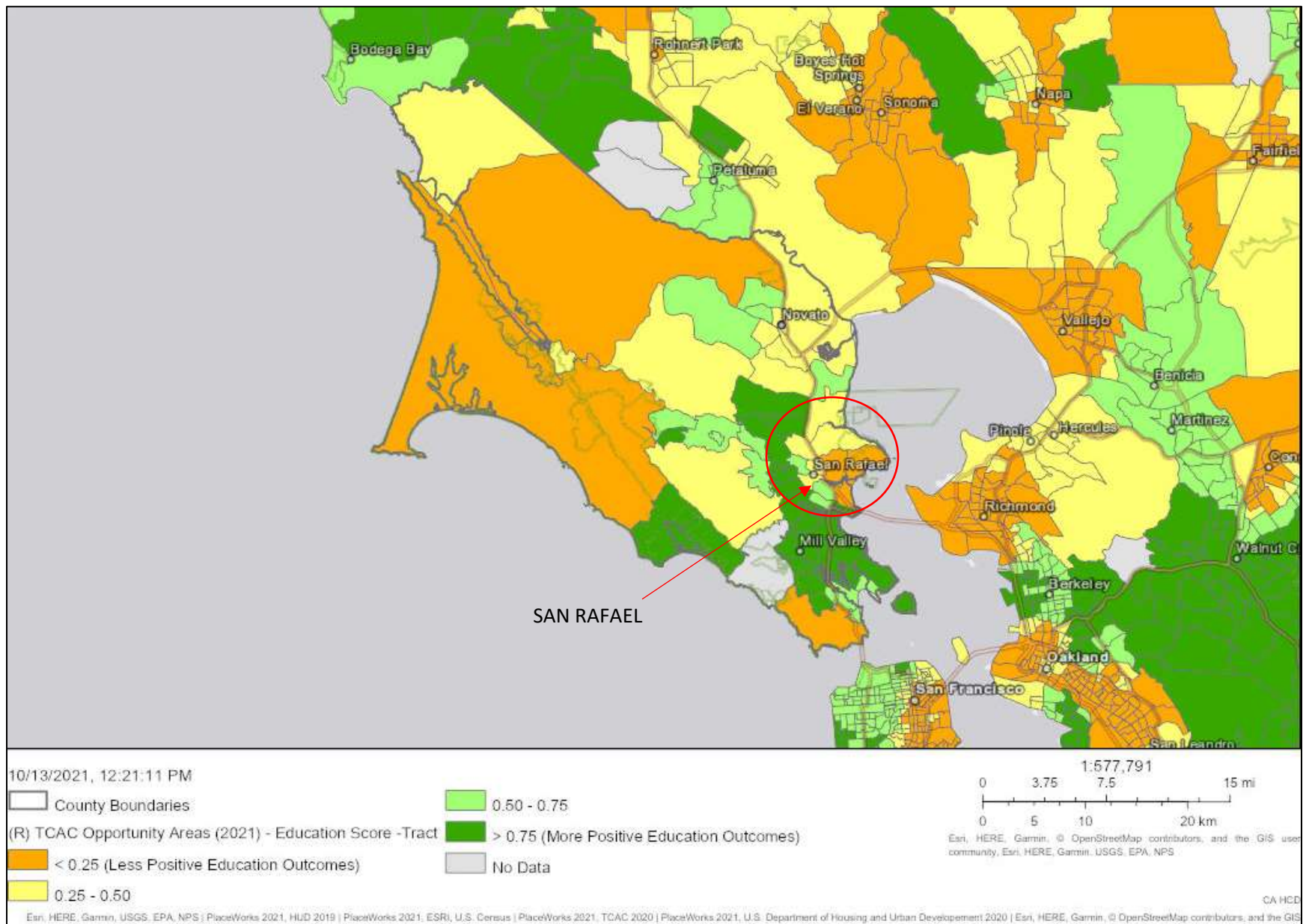


Figure A-34: TCAC Education Scores in Northern Bay Area

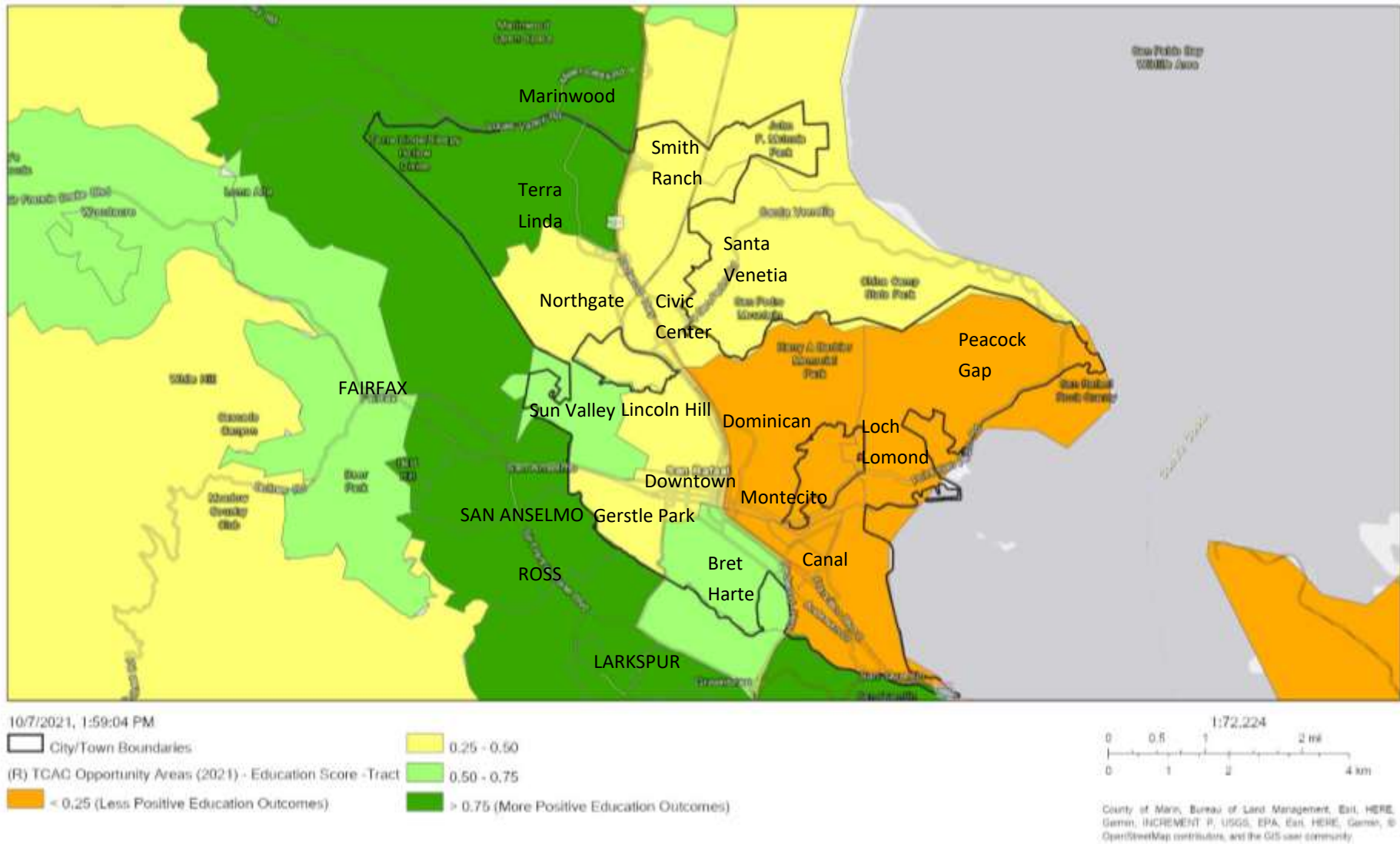


Figure A-35: TCAC Education Scores in San Rafael

F.4 Transportation Outcomes

F.4.1 Regional Trends

According to ABAG's Plan Bay Area 2040, a regional mismatch between employment growth and housing growth has resulted in a disconnect between where people live and work. Overall, the Bay Area has added nearly two jobs for every housing unit built since 1990. The mismatch accelerated in the 2010s as job growth far exceeded housing production. The deficit in housing production has been particularly impactful on lower- and middle wage workers, especially in many of the jobs-rich, high-income communities along the Peninsula and in Silicon Valley. As a result, there has been growing freeway congestion and crowding on transit systems like Bay Area Rapid Transit (BART), Caltrain and San Francisco's Municipal Railway (Muni).

HUD's opportunity indicators provide a picture of transit use and access in Marin County through the transit index¹⁰ and transportation cost index.¹¹ Index values can range from zero to 100 and are reported by race so that differences in access to transportation can be evaluated through that lens. In Marin County, transit index values range from 61 to 69, with White residents scoring lower and Black and Latino residents scoring highest. The higher indices for Black and Latino residents are an indicator that these racial/ethnic groups are more likely to use public transit. For residents living below the poverty line, the index values are 61 for White residents and 75 for Latino residents.

Transit services in Marin County are concentrated along the city-centered corridor from Novato to Marin City/Sausalito. San Rafael is the hub of this system, with connections eastbound over the Richmond bridge to the East Bay, as well as north to Santa Rosa and south to San Francisco. The County's principal intermodal transit center is in Downtown San Rafael, and the Downtown area is particularly well-served by transit. Marin Transit Authority (MTA) operates all bus routes that begin and end in the County.

F.4.2 Local Trends

In 2017, MTA conducted an onboard survey of their ridership and identified the Canal District of San Rafael as having a high number of transit users. A profile of Canal transit users indicated that 42 percent had annual incomes of less than \$25,000, 90 percent identified as Hispanic or Latino, 84 percent spoke Spanish at home, 19 percent of households had no vehicle, and 30 percent had five or more workers living with them.¹² According to the survey, residents in the Canal area had the highest percentage of their trips on Marin Transit relative to other parts of Marin County.

AllTransit is a national transit advocacy organization that has developed metrics related to the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), San Rafael has an

¹⁰ *Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.*

¹² *From the 2020 County of Marin Analysis of Impediments to Fair Housing Choice*

AllTransit Performance Score of 5.4 (out of 10). AllTransit further reports there are 60,000 jobs accessible by transit within a 30-minute ride from San Rafael and that 11.5 percent of the city's workforce used transit to get to work in 2021.

The map in Figure A-36 shows that the southern areas of the city and areas along the 101 corridor have higher transit scores compared to other areas of San Rafael. According to AllTransit, 95.7 percent of the jobs in San Rafael are located within ½ mile of transit and 83.6 percent workers live within ½ mile of transit.

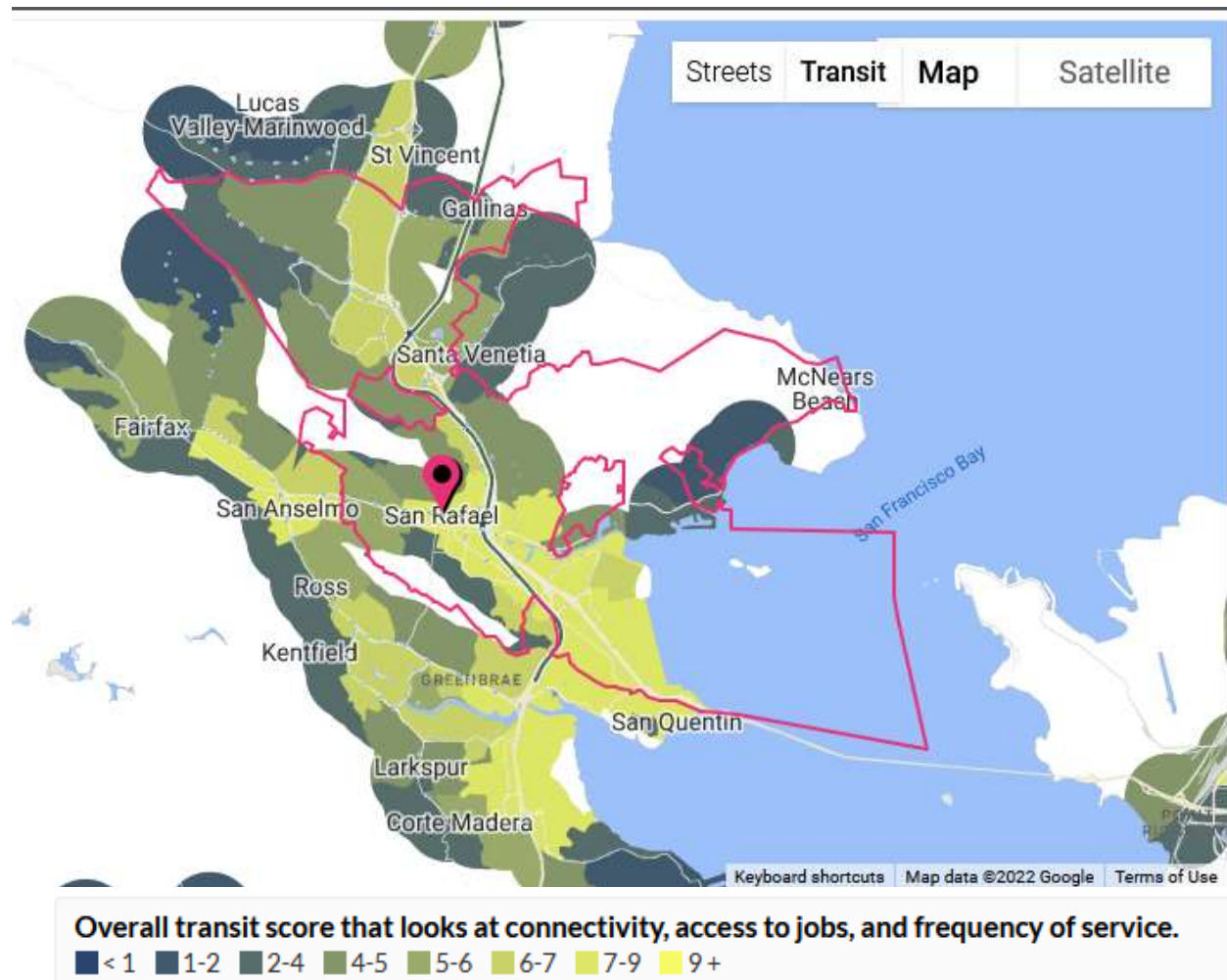


Figure A-36: AllTransit Performance Score for San Rafael

F.5 Economic Outcomes

F.5.1 Regional Trends

The Bay Area is the fourth largest regional economy in the United States, with over 7.7 million people residing in the nine-county, 7,000 square-mile area. In recent years, the Bay Area has experienced record employment levels during a tech expansion surpassing the “dot-com” era of the late 1990s. The latest boom has extended not only to the South Bay and Peninsula — the traditional hubs of Silicon Valley — but also to neighborhoods in San Francisco and cities in the East Bay, most notably Oakland. The rapidly growing and changing economy has also created significant housing and transportation challenges due to job-housing imbalances.

HUD’s opportunity indicators provide values for labor market index¹³ and jobs proximity index¹⁴ that can be used to evaluate economic development in Marin County. Like the other HUD opportunity indicators, scores range from 0 to 100 and are published by race and poverty level to identify differences in economic opportunity. The labor market index value is based on the level of employment, labor force participation, and educational attainment in a census tract- a higher score means higher labor force participation in a neighborhood. Marin County’s labor market index values range from 49 to 86, with Black residents scoring lowest and White residents scoring highest. Scores for Marin County residents living below the poverty line are significantly lower.

HUD’s “jobs proximity index” measures how accessible each neighborhood is to job locations in the area. Scores are based on a gravity model that considers the location of the labor force relative to the location of jobs. The higher the index, the better the access to employment. Index values can range from 0 to 100. Marin County jobs proximity index values range from 65 to 75 and are higher for Hispanic and Black residents than for White residents. The jobs proximity value map in Figure A-37 shows the distribution of scores in the region. Regionally, tracts in the urban core of the Bay Area (Oakland and San Francisco) have the highest scores.

In Marin County, the highest values are in Central Marin near the intersection of Highway 101 and Highway 580 in south San Rafael. West Marin has significantly lower scores, which is intuitive given its agricultural character and low population density. The blue areas are considered to have the best access to jobs. In a regional context, San Rafael’s scores are higher than most of Marin County. High scores also appear in San Francisco, Berkeley, Oakland, and parts of Southern Marin. Some of the blue areas in the North Bay correspond to very large open space areas with low employment, making this data less useful as an analytical tool for rural areas than for urban communities.

¹³ *Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.*

¹⁴ *Jobs Proximity Index: The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*

The TCAC Economic Scores are a composite of jobs proximity index values as well as poverty, adult education, employment, and median home value characteristics.¹⁵ TCAC economic scores range from 0 to 1, where higher values indicate more positive economic outcomes. The regional map in Figure A-38 shows very high economic outcomes for most of Marin County, with lower rates in Novato, Bolinas, and the rural northwest part of the county. High outcomes also appear in San Francisco, and more affluent areas of the East and North Bay. Lower outcomes appear in Central Petaluma, Cotati-Rohnert Park, Richmond, Vallejo, Napa, and East Oakland.

F.5.2 Local Trends

HUD's jobs proximity scores, discussed above, are shown by San Rafael block group in Figure A-39. Most block groups received favorable jobs proximity index scores of 60 or higher. The Bret Harte and Canal areas and the Northgate/Civic Center area, specifically, received the highest scores, exceeding 80. Two block groups received lower scores ranging from 40 to 60: these include the Peacock Gap area and northern Terra Linda. In general, job proximity scores in San Rafael indicate employment opportunities are highly or moderately accessible to residents. Jobs proximity scores for San Rafael block groups are consistent with jurisdictions to the north and south, and higher than unincorporated County areas to the west.

The TCAC Economic Scores are a composite of jobs proximity as well as poverty, adult education, employment, and median home value characteristics. The map in Figure A-40 shows relatively high scores in most of San Rafael (though not as high as in Ross and in Larkspur). The Canal area and other parts of southeast San Rafael are in the bottom quartile, with poorer economic outcomes for residents. As discussed previously, this area of the City has several overlapping conditions including larger racial/ethnic minority and LMI populations, and low resource/area of high segregation and poverty designations.

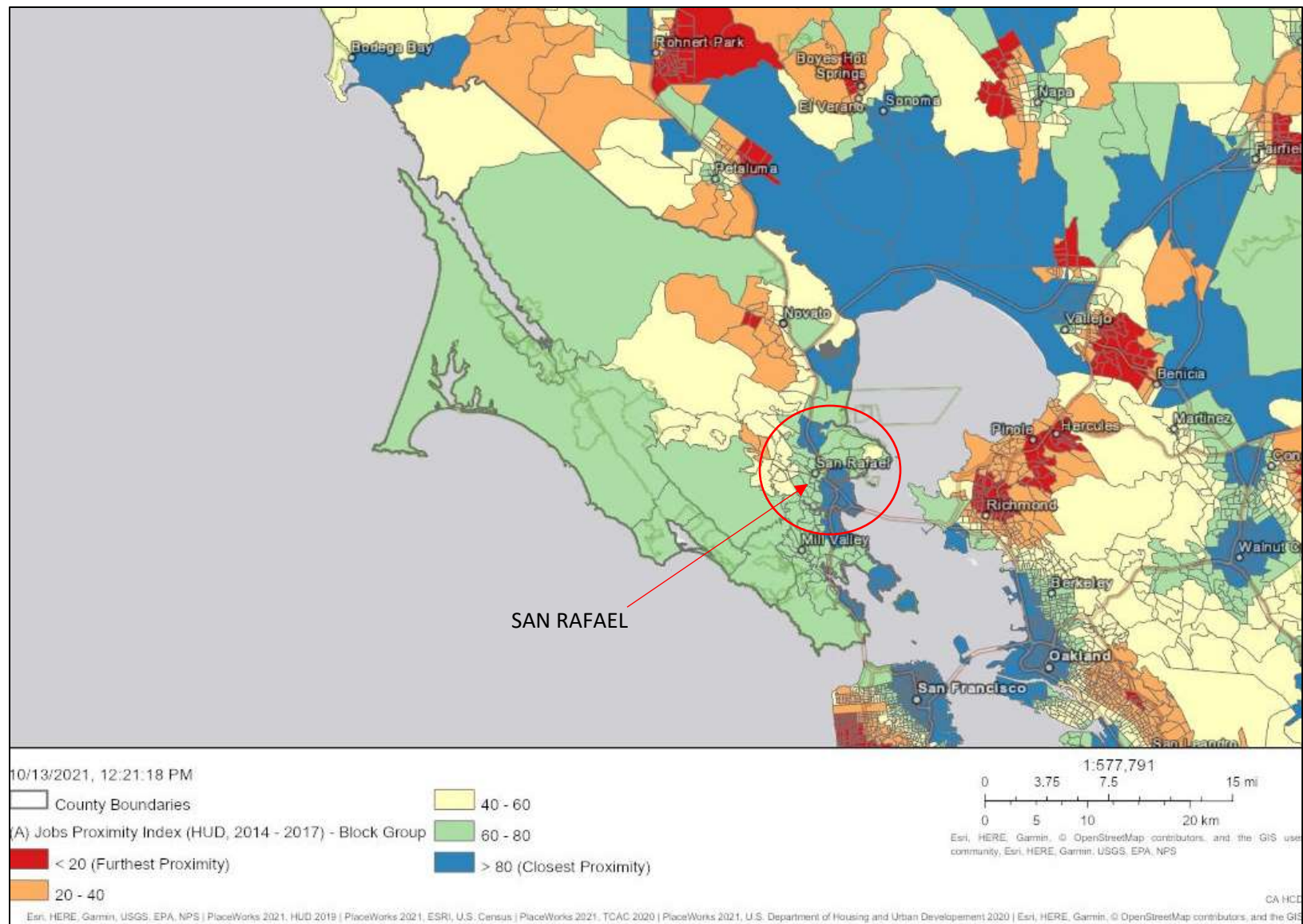


Figure A-37: Jobs Proximity Index for Northern Bay Area, 2017

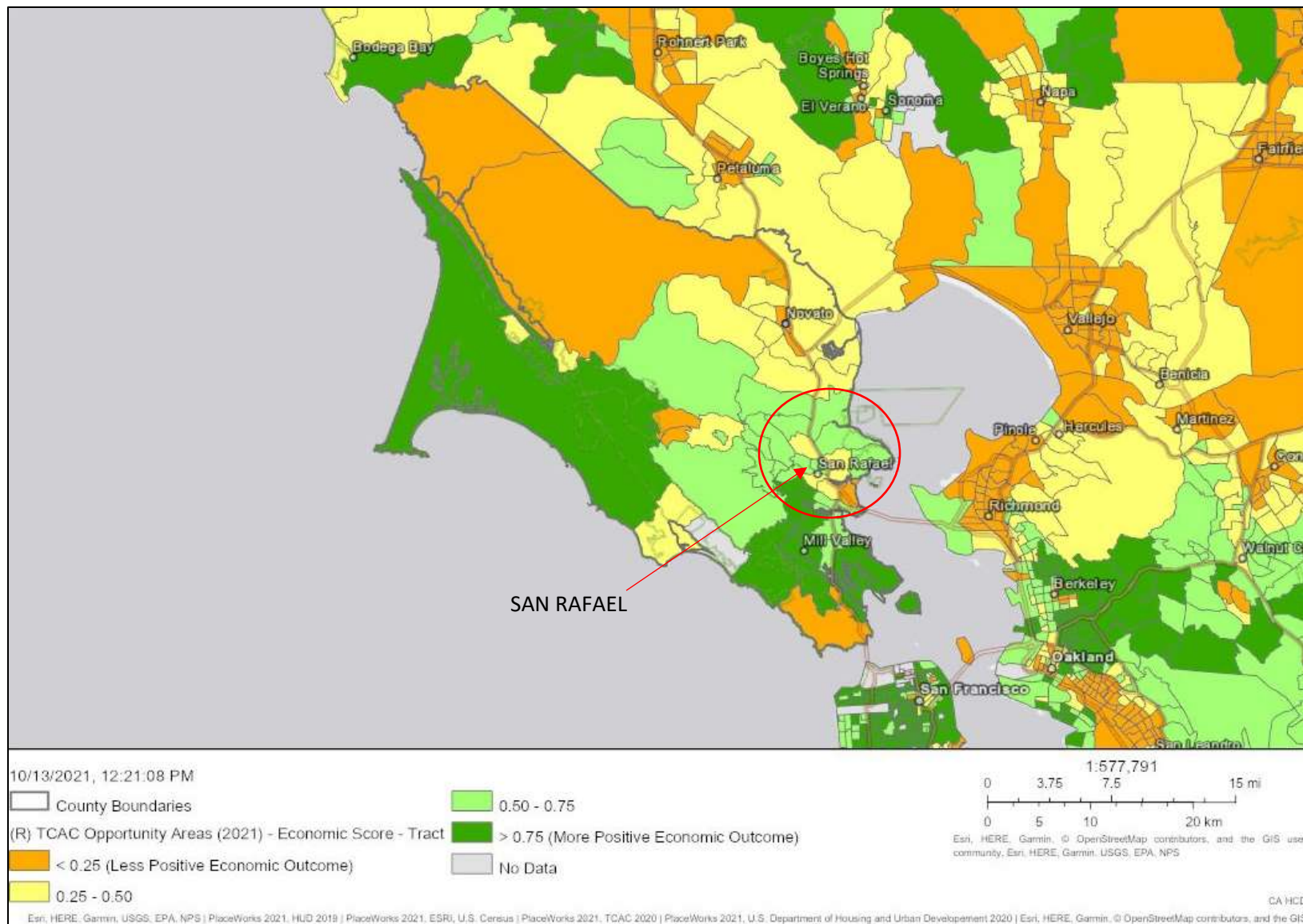


Figure A-38: TCAC Economic Outcome Score for Northern Bay Area, 2021

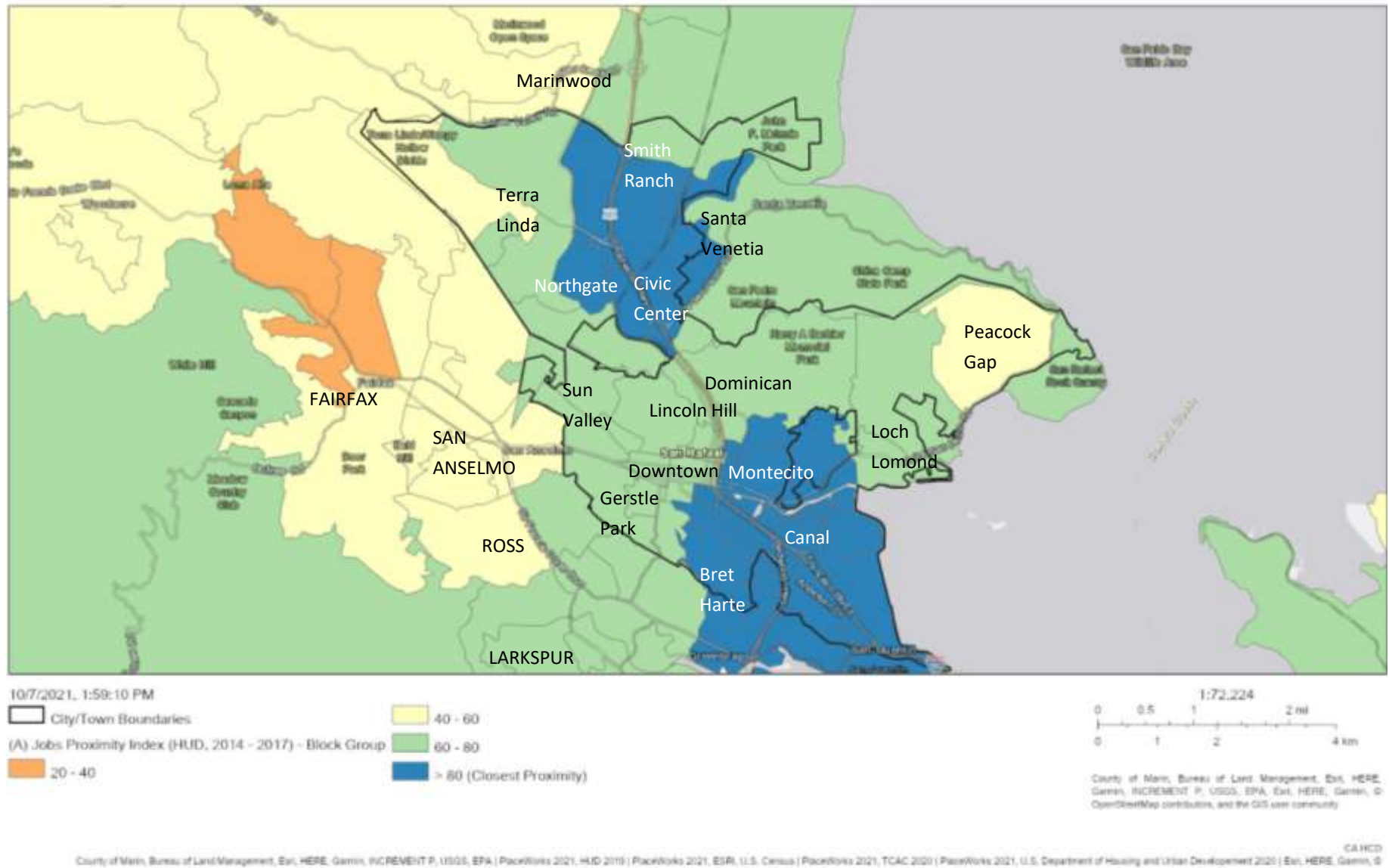
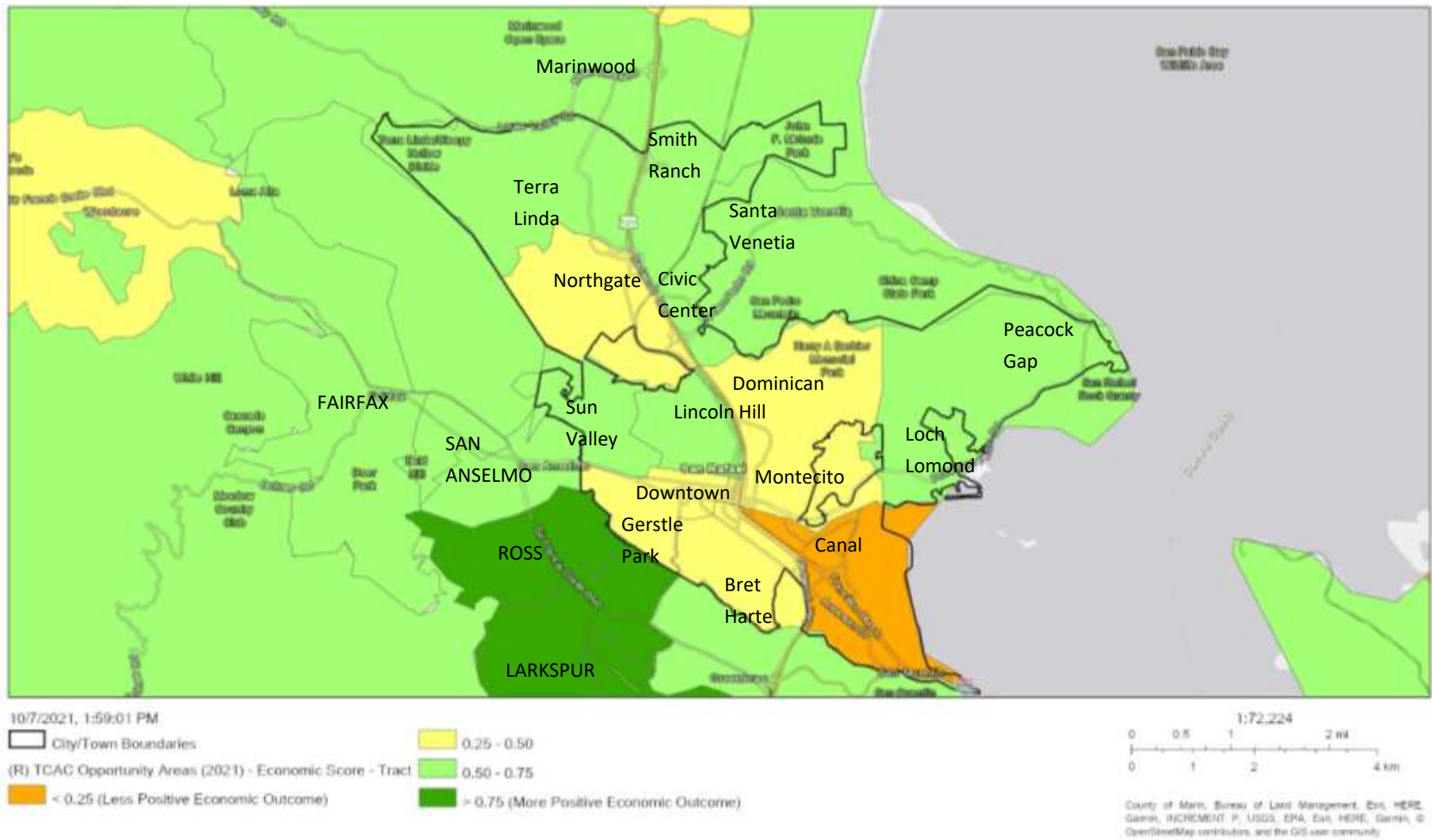


Figure A-39: Jobs Proximity Index for San Rafael, 2017



CAHCD
County of Marin, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

Figure A-40: TCAC Economic Outcome Score for San Rafael, 2021

F.6 Environmental Outcomes

The Office of Environmental Health Hazard Assessment (OEHHA), on behalf of the California Environmental Protection Agency (CalEPA), has prepared a tool to identify California communities that are disproportionately burdened by multiple sources of pollution. Census tracts are mapped on a scale of 1 to 100, with 100 being the “worst” score. The score considers exposure to air and water pollution, pesticides and toxins, hazmat sites, drinking water quality, ground water, and health indicators (such as rates of asthma, heart disease, and low birth weight).

CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. TCAC Environmental Scores range from 0 to 1, where higher scores indicate a more positive environmental outcome (better environmental quality).

F.6.1 Regional Trends

Figure A-41 shows TCAC environmental scores in the northern part of the Bay Area. The environmental scores are lowest in the heavily urban tracts along San Francisco and San Pablo Bays, particularly in Richmond, Vallejo, Oakland, and San Francisco. Marin County is an exception to this pattern, as most of its shoreline was not historically developed with industry. In Marin County, TCAC environmental scores are lowest in parts of West Marin and in a handful of census tracts along the 101 Corridor, including the Canal area of San Rafael and the Black Point area of Novato.

The Office of Environmental Health Hazard Assessment released updated scores in February 2020 (CalEnviroScreen 4.0). These scores likewise show the Canal area and Marin City as being disproportionately burdened by environmental hazards relative to the rest of the County.

F.6.2 Local Trends

As presented in Figure A-42, San Rafael census tracts have variable TCAC environmental scores. Scores heavily correlate with neighborhood income levels. Most tracts west of Highway 101 and on the San Pedro Peninsula rank 0.75 or higher. The tracts containing the Bret Harte/Woodland Avenue neighborhood and Contempo Mobile Home Park area rank between 0.25 and 0.50. Both of these tracts are adjacent to (or include) industrial areas, which tends to result in lower scores. The core Canal neighborhood (tract 1122.01) actually ranks above 0.75, but the adjacent tract that includes the southeast San Rafael industrial area, ranks below 0.25.

The CalEnviroScreen 4.0 scores show similar patterns. These are shown in Figure A-43 (along with a map of the City’s housing sites, discussed in the next section). The large Southeast San Rafael tract that includes Bahia, Spinnaker Point, and Bay Point has the highest Cal EnviroScreen score (over 70 percent), meaning it has the greatest concentration of environmental pollutants. This area historically included most of San Rafael’s heavier industrial uses, including landfills and quarries. The Core Canal tract scores in the 60th-70th percentile, while the Woodland Av/Bret Harte area scores in the 50th-60th percentile. The rest of the city scores in the 40th percentile or lower, indicating low levels of potential environmental hazards.

F.2.3 Relationship of Sites Inventory to Cal EnviroScreen Scores

Table A-22 below compares the distribution of the city's housing opportunity sites to the Cal EnviroScreen environmental hazard ratings. This is shown graphically in Figure A-43. Most RHNA units (91.7 percent) are in tracts scoring in within the 40th percentile or lower, indicating environmental conditions are favorable. Approximately 7.1 percent of the RHNA units are in areas with scores in the 61-70 percentile range, indicating less favorable conditions (sites in this area include properties on East Francisco Boulevard and Windward Way). The units in this area are evenly split between lower-income units and moderate/above moderate-income units. Overall, 89.5 percent of the lower-income RHNA capacity is in areas within the 40th percentile or lower, indicating that most lower income capacity located in areas with favorable Cal EnviroScreen scores.

Table A-22: Distribution of RHNA Units by Cal EnviroScreen Scores

Cal EnviroScreen Percentile Score (Census Tract)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
1-10%	469	28.4%	162	26.1%	1,127	46.7%	1,758	37.5%
11-20%	197	11.9%	85	13.7%	42	1.7%	324	6.9%
21-30%	548	33.2%	278	44.8%	820	34.0%	1,647	35.1%
31-40%	263	15.9%	60	9.7%	244	10.1%	567	12.1%
41-50%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
51-60%	5	0.3%	0	0.0%	53	2.2%	58	1.2%
61-70%	168	10.2%	36	5.8%	128	5.3%	332	7.1%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: Cal EnviroScreen 4.0, 2021

F.2.4 Healthy Places Index

The Healthy Places Index (HPI) was developed by the Public Health Alliance of Southern California to diagnose community conditions that affect health outcomes and the well-being of residents. It is used to compare conditions in communities across the state based on 25 community characteristics, including housing, education, economic, and social factors, using a single indexed percentile score. HPI scores in the Bay Area tend to be above the 60th percentile except in concentrated areas that include Vallejo, Richmond, Berkeley, Oakland, and San Francisco. In Marin County, most tracts score above the 80th percentile. However, the Core Canal Census Tract is has a score of 26 percent, and the adjacent neighborhood (including Bahia, Spinnaker/Bay Pointe and the industrial area) is in the 40-60th percentile. The tracts containing the Woodland Avenue corridor and Contempo Mobile Home Park both score in the 60th percentile. These areas generally correspond to the San Rafael tracts with the lowest incomes and the highest concentrations of minority residents.

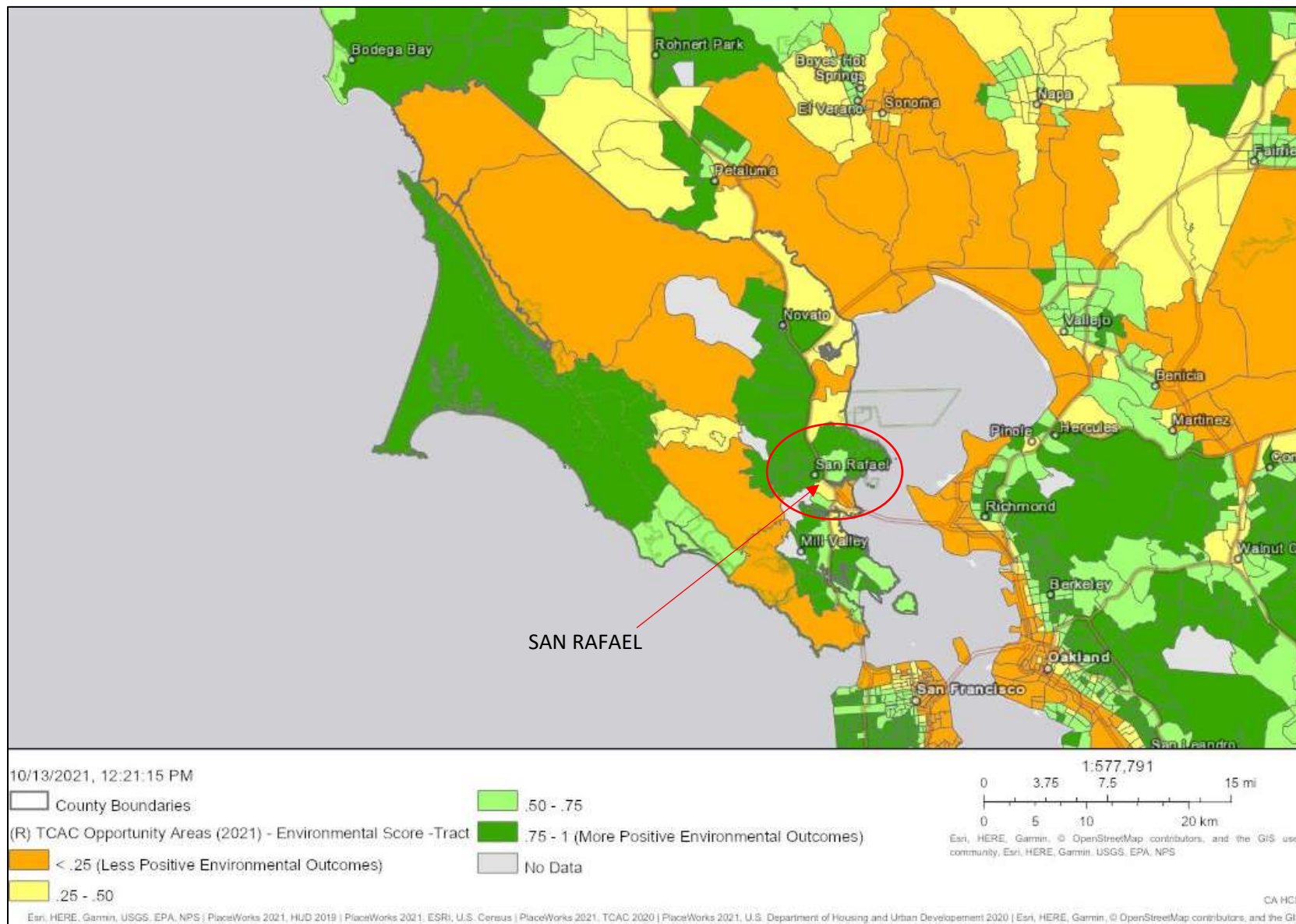


Figure A-41: TCAC Environmental Outcome Score for Northern Bay Area, 2021

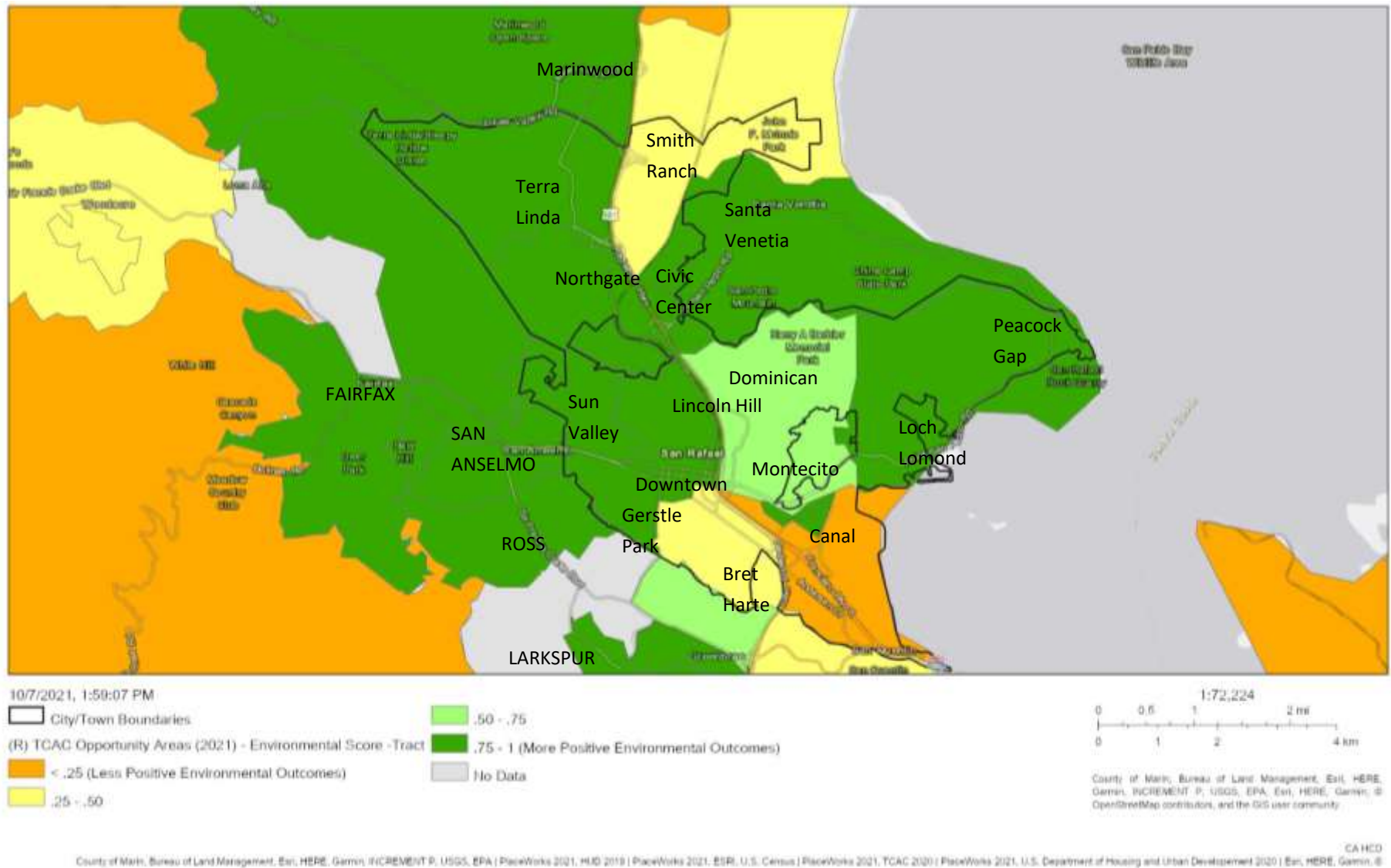


Figure A-42: TCAC Environmental Outcome Score for San Rafael, 2021

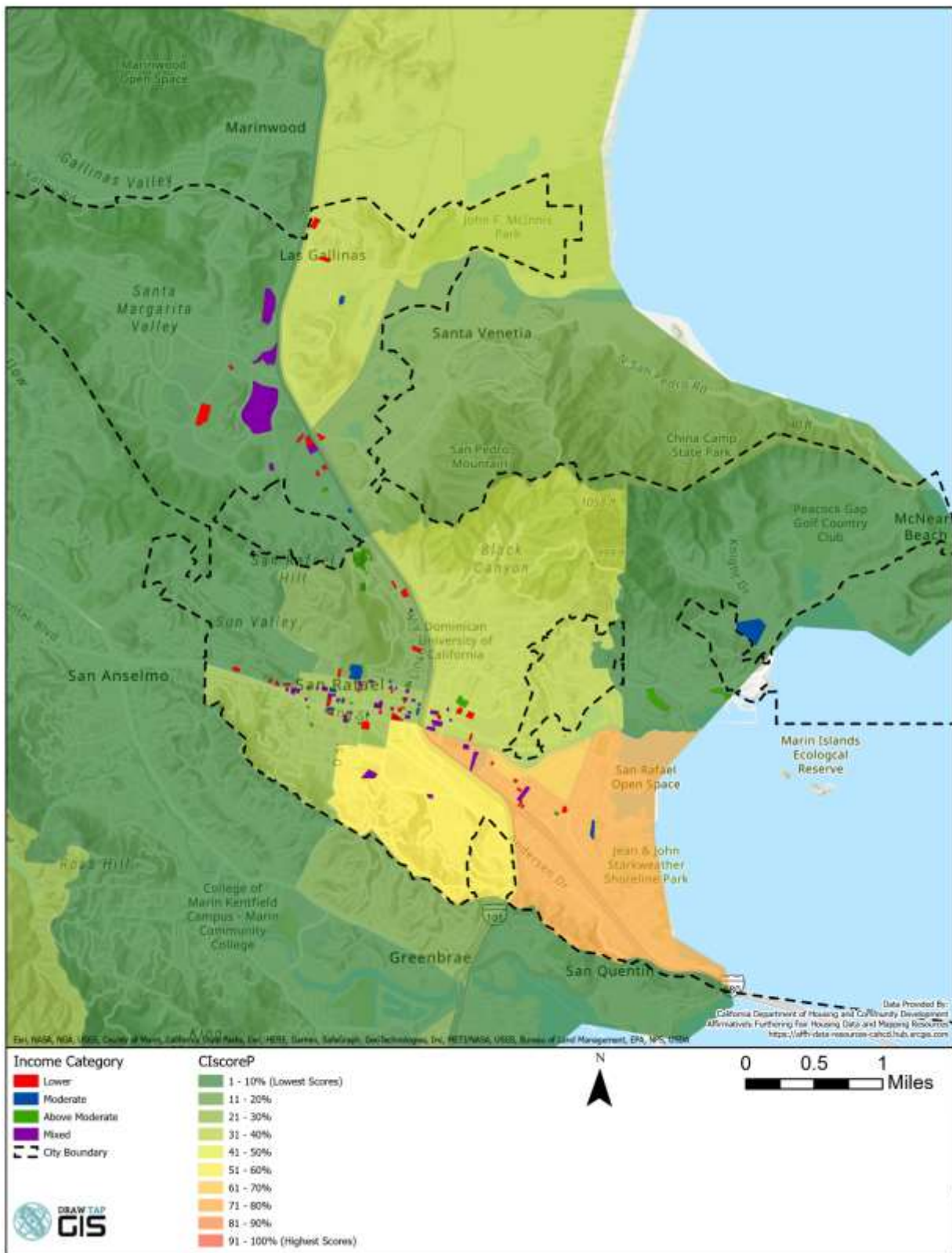


Figure A-43: Distribution of Housing Sites Relative to TCAC Environmental Scores

F.7 Access to Open Space and Parks

F.7.1 Regional Trends

A strong regional movement emerged during the latter half of the 20th century to protect farmland and open space. Local governments across California adopted urban growth boundaries, approved bond measures to acquire open space, and implemented “focused growth” strategies with support from environmental groups and regional agencies. The objective of these initiatives to limit sprawl, expand recreational opportunities, and preserve scenic and natural resources. While these policies have created a high quality of life, they have strained the region’s ability to build the housing needed for a growing population. In addition, simply acquiring open space does not ensure equal access to it.

In Marin County, open space is owned and managed by a variety of entities, including the federal government, the State of California, the Marin County Open Space District (Marin County Parks), and individual local governments. Marin County Parks includes regional and community parks, neighborhood parks, and 34 open space preserves that encompass 19,300 acres and 190 miles of unpaved public trails. Marin County residents generally perceive parks and open space very favorably, regardless of geographic area, age, ethnicity, or income. However, the 2020 Analysis of Housing Impediments (AI) found that residents in some parts of the county had limited access to open space for recreation. The lack of access to parks and open space has contributed to health issues in the County’s lower-income communities, including Marin City and the Canal.

In 2019, Marin County Parks conducted a Community Survey and identified the cost of entrance and fees to be obstacles for access to County parks. As a result, in July of 2019, entry fees were reduced from \$10 to \$5 for three popular parks in the County, and admission charges to McNears Beach Park pool, located in San Rafael, were eliminated.

F.7.2 Local Trends

San Rafael is home to numerous parks and open space areas. The San Rafael General Plan found that the city had 4.28 acres of active parkland per 1,000 residents, which exceeded its adopted service standard. However, this parkland is not evenly distributed around the city. Moreover, the quality of parkland and access to amenities is variable. Some communities are close to natural open space, hiking trails, and shoreline but lack access to sports fields, playgrounds, swimming pools and recreational features. Some parts of San Rafael lack a neighborhood park, while others rely on a single park to meet the needs of many thousands of residents. This is particularly true in the Canal area, where almost all residents live in multi-family housing with limited access to backyards and recreational open space.

General Plan 2040 calls for expanded investment in parks and open space in the city’s lower income neighborhoods, including improvements to Pickleweed Park, shoreline paths in the Canal area, and retention of the Canal Community Garden. The General Plan also supports new Downtown open spaces, commensurate with the area’s growth and redevelopment. It also envisions a “town square” and neighborhood park at Northgate, to be created as that area is redeveloped with housing.

F.8 Access to Home Loans

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the continued impacts of the lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

F.8.1 Regional Trends

The 2020 Marin County Analysis of Impediments to Fair Housing Choice (AI) examined lending practices across Marin County. According to HMDA, in 2017, there were a total of 11,688 loans originated for Marin properties. Of the 11,688 original loan applications, 6,534 loans were approved, representing 56 percent of all applications, 1,320 loans denied, representing 11 percent of the total applications, and there were 1,555 applicants who withdrew their applications, which represents 13 percent of all applications. Hispanic and Black/African American residents were approved at lower rates and denied at higher rates than all applicants in the County. The AI also identified many residents who lived in Marin City during the Marinship years¹⁶ were not allowed to move from Marin City to other parts of the County because of discriminatory housing and lending policies and practices.

Table A-23: Home Loan Approval, Denial and Withdrawal for Marin County, by Race/Ethnicity

	All Applicants	White	Asian	Hispanic/ Latinx	Black/African American
Loans approved	55.9%	60.0%	59.0%	50.0%	48.0%
Loans denied	11.3%	12.0%	16.0%	18.0%	19.0%
Loans withdrawn by applicant	13.3%	14.0%	13.0%	19.0%	14.0%

Source: 2020 Marin County AI (2017 HMDA data)

¹⁶ Marinship is a community of workers created by the Bechtel Company which during World War II built nearly 100 liberty ships and tankers. Since Marinship faced a shortfall in local, available workers, Bechtel overlooked the workplace exclusions that were standard at the time and recruited African Americans from southern states such as Louisiana, Arkansas, Texas and Oklahoma. A thorough history of Marin City and Marinship is found in the local knowledge section.

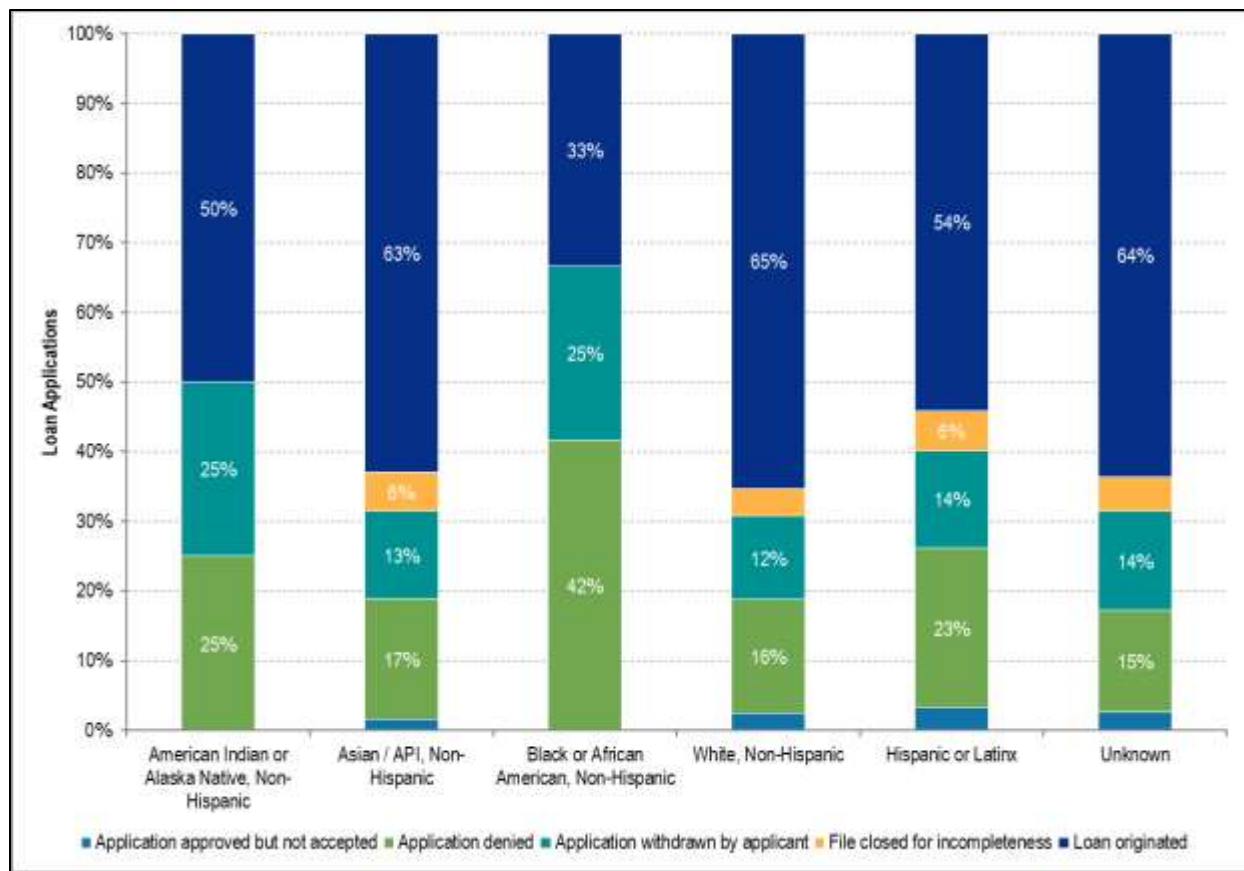
Based on the identified disparities of lending patterns for residents of color and a history of discriminatory lending practices, the AI recommended further fair lending investigations/testing into the disparities identified through the HMDA data analysis. More generally, it recommended that HMDA data for Marin County should be monitored on an ongoing basis to analyze overall lending patterns in the County. In addition, it recommended an analysis of lending patterns of individual lenders to gauge how effective the Community Reinvestment Act (CRA) programs are in ensuring that people of all races and ethnicities have equal access to loans.

F.8.2 Local Trends

Loan applications by race/ethnicity in San Rafael from 2018 to 2019 are presented in Figure A-44. Most home loan applications were submitted by White, non-Hispanic residents, a reflection of the overall racial/ethnic composition of the City. Of the 2,407 home loan applications submitted by San Rafael residents during this period, 63.4 percent were submitted by White residents, 25.6 percent were submitted by residents of an unknown race or ethnicity, 5.3 percent were submitted by Asian or Pacific Islander residents, 5.1 percent were submitted by Hispanic or Latinx residents, 0.5 percent were submitted by Black or African American residents, and 0.2 percent were submitted by American Indian or Alaska Native residents. All racial/ethnic groups, except for the non-Hispanic White and American Indian/Alaska Native populations, are underrepresented in the home loan market based on the overall racial/ethnic composition of the city.

Due to the large number of applications submitted by residents of an unknown race (21 percent of applications), it is difficult to estimate which racial/ethnic groups are most underrepresented in the home loan application pool. However, the Hispanic/Latinx community was the most drastically underrepresented, representing 31 percent of the city population, but only 5.1 percent of applicants.

The application denial rate for White, Non-Hispanic residents was 16 percent. For Black/African American applicants, the denial rate was significantly higher, at 42 percent. The American Indian/Alaska Native applicant pool, Asian/API applicant pool, and Hispanic/Latinx applicant pool were denied at rates between 17 and 23 percent. As discussed previously, the County AI recommended HMDA data be monitored due to disparities in lending patterns on the basis of race or ethnicity.



Source: ABAG Housing Needs Data Package, HMDA Data (2018-2019).

Figure A-44: Home Loan Applications by Race in San Rafael, 2018-19

G. Disproportionate Housing Needs

The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to other relevant groups or the population at large in the same geographic area. The analysis is completed by assessing cost burden, overcrowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Marin County. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income
- Overcrowded conditions (housing units with more than one person per room)
- Units with physical defects (lacking complete kitchen or bathroom).

According to CHAS data based on the 2013-2017 ACS, approximately 40 percent of Marin County households experience one or more of the above housing problems. In San Rafael, the figure is higher, at 45 percent of all households. In both the county and the city, renters are more likely to be affected by housing problems than owners. However, the disparity between problems for renters versus owners is much more prominent in San Rafael than in the county. By a significant margin, the largest category of the four “housing problems” listed above is housing cost exceeding 30 percent of gross income.

G.1 Cost Burden

G.1.1 Regional Trends

As shown in Table A-24, approximately 38 percent of households in Marin County experience cost burdens (i.e., housing costs exceeding 30 percent of income). Renters experience cost burdens at higher rates than owners (48 percent compared to 32 percent), regardless of race. Among renters, American Indian and Pacific Islander households experience the highest rates of cost burdens (63 percent and 86 percent, respectively). Geographically, cost burdened renter households are concentrated in North and Central Marin in Novato and San Rafael (Figure A-45). In some tracts, between 60 and 80 percent of renter households experience cost burdens. Throughout the incorporated County census tracts, between 40 and 60 percent of renter households are experiencing cost burdens. Within Marin County, cost-burdened owner households are clustered in the Bolinas/Stinson Beach area (see Figure A-46)

Housing problems and cost burdens can affect special needs populations disproportionately. Table A-25 shows that renter households comprised of older adults and large families experience housing problems and cost burdens at higher rates than all renters, all households, and their owner counterparts.

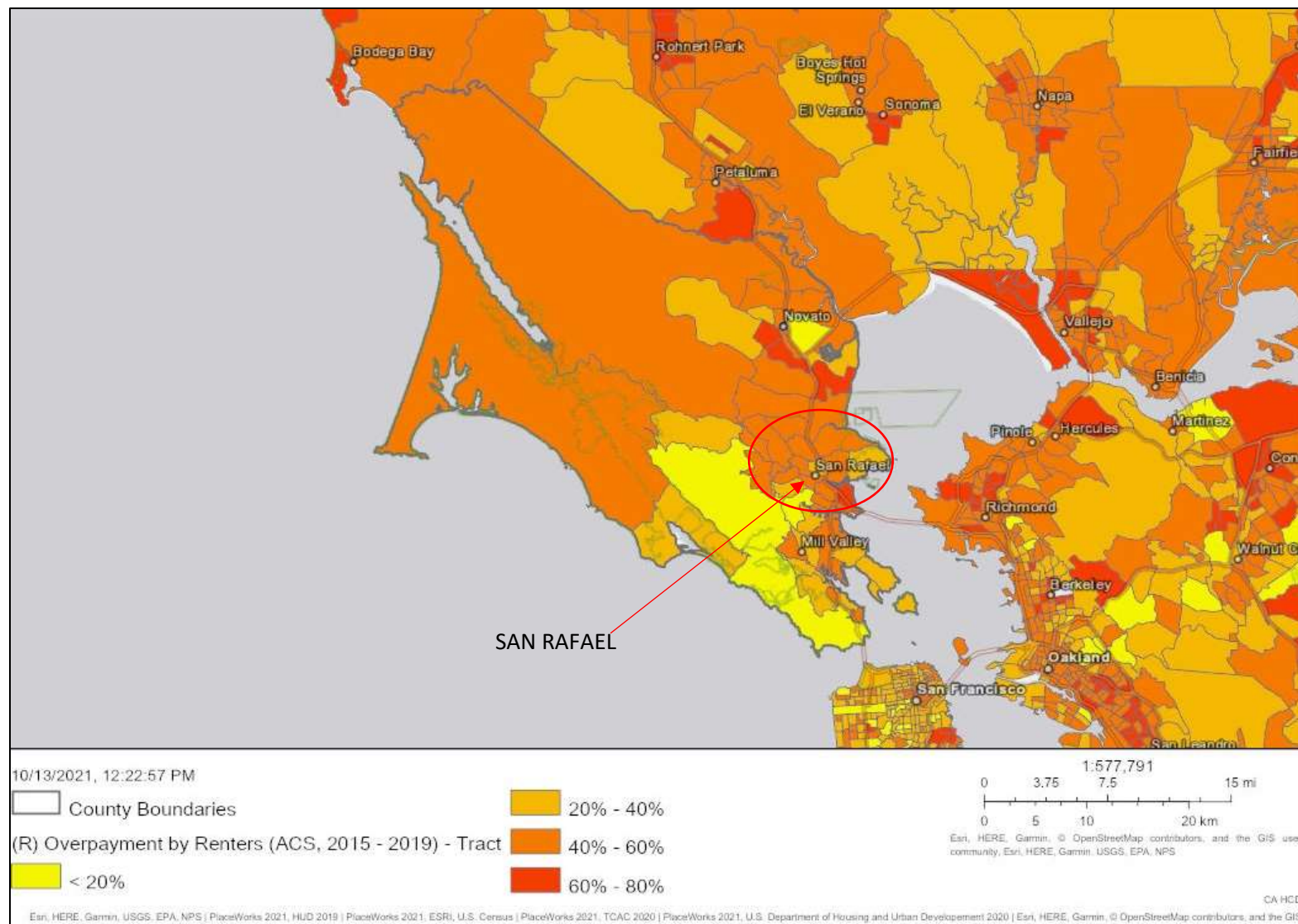


Figure A-45: Percent of Income Spent on Housing by Renters, 2019

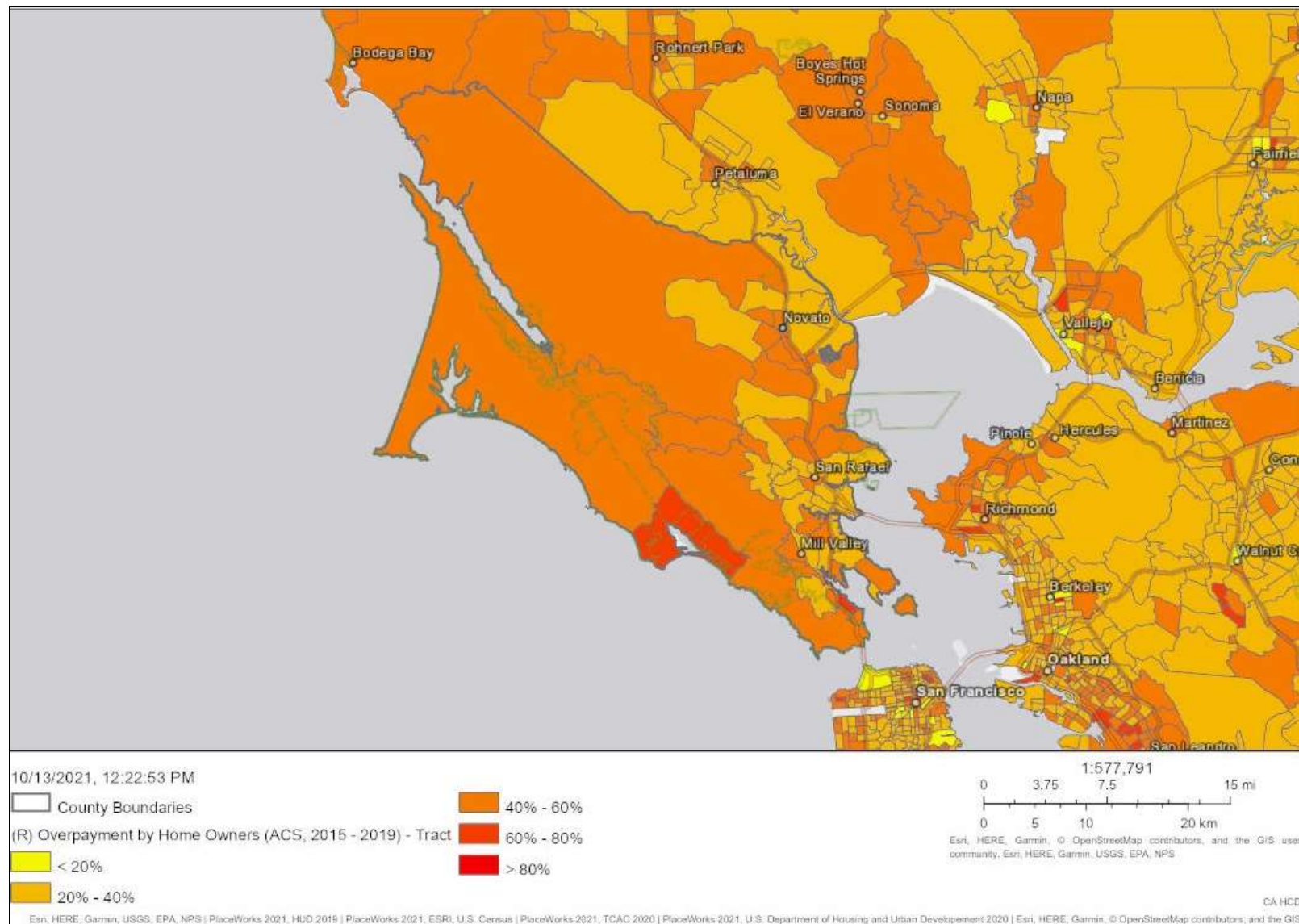


Figure A-46: Percent of Income Spent on Housing by Owners, 2019

Table A-25: Housing Problems and Cost Burdens by Race and Ethnicity in Marin County, 2017

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With a “Housing Problem”¹⁷							
Owner-Occupied	31.8%	41.1%	30.7%	37.5%	0.0%	52.7%	32.9%
Renter-Occupied	47.9%	59.5%	51.2%	62.5%	85.7%	73.7%	53.2%
All Households	36.6%	54.5%	38.7%	43.8%	54.5%	67.5%	40.2%
Cost Burden > 30%							
Owner-Occupied	31.2%	41.1%	29.0%	37.5%	0.0%	49.4%	32.2%
Renter-Occupied	45.1%	57.5%	41.5%	62.5%	85.7%	58.9%	47.7%
All Households	35.4%	53.1%	33.9%	43.8%	54.5%	56.1%	37.7%

Source: HUD CHAS (based on 2013-2017 ACS), 2020

Table A-26: Housing Problems and Cost Burdens for Older Adults and Large Households in Marin County, 2017

	Owner-Occupied			Renter-Occupied			All Households
	Over 65	Large HH	All Owners	Over 65	Large HH	All Renters	
With a “Housing Problem”	34.0%	30.2%	32.9%	34.0%	30.2%	32.9%	34.0%
Cost Burden > 30%	33.6%	26.7%	32.2%	33.6%	26.7%	32.2%	33.6%

Source: HUD CHAS (based on 2013-2017 ACS), 2020

¹⁷ HUD defines a “housing problem” as spending more than 30% of income on housing, living in overcrowded conditions, or occupying a substandard housing unit.

G.1.2 Local Trends

Cost burdens are more common amongst San Rafael households compared to the county at large; 38.8 percent of households in the city are cost burdened compared to 37.7 percent countywide (Table A-27). San Rafael has a larger proportion of cost burdened renters (50.8 percent) than Marin County (47.7 percent), but a smaller proportion of cost burdened owners (27.9 percent vs. 32.2 percent, respectively). As mentioned above, San Rafael has a larger proportion of renters (50 percent) than the county (36.3 percent) and the Bay Area (44 percent). Renters are significantly more likely to experience housing problems and cost burden compared to owners in both the county and city.

Amongst renter-occupied households, Pacific Islander (100 percent), Hispanic (63.8 percent), and Black (59 percent) householders have the highest rate of cost burden. White and Asian renters have cost burden rates below the Citywide average of 50.8 percent. Additionally, 100 percent of owner-occupied Native American households, 40 percent of Black owner-occupied households, 39.3 percent of Hispanic owner-occupied households, and 30.5 percent of Asian owner-occupied households in San Rafael are cost burdened, exceeding the citywide average of 27.9 percent.

As discussed previously, housing problems and cost burden often affect special needs populations disproportionately. Rates of housing problems and cost burden for older adult and large households in the City are presented in Table A-27. Among owner-occupied households, older adult households and large families are less likely to experience housing problems, including cost burden, compared to the citywide average. This is likely related to the length of residency for older adults, many of whom purchased their homes before the run-up in prices during the 2000s. Conversely, older renters and large renter-occupied households are significantly more likely to be cost burdened than renters as a whole. Over 57 percent of older adult renters and 70.6 percent of large renter households are cost burdened compared to only 50.8 percent of all renters in San Rafael.

Rates of cost burden amongst older owners and large family renters in the city are lower than in the county as a whole. However, the rates of cost burden amongst older renters and large renter households are higher in San Rafael than in Marin County.

Figure A-47 and Figure A-48 show cost burden in the city by tract and tenure. In most tracts, between 40 and 60 percent of renters are cost burdened. Fewer renters are cost burdened in those neighborhoods where single-family housing is the predominant housing type. Overpaying renters are concentrated in the Canal area, which coincidentally also has the highest percentage of renter households in the city. According to the HCD AFFH Data Viewer, 93.2 percent of households in the “Core Canal” census tract are renters.

As shown in Figure A-48, the rates of homeowner cost burden by census tract vary between 20 and 60 percent in San Rafael. North San Rafael tends to have larger populations of cost burdened homeowners compared to the southern and central tracts. Since the 2010-2014 ACS, the proportion of cost burdened owners has decreased in most San Rafael tracts. The proportion of cost burdened owners has increased in only two tracts, both located along the western city boundary.

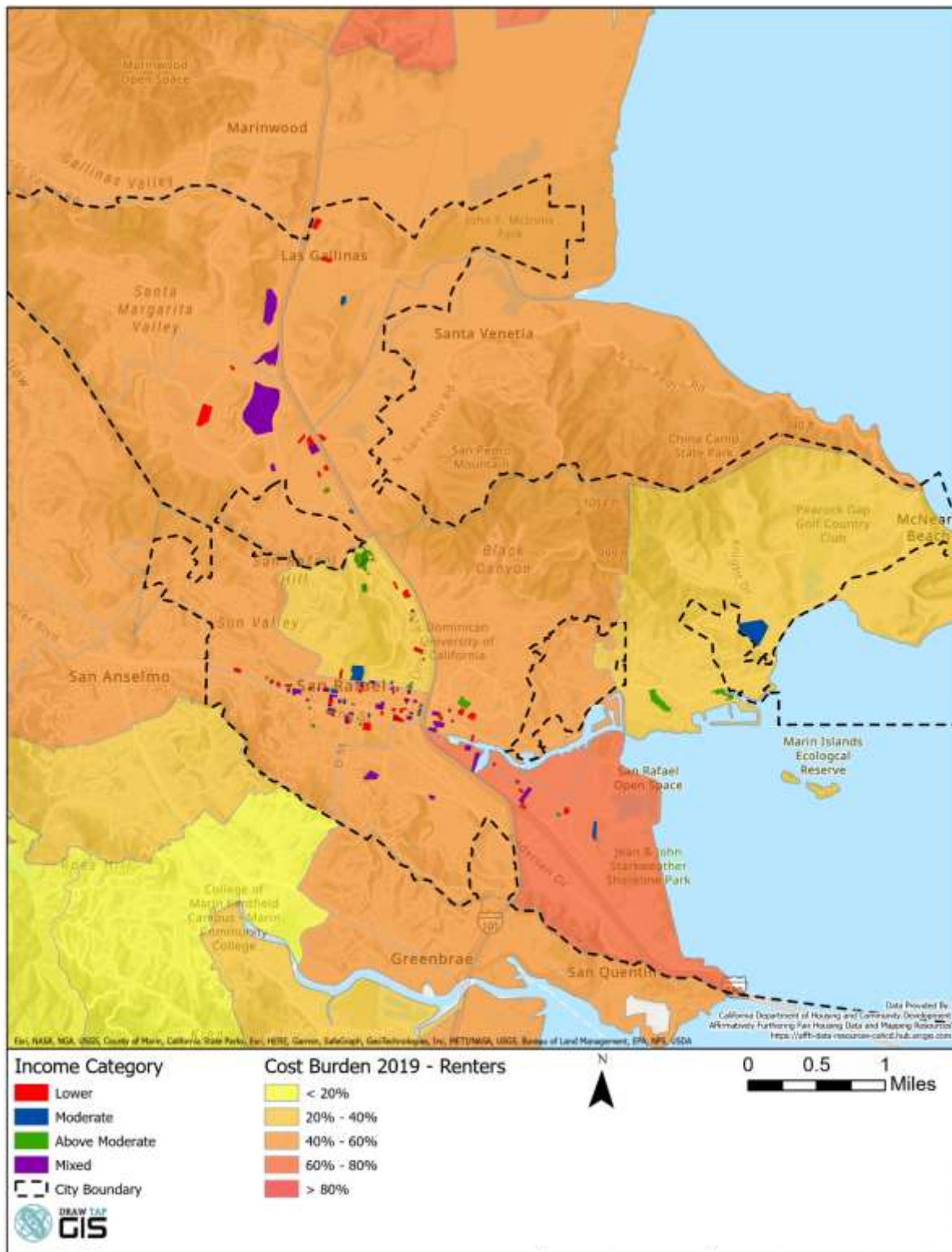


Figure A-47: Percent of Income Spent on Housing by San Rafael Renters, 2019



Table A-27: Housing Problems and Cost Burdens by Race and Ethnicity in San Rafael, 2017

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With a "Housing Problem"							
Owner-Occupied	28.2%	40.0%	34.8%	100.0%	0.0%	38.4%	29.3%
Renter-Occupied	50.8%	63.8%	63.2%	--	100.0%	81.8%	62.1%
All Households	36.4%	60.0%	47.7%	100.0%	60.0%	75.9%	45.0%
Cost Burden > 30%							
Owner-Occupied	27.5%	40.0%	30.5%	100.0%	0.0%	39.3%	27.9%
Renter-Occupied	46.4%	59.0%	43.6%	--	100.0%	63.8%	50.8%
All Households	34.3%	56.0%	36.4%	100.0%	60.0%	60.5%	38.8%

Source: HUD CHAS (based on 2013-2017 ACS), 2020

Table A-28: Housing Problems and Cost Burdens for Older Adults and Large Households in San Rafael, 2017

	Owner-Occupied			Renter-Occupied			All Households
	Over 65	Large HH	All Owners	Over 65	Large HH	All Renters	
Any "Housing Problem"	27.1%	20.4%	29.3%	65.5%	93.3%	62.1%	45.0%
Cost Burden > 30%	26.5%	15.9%	27.9%	57.2%	70.6%	50.8%	38.8%

Source: HUD CHAS (based on 2013-2017 ACS), 2020

G.1.3 Relationship of Sites Inventory to Housing Cost Burden for Owners and Renters

The distribution of RHNA units by population of cost burdened renters is shown in Table A-29 and Figure A-47. About 85 percent of the RHNA units are in tracts where the rate of renter cost burden is between 40 and 60 percent. This is comparable to the rate of renter cost burden throughout Marin County and does not suggest an overconcentration of housing potential in areas that are especially cost burdened. Only about seven percent of the city's RHNA capacity is in census tracts where more than 60 percent of the renters are cost burdened. A majority of this capacity is identified for lower income units, which could alleviate some of the cost burden. Overall, the City's RHNA strategy distributes sites throughout tracts with variable populations of cost-burdened renters to the greatest extent possible, given the overall character of the City.

Table A-30 and Figure A-48 show the distribution of units selected to meet the RHNA by percent of overpaying *owner* households. A quarter of units selected to meet the RHNA are in tracts where 20 to 40 percent of owners are cost burdened, while the remaining 75 percent are in tracts where 40 to 60 percent of owners are cost burdened. The RHNA sites do not result in excessive concentrations of units in cost-burdened neighborhoods.

Table A-29: Distribution of RHNA Units by Housing Cost Burden for Renters

Percent of Renters Paying 30%+ Income on Housing (Census Tract)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
20-40%	117	7.1%	137	22.1%	86	3.6%	340	7.3%
40-60%	1,365	82.7%	448	72.1%	2,200	91.1%	4,014	85.7%
60-80%	168	10.2%	36	5.8%	128	5.3%	332	7.1%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: VTA, City of San Rafael, 2022

Table A-30: Distribution of RHNA Units by Housing Cost Burden for Owners

Percent of Owners Paying 30%+ Income on Housing (Census Tract)	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
20-40%	441	26.7%	213	34.3%	511	21.2%	1,165	24.9%
40-60%	1,209	73.3%	408	65.7%	1,903	78.8%	3,521	75.1%
Total	1,650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: VTA, City of San Rafael, 2022

G.2 Overcrowded Households

G.2.1 Regional Trends

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchens). According to the 2017 ACS estimates, about 6.5 percent of all households in the Bay Area region are living in overcrowded conditions (Table A-31). The incidence of overcrowding is higher for renters than for owners. About 11 percent of renter households are living in overcrowded conditions in the region, compared to three percent of owner households. Overcrowding rates in Marin County are lower than the Bay Area average. Overcrowded households in the region are concentrated in Richmond, Oakland, and San Francisco (see Figure A-47). At the county level, overcrowded households are concentrated North and Central Marin, specifically in central Novato and the southeastern tracts of San Rafael (Canal).

While the ACS data shows that overcrowding is not significant problem, it is likely that this data is an undercount, especially with families who may have undocumented members.

G.2.2 Local Trends

Overcrowding amongst owner-occupied households is less prevalent in San Rafael than it is in the Bay Area and Marin County as a whole. As shown in Table A-32, only 0.4 percent of owner-occupied households are overcrowded. Renter-occupied households experience overcrowding at a significantly higher rate. Over 21 percent of San Rafael renters are overcrowded, including 11.7 percent that are severely overcrowded. The comparable figure for renters in Marin County is 9.4 percent, while it is 10.9 percent regionwide. As mentioned previously, San Rafael also has a larger renter population compared to the Bay Area and the county.

Figure A-48 shows the population of overcrowded households by census tract. In most tracts, fewer than 8.2 percent of households, the Statewide average, are overcrowded. The two southernmost tracts, including the Canal neighborhood, have larger populations of overcrowded households. According to the HCD AFFH Data Viewer, 10.7 percent of households in the southernmost tract and 40.5 percent of households in the Canal neighborhood tract are overcrowded. More than 20 percent of households in the Canal census tract are severely overcrowded. As discussed earlier in this analysis, this tract also a high racial/ethnic minority concentration, a large low-moderate income populations, and is defined as a low resource/ high segregation and poverty area by the State Tax Credit Allocation Committee. city.

G.2.3 Sites Inventory

The distribution of RHNA units relative to overcrowded households is shown in Table A-33 and Figure A-49. Nearly 93 percent of the RHNA units are in tracts where the rate of overcrowding is lower than the state average of 8.2 percent. Only one percent of the RHNA units are in the Canal tract, where the rate of overcrowding exceeds 20 percent. As shown in Table A-33, the potential for 48 lower-income units has been identified in the Canal tract. The distribution of sites would not exacerbate overcrowding in either the Canal area or the city at large.

Table A-31: Overcrowded Households: Bay Area and Marin County

	Bay Area	Marin County
Owner-Occupied	3.0%	0.8%
Renter Occupied	10.9%	9.4%
All HH	6.5%	3.9%

Source: ABAG Housing Data Needs Package, HUD CHAS (based on 2013-2017 ACS), 2020.

Note: Overcrowding means more than one person per household.

Table A-32: Overcrowded Households: San Rafael

	Overcrowded (>1.0 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	0.4%	0.4%
Renter Occupied	21.4%	11.7%
All HH	10.9%	6.0%

Source: ABAG Housing Data Needs Package, HUD CHAS (based on 2013-2017 ACS), 2020.

Note: Overcrowding means more than one person per household.

Table A-33: Distribution of RHNA Units Relative to Overcrowded Census Tracts

Percent of Households in Tract that are Overcrowded	Lower Income		Moderate Income		Above Mod Income		Total	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<8.2%	1,482	89.8%	585	94.2%	2,286	94.7%	4,354	92.9%
8.3-12%	120	7.3%	36	5.8%	128	5.3%	284	6.1%
12.1-15%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
15.1-20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>20%	48	2.9%	0	0.0%	0	0.0%	0	1.0%
Total	1650	100.0%	621	100.0%	2,414	100.0%	4,686	100.0%

Source: VTA, City of San Rafael, 2022

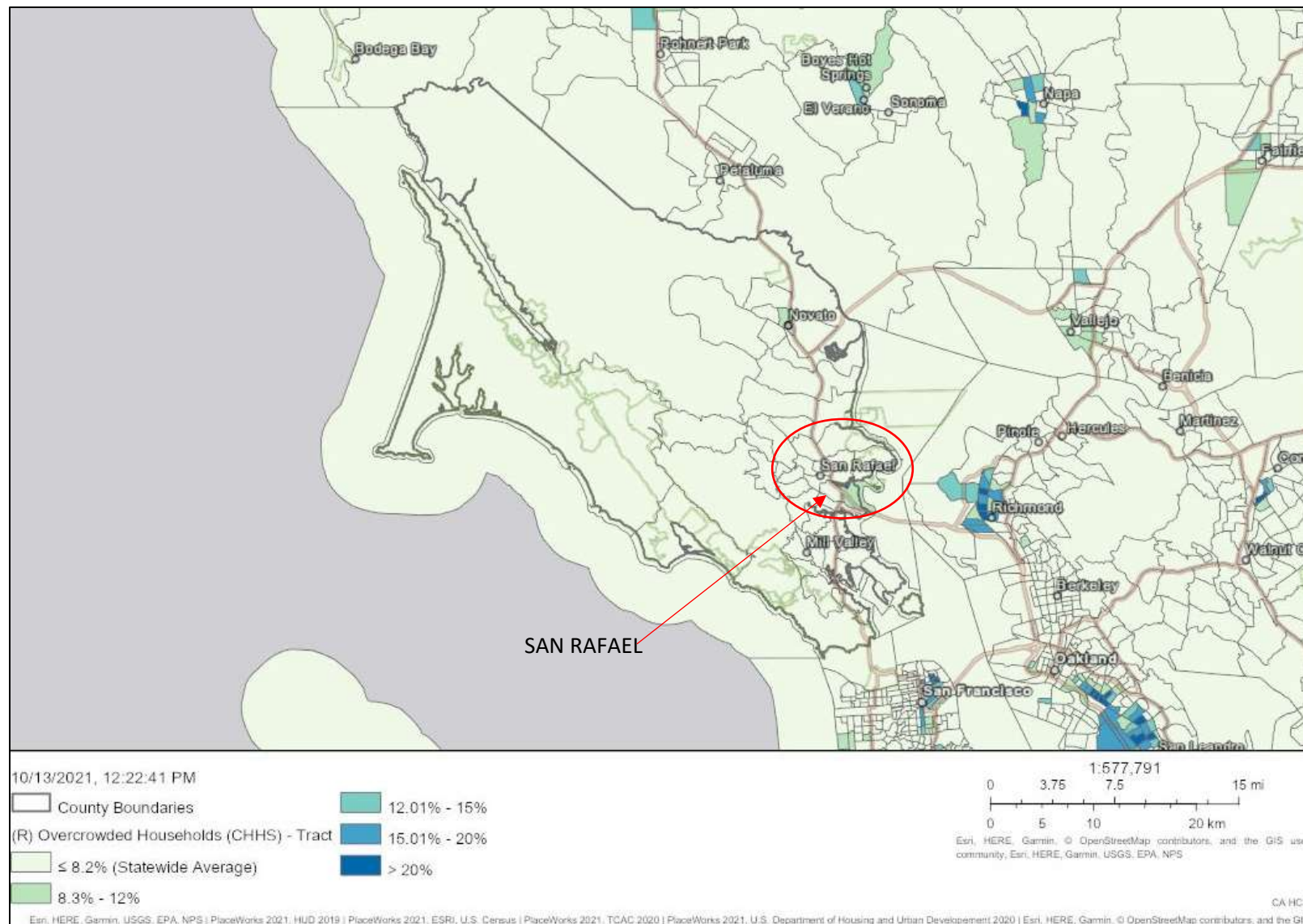


Figure A-47: Percent of Households in Northern Bay Area Census Tracts Considered “Overcrowded”

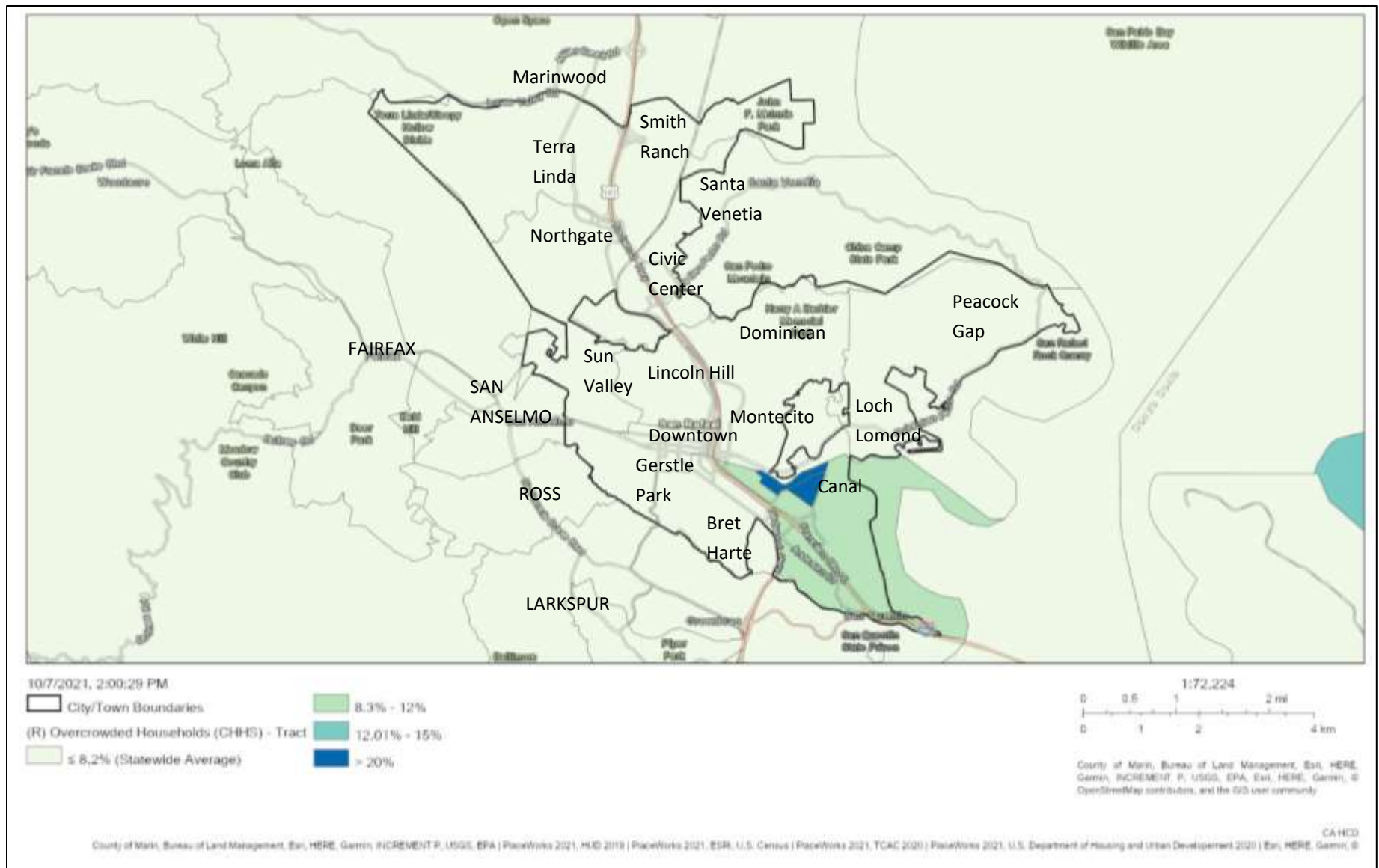


Figure A-48: Percent of Households in San Rafael Census Tracts Considered “Overcrowded”

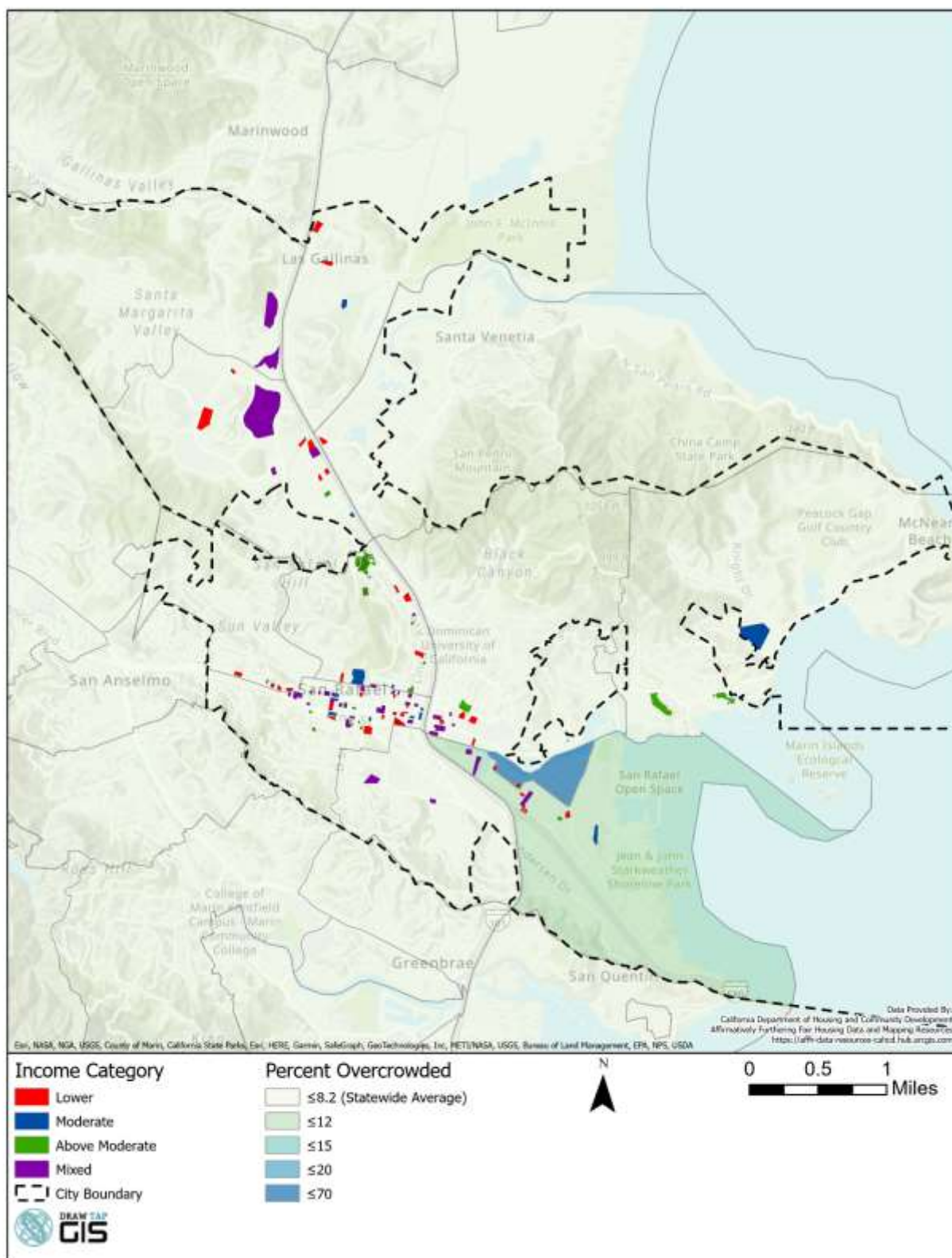


Figure A-49: Distribution of Housing Sites Relative to Overcrowding

G.3 Substandard Housing Conditions

G.3.1 Regional Trends

Incomplete plumbing and/or kitchen facilities are sometimes used as metrics for identifying substandard housing conditions in a community. Both characteristics are measured by the Census in the 2015-2019 ACS. In the absence of a detailed field survey, another metric used to estimate housing conditions is the age of the housing stock. In general, residential structures over 50 years of age are more likely to require rehabilitation such as roofing, plumbing, and electrical system repairs than newer housing.

According 2015-2019 ACS estimates, shown in Table A-34, only about one percent of households in the Bay Area and Marin County lack complete kitchen and plumbing facilities. In Marin County, one percent of households lack complete kitchen facilities and 0.4 percent lack complete plumbing facilities. Incomplete kitchen facilities are more common in renter-occupied units than in owner-occupied units. However, even in units with complete kitchens, there may be substandard conditions such as mold, lack of hot water, or rodents.

Table A-34: Percent of Housing Units Without Complete Kitchens or Plumbing, Bay Area, Marin County, and San Rafael

	Bay Area		Marin County		San Rafael	
	Lacking complete kitchen facilities	Lacking complete plumbing facilities	Lacking complete kitchen facilities	Lacking complete plumbing facilities	Lacking complete kitchen facilities	Lacking complete plumbing facilities
Owner	0.3%	0.2%	0.2%	0.3%	0.3%	0.1%
Renter	2.6%	1.1%	2.4%	0.6%	2.6%	0.7%
All Households	1.3%	0.6%	1.0%	0.4%	1.4%	0.4%

Source: American Community Survey, 2015-2019

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In Marin County as a whole, 86 percent of the housing stock was built prior to 1990 and 58 percent was built prior to 1970. Figure A-50 shows median housing age for Marin County cities and Census-designated places (CDPs). Central and Southern Marin, specifically the cities of Ross, Fairfax, and San Anselmo have the oldest housing while Novato and some of the unincorporated areas have the newest housing. As the map shows, housing age is not always an indicator of value; the communities with the highest concentrations of older housing in Marin (Ross, Sausalito, etc.) are among the highest cost cities in the county.

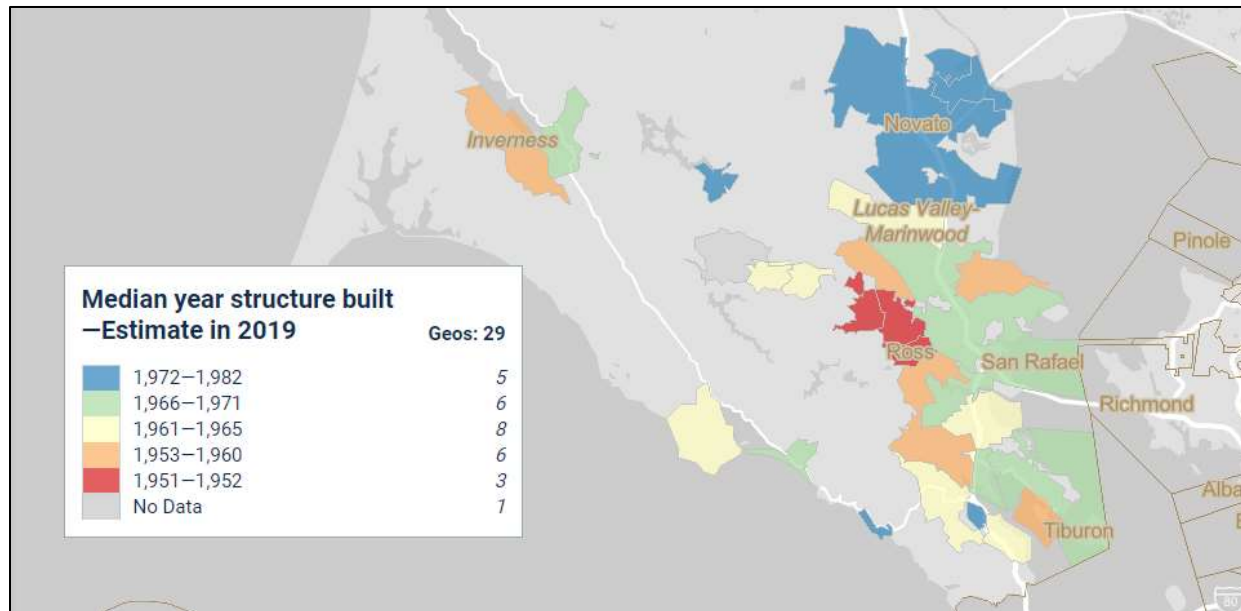


Figure A-50: Median Year Structure Built in Marin County

G.3.2 Local Trends

The percentage of San Rafael households living in units without complete kitchen facilities is slightly higher than the Bay Area and Marin County (see Table A-34). The percentage of households living in units without complete plumbing facilities in the City is also comparable to the regional and countywide averages. Renters are more likely to lack complete facilities than owners, but the rate for both sub-populations is low.

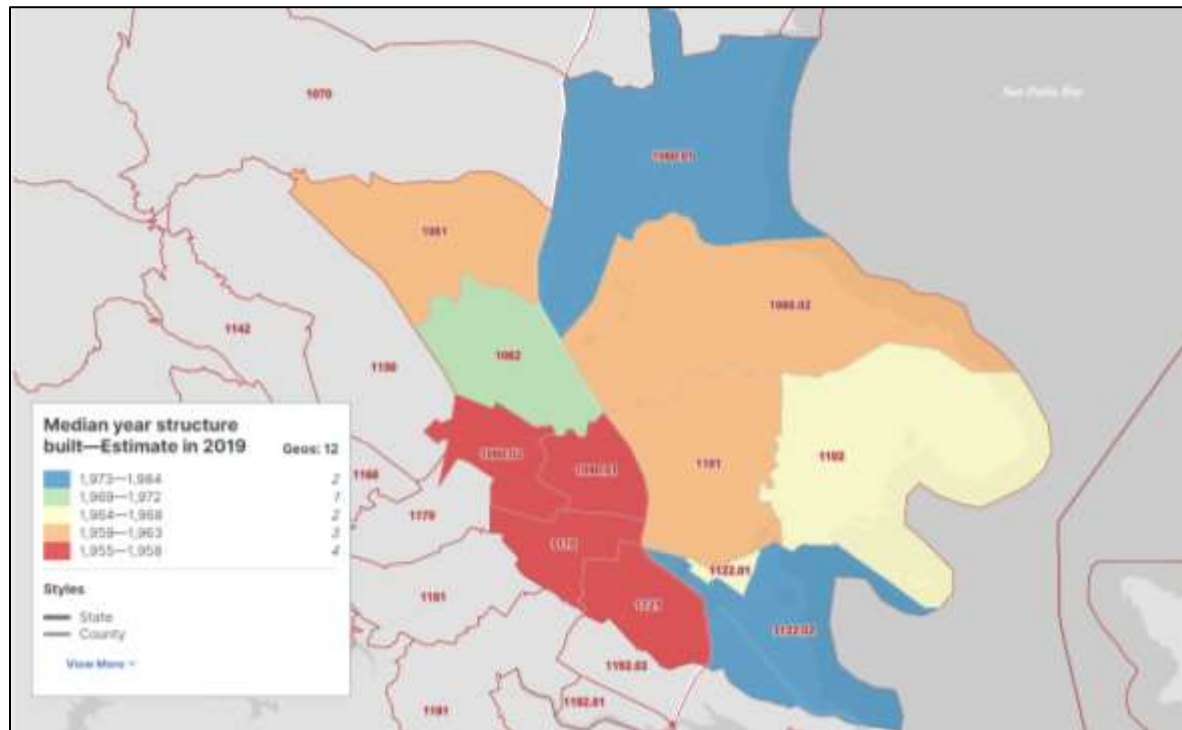
Table A-35 shows the age of housing stock in San Rafael at the census tract level, as well as equivalent data for the city as a whole, and the county. Nearly 60 percent of San Rafael's housing units were built before 1970, almost the same percentage as the county as a whole. San Rafael has a slightly smaller proportion of housing units built in 1990 or later compared to the county. While homes more than 50 years old may be an indicator of structure condition, the vast majority of the city's housing stock is in excellent condition.

As shown in Figure A-51, older housing units are most concentrated in tracts 1090.01, 1090.02, 1110, and 1121 in and around Downtown San Rafael. More than 70 percent of housing units in these tracts were built prior to 1970. The highest concentration of new housing units is in tracts 1060.01 in the northeastern corner (Deer Park/Smith Ranch) and 1122.02 in the southernmost area (Bay Pointe/Spinnaker Pointe). As in other parts of Marin County and the Bay Area, housing age in San Rafael does not necessarily correlate to poor building condition. The city's oldest neighborhoods are also among its most expensive, given larger lots, distinctive architecture, and historic amenities. However, older homes may require higher levels of investment in home repair and maintenance, as well as higher energy costs, potentially creating financial challenges for older adults and long-time occupants.

Table A-35: Age of Housing Stock by Census Tract in San Rafael

Tract/Jurisdiction	1969 or Earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or Later (<30 Years)	Total Housing Units
1060.01	11.9%	49.9%	38.2%	2,222
1060.02	56.8%	25.5%	17.7%	2,254
1081	90.3%	8.6%	1.1%	2,669
1082	46.8%	39.2%	14.0%	3,157
1090.01	70.3%	25.3%	4.4%	1,916
1090.02	79.5%	18.9%	1.6%	1,853
1101	69.9%	24.8%	5.4%	2,545
1102	55.8%	35.1%	9.1%	2,265
1110	71.7%	10.6%	17.7%	2,958
1121	73.4%	22.3%	4.3%	1,942
1122.01	62.0%	37.4%	0.6%	1,890
1122.02	23.0%	49.1%	27.9%	1,351
San Rafael	59.3%	28.6%	12.0%	24,468
Marin County	58.0%	28.2%	13.9%	113,084

Source: American Community Survey, 2015-2019

**Figure A-51: Median Year Structure Built in San Rafael**

G.4 Displacement Risk

G.4.1 Regional Trends

UC Berkeley's Urban Displacement Project defines residential displacement as "the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control." This includes physical displacement, resulting from eviction or the removal of housing units, and economic displacement, resulting from rising rents force tenants to move elsewhere. Economic displacement presents a far greater risk, is much more prevalent, but is less conspicuous and harder to assess. Those at greatest risk of economic displacement are lower-income renters, including long-time renters in communities to which they may have social, cultural, economic, and familial connections. Displacement may create a significant hardship for families, seniors, persons with disabilities, and children, and has psychological as well as economic and physical impacts.

The UC Berkeley project identified populations vulnerable to displacement (called "sensitive communities") based on the share of low-income residents in each census tract and other criteria including:

- At least 40 percent of all households in the census tract are renters
- share of people of color in the census tract is more than 50 percent
- share of low-income households in the tract who pay more than 50 percent of income on rent exceeds the countywide median
- area is experiencing rent increases above county median or is adjacent to such areas

Sensitive communities in the Bay Area were identified with this methodology and are shown in Figure A-52. Much of Vallejo, Napa, Richmond, Berkeley, Oakland, and San Francisco are included. In Marin County, sensitive communities were identified in the cities of Novato and San Rafael, and in the unincorporated communities of Marin City, Strawberry, and Nicasio.

G.4.2 Local Trends

San Rafael residents are more vulnerable to displacement than those in Marin County as a whole, as the city has a higher percentage of renters (more than half) and a larger percentage of lower-income residents. Six San Rafael census tracts meet the criteria for sensitive communities. These are shown on Figure A-53. All six tracts are in the central and southern areas of the city. These include the Canal area, which has multiple coincident housing challenges.

In general, the risk of displacement in San Rafael is higher for persons of color than for White households. This is due to lower rates of home ownership among the city's Black and Hispanic households. Roughly 39 percent of the city's White Non-Hispanic households are renters, compared to 86 percent of Black and Hispanic households. The income profile for Black and Hispanic households in San Rafael is also lower than White, Non-Hispanic and Asian households. Although San Rafael has lower median rental prices than the county median, rents have increased faster in San Rafael during the last 10 years than in the county as a whole. Input received during the Housing Element update suggests that residents of the Canal area have been particularly impacted by rising rents, leading to overcrowding and displacement.

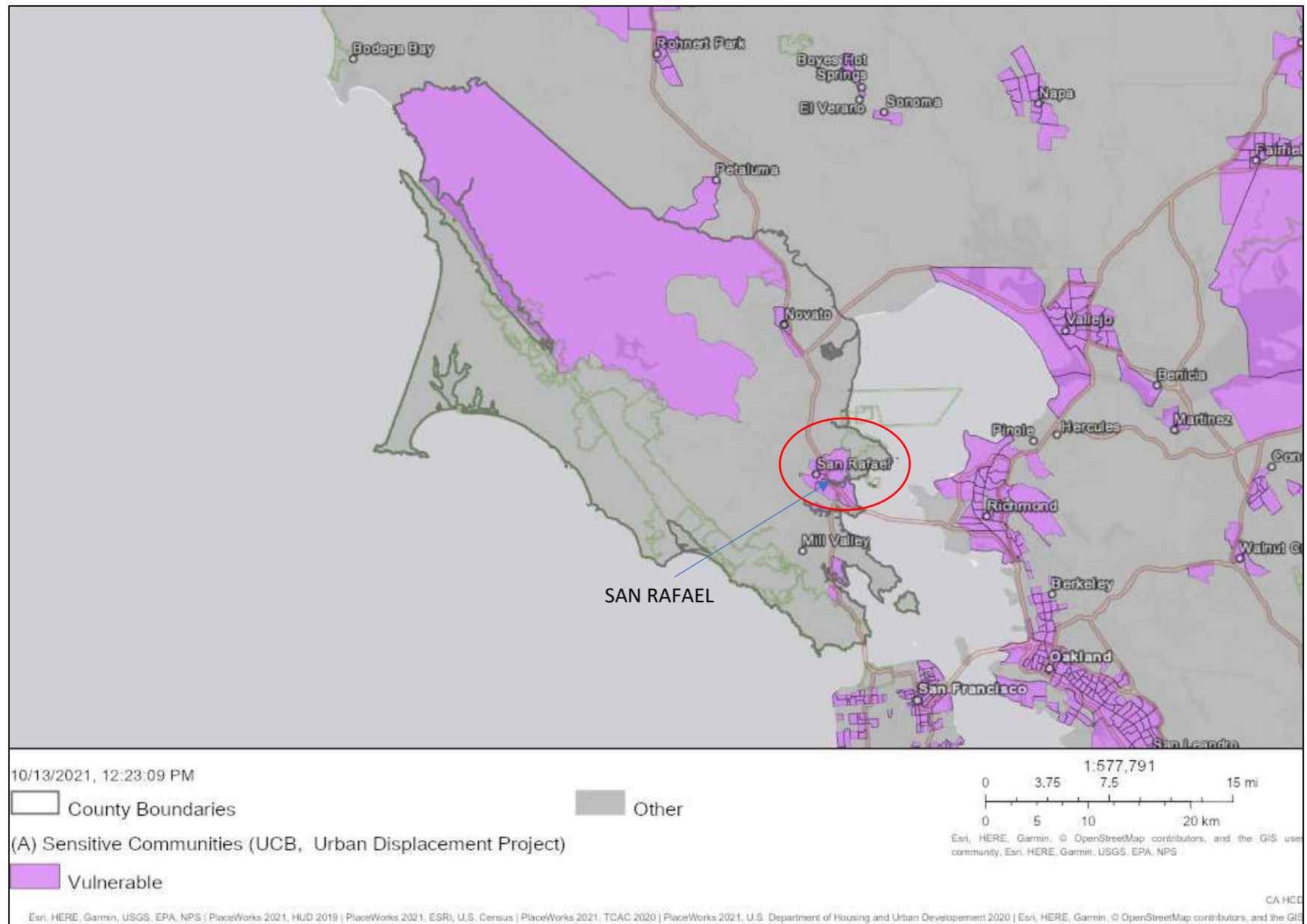


Figure A-52: Neighborhoods Most Vulnerable to Displacement in Northern Bay Area

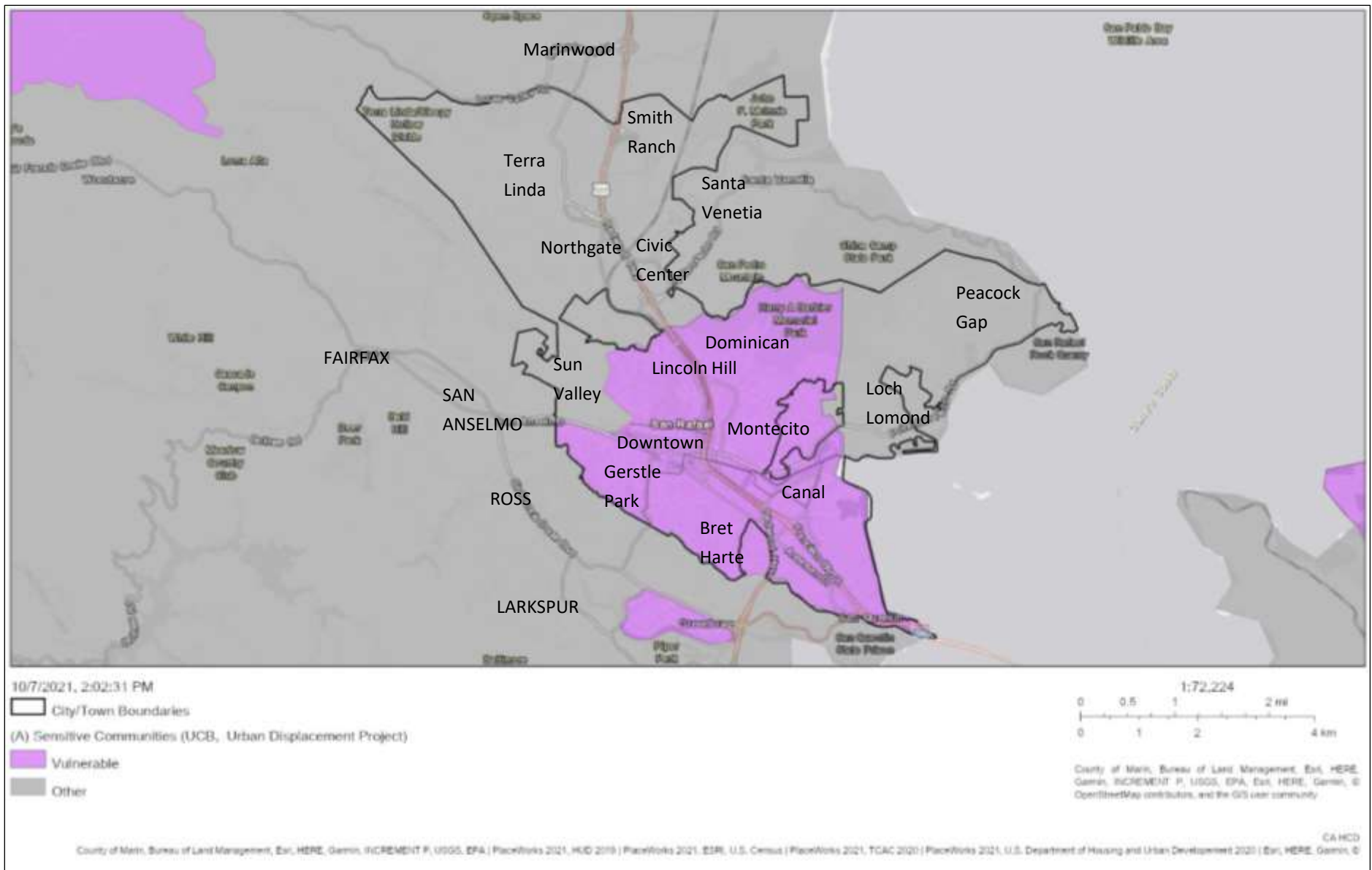


Figure A-53: Neighborhoods Most Vulnerable to Displacement in San Rafael

G.5 Homelessness

G.5.1 Regional Trends

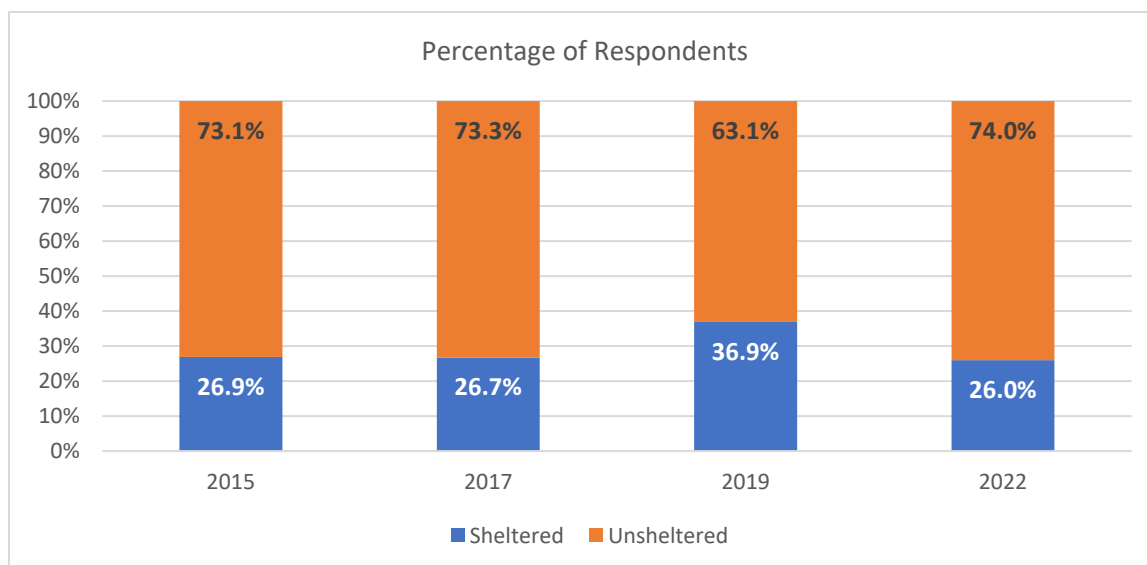
As shown in Table A-36, the County's Point-in-Time (PIT) Homeless Count and Survey found 1,034 persons experiencing homelessness in Marin County in 2019. Most (68.5 percent) were unsheltered. Nearly 17 percent were living in emergency shelters and 15 percent were living in transitional housing. Data from the 2022 Point-in-Time survey was released in September 2022 and may be compared to prior year data to determine trends over time. In the 2022 count, there were 1,121 persons experiencing homelessness, an increase of 8.4 percent over 2019. However, the 2022 figure was below the 2015 figure of 1,309.

In 2022, a larger percentage of the homeless population was unsheltered. The total number of residents in emergency shelter and transitional housing declined between 2019 and 2022, while the number of unsheltered residents increased by 17 percent. The relative increase in the unsheltered population is shown graphically in Figure A-54.

Table A-36: Number of Residents Experiencing Homelessness in Marin County, 2019 and 2022

	2019		2022	
	Number	Percent	Number	Percent
Emergency Shelter	172	16.6%	159	14.2%
Transitional Housing	154	14.9%	132	11.8%
Unsheltered	708	68.5%	830	74.0%
Total	1,034	100.0%	1,121	100.0%

Source: 2019 and 2022 Point-in-Time Counts, Marin County



Source: 2015, 2017, 2019 and 2022 Point-in-Time Counts, Marin County

Figure A-54: Unsheltered vs Sheltered Homeless Population in Marin, 2015-2022

Table A-37 compares the incidence of homelessness among different racial and ethnic groups in both 2019 and 2022. Black/African American, Hispanic/Latinx, and American Indian/Alaska Native populations are all overrepresented in the County's homeless population. Conversely, Asian, White, and Other populations are underrepresented. This was the case in 2019 and it is even more pronounced in 2022. Black residents accounted for 22 percent of Marin's homeless population but represented only two percent of the county population. Similarly, Native Americans represented four percent of the homeless population but less than one percent of the county population. Conversely, the incidence of homelessness was lower for Asian residents relative to their share of the total population, and marginally lower for White residents. Hispanic residents (of any race) were slightly more likely to experience homelessness than the population as a whole.

The number of students in local public schools experiencing homelessness in Marin County has also increased in recent years. Table A-38 indicates the totals for 2016 through 2022 as reported by DataQuest, a reporting system used by the California Department of Education to track vital statistics over time. In 2021-22, there were over 1,400 students in public schools throughout Marin County, representing nearly five percent of total enrollment.

Table A-37: Homelessness by Race/Ethnicity in Marin County, 2019 and 2022

	2019		2022	
	Share of Homeless Population	Share of Total County Population	Share of Homeless Population	Share of Total County Population
American Indian or Alaska Native (Hispanic and Non-Hispanic)	3.5%	0.4%	4%	1%
Asian / API (Hispanic and Non-Hispanic)	3.1%	6.1%	2%	6%
Black or African American (Hispanic and Non-Hispanic)	16.7%	2.2%	22%	2%
White (Hispanic and Non-Hispanic)	66.2%	77.8%	65%	68%
Other Race or Multiple Races (Hispanic and Non-Hispanic)	10.5%	13.5%	5%	11%
Hispanic/Latinx	18.8%	15.9%	23%	19%
Non-Hispanic/Latinx	81.2%	84.1%	77%	81%

Source: 2019 and 2022 Point-in-Time Counts, Marin County

Table A-38: Student Homelessness in Marin County, 2016-2022

	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Number of homeless students	918	712	1,026	1,137	1,475	1,473
Total students	33,633	33,741	33,441	33,516	31,939	30,811
Percent of total	2.7%	2.1%	3.1%	3.4%	4.6%	4.8%

Source: Data Quest, 2022 (CA Dept of Education)

The County's 2019 Homeless Count and Survey found that nearly half (49 percent) of respondents reported that economic issues, such as rent increases or a lost job, were the primary cause of their homelessness. Other causes include personal relationship issues (36 percent), mental health issues (16 percent), substance use issues (14 percent), and physical health issues (11 percent). The 2022 count found shifts in this distribution, with 31 percent reporting economic issues, 24 percent reporting personal relationship issues, and 13 percent reporting mental health issues. There were significant increases in two areas: 21 percent reported the cause of their homelessness to be substance abuse, and 14 percent reported COVID-19 related issues.

As shown in Figure A-55, the 2019 PIT Count and Survey also showed that 73 percent of homeless respondents reported needing rental assistance. Additional assistance needed included more affordable housing (69 percent), money for moving costs (55 percent), help finding an apartment (37 percent), transportation (31 percent), and case management (29 percent). By 2022, the percentage of respondents indicating a need for rental assistance had increased to 77 percent. The percentage indicating a need for affordable housing declined, but the percentage needing help finding an apartment, transportation, and case management increased.

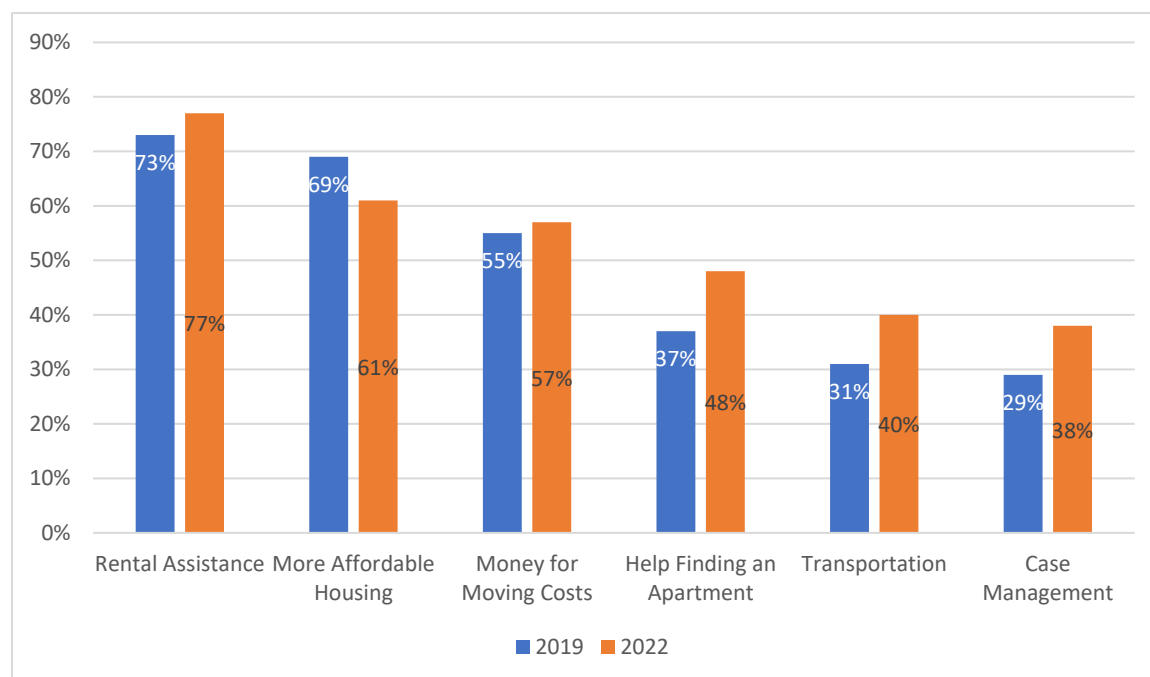


Figure A-55: Type of Assistance Needed for Homeless Residents to Obtain Permanent Housing, 2019 and 2022

G.5.2 Local Trends

According to the County's 2019 PIT Count and Survey, there were 255 persons experiencing homelessness in San Rafael, of which 161 (63.1 percent) are unsheltered and 94 (36.9 percent) are sheltered. By 2022, the PIT count indicated a 36 percent increase, with 348 persons experiencing homelessness. This included 241 unsheltered and 107 sheltered persons, meaning that the number of unsheltered residents increased at a much faster rate than those who were sheltered. The 2022 figure was only slightly higher than the numbers reported in 2017, when there were 233 unsheltered and 85 sheltered residents experiencing homelessness.

In 2022, San Rafael accounted for 31 percent of the county's homeless population, compared to 25 percent in 2019 and 28 percent in 2017. The city has about 23 percent of the county's population, so San Rafael's share is disproportionately high. As the county seat and most urban community, the city includes many of Marin County's supportive service agencies and a number of emergency shelters. Local facilities include the Homeward Bound family shelter on Mission Avenue, the adult shelter at 3301 Kerner, and the new Jonathan's Place Shelter at 190 Mill Street. San Rafael is also home to several transitional housing developments.

H. Local Knowledge

In addition to using federal and state data to analyze fair housing, California jurisdictions are also asked to use local knowledge to in their fair housing assessments. This includes consideration of historical decisions that may have either directly or indirectly resulted in the exclusion of lower income persons and/or persons of color from the community. It further includes past practices related to mortgage lending and racial covenants, decisions about how and where capital improvements have been made in the community, past planning and zoning decisions, and even narrative descriptions of people's lived experiences in the community.

Demographic data alone may misrepresent what is happening on the ground or present a skewed understanding of local priorities. For example, the AFFH data suggests that affordable housing construction in the Canal neighborhood could exacerbate concentrated poverty and segregation. However, the Canal actually has a dearth of affordable housing---its lower-income residents are largely housed in market-rate units that result in cost burdens for almost all households and overcrowding for many. As a result, a recurring theme during the community engagement process in San Rafael was that Canal neighborhood urgently needs more affordable housing and not less, as the data might suggest. Moreover, there is a strong sense of community in the Canal, and a desire to strengthen the community's assets and institutions through further investment in housing that meets the needs of local residents.

The local perspective on fair housing presented below includes a historical overview of San Rafael's development, describing the community's evolution from mission city to small town, small town to suburb, and suburb to regional center with a diverse population and employment base. The discussion is framed within the broader context of development throughout the Bay Area, California, and the United States. It also identifies some of the priorities expressed by the community relating to fair housing and equity.

H.1 Historical Perspective

H.1.1 Early Development

San Rafael was first inhabited by the Coastal Miwok people, with a peak pre-European population of about 1,500. Settlements existed in what is now Downtown San Rafael (Nanaguani), Terra Linda (Ewu), and Marinwood (Shotomko-cha). The Miwok inhabited the area for thousands of years, developing a rich culture and complex language. They were sustained by abundant natural resources, including forests, creeks, marshland, and the Bay.

European settlement began in 1817 when Asistencia San Rafael Arcangel was established by Spanish Franciscan friars. Initially built as a sanitarium for Native Americans who had succumbed to European diseases, San Rafael Arcangel became the 20th of California's 21st missions in 1822. By the time the missions were secularized in 1833, the Miwok population had been significantly reduced and their hunter/ gatherer way of life destroyed. San Rafael and its environs were partitioned into land grants, which eventually became ranches and farms. The era of colonization has been described by some as the “earliest form of racial exclusion in the Bay Area”, with native residents violently displaced and disenfranchised.¹⁸

San Rafael's designation as the county seat in 1851 established its early position as the center of Marin County and attracted much of the North Bay's early growth. This was accelerated by construction of a rail line from the city to the ferry depot at Point San Quentin in 1870 and other rail lines linking Marin County with points north. Increasing commerce, development, and population led San Rafael to incorporate in 1874. The city's population increased from 600 in 1870 to 2,276 in 1880.

The late 19th Century was a time of expansion for San Rafael, as the city became a resort for San Franciscans, as well as a commercial and administrative center. Picnic grounds, summer homes for the wealthy, and hotels proliferated over the following decades. Dominican College was established in 1890, further diversifying the city's economy and culture. By 1900, the population had reached 3,879. The city continued to grow at a moderate rate in the early 20th Century, with new neighborhoods developed on the fringes of Downtown.

State and federal laws during this period directly limited the ownership of land by Asian residents (1913 and 1920 Alien Land Act laws), while discrimination limited mobility and housing options for Black and Hispanic residents outside of central cities. An isolated and segregated community of about 500 Chinese residents thrived on the north side of the San Pedro Peninsula at China Camp in the late 19th and early 20th centuries. Many had moved there from San Francisco to escape racial prejudice and persecution.

H.1.2 Suburbanization

The opening of the Golden Gate Bridge in 1937 heralded a growth boom in Marin County. Commercial train service to San Rafael ended in 1940, the same year the US 101 viaduct was completed over San Rafael Creek. San Rafael's population increased from 8,573 in 1940 to 38,977 in 1970. Population nearly doubled between 1960 and 1970 alone and jumped again in

¹⁸ *Roots, Race, Place. Haas Institute, UC Berkeley. 2019*

1972 with the annexation of Terra Linda. Development during this period was auto-oriented and suburban in scale, with large subdivisions on the San Pedro Peninsula, in North San Rafael, and areas like Sun Valley. Northgate Mall was developed in the mid-1960s, creating a second major shopping district and regional destination.

Prior to the passage of the 1960s, racial covenants, codes, and restrictions were common in Marin County's single-family neighborhoods. Subdivision developers wrote clauses into property deeds forbidding the resale (and sometimes rental) of homes to non-whites. This practice was endorsed by lending institutions and the real estate industry, at least through the 1940s. In 1960, the Marin County Committee on Racial Discrimination reported that restrictive covenants were still being used, despite their illegality.

Much of North San Rafael was developed in the late 1950s and early 1960s by developer Joseph Eichler. While Eichler is best remembered for stylish mid-century homes, he also was a pioneer in fair housing practices and challenged the status quo of the time. His company began actively integrating home sales in Palo Alto as early as 1950. In 1958, Eichler challenged the National Association of Home Builders position against integration. He later consulted with members of the US Civil Rights Commission, Federal Housing Administration, Housing and Home Finance Agency, and US Department of Housing and Community Development on how to promote anti-discrimination laws in single family neighborhoods.

Despite these opportunities and the eventual elimination of racial covenants, past patterns of discrimination left an imprint on the Bay Area. Lack of access to mortgage loans and the practice of "redlining" in the early- and mid-20th Century created a barrier to amassing generational wealth for many households of color. San Rafael remained largely White through the 1960s and 1970s, while the Bay Area as a whole became more diverse.

By 1980, the nine county Bay Area had a population of 5.2 million residents. The region's population was 76% White, 9% Black, 9% Asian/Pacific Islander, and 6% Other. Hispanic residents represented 12% of the population. In San Rafael, the population was 93% White, 2% Black, 3% Asian/Pacific Islander, and 2% Other. Hispanic residents represented 5% of the population. At the time, the region's non-White population was heavily concentrated in the region's urban centers and industrial cities, such as San Francisco, Oakland, and Richmond.

In Marin County, the wealth and race divides were clearly evident in Marin City. This unincorporated community was built in the 1940s for wartime shipyard workers. In 1970, Marin City was 75 percent Black while the rest of the County was 95 percent White.

Land use and zoning regulations enacted by San Rafael and other Marin County communities in the 1960s, 70s, and 80s were race-neutral on paper, but may have had unintentional exclusionary effects. For example, in response to massive development proposals in the 1960s (including a proposal for high-rise condos on the San Pedro Peninsula in San Rafael), residents voted to tax themselves so that substantial areas could be preserved as open space. The resulting network of parks, trails, and open spaces is cherished by residents, but dramatically curtailed housing potential.

San Rafael updated its General Plan in 1974, rolling back plans for high density housing, bay fill, and freeways and ushering in a more environmentally sensitive approach to development.

About the same time, the city became a regional employment center, adding office and industrial parks and creating thousands of jobs. The cumulative effect was to protect the quality of life for those living in the community, while limiting opportunities for those who wished to move there. This phenomenon was not unique to San Rafael and occurred throughout Marin County and the Bay Area.

H.1.3 Modern Era

Multi-family rental development did occur in San Rafael in the 1960s, 70s, and 80s, particularly Downtown, in the Northgate area, and along the San Rafael Canal. The Canal neighborhood's housing stock was comprised of studio, one-bedroom, and two-bedroom apartments, generally intended for small households, young couples, and singles. The community was one of the first places in Marin (outside Marin City) that was receptive to Black renters, in part because of the growth of the Section 8 voucher program in the 1970s.

The end of the Vietnam War and political turmoil in southeast Asia brought a wave of refugees to the United States. Many found housing in the Canal, along with lower-end service jobs in the Marin economy. By 1990, more than 600 residents from southeast Asia had settled in San Rafael. In the decades that followed, civil unrest in Guatemala, El Salvador, Mexico, and Nicaragua created a new flow of refugees. In 25 years, the Canal went from having almost no immigrants to a population that is 90% immigrant or first-generation Hispanic/Latino. Vacancy rates in the Canal have fallen to just one percent, well below the countywide vacancy rate.

The Canal neighborhood is physically separated from the rest of San Rafael by water, industry, and freeways; this tends to reinforce its image as a separate community that is not well connected to the rest of the city. The community continues to be challenged by high poverty rates, a lack of affordable housing, flood hazards, and limited community services. These challenges were laid bare by the COVID-19 pandemic, which hit the Canal community much harder than the rest of San Rafael. Canal residents faced a number of compounding vulnerabilities throughout the pandemic, including overcrowding, loss of income, threats of eviction, limited access to health care, and essential service jobs that do not offer the option of working remotely.

The city as a whole has become more diverse in recent years. Demographic data from the 2020 Census indicates that 11 of the 15 census tracts in San Rafael now have a Hispanic/Latino population that exceeds 20 percent of the total. This includes a tract near Northgate Mall that is now 30 percent Hispanic/Latino. There are also three census tracts in which at least 10 percent of the population is Asian. The Black population remains very low in the city and only exceeds 2 percent in two census tracts (Downtown San Rafael and Contempo Marin/Smith Ranch).

H.2 Community Response

The Housing Element update process was heavily focused on fair housing issues and efforts to engage populations who have been historically under-represented in policy making. The City's Housing Element Working Group included representatives from fair housing advocacy organizations, immigrants' rights organizations, affordable housing developers, renters, and homeless service providers. The project team solicited direct input from groups such as Voces del Canal, the Canal Policy Working Group, the Canal Alliance, Legal Aid of Marin, and the Multi-

Cultural Center of Marin. Much of the input focused on the need for more affordable housing, housing resources for immigrant and undocumented residents, improved housing conditions, supportive services, and issues of housing security. Housing was also recognized as one of a broader list of priorities associated with more equitable service delivery, hazard mitigation, capital improvements (street lighting, transportation, parks, broadband, etc.), and public safety in San Rafael.

The Canal community expressed particular concern about the threat of displacement due to rising rents and the potential for no fault evictions. The Housing Element update coincided with the potential displacement of multiple households from a large Canal area apartment building proposed for a major remodel, highlighting the urgency of this threat. On a broader level, residents in the neighborhood spoke out about poor housing conditions, overcrowding, and the cost burden of paying market-rate rent. Despite the passage of AB 1482 and a local just cause for eviction ordinance, multiple community members indicated tenant protection measures are insufficient and need to be strengthened. Residents also suggested additional fair housing testing, more resources for homeless and extremely low-income households, and acquisition and rehabilitation programs that would limit future rent increases while improving housing conditions.

While this Fair Housing Analysis has focused on the Canal area as a neighborhood of concentrated poverty and segregation, it would be a mistake to presume that the appropriate policy response is to discourage affordable housing construction in the neighborhood and expect local residents to move elsewhere. Many residents participating in the Housing Element process expressed that they would prefer to stay in the community, given ties to social infrastructure, friends, and family, rather than moving elsewhere. While an equity-based solution may focus on affordable housing development in other parts of San Rafael, it should also include affordable units in the Canal. Many residents are rooted in place, dependent on community support systems, and would prefer to remain in the neighborhood, albeit in improved and more affordable housing.

I. Housing Sites

AB 686 requires that a jurisdiction's site inventory "...identify sites throughout the community, consistent with... its duty to affirmatively further fair housing." The number of units, location and presumed affordability of identified sites throughout the community relative to all components of the fair housing assessment has been referenced throughout this fair housing assessment. This section of the analysis focuses on the cumulative nature of these factors as they relate to the distribution of housing sites. The City's sites inventory is presented in Figure A-56 and is shown by subarea and AFFH variable in Table A-39.

I.1 North San Rafael

This analysis defines North San Rafael as census tracts 1060.01, 1060.02, 1081, and 1082. These tracts are generally located north of Puerto Suelo Hill and include the Marin Civic Center area, the Smith Ranch/Contempo area, Terra Linda, Mont Marin/San Rafael Park, Northgate, and Rafael Meadows. The listed census tracts also include a number of incorporated areas, including Los Ranchitos and Santa Venetia. Most of this area is planned and zoned for lower density residential uses. There are pockets of Multifamily Residential zoning (HR1.8, HR1, HR1.5), particularly along Nova Albion Way, Merrydale Road, and Los Gamos Drive. In addition, this area contains multiple Planned Developments (PDs) with apartments, townhomes, condominiums, and small-lot single family housing.

As shown in Table A-39, the four North San Rafael census tracts includes 38 percent of San Rafael's households.¹⁹ A total of 1,785 RHNA units have been allocated to this sub-area, representing 38 percent of the city's total RHNA capacity. Of the RHNA allocation, 576 units are lower-income (33 percent), 130 are moderate-income (7 percent), and 1,079 are above moderate (60 percent). It is worth noting that more than half of this area's capacity is associated with the proposed Northgate Mall project. Another 18 percent is associated with the approved Northgate Walk and Los Gamos Apartments. While most of the identified capacity is for above moderate-income housing, almost all of it is multi-family, creating a greater likelihood for housing that is affordable "by design" to moderate income households.

North San Rafael is somewhat more affluent than the city as a whole. Housing tends to be newer than in Central San Rafael, and the percentage of households who are homeowners is high. Three of the tracts are TCAC moderate resource areas and one is a high resource area. Roughly 30 percent of the population is non-White or Latino, about 40 percent is low-moderate income, and fewer than 5 percent of the housing units are overcrowded. There are no areas considered to have high displacement risk, based on the metrics described earlier in this report. The City's RHNA strategy accommodates units of all income levels in North San Rafael and does not exacerbate segregation or negatively impact fair housing conditions in this part of the city.

¹⁹ The percentage is 35 percent if unincorporated Santa Venetia and Los Ranchitos are not counted.

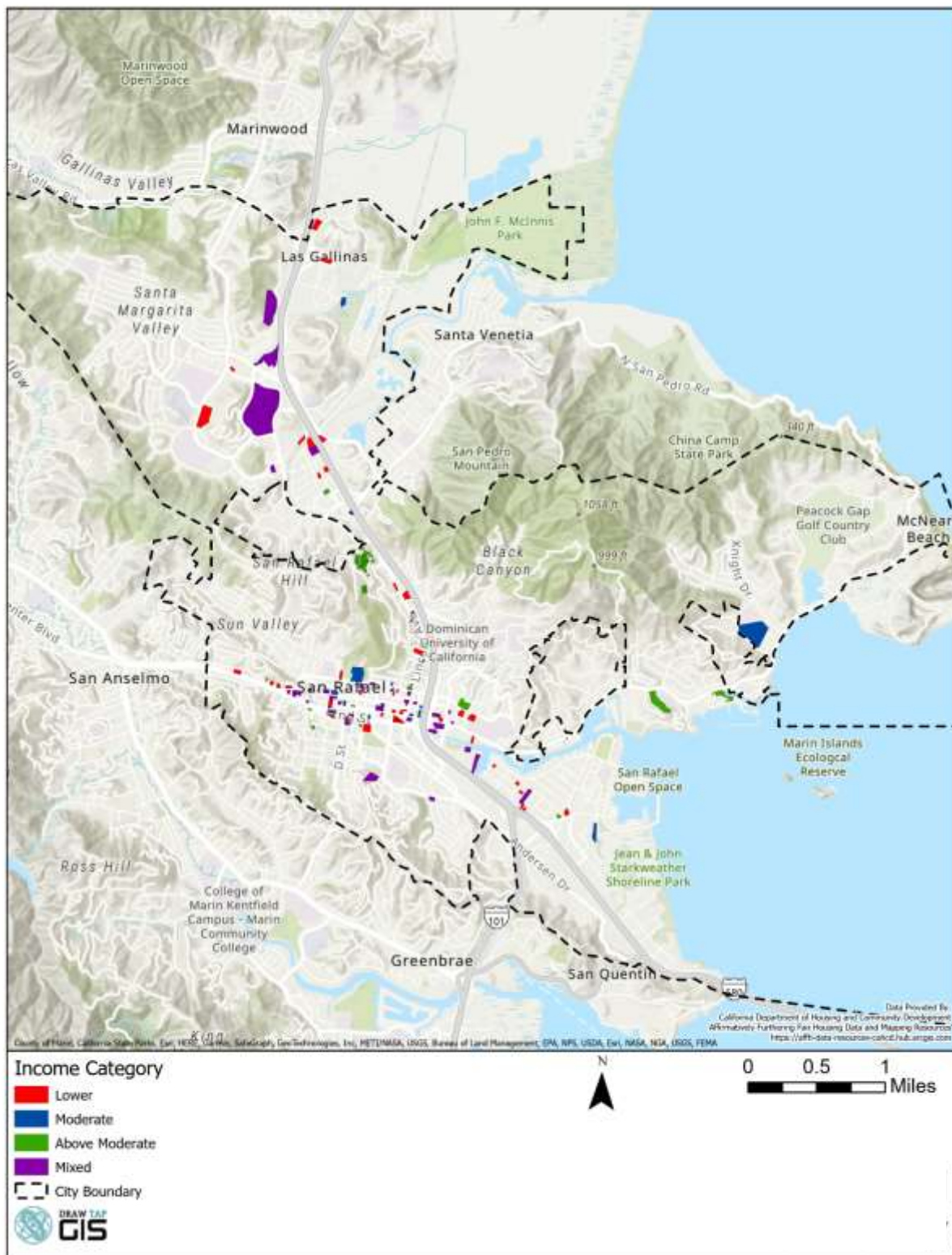


Figure A-56: San Rafael Housing Site Inventory, 2023-2031

Table A-39: Distribution of RHNA Sites by Fair Housing Variables (*)

Census Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			TCAC Opp. Category	% Non-White or Hispanic	% Low-Mod income Pop	Renter Cost Burden	% Over-crowded	At Risk of Displacement?
			Lower	Moderate	Above Moderate						
NORTH SAN RAFAEL											
1060.01	2,138	132	112	20	0	Moderate	34.0 – 36.9%	46.0 – 71.0%	40.3%	0.7%	No
1060.02	2,235	80	80	0	0	Moderate	30.6%	31.0%	40.3%	0.0%	No
1081	2,638	328	37	00	291	Highest	21.3%	37.0%	59.0%	1.6%	No
1082	2,911	1,245	347	110	788	Moderate	22.8 – 49.0%	13.0 – 51.0%	58.4%	5.6%	No
Total	9,922	1,785	576	130	1,079						
CENTRAL SAN RAFAEL											
1090.01	1,819	244	117	85	42	Moderate	13.6 – 56.1%	24.0 – 73.0%	37.7%	0.6%	Yes
1090.02	1,735	89	85	0	4	Highest	18.8%	43.0%	46.5%	0.0%	No
1101	2,366	435	151	40	244	Low	24.2 – 40.1%	19.0 – 60.0%	58.0%	0.7%	Yes
1110	2,804	1,647	548	278	820	Moderate	26.0 – 47.9%	44.0 – 77.0%	47.7%	4.7%	Yes
Total	8,724	2,415	901	403	1110						
SAN PEDRO PENINSULA											
1102	2,175	96	0	52	44	Moderate	12.9 – 13.6%	30.0 – 35.0%	23.6%	0.0%	No
Total	2,175	96	0	52	44						
SOUTHEAST SAN RAFAEL											
1121	1,881	58	5	0	53	Moderate	27.0 – 70.4%	62.0 – 83.0%	57.2%	8.2%	Yes
1122.01	1,890	48	48	0	0	High Seg. & Poverty	94.3%	96.0%	63.4%	40.5%	Yes
1122.02	1,323	284	120	36	128	Low	86.3%	85.0%	72.6%	10.7%	Yes
Total	5,094	390	173	36	181						
CITY	25,915	4,686	1,650	621	2,414						

Source: City of San Rafael, ACS 2015-2019. Several tracts include unincorporated communities, resulting in a citywide total that is 9 percent above the actual total. Capacity excludes ADUs.
 Note: Census tracts reflect 2019 boundaries. Three tracts were split in the 2020 Census, resulting in a total of 15 tracts.

I.2 Central San Rafael

Central San Rafael includes census tracts 1090.01, 1090.02, 1101, and 1110. This corresponds to Downtown San Rafael and the “inner ring” neighborhoods of West End, Sun Valley, Fairhills, Lincoln Avenue, Dominican, Montecito, and Gerstle Park. This is the oldest part of San Rafael and includes its most diverse housing stock. Housing ranges from high-density Downtown mixed-use projects to large lot single family homes. Almost every residential zoning district in San Rafael appears in this area.

As shown in Table A-39, these four census tracts include 33 percent of the city’s households. They have been allocated 2,415 RHNA units, or 51 percent of the citywide total. This includes 901 low-income units (37 percent), 403 moderate-income units (17 percent), and 1,110 above moderate-income units (46 percent). The higher concentration of units in this area relative to population is due to the location of Downtown San Rafael within this area. Most of the 2,415 units are located within the Downtown Precise Plan boundary and are planned for high-density multi-family and mixed-use housing. Thus, some of the above moderate-income units may be affordable “by design” to moderate-income households.

Central San Rafael has a more varied demographic profile than North San Rafael. It includes some of the city’s most affluent neighborhoods, but it also includes areas with high percentages of renters and lower income households. About one-third of the population is non-White or Latino. About half of the households in this area are considered low or moderate income. Rates of overcrowding are generally low. Of the four census tracts, two are considered TCAC moderate resource areas, one is a low resource area, and one is a highest resource area. Three of the four tracts have been identified as having a risk of displacement using the metrics described earlier in this report.

Lower income RHNA units have been distributed to all census tracts, including the high-resource tract. While the low-resource tract (census tract 1101) is being assigned 151 lower-income RHNA units, the low-resource TCAC designation for this area is misleading. The area includes Dominican University and has a large student population. It also includes affluent neighborhoods such as Dominican-Black Canyon and the unincorporated Country Club area. The neighborhood also includes the eastern edge of Downtown and Montecito district. The largest share of RHNA units is in Census Tract 1110, which includes most of Downtown. This is the best suited area in the city for high-density mixed income housing, as it includes numerous transit facilities, employment uses, shopping and entertainment facilities, and supportive services.

Overall, the RHNA strategy for Central San Rafael promotes mixed income communities. It does not exacerbate segregation or negatively impact fair housing conditions in this part of the city.

I.3 San Pedro Peninsula

This area includes Census Tract 1102, and includes the Loch Lomond, Glenwood, and Peacock Gap areas. While much of Census Tract 1101 is also on the peninsula, that area is covered under Central San Rafael above. San Pedro Peninsula is the smallest of the four subareas, with about 8 percent of the city’s households. The area is predominantly comprised of single family homes and townhomes, almost all of which are owner-occupied.

A total of 96 RHNA units have been identified in this tract, including 52 moderate-income units and 44 above moderate-income units. While no lower-income units have been allocated here, the area has significant potential for accessory dwelling units (ADUs) and Junior ADUs. Also, more than half of the identified potential is for moderate-income units (rather than above moderate), which will create additional housing mobility while responding to the area's physical constraints. Unlike other parts of San Rafael, there are very few commercial (or former commercial) uses here with the potential for reuse as housing.

Tract 1102 is considered a moderate resource area. It contains block groups with smaller populations of racial/ethnic minority groups and low-moderate income households than the city as a whole. The 96 RHNA units allocated in this block group will not exacerbate segregation or negatively impact fair housing conditions in this part of the city.

I.4 Southeast San Rafael

Southeast San Rafael includes three tracts: 1121, 1122.01, and 1122.02. Tract 1122.01 is the Canal neighborhood, while 1122.02 is the adjacent area including Bay Pointe, Spinnaker Point, and the Francisco Boulevard commercial and industrial district. Tract 1121 is the Bret Harte/Picnic Valley neighborhood and adjacent Woodland Avenue apartment district. The predominant housing type in Southeast San Rafael is multi-family residential, but the area includes numerous townhomes, single family homes, duplexes, and other housing types.

Southeast San Rafael contains 20 percent of the city's households. Total RHNA capacity is 390 units, which is 8.3 percent of the city's total. This includes 173 lower-income units (44 percent), 36 moderate-income units (9 percent), and 181 above moderate-income units (46 percent).

As discussed throughout this Fair Housing Assessment, Southern San Rafael has the highest concentration of fair housing issues. Most block groups have larger racial/ethnic minority populations than the city as a whole. All block groups are considered areas where more than 50 percent of the population is low or moderate income. Tract 1121 is a moderate resource area, Tract 1122.01 is an area of high segregation and poverty, and Tract 1122.02 is a low resource area. All tracts have been identified as communities with displacement risks. Renter cost burden and overcrowding are also more common in these tracts than in the rest of the city.

The RHNA strategy is aligned with other long-range planning strategies for this part of the city, which recognize not only housing needs but also its vulnerability to sea level rise and role as a industrial area serving much of Marin County. The share of RHNA units assigned here is less than its current share of population, in part to create housing opportunities in higher resource areas and in part to recognize constraints. The available housing capacity is roughly evenly divided between lower income and above moderate-income opportunities. This acknowledges approved and proposed development in the area, while also recognizing the need for diverse housing choices (including affordable housing for lower income residents, consistent with community input and the large number of cost-burdened residents in this area).

The overall housing strategy for this part of the city supports mixed income communities. It does not exacerbate segregation or negatively impact fair housing conditions in this part of the city. Housing preservation and conservation is also critical to the fair housing strategy in this area and is incorporated in the 2023-2031 housing programs.

J. Contributing Factors

A contributing factor is defined as something that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. AB 686 requires linking this analysis to the policies and actions in the Housing Element, with policies designed to address these factors and related fair housing issues. Contributing factors must be prioritized based in the AFFH analysis, with highest priority given to factors that limit or deny fair housing choice, access to opportunities, or civil rights. In any given community there are multiple contributing factors—the key is to prioritize those that are most relevant and important and ensure they are linked to goals.

J.1 Lack of Fair Housing Education, Outreach, and Testing

There is insufficient community awareness of fair housing law and discrimination complaint filing procedures. Current outreach practices and web-based information do not provide sufficient information related to fair housing, including federal and state fair housing law. Cost burdened renters in the southern areas of the city may be unaware of affordable housing opportunities as well as their rights as tenants. Approximately 56 percent of discrimination complaints filed through FHANC by San Rafael residents between 2018 and 2021 were related to disability status. This suggests insufficient outreach to housing providers related to reasonable accommodations and ADA laws. Further, while fair housing testing may be insufficient for monitoring housing discrimination.

Contributing Factors

- Lack of fair housing testing
- Lack of monitoring
- Lack of targeted outreach
- Need for additional language access
- Lack of awareness of reasonable accommodation and ADA laws

J.2 Integration and Segregation

The Canal neighborhood has been identified as an area of segregation and concentrated poverty. This Fair Housing Analysis found that the neighborhood had high racial/ethnic minority populations, high concentrations of low-moderate income (LMI) households, a high rate of overcrowding, and a high rate of cost-burden. Residents here are also subject to negative environmental, educational, and economic outcomes at a greater rate than in the city as a whole. The neighborhood has limited opportunities for new housing but does present opportunities for acquisition/rehabilitation and conversion of market-rate housing to affordable units. Place-based strategies are needed to support public investment and improve resilience. At the same time, affordable housing opportunities in higher-resource areas are needed to expand housing choice and mobility for current residents.

Contributing Factors

- Limited availability of affordable housing

- Lack of opportunities for residents to obtain housing in higher opportunity areas
- Need for additional language access
- Lack of financial resources for acquisition/rehab projects

J.3 Disproportionate Housing Needs and Displacement Risk

Roughly half of San Rafael's residents are renters, and a majority are low- and moderate-income. San Rafael's renters reside in one of the expensive housing markets in the United States. They have limited rental housing options in the Marin County real estate market, which has seen very little rental construction in the past two decades. Despite San Rafael's successful efforts at producing below market rate (BMR) housing, there is still a shortage of affordable housing in the city. As a result of this shortage, most lower-income tenants live in market-rate rental units. Some face the risk of displacement as rents increase and buildings are remodeled. The situation is compounded in the Canal neighborhood, which has disproportionate needs relative to the rest of the city. The Canal is also vulnerable to sea level rise and will require adaptation and resiliency planning to protect the health and safety of its residents. However, displacement is an issue throughout the city and requires citywide solutions.

Contributing Factors

- An aging housing stock that requires rehabilitation and thus creates the risk of displacement
- Low rates of home ownership, especially for Black and Hispanic/Latino residents
- Lack of affordable housing options
- Climate change/sea level rise

J.4 Limited Access to Opportunity

There are significant housing disparities among racial and ethnic groups in San Rafael. the Hispanic/Latinx community is drastically underrepresented in the home ownership market, representing 31 percent of the City population, but only 5.1 percent of housing loan applicants. Black/African American applicants were denied at a rate of 42 percent, significantly higher than the Citywide average and all other racial/ethnic groups. All non-White racial/ethnic groups are significantly less likely to own their homes compared to White householders. Black, American Indian, Pacific Islander, and Hispanic households are also more likely to be cost burdened compared to White and Asian households. Similar findings appear in indicators related to education, income, and access to jobs. Additional public and private investment is needed in the city's "low resource" and "concentrated poverty" areas. At the same time, additional housing and economic opportunities are needed in moderate and high resource areas.

Contributing Factors

- Lack of affordable housing options in higher resource areas
- Lack of market access for first-time homebuyers
- Lack of access to financing and financial services
- Need for improvements in education, workforce development, and public transportation

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