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Comments on Draft San Rafael 2023-2031 Housing Element; 12/5/2022

Table 4.1 should be revised to show the Total Buffer = 51%. Why is the Total Buffer on Table 4.1 shown as N/A? The total buffer = 51% (50.869%); why is this not shown in the table?

There is no justification for such a large buffer and it should be drastically reduced, down to the 15% buffer that is required. Why allocate a 51% when the State requirement is for a 15% buffer. What is the rationale and justification such a high buffer? Especially when the ABAG RHNA allocation of 3,220 units is already such an arbitrary and grossly inflated number to begin with.

The Housing Element needs to show and clearly define the income levels associated with Low, Moderate, and Above Moderate income households; the only mention of this is buried in tiny print in an asterix note at the bottom of Table 4.3. There needs to be better transparency of the incomes associated with the housing categories.

The City needs to reconsider its allocation of Moderate housing units. Table 4.2 shows that Moderate Income housing units have been left in the dark by the City, and almost completely left out of City-approved housing units, with only 3 out of 785 units being Moderate.. Table 4.3 shows that again Moderate housing units will be sidelined with only 11% of units in the approval pipeline designated for Moderate income levels. If the City wants to profess that it is making housing units available to safety & emergency service employees then how will there be enough Moderate Income units available given the City's track record? It seems to be a false argument for more housing if the City won't deliver on the housing for Moderate income families.

Figure 4-1 needs to be revised to show in a legend what the circled letter-number designations represent. There is no information on Figure 4-1 on what these designations are. The maps should also have basic and standard map references to a north arrow and scale.

The Housing Element needs to include maps showing what the zoning designations are for the areas around the units highlighted; there should be more transparent information about how the proposed zoning for the allocated sites compares to the areas around the sites.

Housing designations bordering single-family residential parcels should constraint building height so that new developments do not tower over and look into private residences, thus destroying privacy. An example site is the Dandy Market site at the corner of Merrydale Road and El Prado (Site E-20). Any new development at this site must not destroy the privacy of the single-family residences behind Dany Market.

Thank you.