



June 30, 2021

Mayor Jesse Arreguin, President
Executive Board, Association of Bay Area Governments
375 Beale Street
San Francisco, CA 94105

Subject: Draft RHNA Allocations 2023-2031

Dear Chair Arreguin:

On behalf of the City of San Rafael, we are writing to respond to the Draft RHNA Allocations approved by your Executive Board on May 20, 2021. Over the past year, our staff has been tracking and participating in the RHNA methodology process. Up until December 2020, we have been relying on the draft RHNA share allocated to us that was presented in the Baseline 2050 Households Draft Blueprint. This Draft Blueprint allocation was 2,785, which is a 177% increase from our allocation under the current Housing Element cycle (1,007). We anticipated a substantial increase in our share, so we have been actively planning to address it in this next Housing Element cycle. This planning has included efforts such as the development of a Downtown San Rafael Precise Plan; this Plan has been prepared to accommodate a substantial increase in housing growth.

At the beginning of the year, we were informed that our updated allocation had increased to 3,252, an increase of over 17% from the draft share provided in late 2020 and a total increase of 223% from our allocation under the current RHNA cycle. This increase is unreasonable and unrealistic given that the City doesn't build housing nor control the barriers to housing construction once entitlements are issued.

The City is committed to removing regulatory barriers to housing production and looking for creative ways to meet our goals. We continue to look for ways to streamline review of housing projects. However, we continue to hear from housing developers that one of the barriers to development continues to be high cost of land and materials.

While the use of funding, (ie LEAP, REAP etc) for preparation of planning documents that plan for additional housing is helpful, we urge ABAG to develop creative tool kits that help remove financial barriers to housing construction, particularly those projects that include affordable housing.

We realize that other jurisdictions have submitted appeals letters. While San Rafael will not be submitting an appeal letter, we are aware that the Marin County Board of Supervisors recently adopted a resolution to move forward with an appeal and several cities either have or intend to also file appeals. The City objects to any redistribution of units that would result in additional increases to the City of San Rafael, should any of the Countywide appeals become successful. As mentioned above, San Rafael is committed to building housing of all types and levels of affordability.

With appreciation for your Bay Area regional work, we thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Kate Colin". The signature is written in a cursive, flowing style.

Mayor Kate Colin

A handwritten signature in black ink that reads "Jim Schutz". The signature is written in a cursive, flowing style with a long horizontal stroke extending from the end.

Jim Schutz, City Manager