



COMMUNITY DEVELOPMENT AGENCY

HOUSING AND FEDERAL GRANTS DIVISION

January 26, 2021

Marin County Civic Center
3501 Civic Center Drive
Suite 308
San Rafael, CA 94903
415 473 6269 T
415 473 7880 F
415 473 2255 TTY

Building and Safety
Environmental Health Services
Planning
Environmental Review
Housing
Sustainability
Code Enforcement
GIS
Federal Grants

www.marincounty.org/cda

Marin County Board of Supervisors
3501 Civic Center Drive
San Rafael, CA 94903

SUBJECT: Housing Element Update - Regional Housing Need Allocation (RHNA)

Dear Supervisors,

RECOMMENDATION:

Receive informational report on the Regional Housing Need Allocation (RHNA) which determines the number of housing units unincorporated Marin will need to plan for in the Housing Element update

SUMMARY:

The Community Development Agency is initiating the next Housing Element in order to plan for future housing needs for the planning period of 2022-2030. The process to determine how many housing units jurisdictions will plan for is called the Regional Housing Need Allocation (RHNA). To arrive at this number, the California Department of Housing and Community Development, or HCD, determines the total number of new homes the Bay Area needs to build—and how affordable those homes need to be—in order to meet the housing needs of people at all income levels.

The Association of Bay Area Governments (ABAG), working through its Housing Methodology Committee (HMC), distributes a share of the region's housing need (also referred to as the Regional Housing Needs Determination, or RHND) to each city, town and county. On December 18, 2020 ABAG released the Draft RHNA Methodology and Final RHNA Subregional Shares. The ABAG Regional Planning Committee and the Executive Board are scheduled to take action on the Draft RHNA Methodology and Final RHNA Subregional Shares in January 2021. Once approved, ABAG will submit the draft methodology to HCD for its consideration and review, in advance of RHNA finalization later this year.

This Report is intended to provide your Board with an overview of the draft RHNA, assigned to the unincorporated County (Attachment 1). The number of units of housing for the unincorporated County has increased from 185 units for the current Housing Element cycle to 3,510 units recommended for the upcoming cycle, by approximately 1,900%.

Draft RHNA: Unincorporated Marin County (2022-2030)

Income Level	Very Low	Low	Moderate	Above Moderate	Total
	1,063	611	512	1,324	3,510

DISCUSSION:***Regional Housing Need Allocation***

Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the number of housing units, by affordability level, that each jurisdiction must accommodate in the Housing Element of its General Plan (Government Code §65584). On June 9, 2020, HCD released the Regional Housing Needs Determination (RHND) for the 6th Housing Element cycle to the Association of Bay Area Governments (ABAG). A total of 441,176 housing units were allocated to the Bay Area for the planning period of 2022 to 2030. This number is approximately twice the housing needs determination the Bay Area received in February of 2012 for the last RHNA cycle and reflects changes to state law, the methodology for allocating housing need, and growth over the past eight years. With the overall increase in the Bay Area's RHND and the incorporation of new criteria such as equity, which is used to allocate those units, the unincorporated County also has a significant increase in the number of housing units it will be required to plan for in order to have a certified Housing Element. ABAG convened a Housing Methodology Committee (HMC) in October 2019 to advise and make recommendations on the RHNA methodology for allocating the RHNA to all Bay Area jurisdictions consistent with the State's new equity framework and the statutory objectives of RHNA.

The current allocation of 3,510 units for the unincorporated area of Marin reflects these changes. Marin County's total RHNA allocation, inclusive of units that are allocated to the 11 cities and towns, is increasing by 526%, from 2,298 to 14,380. As noted above, the unincorporated County's share of the RHNA was 185 units for the last eight-year cycle (2015-2023), which represents a decrease of approximately 76% from the prior RHNA and Housing Element (2007-2014). The County's 2007-2014 allocation was 773 units of housing and illustrates that the County has a history of planning for larger allocations than what was determined for the 2015-2023 cycle. However, because the current increase for this cycle is so significant, your Board submitted letters to ABAG objecting to the increase. (Attachment 2) The increased RHNA will be a challenge because nearly half of the county's land base is protected by park or open space status. With the largest amount of public land in the nine-county Bay Area, Marin County's 118,669 acres of park and open space make up 30 percent of the County's land base, while water area and watershed lands comprise another 20 percent. Approximately 15% remains undeveloped.

Staff will work with the Board Subcommittee on Affordable Housing to identify strategies to address the increase in RHNA and meet HCD's new requirements for sites, which may include:

- Consideration of by-right zoning¹ on some existing housing element sites which are designated to accommodate lower income housing, this would mean that the County would rely on the adopted Objective Design Standards to evaluate a project, rather than the typical discretionary review process
- Evaluating the use of tools like rezoning, overlay zoning to increase density on sites zoned for multifamily and mixed-use

¹ 'By right' means that no review is required under the California Environmental Quality Act (CEQA), unless a subdivision is required, and the project can only be reviewed using 'objective' design standards. (§ 65583.2(i).)

- Other incentives to encourage and facilitate lower income housing
- Apply equity framework when identifying sites which may be suitable for housing development.

Any of these proposed strategies would include a robust public outreach and opportunities for public comment and would be presented to your Board for consideration at a public hearing.

BACKGROUND

Marin County, like other communities in California, is initiating a planning process under State law to identify how to meet housing needs at all income levels. This process involves updating the County's Housing Element, which is a required component of the Countywide Plan (the County's general plan). The California Department of Housing and Community Development (HCD) one of the seven mandatory elements of a general plan to address local housing needs. According to State housing element legislation, all local governments must adopt land use plans and regulations that provide opportunities for, and do not unduly constrain, housing development. Because housing availability is a critical issue with statewide implications, and most housing decisions occur at the local level, State law requires housing elements to be updated on a regular cycle (the timeframe for the next Housing Element is 2022-2030). The State also mandates that housing elements, unlike other elements of the general plan, be reviewed and certified by the State.

The State has previously certified six Marin County Housing Elements, dating back to 1970. The County adopted the 2015-2023 Housing Element in December 2015, which required the County to plan for a minimum of 185 units of housing at a variety of income levels and locations within unincorporated Marin. To ensure flexibility, the County included a sites list which could accommodate 378 units of housing. The Housing Element also includes 48 programs, over 87% of which have been completed or partially implemented. As required by State law, the County submits Annual Progress Reports (APR) on Housing Element implementation progress to the State. Timely submittal of APRs makes the County eligible for funding and impacts the applicability of some housing streamlined legislation. As part of the previous Housing Element approvals, the County also certified a Supplemental Environmental Impact Report (SEIR) to comply with State environmental review requirements under the California Environmental Quality Act (CEQA). The list of potential housing sites studied in the SEIR, along with those in the current Housing Element, provide the County a place to begin analysis for possible inclusion in the next housing element.

Housing Need

While Marin continues to have one of the highest median incomes in the State and has been identified as one of the healthiest counties, many working young adults, families and seniors struggle to meet their basic housing, food, and childcare needs. The high cost of living in Marin and continued rising costs of basic necessities contribute to the stress put on our lower income households, especially communities of color.

For example, special needs populations, such as lower income families with children, seniors, persons with disabilities and people who are homeless, face disproportionately difficult challenges and barriers to finding housing appropriate and

affordable for their individual needs. According to the Area Plan for Aging², the senior population is projected to increase to 48% of the County's total population by 2035, a 30% increase. With approximately 5% of the County's seniors with incomes currently below the poverty line, the need for affordable housing opportunities for seniors will only become more acute in the years to come. Affordable housing is also necessary to address the housing needs of persons with disabilities in the unincorporated County, as well as the homeless and precariously housed in our community.

According to the 2020 Marin County Analysis of Impediments to Fair Housing Choice (AI), 30.4% of households in Marin have children, with 23% living below the Federal poverty level. The AI also showed that 712 students in Marin were experiencing some form of homelessness, which includes sharing housing with others due to loss of housing/economic hardship, living in a hotel or motel, living in a temporary shelter or being unsheltered. Additionally, the 2020-24 Marin County Consolidated Plan demonstrates that about 64% of families in poverty are renters.

The 2020 Marin County AI also illustrates racial disparities in housing, largely tied to the impacts of historic housing policies and practices that prevented equal opportunity in housing accessibility, quality, and financing. Marin County presents the starkest racial inequities in housing tenure throughout the nine Bay Area counties: while over two thirds of non-Hispanic white residents are homeowners, roughly three quarters of both Black/African American and Hispanic/Latinx communities in Marin are renters.

Additionally, considering RHNA income categories and Marin's median income, farm workers, retail salespersons and childcare workers earn a salary that is considered by the State as very low income (below 50% of area median income); many county staff including police, fire, and ambulance dispatchers typically earn a low income salary (below 80% of area median income); and loan officers and social workers typically earn a moderate income salary (below 120% of area median income). These workers are critical to supporting the services, amenities, and local businesses that contribute to Marin's quality of life and diversity, in addition to the health of our local economy. However, these low to moderate wage earners and their families either struggle or are unable to live in the communities where they work, magnifying concerns about both ecological and economic sustainability.

Well-placed and well-designed affordable housing can serve the populations with identified housing needs, as well as reflect or reinforce attributes of the community as a whole.

Fair Housing Choice

Under Assembly Bill 686, the Housing Element is required to incorporate an assessment of fair housing to address barriers to fair housing choice and identify sites and programs that provide housing opportunity for lower income families and individuals near high quality schools, employment opportunities and public transportation.

As a precursor to incorporating a fair housing assessment into the Housing Element, in 2020, the County completed an Analysis of Impediments to Fair Housing Choice (AI) which examined barriers to fair housing. The AI meets both the federal prerequisite for state and local governments receiving block grants for housing and community

² <https://www.marinhhs.org/area-agency-aging>

development projects as well as Marin’s commitment to the promotion of fair housing choice, and to affirmatively further fair housing. The County’s goal is to increase, expand and maintain its affordable housing inventory and to increase opportunities for housing choice for low income residents, people of color, people with disabilities and residents who have specifically been impacted by historic government policies and practices that created segregated communities in Marin and who continue to be marginalized today. The AI identified four overarching impediments to fair housing choice in Marin:

- Community opposition to developing new affordable housing
- Cost of developing affordable housing and the lack of available land for development
- Lack of affordable housing sites
- Lack of homeownership, particularly for African Americans, and ongoing concerns of gentrification.

The overarching conclusion of the AI is that whether it is national, regional or local, where you live matters - particularly for people of color, those with disabilities, families and other members of the protected classes. A person’s zip code can predict their life expectancy, their ability to attend good schools, opportunities for employment, transportation options and quality housing. This is particularly relevant to Marin County, which is determined to be the most racially unequal county in California, according to the Advancement Project California, a Los Angeles-based civil rights organization³. “Most racially unequal” signifies that non-Hispanic Whites generally fare better in all categories measured than Blacks, Latinx, Asians and other people of color. For example, 62.6 percent of non-Hispanic Whites in Marin own their own home, compared with 59.8 percent of Asians, 27.7 percent of Blacks, 26.4 percent of Latinx and 8.5 percent of Native Americans. These findings will inform the assessment of fair housing as required under AB 686.

Changes from the previous Housing Element

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the state’s housing shortage and rising housing costs. The package included bills aimed towards funding affordable housing, streamlining permits, increasing local accountability for housing production, inclusionary zoning, and preserving existing affordable housing.

The 2018 legislative session also brought new requirements to the criteria applied to suitable sites, now codified in [Government Code Section 65583.2](#). One of the principal outcomes of these changes is the potential for increased state housing allocations through the RHNA process with new state criteria that may increase the difficulty in identifying suitable and reusable housing sites to accommodate the projected growth because of the more stringent requirements for site selection.

The 2019 legislative session concluded with a new batch of legislative bills aimed at increasing production by removing barriers to entitlements, including project streamlining, fee reductions, and limiting local control, to name a few. Bills including Senate Bill 35, Senate Bill 330 and changes to the Housing Accountability Act (HAA), have established mandates for cities, towns and counties to streamline the review process for multi-family housing projects.

³ <https://www.racecounts.org/>

In the 2019-20 Budget Act, Governor Gavin Newsom allocated \$250 million for all regions, cities, and counties to prioritize planning activities that accelerate housing production to meet identified needs of every community. With this allocation, HCD established the Local Early Action Planning Grant Program (LEAP) for cities and counties and the Regional Early Action Planning Grants (REAP) for regional governments. LEAP and REAP provides one-time grant funding to cities and counties to update their planning documents and implement process improvements that will facilitate the acceleration of housing production and help local governments prepare for their 6th cycle Regional Housing Need Allocation (RHNA) and Housing Elements, much like the Senate Bill 2 Planning Grants that local governments in Marin have already received.

One particular area of continued scrutiny will be the inventory of housing sites which will be required to meet the County's share of projected residential growth as determined by the RHNA. Many of the legislative changes made to housing element law⁴ will affect the County's next Housing Element, especially as it relates to the selection of sites to accommodate our lower-income RHNA. For example, sites in the current housing element which are identified to accommodate lower income housing may not be reused unless additional actions are taken to encourage and facilitate housing on those sites. These actions could include by-right zoning or re-zoning at a higher density and could facilitate meeting the higher RHNA numbers.

Public Outreach

Extensive public outreach is both a critical component of Housing Element legislation and an important goal for the County. Engaging people of color, lower income and special needs community members is especially important since they are most at risk of being affected by the current housing crisis and have historically not been engaged in planning processes in the County. Staff is seeking to improve outreach efforts and is working to involve all members of the community throughout the update process. To accomplish this, the Community Development Agency has retained a consultant firm that specializes in community outreach, to supplement staff resources. This firm will work with staff to help facilitate the outreach process, and to improve access to and the quality of information provided to the public, with a focus on empirical data through surveys and focus groups.

Staff is working to provide a variety of opportunities for the community to contribute ideas and is seeking new ways to reach those less likely to participate in the process. Operating under the current pandemic will change the outreach process, requiring new ways of informing and engaging the public to ensure all voices are heard despite the digital divide experienced by many Marin communities. In accordance with Housing Element law, some methods of public outreach include:

- Updating the Housing Element website to improve access to the information needed to become familiar with housing issues in Marin
- Encouraging community members to participate in a Marin County Housing Survey, and to sign up for e-mail updates on the updated website at www.MarinCounty.org/HousingElement
- Engaging with local Design Review Boards, Community Service Districts and other community stakeholder groups to provide information on the Housing Element update and request feedback on conducting outreach

⁴ See Government Code Sections 65583 and 65583.2 for details

- Scheduling a series of on-line community focus groups to solicit public input on how best to satisfy our housing needs for the next Housing Element cycle (the public outreach will occur prior to the completion of the Draft Housing Element and before the Planning Commission begins its hearings on the Housing Element)

Timeline

The Housing Element update for the planning period of 2022-2030 is due to the State by January 2023. Changes in housing element legislation now include incentives, such as eligibility for funding, for counties and cities to adopt a housing element by this deadline. More information can be found on [CDA's Housing Element webpage](#).

FISCAL/STAFFING IMPACT:

No Impact on the general fund, this is an informational report only.

REVIEWED BY:

- ☐ Department of Finance
- ☒ County Administrator's Office
- ☐ County Counsel
- ☐ Human Resources

- ☒ N/A
- ☐ N/A
- ☒ N/A
- ☒ N/A

SIGNATURE:

Leelee Thomas

Leelee Thomas
Planning Manager

Attachment 1: Draft RHNA (released 12/18/2020)

Attachment 2: Letters from Marin County Board of Supervisors to ABAG

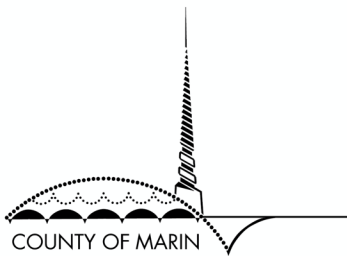
Attachment 3: RHNA Development Timeline

Jurisdiction Illustrative Allocations by Income Category

BOS ATTACHMENT 1

Note: the jurisdiction-specific allocations shown are for illustrative purposes only. ABAG will issue Final Allocations by the end of 2021.

Jurisdiction	Jurisdiction Share of 2050 Households*		Proposed RHNA Methodology (Baseline: 2050 Households - Draft Blueprint)					Draft RHNA Methodology (Baseline: 2050 Households - Final Blueprint)					Comparison of Total RHNA	
	Draft Blueprint	Final Blueprint	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total	Unit Change from Proposed to Draft	Percent Change from Proposed to Draft
Belvedere	0.033%	0.032%	49	28	23	61	161	49	28	23	60	160	(1)	-1%
Corte Madera	0.135%	0.138%	209	121	106	274	710	213	123	108	281	725	15	2%
Fairfax	0.104%	0.098%	158	91	75	195	519	149	86	71	184	490	(29)	-6%
Larkspur	0.197%	0.189%	303	175	150	390	1,018	291	168	145	375	979	(39)	-4%
Mill Valley	0.161%	0.164%	248	142	124	320	834	252	144	126	326	848	14	2%
Novato	0.669%	0.672%	582	335	332	858	2,107	583	336	332	860	2,111	4	0%
Ross	0.023%	0.022%	35	20	17	44	116	33	19	16	41	109	(7)	-6%
San Anselmo	0.149%	0.167%	226	130	108	280	744	253	145	121	314	833	89	12%
San Rafael	0.895%	1.048%	752	433	446	1,154	2,785	877	504	521	1,350	3,252	467	17%
Sausalito	0.125%	0.125%	200	115	115	296	726	200	115	114	295	724	(2)	0%
Tiburon	0.123%	0.126%	186	107	91	236	620	193	110	93	243	639	19	3%
Unincorporated Marin	0.893%	0.822%	1,157	666	557	1,440	3,820	1,063	611	512	1,324	3,510	(310)	-8%
Marin County	3.507%	3.605%	4,105	2,363	2,144	5,548	14,160	4,156	2,389	2,182	5,653	14,380	220	2%
American Canyon	0.190%	0.176%	124	72	81	209	486	115	67	75	194	451	(35)	-7%
Calistoga	0.090%	0.052%	58	32	33	86	209	32	19	19	50	120	(89)	-43%
Napa	0.815%	0.769%	550	317	339	876	2,082	516	298	319	825	1,958	(124)	-6%
St. Helena	0.073%	0.068%	46	27	27	71	171	43	24	26	66	159	(12)	-7%
Unincorporated Napa	0.288%	0.279%	218	126	125	323	792	210	121	120	312	763	(29)	-4%
Yountville	0.031%	0.029%	20	12	12	32	76	19	11	12	30	72	(4)	-5%
Napa County	1.487%	1.373%	1,016	586	617	1,597	3,816	935	540	571	1,477	3,523	(293)	-8%
San Francisco	12.394%	14.304%	18,637	10,717	11,910	30,816	72,080	21,359	12,294	13,717	35,470	82,840	10,760	15%
Atherton	0.065%	0.072%	74	43	51	130	298	81	47	56	144	328	30	10%
Belmont	0.302%	0.305%	485	280	282	728	1,775	488	281	283	733	1,785	10	1%
Brisbane	0.742%	0.423%	573	330	534	1,382	2,819	324	187	303	785	1,599	(1,220)	-43%
Burlingame	0.572%	0.546%	926	534	555	1,434	3,449	883	509	529	1,368	3,289	(160)	-5%
Colma	0.047%	0.052%	40	24	33	86	183	45	26	37	96	204	21	11%
Daly City	1.040%	0.945%	1,150	661	841	2,175	4,827	1,039	598	762	1,971	4,370	(457)	-9%
East Palo Alto	0.219%	0.206%	179	104	169	437	889	169	97	159	410	835	(54)	-6%
Foster City	0.349%	0.327%	556	320	321	831	2,028	520	299	300	777	1,896	(132)	-7%
Half Moon Bay	0.147%	0.149%	93	54	54	141	342	93	54	54	141	342	-	0%
Hillsborough	0.107%	0.097%	169	97	95	245	606	153	88	87	223	551	(55)	-9%
Menlo Park	0.500%	0.481%	773	445	517	1,340	3,075	740	426	496	1,284	2,946	(129)	-4%
Millbrae	0.375%	0.350%	618	356	386	999	2,359	575	331	361	932	2,199	(160)	-7%
Pacifica	0.359%	0.356%	557	321	294	761	1,933	551	317	291	753	1,912	(21)	-1%
Portola Valley	0.045%	0.045%	70	41	39	101	251	70	40	39	99	248	(3)	-1%
Redwood City	1.102%	0.984%	1,284	739	885	2,291	5,199	1,141	658	789	2,041	4,629	(570)	-11%
San Bruno	0.486%	0.730%	481	278	382	989	2,130	721	415	573	1,483	3,192	1,062	50%
San Carlos	0.398%	0.455%	647	372	383	991	2,393	739	425	438	1,133	2,735	342	14%
San Mateo	1.338%	1.419%	1,722	991	1,111	2,873	6,697	1,819	1,047	1,175	3,040	7,081	384	6%
South San Francisco	0.923%	0.929%	892	513	717	1,856	3,978	892	514	720	1,863	3,989	11	0%
Unincorporated San Mateo	0.827%	0.809%	852	490	443	1,148	2,933	830	479	433	1,121	2,863	(70)	-2%
Woodside	0.057%	0.058%	90	52	51	133	326	90	52	52	134	328	2	1%
San Mateo County	10.002%	9.740%	12,231	7,045	8,143	21,071	48,490	11,963	6,890	7,937	20,531	47,321	(1,169)	-2%



BOARD OF SUPERVISORS

November 13, 2020

PRESIDENT

Katie Rice

2ND DISTRICT

VICE PRESIDENT

Dennis Rodoni

4TH DISTRICT

2ND VICE PRESIDENT

Judy Arnold

5TH DISTRICT

Damon Connolly

1ST DISTRICT

Kathrin Sears

3RD DISTRICT

Matthew H. Hymel

COUNTY ADMINISTRATOR

CLERK OF THE BOARD

Marin County Civic Center

3501 Civic Center Drive

Suite 329

San Rafael, CA 94903

415 473 7331 T

415 473 3645 F

415 473 6172 TTY

www.marincounty.org/bos

Mayor Jesse Arreguín, President
Association of Bay Area Governments (ABAG) Board
375 Beale Street, Suite 700
San Francisco, CA 94105-2066
Via email to RHNA@bayareametro.gov

Re: Proposed RHNA Methodology and Subregional Shares

Dear President Arreguín,

On behalf of the Marin County Board of Supervisors, thank you and the Housing Methodology Committee for the difficult work to ensure the Regional Housing Need Allocation is distributed in an equitable way that both seeks to provide opportunity to those in need of housing and ensures that our shared goals to put housing near services and jobs to address climate change are addressed.

We are committed to addressing housing as an issue of equity; where one lives matters a great deal to health and well-being. We recognize the role that housing policies, laws, and regulations can play in promoting neighborhood conditions that positively shape health and well-being. We are committed to providing affordable housing that provides residents the same chance to live in a safe neighborhood with great schools, healthy food options, public libraries, community centers, parks and trails, transportation hubs, and access to employment centers.

However, we are concerned that the proposed methodology adopted by the Housing Methodology Committee (HMC) and assumptions in the Blueprint 2050 will result in a significant increase in the Regional Housing Need Allocation (RHNA) in the unincorporated County that may make it impossible for us to meet these housing goals.

Marin County has a history of receiving State certification of its housing elements going back to 1970 and we wish to continue this practice. The County has adopted strong housing policy and taken a leadership role with coordinating with our cities and towns on housing. Some of our recent successes include:

- *Staffing the Housing Working Group* – In 2018, staff convened a countywide working group of planners to encourage interjurisdictional collaboration on housing issues and solutions, with a specific focus on responding to 2017 State housing Package. The working group established common goals and continues to coordinate on housing legislation, planning, production, and preservation of existing affordability.

- *SB 2 Grants* – The Housing Working Group jointly filed applications for three projects, including the Objective Design and Development Standards and ADU Workbook and Website in order to collaborate on a common strategy and save on costs and time for each participating jurisdiction.
- *Objective Design Standards* – Marin County jurisdictions hired a consultant to produce a general toolkit that will utilize existing zoning codes as a basis to produce objective standards and guidelines. This toolkit will be customized for each jurisdiction through chapters that outline architectural standards, building patterns, and historical significance.
- *ADU Workbook and Website* – The work includes updating the County website with code compliant floor plans, a calculator that estimates construction costs, homeowner spotlights, and a workbook.
- *Housing Trust Balance* – The Board has deposited over \$10 million in a local fund to be used for fund affordable housing.
- *Acquisition of the former Coast Guard Housing Facility* – after federal legislation required the land be sold to the County and years of negotiations with the Coast Guard, the County purchased the property to be developed as affordable housing.
- *Policies to prevent displacement of our existing lower income renters* – The Board of Supervisors has allocated resources and adopted policies, such as tenant protections and purchasing properties, to prevent displacement.

We understand that our share of the RHNA will increase and we are committed to increasing our housing production, especially of homes affordable to lower income households. However, the proposed methodology and assumptions could result in the unincorporated County receiving over 20 times more than the housing allocated to us in the previous cycle. With an increase of this magnitude, the County may not be able to adopt a compliant housing element unless we put housing in environmentally sensitive areas, prone to fires, flooding, and sea level rise.

Nearly half of the county's land base is protected by park or open space status. With the largest amount of public land in the nine-county Bay Area, Marin County's 118,669 acres of park and open space make up 30 percent of the County's land base, while water area and watershed lands comprise another 20 percent. Approximately 15% remains undeveloped.

- *Infrastructure* – Similar to other unincorporated counties, we lack the infrastructure to support densities of this level, especially because the increase is so magnified on such a short timeline. The goals, policies, and programs contained in the County's General Plan (Countywide Plan or CWP) direct future growth towards the City-Centered Corridor and the existing urban service areas of unincorporated communities to ensure that biotic, agricultural, open space, and other resources would be protected. Policies and programs ensure new development would be confined to areas where adequate public services are available and

coordinate the provision, timing, and funding of public services such that new growth would be appropriate to the specific area and constrained by available services such as water supply and wastewater treatment. Analysis of the Countywide Plan has demonstrated that although development is possible in the City-Centered Corridor, the development of units as required by the proposed RHNA numbers is not realistic in this area due to limited infrastructure and policies in the Countywide Plan to address sensitive habitat, high risk of wildfire, flooding, and sea level rise.

- *Wildfire Hazards* – In light of recent fire events, it is important to address fire hazards. Many unincorporated communities are considered “Communities at Risk” by the National Fire Plan because of the proximity of housing to areas susceptible to wildland fires. The California Department of forestry rates portions of Marin County either as a high, very high, or extreme fire hazard. Many of the high-risk areas are interspersed with developed areas. In addition, many of the roads to access these areas are private, narrow and substandard. New land uses and development could expose people and structures to wildland fires throughout the county, especially in areas with steep slopes, high fuel loads (i.e., dense vegetation) or inadequate emergency access.
- *Flooding and Sea Level Rise* – To address risks of flooding, the CWP requires all improvements in Bayfront, Floodplain, Tidelands, and Coastal High Hazard Zones to be designed to be more resistant to damage from flooding, tsunamis, seiches, and related water-borne debris, and to be located so that buildings and features such as docks, decking, floats, and vessels would be more resistant to damage. While the CWP does not prohibit development impacted by flooding, these are real limitations which will continue to increase as we face climate change. Calculations estimate sea level rises ranging anywhere from approximately 1-3 feet or 8.5-35.2 inches by the end of the Century, further limiting our development opportunities.

One of ABAG’s core strategies is “focused growth in communities along existing transportation networks near homes and jobs... This strategy aims to minimize development in our green fields and maximize growth in transit-rich communities, which will help lower vehicle miles traveled and greenhouse gases.” The proposed RHNA numbers in unincorporated Marin County contradict those policies as the County would be forced to develop in green fields and areas outside of transit networks, existing residential development, and job centers.¹

We would like to reiterate that we understand that RHNA is increasing and the County will be expected to do more than in the past. However, we respectfully request that you consider a methodology that will not focus growth in unincorporated areas with few services and more environmentally sensitive areas. Unincorporated areas have fewer services, infrastructure and jobs. To better reflect the realities of the constraints of unincorporated communities, we

¹ <https://abag.ca.gov/our-work/land-use/pda-priority-development-areas>

PG. 4 OF 4

would like to endorse recommendations, such as from the Contra Costa Mayors Conference, that the **Plan Bay Area 2050 Growth** baseline be utilized, leaving the HMC-recommended factors in place.

Thank you for the opportunity to comment.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Katie Rice', written in a cursive style.

Katie Rice, President
Marin County Board of Supervisors

Cc: Marin County Board of Supervisors

2023-2031 RHNA Development Timeline

