



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

March 25, 2021

City of Redwood City
Community Development Department
1017 Middlefield Road
Redwood City, CA 94063

Attn: Diana O'Dell <housingupdate@redwoodcity.org>

RE: Comments on Draft 2023-2031 Housing Element, Redwood City

Dear Ms. O'Dell,

The overall draft Housing Element (HE) appears sound. There are specific areas that will need to be retained or expanded to make sure the final HE contains the key elements needed to make significant progress on addressing the enormous lack of affordable housing in the Bay Area. The HE rightly points out that the housing problem is a regional one and that each city needs to meet or exceed its goal if the housing crisis, particularly for affordable housing, is to be solved.

Highlighted below are the most important goals, policies, and programs in the draft HE that need to be retained and strengthened in the final HE.

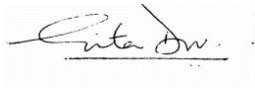
1. The HE aims for a 50% cushion above the RHNA. This is a minimum, but perhaps a higher number should be considered as the ability to actually build out housing has proven, over time, to be very difficult.
2. Increasing affordable housing is strongly emphasized in the draft HE. This is appropriate and the affordable housing should be more strongly focused on low, very low and extremely low-income housing, as these are where the largest needs are and where the lack of inventory is the largest. The very poor jobs/housing fit in the Peninsula can best be addressed with a focus on more affordable housing.
3. The draft map (Figure 1) and proposed policies/programs (Program H1-4) emphasize that the almost the entire city, including R1 areas will need to contribute to the increased housing though such mechanisms as expanded Missing Middle Units (duplex, triplex and fourplex) and ADUs. It is important to retain this broad opportunity for more housing, since R1 is a major part of the total area of the city. Even more priority should be placed on these efforts.
4. The HE proposes several actions to increase density and expand the areas where more dense housing can be located. It is very important to retain and strengthen these actions in the final HE. They include Increasing density in Mixed Use Zones (Program H1-6), Rezone Commercial office to include housing (Program H2-6, Policy H1-1), reducing size requirements and other steps to allow more Missing Middle Housing (Program H4-3, Policy H1.4)

5. Reduced parking requirements are needed to lower costs and increase density (Program H4-7) particularly for projects near transit and retail services. This program should be sped up and put at higher priority.

Below are some additional actions that should be added to the HE to better assure that the goals for housing can be met.

1. Look to increase funding that can be used to support affordable housing. Affordable housing needs to be subsidized and a lack of funding will limit the ability to build the needed affordable housing, particularly for low and very low-income units. This could include establishing or increasing: Vacancy Tax, Commercial Linkage Fees, and Transfer Tax. This could compliment the proposal to reduce costs for affordable units.
2. No mention is made of how housing, particularly new housing, needs to be located so as to be resilient to and viable in the face of climate change. The risks of sea level rise (SLR) near the Bay and wildfires in the hilly and forested areas need to be factored into identifying viable areas for housing including higher density and affordable housing. As an example, the Ferrari Pond property on Redwood Creek is not likely to be viable as a housing site.

Respectfully submitted,



Gita Dev
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