

December 5, 2022

San Rafael City Councilmembers  
1400 Fifth Avenue  
San Rafael, CA 94901

Dear City Councilmembers:

I am a longtime resident of San Rafael, and a leader in the Marin Organizing Committee, and co-chair of the MOC Affordable Housing Team. I am submitting comments regarding the City of San Rafael's Draft 2023-2031 Housing Element as required by the State of California Regional Housing Needs Assessment.

In the new Housing Element, ABAG has allocated 3,220 units of the Bay Area's housing need to San Rafael. While the Draft Housing Element states that some of the sites identified in 2015 are still available and can be carried forward, additional sites must be identified to meet the RHNA assignment. The good news is that with the updated San Rafael General Plan and Downtown Precise Plan the City has further capacity for more housing to be created.

The analysis of housing sites by the City of San Rafael includes properties zoned for residential uses, as well as properties that are zoned to allow both residential and commercial uses. It includes sites that are vacant as well as non-vacant sites that are underutilized. Further, it includes public land that could potentially be surplus and developed with housing. The analysis also includes sites in the development "pipeline", and projects that are in the application or pre-application phases; as well as expectations for creation of more accessory dwelling units which can be part of the affordable housing supply.

I want to commend the City Staff on their report and analysis. It is not only comprehensive, but the analysis addresses in plain language the financial and housing needs of the people who reside in the City. There were specific items of the report that stood out:

1. San Rafael has a larger percentage of single person households and a smaller percentage of married couples/family households.
2. Compared to Marin County as a whole, where 36% of the households are renters, San Rafael had 50% of households who rented in 2019.
3. Between 2013 and 2021, the median income for a household with four people increased from \$103,00 to \$149,600. (This was an inflation rate of 45%). Therefore, a household of four earning less than \$146,350 is considered low income; totaling 47% of households.
4. The number of people who live in over-crowded households nearly doubled between 2010 and 2020; going from 3.1% to 6%. "This is triple the incidence in the County as a whole."
5. Citywide rents are currently "above the level of affordability for all very low income households." Rents in brand new construction for a one-bedroom unit now start at \$3,400.

I appreciated as well in the Draft Report a focus on the special needs of the senior population in the City. The older residents in San Rafael have been on the rise since 1990. As highlighted in the Report, older adults have special housing needs because many are on fixed incomes, have higher health costs as well as reduced mobility and transportation issues. All of these factors make it difficult to find suitable and affordable housing.

Further commendable is the inclusion in the Report a section devoted to "Female-Headed Households." This is a population that is often overlooked in terms of housing needs and the additional expenses for women who need to work have for childcare. This population of female-headed households have lower incomes than their male counterparts.

The report also includes a good analysis of housing units by "structure type." It made clearer the kinds and percentage of units in San Rafael. While single family homes represented 56% of the City's housing stock in 2020, multi-family units were 42% of the City's housing stock. The inclusion of information on the age and condition of this housing stock, also helped in understanding the housing needs of our residents.


The Staff's analysis also identified current housing developments at risk for conversion to market rate. There are approximately 30 different projects in the City of San Rafael that are designated affordable housing. The good

news is that the majority of these developments are built and controlled by nonprofits, but this is something that will need to be monitored by the City.

The Draft Housing Element Report does seem to include enough housing opportunity sites as well as an analysis and methodology used to determine what sites are appropriate. What is clear is that we need to build more low-income workforce housing.

With the proposed development of Northgate along with the Active Mixed Use Downtown Project, as well as other proposed development sites, the City is in a good position to meet its RHNA goals over the next ten years.

Sincerely,

  
Judith Bloomberg



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Mayor Colin and Council Members:

The Marin Environmental Housing Collaborative (MEHC) is a multi-disciplinary consortium of advocates generating support for projects and policies that advance affordable housing, environmental integrity, and social justice. We are writing to comment on San Rafael's draft 6<sup>th</sup> Cycle Housing Element.

We applaud the basic premise of the plan, which is a clear commitment to equity and social justice, rather than the usual focus on the minutia of zoning regulations. While it is critical to promote and implement programs that will accomplish the RHNA production mandate, policies must ultimately be driven by *values*. The thorough and insightful Needs Assessment and the clear, values-based goals and policies show that the City is planning not only for its share of the regional housing requirement, but for the community's needs. Overall, we think the content and writing in the draft Housing Element are excellent.

However, we find that the draft plan fails to adequately address one of the city's most urgent housing problems – gentrification in the Canal neighborhood. As you know, several years ago the federal government designated Canal neighborhood an "opportunity zone." As a direct result, investors purchased the apartment building at 400 Canal Street, radically increased the rent, and served notice that they are about to begin major upgrades to the property. Tenants are effectively being forced out. The draft Housing Element speaks to eviction protections and relocation assistance in the Canal neighborhood (programs 2, 11, and 12) but it is silent on price controls. The draft Housing Element should speak more directly to the need for rent stabilization in the Canal neighborhood.

Also likely in response to opportunity zone incentives, a 70-unit townhome project is being developed on the former bowling alley site

at 88 Vivian Way. The neighborhood is a highly desirable location. The investments at 400 Canal and 88 Vivian Way are clear indications of gentrification that threatens lower income households in the area. While the Canal clearly has problems with crowding and economic disadvantages, it is also a vibrant neighborhood that should be protected for its own intrinsic value. We recommend that a program or programs be added to the Housing Element to facilitate the purchase of rental housing in the Canal by qualified affordable housing providers as was done recently for several properties in Terra Linda.

The Constraints Analysis includes a discussion of the Affordable Housing Ordinance and concludes that "the revised terms of the Affordable Housing Ordinance have had a positive effect, with the number of projects in the pipeline increasing since its approval." Lacking real data on the number of building permits issued and the volume of housing starts, we question this conclusion. We urge you to direct staff to edit the draft plan to include data on permits issued and building starts to document the impact of the Affordable Housing Ordinance revisions.

We are particularly pleased to read Program 26: Objective Design Standards for Multi-Family Housing. In this era when opponents of housing opportunity talk about the "loss of local control" it is, in fact, important for cities to "take control." Objective Design and Development standards as proposed in the draft Housing Element will enable San Rafael to maintain design control while taking advantage of the housing-affirming-power of SB35.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert J. Neveling".

Board Chair