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**From:** Buff Whitman-Bradley [REDACTED]  
**Sent:** Sunday, August 29, 2021 12:49 PM  
**To:** Regional Housing Need Allocation  
**Subject:** regarding RINA appeals in Marin and Sonoma counties

\*External Email\*

Dear ABAG:

I know many, many people have sent you letters opposing the appeals filed by communities in Marin and Sonoma counties. You have all the information and the arguments in front of you. I join those urging you to reject those appeals. I am a resident of Fairfax, in Marin County, and I cannot understand how so many local jurisdictions have been so successful for so long in keeping affordable housing out of their towns. It is shameful and now we have a chance to right that wrong. Please deny the appeals.

Sincerely,

Arthur Whitman-Bradley  
[REDACTED]

[REDACTED]

**BY EMAIL ONLY ([RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov))**

August 30, 2021

Associated Bay Area Governments  
RHNA@bayareametro.gov

**RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and the County of Marin**

To Whom It May Concern,

I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin County: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and the county of Marin.

**I urge you to deny these appeals. I have been a housing attorney for renters in Marin County for almost 20 years, and I see the severe human toll of our housing crisis on almost a daily basis. Although the entire bay area shares responsibility for our failure to provide adequate housing during the recent economic expansion for the region, Marin's performance is even worse than most other counties.**

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – such as through recent ordinances, including just cause for eviction protections for renters, COVID-19 related eviction moratoriums, and source of income protections for people with rental subsidies. These are all positive actions.

However, I am concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends a negative signal by promoting exclusion and reinforcing the segregation of low- income, disabled, and BIPOC communities.

I understand that the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.

I support the equity adjustment because previous RHNA's have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

The equity adjustment is critical to address racial segregation in the Bay Area, including in Marin County. Since the Fair Housing Act of 1968 barred exclusion on the basis of race, wealthier and largely white municipalities throughout California, including in Marin, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are major barriers to developing affordable housing. It's because of this that Marin County is dramatically more segregated today than almost any other area in the region. We need the RHNA allocations to address the impacts of our historical inequitable land use policies.

When we exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in overcrowded homes. Many lower-income communities of color are now facing displacement yet again as suburban expenses quickly outstrip their incomes. The equity adjustment helps increase affordability, ensuring that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on historic patterns of segregation.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

I urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, particularly for African-American and Latinx community members, and deny their appeals.

Thank you for your consideration.

Sincerely,

Sincerely,

*David Levin*

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**From:** Debra [REDACTED]  
**Sent:** Sunday, August 29, 2021 7:59 AM  
**To:** Regional Housing Need Allocation  
**Subject:** Housing

**\*External Email\***

**RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma**

To Whom It May Concern,

I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

**As an over 25 year resident of San Rafael, I continue to see our community as vocal supporters for diversity and equity. However, the actions taken by our communities in Marin and Sonoma counties need to support the advocacy that is preached.**

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – such as through recent ordinances, including just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies. These are all positive actions.

However, I am concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends a negative signal by promoting exclusion and reinforcing the segregation of low- income, disabled, and BIPOC communities.

I understand that the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.

I support the equity adjustment because previous RHNAs have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

The equity adjustment is critical to address racial segregation in the Bay Area, including in Marin and Sonoma counties. Since the Fair Housing Act of 1968 barred exclusion on the basis of race, wealthier and largely white municipalities throughout California, including in these two counties, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are major barriers to developing affordable housing. It's because of this that Marin and Sonoma counties are dramatically more segregated today than four decades ago. We need the RHNA allocations to address the impacts of our historical inequitable land use policies.

I understand the concerns expressed about fire safety, drought, and lack of developable land. However, these concerns need not exclude the need for equity and inclusion.

When we exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in overcrowded homes. Many lower-income communities of color are now facing displacement yet again as suburban expenses quickly outstrip their incomes. The equity adjustment helps increase affordability, ensuring that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on historic patterns of segregation.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

I urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, particularly for Latinx community members, and deny their appeals.

Thank you for your consideration.

Sincerely,  
Debra Taube



# Fair Housing Advocates of Northern California

1314 Lincoln Ave., Ste. A, San Rafael, CA 94901 ▼ (415) 457-5025 ▼ TDD: (800) 735-2922  
[www.fairhousingnorcal.org](http://www.fairhousingnorcal.org) ▼ [fhanc@fairhousingnorcal.org](mailto:fhanc@fairhousingnorcal.org)

August 30, 2021

Associated Bay Area Governments  
[RHNA@bayareametro.gov](mailto:RHNA@bayareametro.gov)

**RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma**

To Whom It May Concern,

On behalf of staff and board of Fair Housing Advocates of Northern California (FHANC), I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma. FHANC is a non-profit organization dedicated to promoting equal housing opportunity in Marin, Sonoma, and Solano Counties through community education, housing counseling, particularly related to housing discrimination, and advocacy related to affirmatively furthering fair housing.

We urge you to deny the appeals.

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – as evidenced by recent ordinances, including just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies.

**However, we are concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends an opposite signal from a message of inclusivity and prosperity for all.**

As we know, the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.<sup>1</sup>

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<sup>1</sup> The equity adjustment uses a composite score that identifies jurisdictions exhibiting racial and economic exclusion based on the jurisdiction's divergence index score and the percent of the jurisdiction's households above 120% of Area Median Income (AMI). The divergence index score calculates how different a jurisdiction's racial demographics are from the region's demographics. (The Othering and Belonging Institute at UC Berkeley has identified the divergence index as the best measure of segregation in the region.) The equity adjustment ensures that all of the jurisdictions identified using this composite score receive an allocation of very low- and low-income units that is at least proportional to its share of the region's total households in 2020. This means that to have a proportional allocation, a city with 2% of existing households would also get 2% of the allocation of very low- and low-income RHNA units. In the seven jurisdictions in Marin, Napa, and

*A local non-profit helping communities eliminate housing discrimination*

TDD: CALIFORNIA RELAY SERVICE FOR THE HEARING OR SPEECH IMPAIRED: (800) 735-2922  
SE HABLA ESPAÑOL - NẾU CẦN GIÚP ĐỠ BẰNG TIẾNG VIỆT NAM XIN LIÊN LẠC SỐ: (415) 847-2747

When high-resource jurisdictions, such as those in Marin County, improve housing opportunities for low-income individuals, who are disproportionately people of color and people with disabilities, the jurisdiction will move closer to being an inclusive and equitable place where all residents have access to a safe and affordable home and equal access to economic opportunity.

FHANC supports the equity adjustment because previous RHNA cycles have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area.<sup>2</sup> A 2017 study by the Haas Institute for a Fair and Inclusive Society at UC Berkeley found that ABAG was not allocating a fair share of low-income housing to jurisdictions with higher percentages of White residents in prior RHNA cycles.<sup>3</sup>

The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Adhering to the adjusted allocations will allow the jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

Affirmatively furthering fair housing means taking meaningful actions to overcome patterns of segregation and fostering inclusive communities, free from barriers that restrict access to opportunity.<sup>4</sup> The equity adjustment helps meet the duty to affirmatively further fair housing by increasing affordability and thereby inclusivity in our community such that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on patterns of segregation.

The equity adjustment is critical to address racial segregation in the Bay Area, including Marin and Sonoma counties. Since the Fair Housing Act of 1968 barred exclusion on the basis of race, wealthier predominantly white municipalities throughout California, including the jurisdictions in these two counties, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.<sup>5</sup>

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Sonoma subject to the equity adjustment, a total of 940 lower-income units are needed to achieve proportionality. ABAG Executive Director, "Draft RHNA Methodology and Final Subregional Shares" (Association of Bay Area Governments, January 21, 2021), 36, 19 [https://abag.ca.gov/sites/default/files/draft\\_rhna\\_allocation\\_presentation\\_to\\_exec\\_bd\\_jan\\_21.pdf](https://abag.ca.gov/sites/default/files/draft_rhna_allocation_presentation_to_exec_bd_jan_21.pdf).

<sup>2</sup> For background on the most racially segregated cities in the Bay Area measured by "inter-municipal" segregation, see Stephen Menendian, Arthur Gales, and Samir Gambhir, "The Most Segregated (and Integrated) Cities in the SF Bay Area," (Othering & Belonging Institute, November 18, 2020), <https://belonging.berkeley.edu/most-segregated-and-integrated-cities-sf-bay-area>.

<sup>3</sup> Local governments with higher percentages of white residents were allocated lower numbers of lower income housing during the 3rd and 5th RHNA cycles, which span the years 1999-2006 and 2014-2023. Heather Bromfield and Eli Moore, "Unfair Shares: Racial Disparities and the Regional Housing Needs Allocation Process in the Bay Area," Research Brief (Haas Institute for a Fair and Inclusive Society, August 2017), 6, [https://belonging.berkeley.edu/sites/default/files/haasinstitute\\_unfairshares\\_rhnabayarea\\_publish.pdf](https://belonging.berkeley.edu/sites/default/files/haasinstitute_unfairshares_rhnabayarea_publish.pdf).

<sup>4</sup> See Gov. Code, § 8899.50, subd. (a)(1).

<sup>5</sup> Ameer Chew and Chione Lucina Muñoz Flegal, Facing History, Uprooting Inequality: A Path to Housing Justice in California (PolicyLink, 2020), 47, [https://www.policylink.org/sites/default/files/pl\\_report\\_calif-housing\\_101420a.pdf](https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf).

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are significant barriers to affordable housing development.<sup>6</sup> As a result, Marin and Sonoma counties are dramatically more segregated today than it was in 1980.<sup>7</sup> A regional approach is necessary to address the impacts of this history of inequitable land use policy.

FHANC recognizes the jurisdictions' concerns such as fire safety and lack of developable land; however, if we do not step up on building more affordable housing, these counties cannot be successful in becoming more diverse.

When jurisdictions exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in an overcrowded home. Many lower-income communities of color have already had to do that in the Bay Area, but they are now facing displacement again as the suburban cost-of-living skyrockets much faster than their incomes.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities and requiring us to reimagine our housing system as we build toward a just recovery. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

We urge you to require that these jurisdictions meet their assigned regional housing needs and expand opportunities in high-resource communities, particularly for Latinx community members,<sup>8</sup> and deny their appeals. Thank you for your consideration.

Sincerely,

*Caroline Peattie*

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Caroline Peattie  
Executive Director, FHANC  
[peattie@fairhousingnorcal.org](mailto:peattie@fairhousingnorcal.org)



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Azalea Rendfield  
Board President, FHANC  
[azalearenfield@gmail.com](mailto:azalearenfield@gmail.com)

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<sup>6</sup> Chew et al., Facing History, Uprooting Inequality: A Path to Housing Justice in California, 47.

<sup>7</sup> Stephen Menendian and Samir Gambhir, "Racial Segregation in the San Francisco Bay Area, Part 3: Measuring Segregation," (Othering & Belonging Institute, May 28, 2019), <https://belonging.berkeley.edu/racial-segregation-san-francisco-bay-area-part-3>. <sup>8</sup> See Gov. Code, § 65587(b). <sup>9</sup> Between 2000 and 2015, Sonoma County's low-income Latinx population more than doubled and Marin's nearly doubled. Rising Housing Costs and Re-Segregation in the San Francisco Bay Area (UC Berkeley's Urban Displacement Project and the California Housing Partnership, February 2019), 8, [https://www.urbandisplacement.org/sites/default/files/images/bay\\_area\\_re-segregation\\_rising\\_housing\\_costs\\_report\\_2019.pdf](https://www.urbandisplacement.org/sites/default/files/images/bay_area_re-segregation_rising_housing_costs_report_2019.pdf).

<sup>8</sup> Between 2000 and 2015, Sonoma County's low-income Latinx population more than doubled and Marin's nearly doubled. Rising Housing Costs and Re-Segregation in the San Francisco Bay Area (UC Berkeley's Urban Displacement Project and the California Housing Partnership, February 2019), 8, <https://www.urbandisplacement.org/sites/default/files/images/>



August 30, 2021

Associated Bay Area Governments  
RHNA@bayareametro.gov

**RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma**

To Whom It May Concern,

I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

**I urge you to deny the appeals. We retired to Sausalito and now Mill Valley 5 years ago from New York City where we lived for many years in highly integrated buildings. Priced from \$3 million purchase to \$3,000/mo. – subsidy rent, each floor of each building had residents from a wide economic and racial background. Marinites claim progressiveness but it only shows up in voting and attitudes pertaining to areas outside their own communities.**

Just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies are all positive actions, however, the appeal of the Regional Housing Needs Allocation (RHNA) allocations promotes exclusion and reinforcing the segregation of low-income, disabled, and BIPOC communities.

Previous RHNAs have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

It is time for Marin to get used to living in neighborhoods that contain people from a wide variety of income, education, religion and racial backgrounds. Such communities are more safe, vibrant and productive and do not reduce property values.

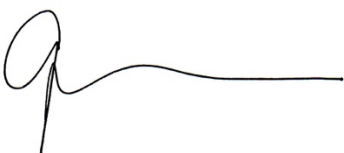
I urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, particularly for Latinx community members, and deny their appeals.

Thank you for your consideration.

Sincerely,



Frank Shinneman & Cindy Knoebel



August 28, 2021

Associated Bay Area Governments  
RHNA@bayareametro.gov

RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma

To Whom It May Concern,

I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

I urge you to deny the appeals. As a 40 year resident of Fairfax and San Anselmo, I continue to see our community as vocal supporters for diversity and equity. However, the actions taken by our communities in Marin and Sonoma counties need to support the advocacy that is preached.

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – such as through recent ordinances, including just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies. These are all positive actions.

However, I am concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends a negative signal by promoting exclusion and reinforcing the segregation of low- income, disabled, and BIPOC communities.

I understand that the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.

I support the equity adjustment because previous RHNAs have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

The equity adjustment is critical to address racial segregation in the Bay Area, including in Marin and Sonoma counties. Since the Fair Housing Act of 1968 barred exclusion on the basis of

race, wealthier and largely white municipalities throughout California, including in these two counties, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are major barriers to developing affordable housing. It's because of this that Marin and Sonoma counties are dramatically more segregated today than four decades ago. We need the RHNA allocations to address the impacts of our historical inequitable land use policies.

I understand the concerns expressed about fire safety, drought, and lack of developable land. The actual appeal made by the Town of Fairfax, for example, focuses on these three items. However, Fairfax's appeal does not make any argument against the need for inclusion, equity or diversity within our community, which is the basis of the equity adjustment.

When we exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in overcrowded homes. Many lower-income communities of color are now facing displacement yet again as suburban expenses quickly outstrip their incomes. The equity adjustment helps increase affordability, ensuring that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on historic patterns of segregation.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

I urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, particularly for Latinx community members, and deny their appeals.

Thank you for your consideration.

Sincerely,

Lisa Mennucci

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**From:** [REDACTED]  
**Sent:** Sunday, August 29, 2021 1:25 PM  
**To:** Regional Housing Need Allocation  
**Subject:** Comment on RHNA allocation appeals

**\*External Email\***

Associated Bay Area Governments

To Whom It May Concern,

I have lived in Marin County for 50 years and have never been happy with the lack of diversity in our County.

I am writing now concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

I hope to hear that you deny the appeals. I support the equity adjustment because previous RHNAs have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area.

Sincerely

Marilyn Price  
[REDACTED]

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**From:** Stephen Bingham [REDACTED]  
**Sent:** Sunday, August 29, 2021 3:04 PM  
**To:** Regional Housing Need Allocation  
**Subject:** RHNA allocation appeals filed by the Marin County and various cities in the County

**\*External Email\***

August 30, 2021

Executive Board  
Associated Bay Area Governments  
RHNA@bayareametro.gov

**RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma**

Dear Members of the ABAG Executive Board:

I am writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

**I urge you to deny the appeals. I live in San Rafael and have fought for years for more affordable housing in San Rafael and Marin County. While San Rafael and Novato have taken some positive steps in the right direction, the County and the cities filing the current RHNA appeals have approved virtually no affordable housing in the over 25 years my wife and I have lived in Marin. This has resulted in a huge lack of diversity of populations in the County and horrific traffic during commute hours because those who work in Marin can't afford to live here. [**

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – such as through recent ordinances, including just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies. These are all positive actions.

However, I am concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends a negative signal by promoting exclusion and reinforcing the segregation of low- income, disabled, and BIPOC communities.

I understand that the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.

I support the equity adjustment because previous RHNA's have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

The equity adjustment is critical to address racial segregation in the Bay Area, including in Marin and Sonoma counties. Since the Fair Housing Act of 1968 barred exclusion on the basis of race, wealthier and largely white municipalities throughout California, including in these two counties, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are major barriers to developing affordable housing. It's because of this that Marin and Sonoma counties are dramatically more segregated today than four decades ago. We need the RHNA allocations to address the impacts of our historical inequitable land use policies.

I understand the concerns expressed about fire safety, drought, and lack of developable land. However, the appeals don't argue against the need for inclusion, equity or diversity within our community, which is the basis of the equity adjustment.

When we exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in overcrowded homes. Many lower-income communities of color are now facing displacement yet again as suburban expenses quickly outstrip their incomes. The equity adjustment helps increase affordability, ensuring that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on historic patterns of segregation.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

I urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, particularly for Latinx community members, and deny their appeals.

Thank you for your consideration.

Sincerely,

*Stephen Bingham*

Stephen Bingham  


August 31, 2021

Associated Bay Area Governments  
RHNA@bayareametro.gov

**RE: Comment on RHNA allocation appeals filed by the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma**

To Whom It May Concern,

We are writing to you concerning the RHNA allocation appeals that have been filed from jurisdictions in Marin and Sonoma counties: the cities of Belvedere, Larkspur, Mill Valley, Sausalito, Corte Madera, Fairfax, Ross, San Anselmo, Tiburon, and Windsor, and the counties of Marin and Sonoma.

**We urge you to deny the appeals. We see a lot of lip service paid to diversity, equity and inclusion in our community but when it comes to housing, the conversation changes to then deflect and disregard the deep-seated systemic racism behind the resistance to more housing in Marin.**

Many of the jurisdictions listed above have increased tenant protections and housing affordability for the people who live and work in the jurisdiction – such as through recent ordinances, including just cause for eviction protections for renters, Covid-19 related eviction moratoriums, and source of income protections for people with rental subsidies. These are all positive actions.

However, we are concerned that the appeal of the Regional Housing Needs Allocation (RHNA) allocations sends a negative signal by promoting exclusion and reinforcing the segregation of low- income, disabled, and BIPOC communities.

We understand that the Executive Board of the Association of Bay Area Governments (ABAG) adopted the RHNA equity adjustment to ensure that all jurisdictions exhibiting above-average levels of racial and economic exclusion take on their fair share of low- and very-low-income RHNA units.

We support the equity adjustment because previous RHNAs have failed to allocate enough affordable housing to white, affluent jurisdictions that have a history of opposing affordable housing development in the Bay Area. The new RHNA methodology, which includes the equity adjustment, provides a meaningful opportunity for these cities and counties to address the inequitable allocations of the recent past. Keeping the adjusted allocations will allow jurisdictions to meet state legal requirements to affirmatively further fair housing in their communities.

The equity adjustment is critical to address racial segregation in the Bay Area, including in Marin and Sonoma counties. Since the Fair Housing Act of 1968 barred exclusion on the basis of race, wealthier and largely white municipalities throughout California, including in these two counties, passed exclusionary land use and zoning regulations such as large-lot zoning, prohibitions on multi-family housing, parking requirements, and more to limit the development of affordable housing and exclude low-income people of color.

Today, exclusionary zoning and community opposition in neighborhoods with well-funded schools and public amenities are major barriers to developing affordable housing. It's because of this that Marin and Sonoma counties are dramatically more segregated today than four decades ago. We need the RHNA allocations to address the impacts of our historical inequitable land use policies.

We understand the concerns expressed about fire safety, drought, and lack of developable land. The actual appeal made by the Town of Fairfax, for example, focuses on these three items. However, Fairfax's appeal does not make any argument against the need for inclusion, equity or diversity within our community, which is the basis of the equity adjustment. And these environmental concerns tend to overlook the current, creative solutions which will ensure better environmental outcomes for all of us.

When we exclude affordable homes, communities who need that affordability, particularly people of color and those with disabilities who work in the community, are forced to live elsewhere, far from their work or in overcrowded homes. Many lower-income communities of color are now facing displacement yet again as suburban expenses quickly outstrip their incomes. The equity adjustment helps increase affordability, ensuring that everyone can live in neighborhoods of their choice based on individual and family needs rather than based on historic patterns of segregation.

The COVID-19 pandemic has highlighted the disparities and inequities in our region, exposing a housing system that is failing low-income people and BIPOC communities. We must all work together to ensure everyone has a choice to stay and thrive in their communities or move closer to their jobs and other needs.

We urge you to require that these jurisdictions meet their assigned regional housing needs, expand opportunities in high-resource communities, particularly for Latinx community members, and deny their appeals.

Thank you for your consideration.

Sincerely,

SURJ Marin (Showing Up for Racial Justice)

<https://surjmarin.org/>