
APPENDIX B: REVIEW OF 2015 HOUSING ELEMENT

Overview

Under State Housing Element law, communities are required to assess the achievements under their adopted housing programs as part of the periodic update to their housing elements. These results should be quantified where possible (e.g., the number of units rehabilitated), but may be qualitative where necessary (e.g., mitigation of governmental constraints). The results should then be compared with what was projected or planned in the earlier element. Where significant shortfalls exist between what was planned and what was achieved, the reasons for such differences must be discussed.

The County of Marin 2015-2023 Housing Element sets forth a series of housing programs with related goals for the following areas:

- Use Land Efficiently
- Meet Housing Needs Through a Variety of Housing Choices
- Ensure Leadership and Institutional Capacity

This section reviews the County's progress to date in implementing these housing programs and their continued appropriateness for the 2023-2031 Housing Element. Table B-1 summarizes the County's housing program accomplishments, followed by a review of its quantified objectives. The results of this analysis will provide the bases for developing the comprehensive housing program strategy for the 2023-2031 Element.

Cumulative Impacts on Addressing Housing for Special Needs

The County of Marin, including the Federal Grants Division, allocates funding for housing projects, including those for special needs populations. Many of the programs in the 2015-2023 Housing Element worked towards additional housing opportunities for seniors, agricultural workers, disabled residents, homeless persons, and others. Below are highlights of these efforts, while Table B-1 provides a thorough analysis of all Housing Element programs:

- The County dedicated \$763,732 towards rehabilitation activities supporting 107 units of family housing across six development projects, including special needs individuals: a) \$21,810 to support rehabilitation of an affordable senior housing development that currently serves some individuals with special needs; b) \$396,371 towards the development of a new affordable housing complex for older

adults, including special needs individuals; and c) \$30,922 towards home access modifications to allow people with disabilities to maintain living in their homes.

- Since the start of COVID-19 and subsequent shelter-in-place orders, Housing and Federal Grants staff have worked very closely with Health and Human Services staff in direct pandemic housing response around Marin’s emergency motels, rental assistance and Homekey programs.
- The Housing and Federal Grants Division participates as a voting member in bimonthly Homeless Policy Steering Committee (HPSC) meetings. In 2020, local match funds of \$2,395,000 were used to leverage \$9,214,948 in State Homekey funding to acquire a former motel and commercial building to create 63 units of interim housing which will be converted to permanent supportive housing with wrap-around services earmarked for individual who have recently experienced homelessness.
- Housing and Federal Grants Division staff actively refer tenants in need of assistance making reasonable accommodation requests in the private housing market to the Marin Center for Independent Living (MCIL) and Fair Housing Advocates of Northern California (FHANC). FHANC received a \$64,000 allocation to support its fair housing monitoring and assistance. It intervened on behalf of 42 households, requesting reasonable accommodations and succeeded in securing reasonable accommodation concessions in 33 of those cases.
- The County requires non-discrimination clauses in contracts to which it is a party.
- The County acquired the U.S. Coast Guard Facility in the fall of 2019. The 32-acre site contains 36 multi-bedroom housing units and other community facilities. In November 2019, the County released a Request for Proposals and Statement of Qualifications to convert the existing housing to affordable housing and implement a community vision and reuse plan. As part of this, the developer will create a set-aside to house agricultural workers and their families.
- Since adoption of the County’s source of income ordinance to prevent discrimination against tenants with third-party housing vouchers, Housing and Federal Grants staff have dedicated resources to support incorporated jurisdictions with research and development of their own source of income protections.

For the sixth cycle Housing Element update, the County will expand opportunities for a range of housing types throughout the unincorporated areas. Programs to pursue funding, partnership with nonprofit developers, and code amendments to facilitate special needs housing are also included in the Housing Element update.

Table B-1: Evaluation of 2015-2023 Housing Element Programs

2015-2023 Housing Element Goal, Policy, or Program	Goal, Policy or Program	Achievements/ Results	Evaluation of Barriers to Implementations	Recommendations for the Housing Element Update
Goal 1	Use Land Efficiently	On-going		Carry forward as is
Program 1.a	Establish Minimum Densities on Housing Element Sites	Complete. Planners developed and routinely consult a Housing Element layer in the County's Geographic Information Systems (GIS) application for planning and land management; the Housing Element layer identifies the location of and expresses minimum densities for sites listed in the Site Inventory.	Successfully implemented	Carry forward as is
1.b	Evaluate Multi-family Land Use Designations	Complete. In 2020, Staff completed the Multi-Family Land Use Designation and Zoning Analysis Report and Multi-Family Zoning GIS Map, which was presented to the Board of Supervisors in January 2021.	Successfully implemented	Successfully completed, but additional revisions are being suggested for the 2023-2031 Housing Element.
1.c	Evaluate the Housing Overlay Designation	Partially Implemented. Achievement of this program is contingent upon an update to the General Plan.	Partially implemented	Review and update was initiated as part of the Housing Element update
1.d	Study Ministerial Review for Affordable Housing	In progress. In conjunction with its analysis and preparation of streamlined review procedures pursuant to SB 35, staff initiated an exploration of potential procedures to expedite review for affordable housing projects. Staff started working with consultants on Objective Design and Development Standards in collaboration with cities and towns to streamline the development of housing, including affordable housing in the fall of 2019. This study is in partnership with nine other jurisdictions in Marin County.	Partially implemented	AB 1397 requires that housing to be developed on reuse or rezone sites be provided ministerial review if the project includes 20% lower income units. This provision is included in the 2023-2031 Housing Element as part of the adequate sites project.
1.e.	Consider Adjustments to Second Unit Development Standards	Complete. In 2018, provisions were established for JADUs and waivers of certain fees for JADUs and ADUs. In 2020, the Board expanded the program; property owners can receive up to \$10,000 in building permit fee waivers if they rent the second unit to a	Successfully implemented.	The 2023-2031 Housing Element includes a program to facilitate the development of Accessory Dwelling Units (ADUs) and

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		household that earns below 80% area median income, up to \$5,000 if rented to a household that earns between 80% and 120% area median income, and up to \$2,500 if rented at market-rate.		monitor the trend of development.
1.f	Review and Consider Updating Parking Standards	Completed. In December 2018, the Board of Supervisors adopted amendments to County parking standards to reduce parking space requirements for projects developed under the Housing Overlay Designation policy, in transit-rich areas, and for affordable housing developed near transit. The amendments also authorized tandem parking for certain residential uses.	Successfully implemented.	Additional revisions are being recommended in the 2023-2031 Housing Element.
1.g	Codify Affordable Housing Incentives Identified in the Community Development Element	The County authorizes waiver of Building and Planning permit fees and reimbursement of Environmental Health Service fees for affordable housing developments. The County's Mixed-Use Policy allows developments containing housing affordable to low- and very-low-income households to exceed a site's maximum Floor Area Ratio to accommodate the additional affordable units.	Successfully implemented.	2023-2031 Housing Element includes a new program for affordable housing incentives.
1.h	Promote Resource Conservation	Currently implementing a variety of programs including: - County works with and promotes the Bay Area Regional Energy Network's (RayREN) Single-Family and Multi-Family Energy Efficiency programs; - County operates its Green Building Program, which includes mandatory energy efficiency and green building measures for both new construction and remodel projects.	On-going	Programs offered by outside agencies are referenced in the 2023-2031 Housing Element as resources.

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1.i	Consider Simplifying Review of Residential Development Project in Planned Districts	Completed. In March 2017, the Board of Supervisors amended the County Development Code to permit Master Plans to set ministerial development standards. The Board of Supervisors also approved modifications to planned zoning districts; the County now evaluates them through a more streamlined process of site review rather than full design review. In many cases, this change is anticipated to reduce time spent on review by 50% or more.	Successfully implemented.	Delete; successfully completed.
1.j	Consider Adjusting Height Limits for Multi-family Residential Buildings	Completed. County staff initiated a process to address this program as part of a broader set of Development Code amendments. The Development Code amendments allowed increased heights in both planned and conventional districts for multi-family housing.	Successfully implemented.	Additional revisions are being recommended in the 2023-2031 Housing Element.
1.k	Clarify Applicability of State Density Bonus	Not started. Implementation of this program requires CEQA review. To conserve resources, staff proposes to integrate evaluation of the State density bonus program with a forthcoming General Plan update, scheduled for initiation in late 2021.	Delay in implementation due to need for further analysis	Density bonus is incorporated in new program for facilitating affordable housing in the Housing Element update.
Goal 2	Meet Housing Needs Through a Variety of Housing Choices			Carry forward as is
Program 2.a	Encourage Housing for Special Needs Households	Currently implementing. Through the 2020 Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) allocation process, the Housing Trust Fund, and Measure W funding the County dedicated \$763,732 towards rehabilitation activities supporting 107 units of family housing across six development projects, including	On-going	The 2023-2031 Housing Element includes a program to address the provisions of other special needs housing such as Low Barrier Navigation Center (AB 101) and

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		special needs individuals; \$21,810 to support rehabilitation of an affordable senior housing development that currently serves some individuals with special needs; \$396,371 towards the development of a new affordable housing complex for older adults, including special needs individuals; and \$30,922 towards home access modifications to allow people with disabilities to maintain living in their homes.		Supportive Housing (AB 2162).
2.b	Enable Group Residential Care Facilities	Currently implementing. Small group homes, defined as those with six or fewer residents, are permitted by right in all residential zoning districts. Large group homes, defined as those with at least seven residents, may apply for a conditional use permit in any residential zoning district.	On-going	The 2023-2031 Housing Element includes an evaluation of the CUP findings required for large group residential care facilities.
2.c	Make Provisions for Multi-Family Housing Amenities	Currently implementing. The County prioritizes rental housing for families when making funding recommendations for HOME and CDBG funds. In 2020, the County allocated funding for the development, rehabilitation, or acquisition of 194 units of family housing using Housing Trust, CDBG and HOME funds.	On-going	The 2023-2031 Housing Element includes a program to facilitate housing for families.
2.d	Foster Linkages to Health and Human Services Programs	Currently implementing. Since the start of COVID-19 and subsequent shelter-in-place orders, Housing and Federal Grants staff have worked very closely with HHS staff in direct pandemic housing response around Marin’s emergency motels, rental assistance and Homekey programs. Also see response to program 2.e, “support efforts to house the homeless.”	On-going	The 2023-2031 Housing Element includes Project Homekey and linkage to other supportive programs.

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2.e	Support Efforts to House the Homeless	Currently implementing. The Housing and Federal Grants Division participates as a voting member in bimonthly Homeless Policy Steering Committee (HPSC) meetings. Staff also participate in Opening Doors, an organization with a focus on solving chronic homelessness. In 2020, local match funds of \$2,395,000 were used to leverage \$9,214,948 in State Homekey funding to acquire a former motel and commercial building to create 63 units of interim housing which will be converted to permanent supportive housing with wraparound services earmarked for individual who have recently experienced homelessness.	On-going	These are modified and included in the 2023-2031 Housing Element.
2.f	Engage in a Countywide Effort to Address Homeless Needs	Currently implementing. See response to program 2.e, "support efforts to house the homeless."	On-going	These are modified and included in the 2023-2031 Housing Element.
2.g	Ensure Reasonable Accommodation	Partially completed. Housing and Federal Grants Division staff actively refer tenants in need of assistance making reasonable accommodation requests in the private housing market to the Marin Center for Independent Living (MCIL) and Fair Housing Advocates of Northern California (FHANC). Both organizations were supported in their work by CDBG funding. MCIL received a \$30,922 allocation to its home modification program to fund alterations in homes occupied by low-income individuals with disabilities. FHANC received a \$64,000 allocation to support its fair housing monitoring and assistance. It intervened on behalf of 42 households requesting reasonable accommodations and succeeded in	On-going	The 2023-2031 Housing Element includes a program to expedite Reasonable Accommodation requests.

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		securing reasonable accommodation concessions in 33 of those cases.		
2.h	Require Non-discrimination Clauses	Currently implementing. The County requires non-discrimination clauses in contracts to which it is a party. Housing and Federal Grants staff developed an affirmative marketing tool and implemented a requirement for applicants requesting Federal Grants and Housing Trust Fund monies to submit affirmative marketing plans as part of their funding applications.	On-going	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
2.i	Increase Tenant Protections	Currently implementing. To implement Ordinance 3705, a new landlord registry tool was developed to simplify the process for landlords subject to the ordinance to maintain registration of their properties. In 2020, staff completed a Landlord and Tenant Resources webpage. Since the start of the COVID-19 pandemic, staff have been monitoring State and Federal tenant protections and have brought forward local emergency Resolutions and Ordinances to meet community need.	On-going	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
2.j	Promote the Development of Agricultural Worker Units in Agricultural Zones	Partially completed and on-going. The County acquired the U.S. Coast Guard Facility in the fall of 2019. The 32-acre site contains 36 multi-bedroom housing units and other community facilities. In November 2019, the County released a Request for Proposals and Statement of Qualifications to convert the existing housing to affordable housing and implement a community vision and reuse plan, as part of this, the developer will create a set-aside to house agricultural workers and their families.	On-going.	The 2023-2031 Housing Element includes a new program to facilitate affordable housing for agricultural workers and hospitality workers.

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		<p>CDA staff collaborated with Marin County University of California Cooperative Extension to develop streamlined permitting procedures for agricultural worker housing.</p> <p>CDA staff convenes the Agricultural Worker Housing Collaborative, which is currently working on a comprehensive study to understand the scope and needs for agricultural worker housing.</p> <p>In 2020, CDA staff began exploring the possible development of Agricultural Worker Housing on a County-owned site in Nicasio. To date, a Phase I study and biological assessment have been conducted on the site to help determine suitability for residential development.</p>		
2.k	Promote and Ensure Equal Housing Opportunity	<p>Currently implementing. The County AI was approved in 2020. With more than 1,400 interviews with individual residents and employees, staff developed a rigorous inventory and understanding of barriers to housing opportunity. Beginning in 2020, staff began participating in community conversations regarding the development of a Community Land Trust in Marin City, Marin's historically African American community.</p> <p>All housing providers that receive CDBG, HOME, and Housing Trust dollars from the County must provide an Affirmative Marketing Plan; see Program 2.h.</p>	On-going	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
2.l	Deter Housing Discrimination	Currently implementing. Since the adoption of the County's source of income ordinance to prevent	On-going	Included in the 2023-2031 Housing Element as part of

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		<p>discrimination against tenants with third-party housing vouchers, Housing and Federal Grants staff have dedicated resources to support incorporated jurisdictions with research and development of their own source of income protections. The Town of Fairfax, the City of Novato, the Town of San Anselmo, and the City of San Rafael adopted similar source of income ordinances. Staff continue to provide technical assistance and resources to other Marin jurisdictions.</p> <p>CDA staff continue to refer discrimination complaints to Fair Housing Advocates of Northern California or other appropriate legal services, County, or State agencies.</p>		<p>the County’s meaningful actions to affirmatively further fair housing.</p>
2.m	Implement the Inclusionary Housing Policy	<p>Currently implementing. The County adjusts its in-lieu housing fee annually based on the higher of either the Consumer Price Index (CPI) for Shelter for the Construction Cost Index (CCI) published by the Engineering-News Record. See also response to program 2.n, “apply long-term housing affordability controls.”</p> <p>In response to the Governor’s approval of AB 1505, which renewed the County’s authority to extend its inclusionary zoning policy to rental housing units, the Board adopted an amendment to its Development Code to renew that application of its inclusionary zoning policy to the rental housing development projects.</p>	On-going	<p>The 2023-2031 Housing Element includes a program to implement and modify the Inclusionary Housing policy.</p>

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		The County is working with other Marin Cities and Towns on updating their inclusionary programs, to provide more consistency across jurisdictions and to ensure that the policies are aligned with best practices and current market conditions.		
2.n	Apply Long-Term Housing Affordability Controls	Currently implementing. An affordable housing development's receipt of Marin Housing Trust Fund monies is typically contingent upon acceptance of a regulatory agreement that imposes affordability restrictions in perpetuity. Exceptions to this requirement are made only for projects with unavoidable constraints that preclude the developer's ability to accept those terms. Examples of such constraints include developments with a determinate term length for land or building leases or conflicts with terms of other sources of public financing.	On-going. The County requires long-term affordability restrictions on all inclusionary and funded units	Ongoing practice but is not included in the Housing Element as a separate housing program.
2.o	Encourage Land Acquisition and Land Banking	Currently implementing. Housing and Federal Grants Division staff participate in a committee of funders that seeks out and evaluates potential acquisitions of existing housing and other opportunities for maximizing affordable housing stock throughout the County. Also see response to program 2.e, "support efforts to house the homeless."	On-going.	The 2023-2031 Housing Element includes a program to maintain existing and create new Community Land Trusts.
2.p	Expedite Permit Processing of Affordable and Special Needs Housing Projects	Currently implementing. See response to program 1.d, "study ministerial review for affordable housing."	Limited success because of lack of affordable housing developments seeking permits	Modified in the 2023-2031 Housing Element to reflect AB 1397 requirements. Projects on rezone or reuse sites will be provided ministerial by-right approval if the project

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				includes 20% lower income units.
2.q	Study Best Practices for Housing Choice Voucher Acceptance.	<p>Currently implementing. In August 2018, the County executed a \$450,000 contract with Marin Housing Authority to renew its Landlord Partnership Program for a second two-year period. The program incentivizes landlord participation in the Housing Choice Voucher program and provides security deposit assistance of tenants. The Landlord Partnership Program works in conjunction with the increasing number of sources of income ordinances within the County to increase success rates for voucher holders. In 2018, Marin Housing Authority reported a five percent increase in the success rate; it averaged roughly 60 percent throughout the year.</p> <p>Also see response to program 2.i, “deter housing discrimination.”</p>	On-going	Modified in the 2023-2031 Housing Element to include outreach and education regarding State source of income protection (SB 329 and SB 222), emphasizing new rental housing opportunities through ADUs and SB 9, and areas with disproportionate housing needs.
2.r	Encourage First Time Homebuyer Programs	<p>Currently implementing. The Successor Agency to the Marin County Redevelopment Agency funds the Marin Housing Authority (MHA) Below Market Rate homeownership and down payment assistance programs for first-time homebuyers.</p> <p>MHA, Fair Housing Advocates of Northern California (FHANC), and Habitat for Humanity Greater San Francisco continue to coordinate and host first-time homebuyer readiness workshops and services.</p>	On-going	Program included in the 2023-2031 Housing Element.

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2.s	Link Code Enforcement with Public Information Programs	Currently implementing. County staff enforce housing, building, and fire codes to ensure compliance with basic health and safety building standards. Referrals to Marin Housing Authority's Rehabilitation Loan Program, affordable housing opportunities, and other services are provided as appropriate.	On-going	Program is modified in the 2023-2031 Housing Element to expand inspection scope.
2.t	Assist in Maximizing Use of Rehabilitation Programs	Currently implementing. The MHA Rehabilitation Loan program was allocated \$230,095 in CDBG funds to support the provision of approximately 12 loans to low-, very-low-, and extremely-low-income homeowners in 2020. MHA staff routinely refer recipients of rehabilitation loans to the Green and Healthy Homes Initiative-Marine (GHHI), a collaborative consortium of service providers in Marin that provide housing health and sustainability interventions – including subsidies and rebate programs – for low-income residents.	On-going.	Program expanded to emphasize outreach in areas with disproportionate housing needs.
2.u	Monitor Rental Housing Stock	<p>Currently implementing. Starting in 2019, landlords must report rents and general occupancy information for all rental properties subject to the Just Cause for Eviction ordinance.</p> <p>Housing and Federal Grants Division staff participate in an affordable-housing funders group (see response to program 2.o, “encourage land acquisition and land banking”) and Opening Doors (see response to program 2.e, “support efforts to house the homeless”).</p> <p>The County Development Code prohibits conversion of multi-family rental units into condominiums unless the vacancy rate exceeds 5% and the change does not reduce the ratio of multi-family rental units to less</p>		Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing, with increased monitoring in areas identified with displacement risks in the AFFH analysis.

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		<p>than 25% of the total number of dwelling units in the County.</p> <p>Also see response to program 2.n, “apply long-term affordability controls.”</p>		
2.v	Study Housing Needs and Constraints Specific to West Marin	<p>In progress. In August 2018, the County elected to renew its financial, administrative and technical support of the Community Land Trust Association of West Marin’s (CLAM) Real Community Rentals pilot program for a second two-year period. CLAM provides education, assistance with project management, and a screening and referral service to prospective landlords who agree to rent their units at rates affordable to low- and moderate-income households.</p> <p>In the fall of 2019, the Board of Supervisors authorized staff to enter into a purchase agreement for the Coast Guard property with the federal government. The agreement includes language that restricts the use of the 32-acre site to public benefit, which includes a conversion to affordable housing. A developer was selected for the project in April 2020.</p> <p>In 2019, \$4,712,600, was allocated for the construction and preservation of 49 units of affordable housing, including the above-mentioned Coast Guard property.</p>	In progress	Included in the 2023-2031 Housing Element as part of the County’s meaningful actions to affirmatively further fair housing.
Goal 3	Ensure Leadership and Institutional Capacity			Carry forward as is

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Program 3.a	Consider methods for improving County's outreach with respect to affordable housing	Currently implementing. The Housing and Federal Grants Division publishes staff reports in Spanish and ensures that Spanish interpretation services are made available at Board of Supervisors hearings. To make those hearings more accessible to working households, the Board of Supervisors often holds hearings related to affordable housing in the evening.	On-going.	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing.
3.b	Advance Organizational Effectiveness	Currently implementing. Staff continues to coordinate with other agencies, divisions, and departments as is appropriate to support the accomplishment of intersectional programs and goals.	On-going. Staff has worked with other local governments and staff to address barriers to providing affordable homes in Marin	Ongoing staff function and is not included in the Housing Element as a separate program.
3.c	Provide and Promote Opportunities for Community Participation in Housing Issues	Currently implementing. Staff regularly gives presentations to community groups and conferences on affordable and fair housing issues. Also see response to program 3.a, "consider methods for improving County's outreach with respect to affordable housing."	On-going. Staff conducted an intensive outreach process to update the housing element, including hands-on interactive community workshops.	Included in the 2023-2031 Housing Element as part of the County's meaningful actions to affirmatively further fair housing. A new Community Engagement program is included in the Housing Element.
3.d	Coordinate with Regional Transportation and Housing Activities	Currently implementing. CDA works closely with the Transportation Authority of Marin (TAM) and the Association of Bay Area Governments (ABAG) to produce informative local data. Representatives from	On-going. Staff worked closely with Transportation Authority of Marin and will continue to	Staff function but not included in the Housing Element as a separate program.

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		those agencies attend regular area planning director's meetings.	look for opportunities to coordinate with regional transportation agencies.	
3.e	Coordinate with Other Agencies	Currently implementing. Housing and Federal Grants Division staff coordinate with other agencies to facilitate the efficient processing of affordable and special needs housing applications in both the unincorporated county and the incorporated cities and towns. When project approvals require cooperation between departments, CDA staff facilitate expedition of permits and waiver of fees whenever possible and appropriate. To reduce funding barriers to affordable and special needs housing projects in incorporated cities and towns, the Board of Supervisors maintains a policy that it may support those projects through allocations of Marin Housing Trust Fund monies.	On-going	Staff function but not included in the Housing Element as a separate program.
3.f	Promote Countywide Collaboration on Housing	Currently implementing. Staff work with all towns and cities in Marin through the CDBG Priority Setting Committee (PSC) to fund affordable housing and ensure that jurisdictions affirmatively further fair housing. In 2020, staff continued to convene 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 coordinated on housing legislation, planning, production, and	On-going	Staff function but not included in the Housing Element as a separate program.

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		preservation of existing affordability. The working group applied jointly for SB2 planning grants in the summer and fall of 2019 and have started to collaborate on these grant projects including Objective Design and Development Standards, an ADU Workbook and Website, and Inclusionary housing program updates.		

Table B-2: Summary of RHNA Progress (2015-2021)

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Subtotal Affordable Units	Above Moderate Income	Total
Miscellaneous Housing Element Programs							
Accessory Dwelling Units	1	20	31	24	76	27	103
Attached and Detached Single Family Homes				1	1	140	141
Agricultural Worker Housing		7			7		7
Market Rate Rentals (Multi-Family)						3	3
<i>Subtotal from Miscellaneous Housing Programs</i>	<i>0</i>	<i>27</i>	<i>31</i>	<i>25</i>	<i>84</i>	<i>170</i>	<i>254</i>
Housing from Identified Sites							
Gates Cooperative ¹		2	7		9	1	10
Total Units	1	29	38	25	93	171	264
Regional Fair Share Housing Need 2015-2023	27	28	32	37	124	61	185
Percent of RHNA Met	>1%	103%	118%	68%	75%	280%	140%

¹ Site identified in the 2015 Housing Element