



# **AMBAG Board of Directors Agenda**

**Association of Monterey Bay Area Governments**

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## **Meeting Via GoToWebinar**

**DATE: January 12, 2022**

**TIME: 6:00 PM**

**Please register for the AMBAG Board of Directors meeting at**

**<https://attendee.gotowebinar.com/register/1397908506257070350>**

On September 16, 2021, Governor Newsom signed AB 361 into law. The provisions enacted by AB 361 provide flexibility to meet remotely during a proclaimed emergency and will sunset on January 1, 2024. The AMBAG Board of Directors meeting will be conducted via GoToWebinar as established by Resolution 2022-1 adopted by the AMBAG Board of Directors on January 5, 2022. The AMBAG Board of Directors will participate in the meeting from individual remote locations. Members of the public will need to attend the meeting remotely via GoToWebinar. We apologize in advance for any technical difficulties.

Persons who wish to address the AMBAG Board of Directors on an item to be considered at this meeting are encouraged to submit comments in writing at [info@ambag.org](mailto:info@ambag.org) by Tuesday, January 11, 2022. The subject line should read "Public Comment for the January 12, 2022 Board of Directors Meeting." The agency clerk will read up to 3 minutes of any public comment submitted.

To participate via GoToWebinar, please register for the January 12, 2022 AMBAG Board of Directors meeting using the following link: <https://attendee.gotowebinar.com/register/1397908506257070350>

You will be provided dial-in information and instructions to join the meeting.

If you have any questions, please contact Ana Flores, Clerk of the Board at [aflores@ambag.org](mailto:aflores@ambag.org) or at 831-883-3750 Ext. 300.

1. **CALL TO ORDER**
2. **ROLL CALL**
3. **ORAL COMMUNICATIONS FROM THE PUBLIC ON ITEMS NOT ON THE AGENDA**  
(A maximum of three minutes on any subject not on the agenda)
4. **ORAL COMMUNICATIONS FROM THE BOARD ON ITEMS NOT ON THE AGENDA**
5. **COMMITTEE REPORTS**
  - A. **Executive/Finance Committee**  
**Recommended Action: INFORMATION**
    - President McShane

Receive oral report.
  - B. **Monterey Bay National Marine Sanctuary (MBNMS) Advisory Council (SAC) Meeting**  
**Recommended Action: DIRECT**
    - President McShane

Receive a report on the December 10, 2021 SAC meeting. The next meeting is scheduled on February 18, 2022.
6. **EXECUTIVE DIRECTOR'S REPORT**  
**Recommended Action: APPROVE**
  - Maura Twomey, Executive Director
  - A. **2022 Goals for the Executive Director**

Approve the goals for the Executive Director. (Page 5)
7. **CONSENT AGENDA**  
**Recommended Action: APPROVE**

**Note:** Actions listed for each item represents staff recommendation. The Board of Directors may, at its discretion, take any action on the items listed in the consent agenda.

  - A. **Draft Minutes of the January 5, 2022 AMBAG Board of Directors Meeting**
    - Ana Flores, Clerk of the Board

Approve the draft minutes of the January 5, 2022 AMBAG Board of Directors meeting. (Page 7)

**B. Draft Minutes of the December 8, 2021 AMBAG Board of Directors Meeting**

- Ana Flores, Clerk of the Board

Approve the draft minutes of the December 8, 2021 AMBAG Board of Directors meeting. (Page 11)

**C. AMBAG Regional Clearinghouse Monthly Newsletter**

- Miranda Taylor, Planner

Accept the clearinghouse monthly newsletter. (Page 23)

**D. AMBAG Sustainability Program Update**

- Amaury Berteaud, Special Projects Manager

Accept the AMBAG Sustainability Program update. (Page 27)

**E. Resolution in accordance with AB 361 regarding the Ralph M. Brown Act and Finding of Imminent Risk to Health and Safety of In-Person Meetings as a Result of the Continuing COVID-19 Pandemic State of Emergency Declared by Governor Newsom**

- Maura Twomey, Executive Director

Adopt a resolution in accordance with AB 361 regarding the Ralph M. Brown Act and finding of imminent risk to health and safety of in-person meetings as a result of the continuing COVID-19 pandemic state of emergency declared by Governor Newsom. (Page 31)

**F. Financial Update Report**

- Errol Osteraa, Director of Finance & Administration

Accept the financial update report which provides an update on AMBAG's current financial position and accompanying financial statements. (Page 33)

**8. ITEMS REMOVED FROM CONSENT CALENDAR FOR DISCUSSION AND POSSIBLE ACTION**

**9. PLANNING**

**A. Draft 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy and Draft Environmental Impact Report**

**Recommended Action: PUBLIC HEARING**

- Heather Adamson, Director of Planning

AMBAG is required to prepare a Metropolitan Transportation Plan (MTP) and Sustainable Communities Strategy (SCS). The Draft 2045 MTP/SCS is the blueprint for a regional transportation system that further enhances our quality of life, promotes sustainability and offers more mobility options for people and goods. The Board of Directors is asked conduct a public hearing to receive comments on the Draft 2045 MTP/SCS and Draft Environmental Impact Report. (Page 39)

**B. 6<sup>th</sup> Cycle Regional Housing Needs Allocation Methodology**

**Recommended Action: PUBLIC HEARING/APPROVE**

- Heather Adamson, Director of Planning

Hold public hearing to receive public comment on the draft 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) methodology for allocation of housing need to the region's jurisdictions consistent with the objectives of Government Code § 65584(d) and factors of Government Code § 65584.04(e). Approve a draft RHNA methodology and authorize Association of Monterey Area Governments (AMBAG) staff to submit the draft RHNA methodology to the California Department of Housing and Community Development (HCD) for review and approval. (Page 45)

**10. ELECTION OF 2022 AMBAG OFFICERS**

**Recommended Action: APPROVE**

- President McShane

**A. Report from Nomination Committee Chair**

**Recommended Action: INFORMATION**

**B. President**

**Recommended Action: APPROVE**

**C. Vice President**

**Recommended Action: APPROVE**

**D. Second Vice President**

**Recommended Action: APPROVE**

**11. ADJOURNMENT**

**REFERENCE ITEMS:**

- A. 2022 Calendar of Meetings (Page 119)
- B. Acronym Guide (Page 121)

**NEXT MEETING:**

**Date: February 9, 2022**

**Location: TBD**

**Executive/Finance Committee Meeting: 5:00 PM**

**Board of Directors Meeting: 6:00 PM**

If requested, the agenda shall be made available in appropriate alternative formats to persons with a disability, as required by Section 202 of the Americans with Disabilities Act of 1990 (42 USC Sec. 12132), and the federal rules and regulations adopted in implementation thereof. If you have a request for disability-related modification or accommodation, including auxiliary aids or services, contact Ana Flores, AMBAG, 831-883-3750, or email [aflores@ambag.org](mailto:aflores@ambag.org) at least 48 hours prior to the meeting date.





**MEMORANDUM**

**TO:** AMBAG Board of Directors

**FROM:** Maura F. Twomey, Executive Director

**SUBJECT:** 2022 Goals for the Executive Director

**MEETING DATE:** January 12, 2022

**RECOMMENDATION:**

Approve the Goals for the Executive Director.

**BACKGROUND/DISCUSSION:**

At the November 10, 2020 meeting, the AMBAG Board directed the Executive Director, Maura F. Twomey, to develop goals for the Executive Director for the 2022 year. The Executive Director has developed the following goals and related completion dates for the 2022 year:

- Adoption of the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy – June 2022
- Adoption of the Regional Housing Needs Allocation Plan – October 2022
- Update and revise AMBAG's Administrative Manual – December 2022
- Maintain and enhance relationship with Regional, State and Federal partners – Ongoing
- Continued financial stability for the agency - Ongoing

**ALTERNATIVES:**

N/A

**FINANCIAL IMPACT:**

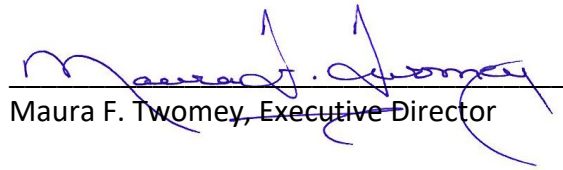
*Planning Excellence!*

N/A

**COORDINATION:**

The Executive Director coordinated the preparation of the goals and accomplishments with the Board President, Steve McShane.

**APPROVED BY:**



Maura F. Twomey, Executive Director

**DRAFT**  
**MINUTES OF THE PROCEEDINGS**  
**OF THE BOARD OF DIRECTORS OF THE**  
**ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS**

**January 5, 2022**

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**1. CALL TO ORDER**

The Board of Directors of the Association of Monterey Bay Area Governments, President, Steve McShane presiding, convened at 5:03 p.m. Wednesday, January 5, 2022 via GoToWebinar.

**2. ROLL CALL**

<b><u>AMBAG Board of Directors</u></b>			
<b>PRESENT:</b>			
<b>Agency</b>	<b>Representative</b>	<b>Agency</b>	<b>Representative</b>
Capitola	Kristen Petersen	County of Monterey	John Phillips
Carmel-by-the-Sea	Karen Ferlito	County of San Benito	Bea Gonzales
Del Rey Oaks	Kim Shirley	County of San Benito	Betsy Dirks
Gonzales	Scott Funk	County of Santa Cruz	Greg Caput
Greenfield	Lance Walker	County of Santa Cruz	Manu Koenig
Hollister	Rick Perez		
King City	Carlos Victoria		
Marina	Lisa Berkley		
Monterey	Ed Smith		
Pacific Grove	Jenny McAdams		
Salinas	Steve McShane		
San Juan Bautista	John Freeman		
Sand City	Mary Ann Carbone		
Santa Cruz	Justin Cummings		
Seaside	Jon Wizard		
Watsonville	Eduardo Montesino		
<b>ABSENT:</b>			
Scotts Valley	Derek Timm	<b><u>Ex-Officio Members:</u></b>	
Soledad	Anna Velazquez	3CE	JR Killigrew
County of Monterey	Mary Adams	Caltrans, District 5	Orchid Monroy-Ochoa
		MBARD	Richard Stedman
		MPAD	Michael La Pier
		MST	Lisa Rheinheimer
		SBtCOG	Veronica Lezama
		SCCRTC	Guy Preston
		SC METRO	Alex Clifford
		TAMC	Todd Muck

**Others Present:** Dolores Morales; Anastacia Wyatt; Amaury Berteaud, Special Projects Manager; Gina Schmidt, GIS Coordinator; Miranda Taylor, Planner; Cynthia Piña, Office Assistant; Heather

Adamson, Director of Planning; Maura Twomey, Executive Director; and Ana Flores, Clerk of the Board.

**3. ORAL COMMUNICATIONS FROM THE PUBLIC ON ITEMS NOT ON THE AGENDA**

There were no oral or written communications from the public.

**4. ORAL COMMUNICATIONS FROM THE BOARD ON ITEMS NOT ON THE AGENDA**

Supervisor Caput announced that the County of Santa Cruz has purchased 38 acres near the Santa Cruz Fairgrounds and will be converted into a public park.

**5. Resolution in accordance with AB 361 regarding the Ralph M. Brown Act and Finding of Imminent Risk to Health and Safety of In-Person Meetings as a Result of the Continuing COVID-19 Pandemic State of Emergency Declared by Governor Newsom**

Resolution 2022-1 was adopted.

**Motion made by Director Smith seconded by Director Cummings to approve Resolution 2022-1 in accordance with AB 361 regarding the Ralph M. Brown Act and Finding of Imminent Risk to Health and Safety of In-Person Meetings as a Result of the Continuing COVID-19 Pandemic State of Emergency Declared by Governor Newsom. Motion passed unanimously.**

**6. ADJOURNMENT**

The Board of Directors meeting adjourned at 5:13 PM.

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Steve McShane, President

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Maura F. Twomey, Executive Director

**DRAFT AMBAG BOARD OF DIRECTORS MEETING ATTENDANCE & VOTING RECORD**  
**BOARD MEETING DATE: January 5, 2022**

		<b>Attendance (X= Present; AB= Absent)</b> <b>Voting (Y= Yes; N=No; A=Abstain)</b>	
<b>MEMBER</b>	<b>AMBAG REP</b>	<b>Attendance</b>	<b>Item #5</b>
Capitola	Kristen Petersen	X	Y
Carmel-by-the-Sea	Karen Ferlito	X	Y
Del Rey Oaks	Kim Shirley	X	Y
Gonzales	Scott Funk	X	Y
Greenfield	Lance Walker	X	Y
Hollister	Rick Perez	X	Y
King City	Carlos Victoria	X	Y
Marina	Lisa Berkley	X	Y
Monterey	Ed Smith	X	Y
Pacific Grove	Jenny McAdams	X	Y
Salinas	Steve McShane	X	Y
San Juan Bautista	John Freeman	X	Y
Sand City	Mary Ann Carbone	X	Y
Santa Cruz	Justin Cummings	X	Y
Scotts Valley	Derek Timm	AB	N/A
Seaside	Jon Wizard	X	N/A
Soledad	Anna Velazquez	AB	N/A
Watsonville	Eduardo Montesino	X	Y
County-Monterey	Mary Adams	AB	N/A
County-Monterey	John Phillips	X	Y
County-Santa Cruz	Manu Koenig	X	Y
County-Santa Cruz	Greg Caput	X	Y
County-San Benito	Betsy Dirks	X	Y
County-San Benito	Bea Gonzales	X	Y

(\* = Board Member(s) arrived late or left early, therefore, did not vote on the item. Please refer the minutes)

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**DRAFT**  
**MINUTES OF THE PROCEEDINGS**  
**OF THE BOARD OF DIRECTORS OF THE**  
**ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS**

**December 8, 2021**

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**1. CALL TO ORDER**

The Board of Directors of the Association of Monterey Bay Area Governments, President, Steve McShane presiding, convened at 6:03 p.m. Wednesday, December 8, 2021 via GoToWebinar.

**2. ROLL CALL**

<b><u>AMBAG Board of Directors</u></b>			
<b>PRESENT:</b>			
<b>Agency</b>	<b>Representative</b>	<b>Agency</b>	<b>Representative</b>
Capitola	Kristen Petersen	County of Monterey	Mary Adams
Carmel-by-the-Sea	Karen Ferlito	County of Monterey	John Phillips
Del Rey Oaks	Kim Shirley	County of San Benito	Bea Gonzales
Gonzales	Scott Funk	County of Santa Cruz	Greg Caput
Greenfield	Lance Walker	County of Santa Cruz	Manu Koenig
Hollister	Rick Perez		
King City	Carlos Victoria	<b><u>Ex-Officio Members:</u></b>	
Marina	Lisa Berkley	Caltrans, District 5	Orchid Monroy-Ochoa
Monterey	Ed Smith	MBARD	Richard Stedman
Pacific Grove	Jenny McAdams	MPAD	Michael La Pier
Salinas	Steve McShane	SBtCOG	Veronica Lezama
San Juan Bautista	John Freeman	TAMC	Todd Muck
Sand City	Mary Ann Carbone		
Santa Cruz	Justin Cummings		
Scotts Valley	Derek Timm		
Seaside	Jon Wizard		
Soledad	Anna Velazquez		
Watsonville	Eduardo Montesino		
<b>ABSENT:</b>			
County of San Benito	Bob Tiffany	3CE	JR Killigrew
		MST	Lisa Rheinheimer
		SCCRTC	Guy Preston
		SC METRO	Alex Clifford

**Others Present:** Beth Jarosz, PRB Consultants; Lowell Hurst, City of Watsonville; Don Freeman, AMBAG Legal Counsel; Margaret Sohagi and Milja Miric; Jeffrey Baron; Alex Black; Tom Brinkhuis, HCD; Lee Butler; Kim Cole, City of Monterey; Colleen Courtney, County of Monterey; Inge Lorentzen Daumer; Kevin Dayton; Michael DeLapa; Scott Eades, Caltrans District 5; John Farrow; Katie Herlihy; Henry Hooker; Megan Hunter, City of Salinas; Carlos Jurado; Kyle Kelley; Erik Lundquist; Elizabeth Madrigal; Natalie Magana; Esther Malkin; Pam Marino; Jonathan Moore; Michael Pisano; Rafa

Sonnenfeld; Ryan Stuart; Matthew Sundt; Matt VanHua; Matthew VanOosten; Anastacia Wyatt, City of Pacific Grove; Allison Kerr; Ambur Cameron; Brian Foucht; Emily Ham; Everardo Jaime Jr; Heather Adamson, Director of Planning; Bhupendra Patel, Director of Modeling; Paul Hierling, Senior Planner; Amaury Berteaud, Special Projects Manager; Sasha Tepedelenova, Planner; Will Condon, Planner; Miranda Taylor, Planner; Cynthia Piña, Office Assistant; Maura Twomey, Executive Director; and Ana Flores, Senior Executive Assistant.

### **3. ORAL COMMUNICATIONS FROM THE PUBLIC ON ITEMS NOT ON THE AGENDA**

There were no oral or written communications from the public.

### **4. ORAL COMMUNICATIONS FROM THE BOARD ON ITEMS NOT ON THE AGENDA**

There were no oral communications from the Board.

### **5. CONSENT AGENDA**

#### **A. Draft Minutes of the November 10, 2021 AMBAG Board of Directors Meeting**

The draft minutes of the November 10, 2021 AMBAG Board of Directors meeting were approved.

#### **B. Resolution in accordance with AB 361 regarding the Ralph M. Brown Act and Finding of Imminent Risk to Health and Safety of In-Person Meetings as a Result of the Continuing COVID-19 Pandemic State of Emergency Declared by Governor Newsom**

Resolution 2021-11 was adopted.

#### **C. Amendment No. 2 to the Population Reference Bureau Contract**

The Population Reference Bureau contract was approved.

Director Velazquez requested that the minutes of the November 10, 2021 AMBAG Board meeting be revised to reflect that she abstained from consent item 8.F. Amendment No. 4 to the employment agreement with Maura F. Twomey.

**Motion made by Director Timm seconded by Director Caput to approve the consent agenda. The motion passed with the edits to the minutes of the November 10, 2021 AMBAG Board of Directors meeting.**

### **6. ITEMS REMOVED FROM CONSENT CALENDAR FOR DISCUSSION AND POSSIBLE ACTION**

None.

### **7. PLANNING**

#### **A. 6<sup>th</sup> Cycle Regional Housing Needs Allocation Methodology**

Heather Adamson, Director of Planning gave a report on the 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) methodology. The RHNA schedule consists of 1) Spring -Fall 2021: Discussions with PDF on potential RHNA methodology options; 2) Summer - Fall 2021: potential RHNA methodology options discussed by AMBAG Board; 3) September 8, 2021: HCD presents at the AMBAG Board meeting; 4) December 8, 2021: Approval of draft RHNA methodology by AMBAG



Board; 5) December 2021 to February 2022: HCD reviews the draft methodology; 6) March 9, 2022: Approval of final RHNA methodology by AMBAG Board; 7) March 21, 2022: Release draft RHNA plan with RHNA allocations by jurisdictions; 8) March 22 – May 5, 2022: local jurisdictions may appeal RHNA allocation within 45 days of release of the draft RHNA plan/allocations; 9) May 2022: AMBAG releases final 2045 MTP/SCS accommodating RHNA; 10) May 6 – June 19, 2022: Local jurisdictions and HCD may comment on appeals during this period; 11) June 2022: adoption of Final 2023-31 RHNA Plan with RHNA allocations by AMBAG Board; 12) July 13, 2022: AMBAG to hold public hearings on appeals (if applicable); 13) August 27, 2022: AMBAG makes final determination that accepts, rejects, modified appeals and issues final proposed allocation plan; 14) September 14, 2022: Adoption of Final 2023-31 RHNA Plan with RHNA allocations by AMBAG Board (if appeals are received); and December 2023: jurisdiction's 6<sup>th</sup> Cycle Housing Elements are due to HCD. The RHNA methodology development 1) COG is responsible for developing a methodology appropriate for each region; 2) must further and support 5 (five) RHNA objectives: a) increase in housing supply and mix; b) promotes infill, equity, and the environment; c) ensure jobs-housing balance/fit; d) promote regional income parity; and e) affirmatively furthers fair housing; and 3) statute allows for flexibility but specifies what can and cannot be used as allocation factors. Ms. Adamson discussed the modifications to the methodology. Feedback was received from the AMBAG Board of Directors, public input, and recommendations from HCD. The comments received included 1) reduce the 10-year housing growth allocation factor to an 8-year period to match the 8-year RHNA; 2) reduce job allocation factor to 50%; 3) include AFFH as an allocation factor using RCAA data; 4) revise the definition of RCAA to incorporate adjustments for jurisdictions that meet one of the two RCAA criteria; 5) reduce income allocation shift from 50% to 30%; and 6) an option that adds jobs/housing ratio as a new factor. Based on the comments received, AMBAG staff proposed two final draft methodologies. Methodology Option A is as follows.

	<b>Final Draft RHNA Methodology – Option A</b>	<b>Units</b>
Regional Growth Forecast	High	12,524
Employment	50%	20,750
Transit	5%	
Resiliency	10%	
AFFH	35%	

AFFH (income shift)	30%
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	<b>Final Draft RHNA Methodology – Option B</b>	<b>Units</b>
Regional Growth Forecast	High	12,524
Employment	40%	20,750
Transit	20%	
Resiliency	5%	
AFFH	25%	

AFFH (income shift)	30%
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The methodology steps for Option A are 1) 2022 RGF (base unit allocation): distributes portion of RHNA based on eight-year housing growth from the 2022 RGF; 2) Jobs, Transit, Resiliency, and AFFH (unit allocation): a) jurisdiction's share of 2020 jobs (50%); b) jurisdictions with existing (2020) transit routes with 15- and 30-minute headways (5%); c) jurisdictions who have the smallest percentages of high fire or high sea level risk (10%); and d) jurisdictions full or partial RCAAs (35%); and 3) Income allocation: redistributes a portion of V.L and L income units to RCAA jurisdictions. The methodology steps for Option B are 1) 2022 RGF (base unit allocation): distributes portion of the RHNA based eight-year housing growth from the 2022 RGF; 2) Jobs, Transit, Resiliency, and AFFH (unit allocation): a) jurisdiction's share of 2020 jobs (40%); b) jobs/housing ratio (20%); c) jurisdictions with existing (2020) transit routes with 15- and 30-minute headways (5%); d) jurisdictions who have the smallest percentages of high fire or high sea level risk (10%); and e) jurisdictions full or partial RCAAs (25%); and 3) Income allocation: redistributes a portion of V.L and L income units to RCAA jurisdictions. Income shift decreased from 50% to 30% and AFFH was added as a unit allocation factor and the income shift was reduced to balance it out. It shifted Above Moderate units to Very Low and shifted Moderate units to Low. The jobs/housing ratio for Option B include 1) number of jobs divided by numbers of housing (2020); 2) additional unit allocation factor of a jobs/housing ratio for 20%; and 3) reduced the jobs and AFFH/RCCA weighting to 40% and 25% respectively. The RHNA methodology Options A & B 1) support and further the 5 (five) objectives and are likely to be approved by HCD; and 2) staff prefers Option A since Option B reduced RHNA allocations in higher opportunity areas and increased allocations in lower opportunity areas. Ms. Adamson added that ultimately, it is up to the AMBAG Board to select and approve a methodology to submit to HCD. HCD's proposed RHNA metrics are 1) higher percentage of RHNA as lower income units for jurisdictions with the highest housing costs; 2) higher percentage of RHNA total unit allocations to jurisdictions with highest job/housing ratios; 3) higher percentage of RHNA as lower income units for jurisdictions with the highest ratio of low-wage jobs to housing units affordable to low wage workers; 4) lower percentage of RHNA as lower income units for jurisdictions with a higher share of lower income households; 5) higher percentage of RHNA as lower income units for jurisdictions with a higher share of higher income households; and 6) higher percentage of RHNA as lower income units for jurisdictions with the most households in RCAAs. Next steps include 1) continue a public hearing; 2) approve a draft methodology and direct staff to submit draft methodology for formal HCD review; and 3) following HCD review, the AMBAG board will be asked to approve the final methodology and direct staff to issue draft RHNA Plan with jurisdiction allocations in March 2022. Ms. Adamson stated that AMBAG received several comment letters from member jurisdictions and other agencies that were either included in the agenda packet or forward to the Board at a later date. President McShane asked for questions from the AMBAG Board of Directors regarding Heather Adamson's presentation. Lengthy discussion followed.

President McShane opened the public hearing.

1) Rafa Sonnenfeld, Santa Cruz YIMB stated that he wanted to thank all of the stakeholders and especially the planning staff and Heather Adamson who's really done a remarkable job given the limited resources that the AMBAG has for the RHNA allocation methodology process. I just wanted to highlight some of the comments that that my organization submitted. We think that the recommendations have come a long way, on both, Option A and Option B. They are much better than the previous methodologies that have been considered. We would like to recommend a 40% income shift and we've included a table in our letter, which you all have a copy of, to see how the 40% income shifts for affirmatively furthering fair housing would that change the unit categories within the affordable requirements. 30% isn't adequate because there are some jurisdictions that are

receiving an allocation based on the RCAA model that doesn't actually assign all of those units as low-income. So, there are jurisdictions that are receiving units based on the fact that they are high opportunity and be a good place for low-income housing. But they're actually not getting all of that low-income housing, but that shouldn't be assigned to them, for the purposes of affirmatively furthering fair housing. We'd recommend increasing up to 40% regardless of the methodology that's selected.

2) Kevin Dayton, resident of Monterey and represent various business groups, such as the Salinas Valley Chamber of Commerce and Monterey Peninsula Chamber of Commerce. Mr. Dayton wanted to mention something that it's a harsh reality that probably won't be said otherwise here. Earlier this year, a couple of academics at UC San Diego did a poll, it was released as a report. Do Californians see their state moving in the right direction? Do they see themselves moving out of California? Add the very discouraging statistic in there. To quote from the report, "Growth is not a goal for most Californians asked to look ahead 10 years. 35% of respondents believe it would be better if the population decreases significantly and 46% wanted to stay about the same. Only 19% of those surveyed said that the state would be better off if its population increases." I understand this is the pressure that is put on all of you on the AMBAG board as you consider this. You know what people at home are seeing. And I'm guessing that as this poll was done in the Monterey Bay counties, you probably come up with similar results. They want their regional housing needs allocation to be zero. However, that's the wrong approach, and the wise approach that will benefit the future of California, is making sure that there's enough housing for everyone. The job housing balance is very important. It's a real shame to see the traffic jam going in and out of the Monterey Peninsula every day as people drive long distances to their jobs. It would be excellent to see people have the opportunity to live where they work and have a better life for that reason. To have these regional housing needs allocations used as a way to prod communities, perhaps, to understand that many people's lives, the quality of it depends on living near their job.

3) John Farrow stated that Land Watch primary concern is the jobs related allocation. Land Watch supports the allocation of the rest of the units, and it supports what it thinks is the consensus weighting. The key point is that the proposed mechanism for the jobs related allocation in Option A doesn't further the statutory objectives. That objective is not job share, it's to promote an improved regional jobs housing balance. That means you have to look not just at the numerator, the city share at regional jobs, but also the denominator, the city's housing units. Option A doesn't do that, ignores its denominator. So, the effect is to allocate thousands of units to jurisdictions that don't have a jobs housing imbalance, and not to allocate sufficient units to the cities that do have an imbalance not to allocate units in proportion to that imbalance. But we've proposed something that does just focus on the jobs housing imbalance, which is what the statute calls for. And our proposal would allocate in proportion to the imbalance. The new Option B moves in that direction, but it doesn't go far enough. It still allocates twice as many of the units on the basis of job share, which is simply not a statutory criteria. The units it does allocate to the cities that have severe imbalances are still allocated based on job share. Instead of in proportion to their imbalances, and then inexplicably it reduces the AFFH waiting from 35 to 25%. Staff rejects Option B, because it doesn't put enough units in opportunity areas, which is kind of a self-inflicted wound. We would support the overall weighting is very statutory objectives. Just argue that AMBAG has to make sure that its methodology actually furthers the statutory objective, which is a jobs housing balance, not just a job share calculation.

4) Elizabeth Madrigal, Monterey Bay Economic Partnership, stated that MBEP supports AMBAG's 6<sup>th</sup> Cycle RHNA final draft methodology of Option A with a minor modification regarding the AFFH Income shift percentage to be weighed at 40%. The City of Salinas, Santa Cruz YIMBY Law, Land

Watch Monterey County. And most recently, the City of Soledad add have also signified support for. California's regional housing needs determination requires our region to plan for 33,274 new homes by 2031 through the 6<sup>th</sup> Cycle Housing Element update. Including 13,014 that are affordable to lower income households through the final draft methodology, the estimated allocations of these homes grants every Monterey Bay jurisdiction the opportunity to promote equity, sustainability, and racially and economically diverse communities. We would like to thank Land Watch for highlighting the tie of placement of allocations hold to job centers on climate change. These must be central principles as each jurisdiction develops their housing element. We would also like to thank AMBAG staff for implementing MBEP's previous recommendation of incorporating a AFFH as an allocation factor, as opposed to AFFH only being integrated via an income shifting mechanism. This has resulted in a more equitable distribution of homes within our region. In regard to the AFFH income shift percentage being weighed at 30%, it should be applied at 40% to ensure that the allocations RCAA's are receiving are completely satisfying the goal of a AFFH by both having larger allocation due to this factor, as well as receiving a substantive proportion of very low and low-income units within set allocation. Thank you for your leadership in moving our region forward on our existing unprojected housing needs. We look forward to working with all 18 municipalities within the purview of AMBAG as they embark on the next step of updating their respective housing elements.

5) Alex Black stated that this is the first meeting he has attended and learning about this organization and how it functions. There is a big question about how units will be allocated and how do we get more units? I don't believe that this is the appropriate time for that question, but I don't know where else to ask. I don't know if the board would be willing to answer that question. That's my big question, is, how do we get more units?

6) Jonathan Moore, City of Salinas, thanked the AMBAG Board and staff for all their hard work on this. We recognize it's a very challenging process, especially with the dramatic increase. The city of Salinas would like to express its support for Option A We feel this is the best option for furthering fair housing, for equity, and will help with the jobs, housing balance, by putting jobs or houses where people work but cannot currently afford to live. We'd also like to express support for increasing the income shift percentage from 30 to 40% along with MBEP, YIMBY Law and others and express that as well. We know that none of us jurisdictions are developers that this is a challenging process but we think Option A is the fair way for the future of housing in the region and puts less burden on communities of color and more for the wealthier jurisdictions. We look forward to working our housing element update and thank you again for your time.

7) Kyle Kelly thanked the AMBAG Board, staff, and HCD for putting this together. I'm really excited for communities in California to do their part and approve enough housing. I live in Santa Cruz now and I grew up in California. And I never understood why it was to difficult to find an apartment or why rent was so high. And I think, for the sake of our children's future, our grandchildren's future, we're going to make sure that we do the right thing. That we make sure to build housing in all places including in wealthy communities where there's access to resources and jobs and maybe better transit. This is a great chance to be able to build this out of the kind of the missteps that we've had in the past and make sure that we've got enough in our coastal community here. I just want to reiterate my support for Option A, and I look forward to all your comments. Thank you.

8) Michael Pisano asked how the transit score is calculated?

9) Lowell Hurst, City of Watsonville, thanked the AMBAG Board and staff for their hard work. It's not an easy task by any means and there are lots of considerations. I was around in the last century and we really got it in a pickle with the RHNA numbers. We came up with a general plan that wasn't

legal according to the courts. My cautionary message is, whatever you do, let's make it practical and doable. Every jurisdiction certainly needs to do their fair share of housing, but some jurisdictions just don't have any land. That creates a unique circumstance for various reasons. So, let's keep it practical and doable. And let's get something done. Thank you very much.

10) Megan Hunter, Community Development Director, City of Salinas, thanked the AMBAG Board for the opportunity to speak. We are very pleased at the work that AMBAG has done and all of the listening that they've done to the jurisdictions. We, Jonathan Moore, mentioned, are in favor of Option A. It's really important to point out that Option A results in a lot more equity, in terms, of providing affordable housing across the region. Some of the smaller communities which are densely populated under Option B, would get a much larger share of the units. A lot of the communities of color have people who work in wealthier jurisdictions but cannot afford to live there. I would argue that, as Jonathan mentioned, that an AFFH factor of 35% is necessary, not only to ensure equity and opportunity areas for people of color and low-income areas, but it will also help with the jobs housing balance. At the very least, I think that percentage of 35% needs to be retained if Option B is looked at and maybe shifting jobs but maintaining the jobs housing ratio.

President McShane closed the public hearing.

Director Montesino made a motion for Option B, with a 40% increase to income shift.

Director Petersen stated that she appreciates staff taking a fresh look at the jobs and housing balance and believes that the new RCAA formula deserves more time as well. There's two points that Director Petersen wanted to make 1) the Resiliency and RCAA allocation formulas should be based on land area adequate for development and not the eight-year housing unit change; and 2) RCAA should include a sliding scale.

Director Berkeley stated that she wants to be sure that the City of Marina's comment letter is kept in the record. Director Berkeley also asked if these options were the only options this evening. Is there an opportunity for us to go back and do some tweaking if we choose one of the options or is this final?

Heather Adamson, Director of Planning, AMBAG stated that the Board has the option to provide additional modifications and send it back to staff and not select an option or methodology. It would be brought back at the January 2022 meeting. Just note that it would further push back the RHNA plan development schedule. That would mean that instead of bringing back the final methodology in March, we are looking at April or May the release.

Director Adams stated that she wants to second the motion on the floor and offered a friendly amendment. The friendly amendment to Option B, with 35% AFFH, 25% job share, and 40% jobs housing.

President McShane asked if Director Montesino would accept the friendly amendment?

Director Montesino declined the friendly amendment.

President McShane stated that Director Montesino declined the friendly amendment and asked if Director Adams wanted to second the original motion? Director Adams declined to second the original motion.

Director Smith stated that is a difficult process and wanted to thank staff for their hard work. Director Smith encouraged the Board to read the letters from the city managers from the City of Pacific Grove and City of Monterey. Director Smith commented that 1) water is the major issue and

the major stumbling block to getting some properties developed; and 2) the City of Monterey had no ability to have the EDD data shared outside of AMBAG staff. The City of Monterey staff and no other city or county in the AMBAG region was able to see the raw data from the EDD. The numbers show Monterey at over 40,000 jobs and when we do the math in Monterey, we just can't reconcile how we come up with 40,000 jobs for city that's got 30,000 population. We do need housing and we are willing to take our fair share but the numbers with the percentage and an overestimate of jobs skews our true factual RHNA number. Director Smith stated that the AMBAG Board will be moving forward with a motion tonight and is forced to support Option A.

Maura Twomey, AMBAG Executive Director stated that she wanted to clarify that AMBAG had access to the EDD data under a confidentiality agreement. AMBAG asked the EDD to waive that confidentiality agreement so AMBAG could share the data. The EDD declined the request, however, the jurisdictions can request the data from the EDD directly.

Director Velazquez stated that it's important that this be an equitable process and that we look at it on a fair and equitable platform and that all communities build their fair share of housing. Many of our resident's commute to the Peninsula to work in the hospitality industry, which is not considered more of the lower income job, and I want to make sure that our residents have the opportunity to live where they work. Director Velazquez supports Option A.

Director Wizard asked if the Board decides to postpone their decision until January 2022, does staff anticipate only a one-month shift in the entire timeline of the RHNA plan development schedule ?

Heather Adamson, Director of Planning stated that staff will have to double check the timeline because it could be a one-month shift or a two-month shift, because HCD needs 60 days for review. Staff doesn't know if we will hear back from HCD in time to take it to the March 2022 Board meeting. Staff might take it to the April Board meeting. The other issues are 1) there are certain requirements of a review period; and 2) if AMBAG receives appeals. Ms. Adamson stated that there would be at least a month, maybe two months delay, if the Board doesn't take action tonight and return back in January 2022.

Director Wizard made a substitute motion for Option A with an income shift adjustment of 40%.

Director McAdams seconded Director Wizard's motion.

Director Cummings stated that in Santa Cruz, both options are a huge shift from the original option. There's a lot of concern here around feasibility and the impact that this is going to have on local land use and land control in our city. People are upset about the fact that we make up about 8% of the population for the AMBAG region and the new proposals increase the overall amount of housing allocation to the city, which seems unfair. The first option that came before the Board seemed like it was fair. One concern is around the fact that with the RCAA shift, we were 1% below which reduces the amount of housing that was to very low and low. We were hoping that we could be included in that to some extent, even if partially, so that we were increasing our very-low and low income housing allocations. Given that the Income shift were suggested, but not required by HCD, it would have been good for us to have seen options with the adjustments only for the income shifts because that would have required our community to have an allocation that is reflective of our population. The two options before us tonight pushes us into an area where it's going to be extremely difficult for us to continue to produce housing as a city that already is producing housing. Director Cummings agrees of the comments that were made by Director Peterson from Capitola regarding available land

and land use. This is a difficult process and very much appreciate our staff for all the hard work that they've done. There could have been a few more options provided to the Board.

Director Berkley requested that Director Adams restate her friendly amendment to Director Montesino's motion?

President McShane stated that Director Adams friendly amendment was to approve Option B, with 35% AFFH, 25% job share, and 40% jobs housing.

Director Berkley asked if Director Adams was willing to put that motion on the floor?

Director Adams put the motion on the floor.

President McShane stated that there was a substitute motion on the floor and it has been seconded.

Director Adams stated that her motion was to approve Option B with 35% AFFH, 20% job share, and 40% jobs housing.

President McShane stated that there was a substitute motion on the floor and would like to limit any comments to that substitute motion.

Heather Adamson, Director of Planning stated that 5% was missing from Director Adam's motion.

Director Adams revised her motion to approve Option B with 35% AFFH, 20% job share, and 40% jobs housing, and 5% transit.

President McShane asked if Director Berkely approved the revision to the substitute motion?

Heather Adamson, Director of Planning asked if that meant 0% for resiliency? Ms. Adamson added that to clarify, staff has not run a scenario option for this recommendation. We can't advise of the outcomes and what the estimates would be.

Director Adams amended her substitute motion to approve Option B with 35% AFFH, 15% employment, 35% job housing, 5% transit, and 10% resiliency. Director Berkley seconded the amended substitute motion.

President McShane took Board comment on the amended substitute motion.

Director Smith stated that he has no idea what the results would be from this change in the calculations. Director Smith would be in favor of staff making the calculations and report back to the Board. Ultimately, what we need to make a decision on is what happens with the proposal, the new math, and allocation for each city. Staff should come back to the Board with this as Option C so we are able to see the results.

Director Freeman stated that he is in favor of this option. We need more fair housing allocation for the low or moderate income because that's the housing we need the most and will help our region.

Maura Twomey, Executive Director read Director Velazquez's comment as she was having technical difficulties. Director Velazquez's comment was "I cannot support a motion that changes calculations without having the final allocation."

Director Caput stated that we need to come back in January 2022 with this new allocation. We are changing things and the people proposing substitute motion had some confusion. The substitute motion would be considered Option C.

Director Timm stated that staff has been in contact with HCD and getting guidance on what will and will not work. I'm concerned that we will start playing with the percentages to benefit our individual jurisdictions. I don't think I can vote on a motion, especially, when we don't even know what's before us.

Director Peterson stated that she is not prepared to support the substitute motion. I would suggest that we would continue this decision until January. So, that we can get the math of the suggestions that are included in the substitute motion with consideration of the land area available for development and also considerations of a partial RCAA allocation for cities with poverty levels near the 67% number.

Director Phillips stated that he was prepared to move forward on Option B, however, doesn't feel comfortable making the decision on the substitute motion.

Director McAdams stated that she concurs with Supervisor Phillips. Staff has not looked at the adjustments. We are not here to throw in different allocations that suit our city. There's been a lot of thought and process and professionals involved with coming up with what was presented to us this evening. I don't want to get into trying to figure out our own percentages that benefit our own individual city. I don't think that's the task that is in front of us this evening.

Director Carbone stated that she knew how she was going to vote on this item and echoes Director Phillips comments that there has been a lot of work put into the two options and is hesitant to move forward without seeing the numbers. Director Carbone suggested that this item be brought back to the January 2022 meeting.

Director Wizard stated he is not in favor of postponing the vote.

The Clerk of the Board took a roll call vote on the substitute motion. The motion did not pass. Voting details can be found in the Voting Record.

President McShane stated that it brings us back to the original motion made by Director Wizard, seconded by Director McAdams to approve Option A with an income shift adjustment from 30 to 40%. President McShane opened up comments from the Board on this motion.

Director Adams offered a substitute motion to consider the allocation she brought as Option C to be brought back at the January 2022 meeting.

Director Berkely seconded the motion.

President McShane opened up comments on the substitute motion.

Director McAdams questioned the point of order on having another substitute motion.

President McShane referred to Don Freeman, AMBAG legal counsel. Mr. Freeman stated that there can be another substitute motion.

Director Peterson offered a friendly amendment to the substitute motion, that it also include consideration of available land use for development and consideration of partial RCAA allocations for cities with poverty levels near 67%.

Director Adams asked for further clarification.



Heather Adamson stated that Director Petersen is requesting that resiliency is included, however, consider resiliency based on land area. It's a change in how resiliency is calculated not a change in factor percentage. Director Petersen's comment on AFFH and RCAA is that we look at it as more of a sliding scale. AFFH and RCAA would be calculated differently under the friendly amendment without adding new factors.

Director Adams accepted the friendly amendment.

Director Berkley accepted the friendly amendment.

President McShane clarified that the substitute motion on the floor will be considered as Option C at the January 2022 Board meeting. Option C will consider the new percentages and staff analysis along with Option A and Option B.

Director Velazquez called for the question.

President McShane stated that the substitute motion made by Director Adams, seconded by Director Berkley is to consider an Option C with 35% AFFH, 15% employment, 35% job housing, 5% transit, and 10% resiliency. President McShane asked that staff clarify the additional factors.

Heather Adamson, Director of Planning added that analysis would include 1) a change on how resiliency is calculated, instead of calculating based on housing units, consider land area and 2) include a sliding scale in the RCAA.

The Clerk of the Board took a roll call vote on the substitute motion. The motion passed. Voting details can be found in the Voting Record.

Maura Twomey, Executive Director stated that a Special meeting of the AMBAG Board on January 5, 2022 consider adoption of a resolution on AB 361.

## **8. ADJOURNMENT**

The Board of Directors meeting adjourned at 8:27 PM.

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Steve McShane, President

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Maura F. Twomey, Executive Director

**DRAFT AMBAG BOARD OF DIRECTORS MEETING ATTENDANCE & VOTING RECORD**  
**BOARD MEETING DATE: December 8, 2021**

Attendance (X= Present; AB= Absent) Voting (Y= Yes; N=No; A=Abstain)					
MEMBER	AMBAG REP	Attendance	Item #5	Item# 7.A 1 <sup>ST</sup> Motion	Item# 7.A 2 <sup>nd</sup> Motion
Capitola	Kristen Petersen	X	Y	N	Y
Carmel-by-the-Sea	Karen Ferlito	X	Y	N	Y
Del Rey Oaks	Kim Shirley	X	Y	N	Y
Gonzales	Scott Funk	X	Y	N	Y
Greenfield	Lance Walker	X	Y	N	Y
Hollister	Rick Perez	X	Y	N	Y
King City	Carlos Victoria	X	Y	N	Y
Marina	Lisa Berkley	X	Y	Y	Y
Monterey	Ed Smith	X	Y	N	Y
Pacific Grove	Jenny McAdams	X	Y	N	Y
Salinas	Steve McShane	X	Y	N	N
San Juan Bautista	John Freeman	X	Y	N	Y
Sand City	Mary Ann Carbone	X	Y	N	Y
Santa Cruz	Justin Cummings	X	Y	N	Y
Scotts Valley	Derek Timm	X	Y	N	Y
Seaside	Jon Wizard	X	Y	N	N
Soledad	Anna Velazquez	X	Y	N	N
Watsonville	Eduardo Montesino	X	Y	N	N
County-Monterey	Mary Adams	X	Y	Y	Y
County-Monterey	John Phillips	X	Y	N	N
County-Santa Cruz	Manu Koenig	X	Y	N	N
County-Santa Cruz	Greg Caput	X	Y	N	Y
County-San Benito	Bob Tiffany	AB	n/a	n/a	n/a
County-San Benito	Bea Gonzales	X	Y	N	N

(\* = Board Member(s) arrived late or left early, therefore, did not vote on the item. Please refer the minutes)



## MEMORANDUM

**TO:** AMBAG Board of Directors

**FROM:** Maura F. Twomey, Executive Director

**RECOMMENDED BY:** Miranda Taylor, Planner

**SUBJECT:** AMBAG Regional Clearinghouse Monthly Newsletter

**MEETING DATE:** January 12, 2022

### RECOMMENDATION:

It is recommended that the Board of Directors accept the December 2021 Clearinghouse monthly newsletter.

### BACKGROUND/DISCUSSION:

Since March 12, 1984, under adopted State Clearinghouse Procedures, the Association of Monterey Bay Area Governments (AMBAG) was designated the regional agency responsible for clearinghouse operations in Monterey, San Benito and Santa Cruz Counties. These procedures implement Presidential Executive Order 12372 as interpreted by the "State of California Procedures for Intergovernmental Review of Federal Financial Assistance and Direct Development Activities." They also implement the California Environmental Quality Act of 1970 as interpreted by CEQA Guidelines.

The purpose of the Clearinghouse is to provide all interested parties within the Counties of Monterey, San Benito and Santa Cruz notification of projects for federal financial assistance, direct federal development activities, local plans and development projects and state plans that are proposed within the region. These areawide procedures are intended to be coordinated with procedures adopted by the State of California.

### FINANCIAL IMPACT:

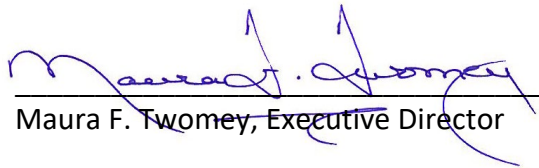
There is no direct financial impact. Staff time for monitoring clearinghouse activities is incorporated into the current AMBAG Overall Work Program and budget.

**COORDINATION:**

Notices for the Clearinghouse are sent by lead agencies to AMBAG. Interested parties are sent email notifications twice a month with the newsletter attached.

**ATTACHMENT:**

1. Monthly Newsletter - Clearinghouse items December 1– December 31, 2021.

**APPROVED BY:**

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Maura F. Twomey, Executive Director

**Attachment 1****AMBAG REGIONAL CLEARINGHOUSE****The AMBAG Board of Directors will review these items on 01/12/2022**

Association of Monterey Bay Area Governments P.O. Box 2453, Seaside, CA 93955 /  
831.883.3750

**ENVIRONMENTAL DOCUMENTS**

<b>20211202- Kall Robert E &amp; Janet Rose (Rio Vista Group LLC)</b>
County of Monterey Shawn Archbold (831) 755-5114
Notice of Availability / Mitigated Negative Declaration (MND)
The project is a Combined Development Permit consisting of: 1) a Use Permit to allow the construction of four (4) 16,286 square foot apartment buildings totaling 60 units for agricultural workforce housing and 1 manager unit; and 2) a Variance to allow building site coverage exceeding 5%. The property is located at 51, 53, 55 & 57 Susan Street, Royal Oaks (Assessor's Parcel Number 1   7-361-016-000), North County Area Plan.
Project is located in Monterey County Parcel: 117361016000
Public hearing information: Online
Public review period ends: Monday, January 24, 2022

<b>20211203- North Fremont Street Sidewalk Gap Closure Project</b>
City of Monterey Fernanda Roveri (831) 242-8788
Notice of Intent (NOI) / Mitigated Negative Declaration (MND)
The project is the construction of an approximate 130-foot long prefabricated bicycle and pedestrian bridge to connect an existing gap in the sidewalk along North Fremont Street on the border of the City of Seaside and City of Monterey. The project involves limited ground disturbance and fill for the span's abutments, curb and gutter improvements, paved sidewalk/trail approaches on each side of the span, and removal of up to four existing oak trees.
Project is located in Monterey County Parcel: 013142004000
Public hearing information: Online
Public review period ends: Monday, January 24, 2022

<b>20211201- County of San Benito Draft Zoning Code</b>
San Benito County Arielle Goodspeed (831) 902-2547
Notice of Availability / Other
The County has embarked on an update to the Zoning Ordinance, the document that provides detailed rules and regulations that affect how land in the County is used for farming, homes, commercial activity, and industry. The Zoning Ordinance has been revised over time, with its most recent comprehensive update in 1984. The County is now undertaking a further comprehensive update to the Zoning Ordinance to make it more modern, easier to use, and more reflective of recent changes in the County General Plan and State law. Key issues that will be addressed in the update of the Zoning Ordinance include: Streamlining the development process, making the Zoning ordinance easier to use, complying with changes in state law, implementing the County General Plan, fixing problems & helping homeowner s design ADUs.
Project is located in San Benito County Parcel: Countywide
Public hearing information: Planning Commission Meeting Online Date: 1/22/2022 / Time: 6:00 PM
Public review period ends: Monday, January 31, 2022



## MEMORANDUM

**TO:** AMBAG Board of Directors

**FROM:** Maura F. Twomey, Executive Director

**RECOMMENDED BY:** Amaury Berteaud, Special Projects Manager

**SUBJECT:** AMBAG Sustainability Program Update

**MEETING DATE:** January 12, 2022

### RECOMMENDATION:

It is recommended the Board of Directors accept this report.

### BACKGROUND/DISCUSSION:

#### AMBAG Sustainability Program Elements

##### Energy Efficiency Program Development

AMBAG is a founding member of the Rural and Hard to Reach (RHTR) working group, which was created in 2015 to promote the deployment of energy efficiency resources to California's rural communities. In the past two year AMBAG staff has been working with other RHTR members to create a Regional Energy Network (REN). Regional Energy Networks are entities which submit business plans to the California Public Utilities Commission (CPUC) to obtain ratepayer funds and implement energy efficiency programs. The RHTR working group is in the final stages of creating such a business plan in order to implement programs as a new Regional Energy Network, the RuralREN. If approved by the CPUC, the RuralREN would bring resources to the region, assisting residents, businesses, and the public agencies in completing energy efficiency projects and creating new sustainability initiatives.

RHTR partners have executed a memorandum of understanding for the development of the RuralREN and have created a detailed program design framework as well as program implementation plans and are currently finalizing the business plan. RHTR partners are also organizing a workshop of the California Energy Efficiency Coordinating Council (CAEECC) in order to present the concept of the RuralREN and gather feedback on the business plan. The finalized RuralREN business plan will be submitted to the CPUC on February 15, 2022. If approved by the CPUC, the RuralREN programs will start operating on January 1, 2023 and until December 31, 2031.

*Planning Excellence!*

### **Central California Energy Watch Program implementation in Monterey County**

The AMBAG Sustainability Program is acting as a sub consultant to the San Joaquin Valley Clean Energy Organization (SJVCEO) to implement the Central California Energy Watch (CCEW) program in Monterey County. AMBAG staff is conducting outreach to public sector agencies and school districts to inform them about the new program, drive program enrollment, and provide energy efficiency technical assistance services. Current efforts are focused on working with jurisdictions and school districts to support energy benchmarking. AMBAG staff is also working with CCEW to explore potential project opportunities at the County of Monterey, the Carmel Unified School District, and the Washington Union School District.

### **School Districts**

The State of California, over five years, has been releasing funding through the Proposition 39: California Clean Energy Jobs Act to help schools implement energy efficiency and conservation. To receive this funding, the school district must comply with the Proposition 39: California Clean Energy Jobs Act – 2013 Program Implementation Guidelines. These guidelines include requirements such as completing energy benchmarks of school facilities, identifying potential energy projects, creating efficiency metrics related to the projects, submitting a funding application to the California Energy Commission called an Energy Expenditure Plan, completing annual reports and submitting a final project completion report. On May 13, 2020, the California Energy Commission extended the Proposition 39 program by one year as a result of the ongoing COVID-19 pandemic. The deadline to complete projects was extended to June 30, 2021, and the deadline to complete the final project completion reports was extended to June 30, 2022.

AMBAG staff has been working with sixteen school districts to complete their final project completion reports. As part of this process AMBAG staff is gathering benchmarking data and creating the necessary reports to obtain California Energy Commission staff approval.

### **Greenhouse Gas Inventories and Climate Action Planning**

AMBAG staff works to complete Greenhouse Gas (GHG) Inventories for all AMBAG Jurisdictions. Staff completed Community-wide GHG Inventories for all jurisdictions in 2005, 2009, 2010, 2015, 2018, and 2019, as well as a baseline Municipal GHG Inventories for all AMBAG jurisdictions in 2005. AMBAG staff has also been able to use the inventories to create a regional roll-up inventory and assist jurisdictions with climate action planning activities.

As part of MOU with AMBAG, Central Coast Community Energy has allocated funding for AMBAG to develop 2018, 2019, and 2020 Community-wide GHG Inventories for all its member jurisdictions in calendar year 2020, 2021, and 2022. This has allowed AMBAG to continue providing GHG inventories to our jurisdictions and enabled continued climate action on the central coast. In the past month AMBAG staff has been starting the process of gathering data for the 2020 Community-wide GHG inventories.



**ALTERNATIVES:**

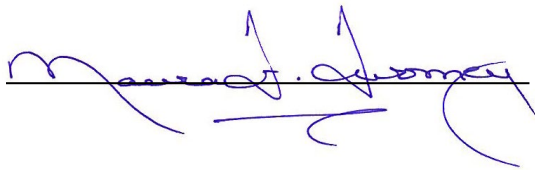
There are no alternatives to discuss as this is an informational report.

**FINANCIAL IMPACT:**

The budget is fully funded under the AMBAG-3CE MOU, a sub consultant agreement with the SJVCEO, and SB1 Planning Funds. All funding is programmed in the FY 2021-22 Overall Work Program and Budget.

**COORDINATION:**

AMBAG staff is coordinating with 3CE, the SJVCEO, as well as local jurisdictions and local community stakeholders.

**APPROVED BY:**A handwritten signature in blue ink is written over a horizontal line. The signature is cursive and appears to read "Maurice J. Quinlan".

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**A RESOLUTION**

**OF THE ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS BOARD OF DIRECTORS ADOPTING A RESOLUTION REGARDING THE RALPH M BROWN ACT AND FINDING OF IMMINENT RISK TO HEALTH AND SAFETY OF IN-PERSON MEETING AS A RESULT OF THE CONTINUING COVID-19 PANDEMIC STATE OF EMERGENCY DECLARED BY GOVERNOR NEWSOM**

**WHEREAS**, on March 4, 2020, Governor Newsom issued a Proclamation of State of Emergency in response to the COVID-19 pandemic; and,

**WHEREAS**, the proclaimed state of emergency remains in effect; and,

**WHEREAS**, on March 17, 2020, Governor Newsom issued Executive Order N-29-20 that suspended the teleconferencing rules set forth in the California Open Meeting law, Government code Section 54950 et seq. (the “Brown Act”), provided certain requirements were met and followed; and,

**WHEREAS**, on June 11, 2021, Governor Newsom issued Executive Order N-08-21 that clarified the suspension of the teleconferencing rules set forth in the Brown Act, and further provided that those provisions would remain suspended through September 30, 2021; and,

**WHEREAS**, on September 16, 2021, Governor Newsom signed AB 361 that provides that a legislative body subject to the Brown Act may continue to meet without fully complying with the teleconferencing rules in the Brown Act provided the legislative body determines that meeting in person would present imminent risk to the health and safety of attendees, and further requires that certain findings be made by the legislative body every (30) days; and,

**WHEREAS**, California Department of Public Health (“CDPH”) and the federal Centers for Disease Control and Prevention (“CDC”) caution that the Delta and Omicron variants of COVID-19, currently the dominant strains of COVID-19 in the country, are more transmissible than prior variants of the virus, may cause severe illness, and that even fully vaccinated individuals can spread the virus, may cause more severe alarming rates of COVID-19 cases and hospitalizations (<https://cdc.gov/coronavirus/2019-ncov/variants/delta-variant.html>); and,

**WHEREAS**, other variants of COVID-19 exist, and it is unknown at this time whether other variants may result in a new surge in COVID-19 cases; and,

**WHEREAS**, the CDC has established a “Community Transmission” metric with 4 tiers designated to reflect a community’s COVID-19 case rate and percent positivity; and,

**WHEREAS**, Monterey County, San Benito County, and Santa Cruz County currently have a Community Transmission metric of “high” which is the most serious of the tiers; and,

**WHEREAS**, the Board of Directors for the Association of Monterey Bay Area Governments (AMBAG) is empowered to take actions necessary to protect public, health, welfare and safety within the region; and,

**WHEREAS**, AMBAG has an important governmental interest in protecting the health, safety and welfare of those who participate in meetings of AMBAG's various legislative bodies subject to the Brown Act; and,

**WHEREAS**, in the interest of the public health and safety, as affected by the emergency cause by the spread of COVID-19, the AMBAG Board of Directors deems it necessary to find that meeting in person for meetings of all AMBAG related legislative bodies as well as subcommittees of the board of Directors subject to the Ralph M. Brown Act, would present imminent risk to the health or safety of attendees, and thus intends to invoke the provisions of AB 361 related to teleconferencing as provided in subdivisions (e) of Government Code section 54953; and,

**WHEREAS**, all teleconference meetings of the AMBAG Board of Directors, AMBAG Executive/Finance Committee, as well as all subcommittees of the Board of Directors shall comply with the requirements to provide the public with access to meetings as prescribed in paragraph (2) of subdivision (e) of Government Code section 54953;

**NOW, THEREFORE, BE IT RESOLVED** that the AMBAG Board of Directors does hereby approve as follows:

1. The AMBAG Board of Directors finds that meeting in person for meeting of all AMBAG related legislative bodies subject to the Ralph M. Brown Act would present imminent risk to the health or safety of attendees.
2. This finding applies to all AMBAG related legislative bodies subject to the Brown Act, including but not limited to, the AMBAG Board of Directors meeting; the AMBAG Executive/Finance Committee; the RAPS, Inc. Board of Directors meeting, and any other standing committees.
3. Staff is directed to return to the Board of Directors no later than thirty (30) days after the adoption of this resolution, or by next Board of Directors meeting (whichever comes first), with an item for the Board to consider making the findings required by AB361 in order to continue meeting under its provisions.
4. The AMBAG Executive Director and AMBAG Counsel are directed to take such other necessary or appropriate actions to implement the intent and purposes of this resolution.

**PASSED AND ADOPTED** this 12<sup>th</sup> day of January 2022.

---

Steve McShane, President

---

Maura F. Twomey, Executive Director



**MEMORANDUM**

**TO:** AMBAG Board of Directors

**FROM:** Maura F. Twomey, Executive Director

**RECOMMENDED BY:** Errol Osteraa, Director of Finance and Administration

**SUBJECT:** Financial Update Report

**MEETING DATE:** January 12, 2022

**RECOMMENDATION:**

Staff recommends that the Board of Directors accept the Financial Update Report.

**BACKGROUND/ DISCUSSION:**

The enclosed financial reports are for the 2021-2022 Fiscal Year (FY) and are presented as a consent item. The attached reports contain the cumulative effect of operations through October 31, 2021, as well as a budget-to-actual comparison. Amounts in the Financial Update Report are unaudited.

**FINANCIAL IMPACT:**

The Balance Sheet for October 31, 2021, reflects a cash balance of \$3,443,520.63. The accounts receivable balance is \$982,926.03, while the current liabilities balance is \$652,633.18. AMBAG has sufficient current assets on hand to pay all known current obligations.

AMBAG's Balance Sheet as of October 31, 2021, reflects a positive Net Position of \$21,922.17. This is due to the Profit and Loss Statement reflecting an excess of revenue over expense of \$176,606.08. Changes in Net Position are to be expected throughout the fiscal year (FY), particularly at the beginning due to collection of member dues which are received in July and the timing of various year-end adjustments required after our financial audit.

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The following table highlights key Budget to Actual financial data:

**Budget to Actual Financial Highlights**  
**For Period July 1, 2021 through October 31, 2021**

<b>Expenditures</b>	<b>Budget Through October 2021</b>	<b>Actual Through October 2021</b>	<b>Difference</b>
Salaries & Fringe Benefits	\$ 816,085.00	\$ 738,641.38	\$ 77,443.62
Professional Services	\$ 2,533,687.00	\$ 576,577.48	\$ 1,957,109.52
Lease/Rentals	\$ 30,333.00	\$ 26,933.39	\$ 3,399.61
Communications	\$ 8,267.00	\$ 5,509.16	\$ 2,757.84
Supplies	\$ 37,133.00	\$ 10,386.79	\$ 26,746.21
Printing	\$ 5,567.00	\$ -	\$ 5,567.00
Travel	\$ 23,400.00	\$ 342.90	\$ 23,057.10
Other Charges	\$ 108,985.00	\$ 127,824.44	\$ (18,839.44)
<b>Total</b>	<b>\$ 3,563,457.00</b>	<b>\$ 1,486,215.54</b>	<b>\$ 2,077,241.46</b>
<b>Revenue</b>			
Federal/State/Local Revenue	\$ 3,582,860.00	\$ 1,662,821.62	\$ 1,920,038.38
Note: AMBAG is projecting a surplus, therefore budgeted revenues do not equal expenses.			

**Revenues/Expenses (Budget to Actual Comparison):**

The budget reflects a linear programming of funds while actual work is contingent on various factors. Therefore, during the fiscal year there will be fluctuations from budget-to-actual.

Professional Services are under budget primarily due to the timing of work on projects performed by contractors. Work is progressing on the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). This work is not performed in a linear fashion while the budget reflects linear programming. In addition, the Regional Early Action Planning Housing Program (REAP) provides \$7,931,330 in funding of which a large portion will pass through to partner agencies. It is in its early stages.

Since AMBAG funding is primarily on a reimbursement basis, any deviation in expenditure also results in a corresponding deviation in revenue. Budget-to-actual revenue and expenditures are monitored regularly to analyze fiscal operations and propose amendments to the budget if needed.

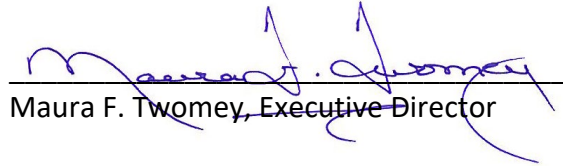
**COORDINATION:**

N/A

**ATTACHMENTS:**

1. Balance Sheet as of October 31, 2021
2. Profit and Loss: July 1, 2021 – October 31, 2021
3. Cash Activity for November 2021

**APPROVED BY:**



Maura F. Twomey, Executive Director

## Balance Sheet - Attachment 1

As of October 31, 2021

	October 31, 2021	October 31, 2021
Assets		
Current Assets		
Cash and Cash Equivalents		
Mechanics Bank - Special Reserve	300,602.68	508,063.48
Mechanics Bank - Checking	13,217.69	144,569.70
Mechanics Bank - REAP Checking	3,125,515.29	
Petty Cash	500.00	0.00
LAIF Account	3,684.97	652,633.18
Total Cash and Cash Equivalents	3,443,520.63	
Accounts Receivable		
Accounts Receivable	982,926.03	258,986.95
Total Accounts Receivable	982,926.03	1,888,153.69
Other Current Assets		
Due from PRWFPA/RAPS	72.82	7,047.76
Prepaid Items	29,899.95	2,737,528.28
Total Other Current Assets	29,972.77	4,891,716.68
Total Current Assets	4,456,419.43	
Long-Term Assets		
Net OPEB Asset	96,473.00	
FY 2002-2003 Housing Mandate Receivable	82,186.00	
Allowance for Doubtful Accounts	(16,437.20)	
Deferred Outflows - Actuarial	533,833.49	
Deferred Outflows - PERS Contribution	272,963.59	
Total Long-Term Assets	969,018.88	
Capital Assets		
Capital Assets	319,089.93	(154,683.91)
Accumulated Depreciation	(178,256.21)	176,606.08
Total Capital Assets	140,833.72	21,922.17
Total Assets	5,566,272.03	5,566,272.03
Liabilities & Net Position		
Liabilities		
Current Liabilities		
Accounts Payable		
Employee Benefits		
Mechanics Bank - Line of Credit		
Total Current Liabilities		
Long-Term Liabilities		
Deferred Inflows - Actuarial		
Net Pension Liability (GASB 68)		
OPEB Liability		
Deferred Revenue		
Total Long-Term Liabilities		
Total Liabilities		
Net Position		
Beginning Net Position		
Net Income/(Loss)		
Total Ending Net Position		
Total Liabilities & Net Position		



**AMBAG**  
**Profit & Loss - Attachment 2**  
July - October 2021

	July - October 2021	July - October 2021
<b>Income</b>		
AMBAG Revenue		174,251.55
Cash Contributions		146,339.64
Grant Revenue		1,262,875.24
Non-Federal Local Match		79,355.19
<b>Total Income</b>		<b>1,662,821.62</b>
<b>Expense</b>		
Salaries		485,398.92
Fringe Benefits		253,242.46
Professional Services		576,577.48
Lease/Rentals		26,933.39
Communications		5,509.16
Supplies		10,386.79
Travel		342.90
Other Charges:		
BOD Allowances	2,850.00	
Workshops/Training	609.97	
GIS Licensing/CCJDC Support	11,700.00	
SB1/MTIP /MTP/SCS/OWP/Public Participation Expenses	2,157.00	
Recruiting	489.95	
Dues & Subscriptions	7,665.68	
Depreciation Expense	9,331.18	
Maintenance/Utilities	256.36	
Insurance	13,403.72	
Interest/Fees/Tax Expense	5.39	
<b>Total Other Charges</b>		<b>48,469.25</b>
Non-Federal Local Match		79,355.19
<b>Total Expense</b>		<b>1,486,215.54</b>
<b>Net Income/(Loss)</b>		<b>176,606.08</b>

**AMBAG**  
**Cash Activity - Attachment 3**  
**For November 2021**

Unaudited

Monthly Cash Activity	July-21	August-21	September-21	October-21	November-21	December-21	January-22	February-22	March-22	April-22	May-22	June-22	TOTAL
<b>1. CASH ON HAND</b>													
[Beginning of month]	4,140,366.44	4,161,723.11	3,647,705.41	3,625,765.50	3,443,520.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>2. CASH RECEIPTS</b>													
(a) AMBAG Revenue	108,597.78	107,565.48	14,000.18	61,432.23	707,408.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	999,003.74
(b) Grant Revenue	180,907.52	21,585.44	193,707.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	396,200.75
(c) REAP Advance Payment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(d) Borrowing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>3. TOTAL CASH RECEIPTS</b>	289,505.30	129,150.92	207,707.97	61,432.23	707,408.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,395,204.49
<b>4. TOTAL CASH AVAILABLE</b>	4,429,871.74	4,290,874.03	3,855,413.38	3,687,197.73	4,150,928.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>5. CASH PAID OUT</b>													
(a) Payroll & Related *	185,064.62	189,829.59	172,248.66	197,590.98	179,470.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	924,203.98
(b) Professional Services	18,658.78	334,934.61	32,380.92	30,636.83	531,139.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00	947,751.00
(c) Capital Outlay	0.00	77,185.31	10,389.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	87,574.44
(d) Lease/Rentals	12,500.53	6,550.66	6,942.40	7,112.08	6,642.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	39,748.66
(e) Communications	1,922.95	1,378.55	1,376.91	1,610.99	1,389.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,678.55
(f) Supplies	145.65	881.31	4,507.02	4,732.31	435.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,701.74
(g) Printing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(h) Travel	38.04	0.00	138.80	289.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	466.69
(i) Other Charges	49,818.06	32,408.59	1,664.04	1,704.06	6,580.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	92,175.03
(j) Loan Repayment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>6. TOTAL CASH PAID OUT</b>	268,148.63	643,168.62	229,647.88	243,677.10	725,657.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,110,300.09
<b>7. CASH POSITION</b>	4,161,723.11	3,647,703.41	3,625,765.50	3,443,520.63	3,425,270.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	



**MEMORANDUM**

**TO:** AMBAG Board of Directors

**FROM:** Maura F. Twomey, Executive Director

**RECOMMENDED BY:** Heather Adamson, Director of Planning

**SUBJECT:** Draft 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy & Draft Environmental Impact Report

**MEETING DATE:** January 12, 2022

**RECOMMENDATION:**

The Board of Directors is asked conduct a public hearing to receive comments on the Draft 2045 MTP/SCS and Draft Environmental Impact Report.

**BACKGROUND/DISCUSSION:**

The 2045 MTP/SCS is the blueprint for a regional transportation system that further enhances our quality of life, promotes sustainability, and offers more mobility options for people and goods. The MTP/SCS is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system so it meets the diverse needs of our changing region through 2045.

The 2045 MTP/SCS contains a robust transportation network, with a diversity of projects that will provide residents and visitors with a variety of travel choices. The transportation network, in conjunction with how local jurisdictions develop land, will provide additional opportunities for walking, biking, getting to work, going to school, shopping and playing.

Passed in 2008, Senate Bill 375 (SB 375) encourages planning practices that create sustainable communities. SB 375 also charged the California Air Resources Board (CARB) with setting regional targets for reducing greenhouse gas emissions by 2020 and 2035. AMBAG must prepare a Sustainable Communities Strategy (SCS) as part of the MTP. The SCS must demonstrate how the region will meet its goals for reducing greenhouse gas emissions from automobiles and light trucks. The 2045 MTP/SCS demonstrates that our region meets these targets.

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The following sections present a brief overview of the Draft 2045 MTP/SCS. The 2045 MTP/SCS adoption process section describes the process to obtain public input on the 2045 MTP/SCS and major milestones leading to the anticipated adoption of the 2045 MTP/SCS in June 2022.

## **Vision**

AMBAG adopted a framework of goals and policy objectives to guide the development of the MTP/SCS. The six goal areas are:

- Access and Mobility
- Economic Vitality
- Environment
- Healthy Communities
- Social Equity
- System Preservation and Safety

## **Transportation Investments**

The Draft 2045 MTP/SCS contains a number of improvements to our multimodal transportation system. The MTP sets forth an integrated approach to transportation investments that maximizes the benefits of the existing transportation system by investing in system preservation and maintenance, along with strategic system expansion and management strategies. The transportation investments will provide more travel choices for our region's residents and visitors.

## **Financial Plan**

The Plan includes a revenue forecast of local, state and federal sources that are reasonably expected to be available through 2045. Total revenues estimated for the Draft 2045 MTP/SCS are approximately \$13.3 billion.

## **Performance Measures**

In support of the goals and policies established through public participation efforts and stakeholder involvement, more than a dozen performance measures were established to measure how well the MTP/SCS performs. The performance measures quantify the transportation, environmental, economic and equity benefits of the MTP/SCS.

## **Public Participation**

AMBAG engaged a wide range of stakeholder groups, elected officials, community groups, and the general public through a series of meetings and workshops. The input received through this process has shaped the 2045 MTP/SCS in a meaningful way.

AMBAG will continue to involve and engage the stakeholders and the public in the process of refining and finalizing the 2045 MTP/SCS.

### **Environmental Impact Report**

AMBAG in consultation with the RTPAs and the consulting team, is preparing an Environmental Impact Report (EIR). Prepared in accordance with the California Environmental Quality Act (CEQA), the Draft EIR evaluates the impacts of the 2045 MTP/SCS on the physical environment at the program level. The Program EIR also serves as the EIR for each of the RTPA's 2045 Regional Transportation Plans. The Program EIR analyzes a range of impacts resulting from future development consistent with the regional growth projections and improvements to the regional transportation network. It provides the framework for subsequent environmental analysis on specific projects, in which individual project impacts will be evaluated separately as project alignments and features are defined.

### **2045 MTP/SCS and EIR Adoption Process**

To obtain public input on the development of the Draft 2045 MTP/SCS, a broad range of media and communication avenues will be utilized to provide information, solicit participation and input and allow for ongoing feedback and updates. A major goal of this public involvement effort is to reach out to both nontraditional and traditional audiences, to include them in the transportation planning process.

AMBAG will hold public workshops and public hearings, in January 2022, to allow for public comment on the 2045 MTP/SCS and the EIR. The public workshops/hearings schedule and format will provide opportunities information to be shared and public comments to be submitted. The list of Draft 2045 MTP/SCS and EIR public workshops/hearings is included in Attachment 1.

Anticipated upcoming major milestones include:

- **November 22, 2021** – Beginning of the public comment period for the Draft 2045 MTP/SCS/EIR
- **January 2022** – Public workshops/hearings on Draft 2045 MTP/SCS/EIR (see Attachment 1)
- **January 31, 2022** – Close of the public comment period for the Draft 2045 MTP/SCS/EIR
- **February/March 2022** – Review and response to comments and consider proposed changes to the 2045 MTP/SCS

- **June 2022** – AMBAG Board certifies Final EIR and adopts Final 2045 MTP/SCS

**ALTERNATIVES:**

N/A

**FINANCIAL IMPACT:**

Planning activities for the 2045 MTP/SCS are funded with FHWA PL, FTA 5303 and SB 1 planning funds and are programmed in the FY 2021-22 Overall Work Program and Budget.

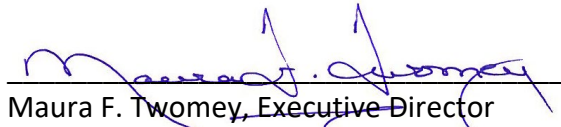
**COORDINATION:**

All MTP/SCS planning activities are coordinated with the MTP/SCS Executive Steering Committee and Staff Working Group which includes participation from Caltrans District 5, Monterey Salinas Transit, Santa Cruz Metropolitan Transit District, Santa Cruz County Regional Transportation Commission, San Benito County Council of Governments, and the Transportation Agency for Monterey County, as well as the Planning Directors Forum and the RTPAs Technical Advisory Committees which includes the local jurisdictions.

**ATTACHMENTS:**

1. Draft 2045 MTP/SCS/EIR Public Workshops/Hearings Flyer

**APPROVED BY:**

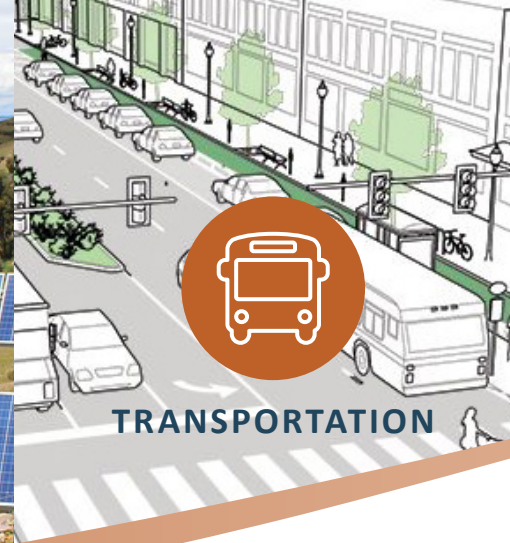
  
Maura F. Twomey, Executive Director



HOUSING



ECONOMIC  
DEVELOPMENT



TRANSPORTATION

# Public Workshop and Hearing on the Draft 2045 MTP/SCS and Draft EIR

Attend a virtual workshop and public hearing on AMBAG's Draft 2045 Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS) and Draft Environmental Impact Report (EIR). Opportunity to provide comments on the Draft Plan and EIR will occur during the public hearing portion of the meeting.

Can't attend the virtual workshop? Send comments by email, [info@ambag.org](mailto:info@ambag.org), or by mail, 24580 Silver Cloud Ct, Monterey, CA 93940. The public comment period closes on January 31, 2022.

Copies of the Draft Plan and EIR are available for download at [www.ambag.org](http://www.ambag.org)

## SCHEDULE

**Wednesday, January 12**  
**AMBAG Board of Directors**  
6:00 p.m.

**Wednesday, January 19**  
6:00 p.m. - 7:30 p.m.

**Monday, January 24**  
6:00 p.m. - 7:30 p.m.

**Thursday, January 27**  
6:00 p.m. - 7:30 p.m.



To register for one of the  
workshops, visit  
[www.ambag.org](http://www.ambag.org)



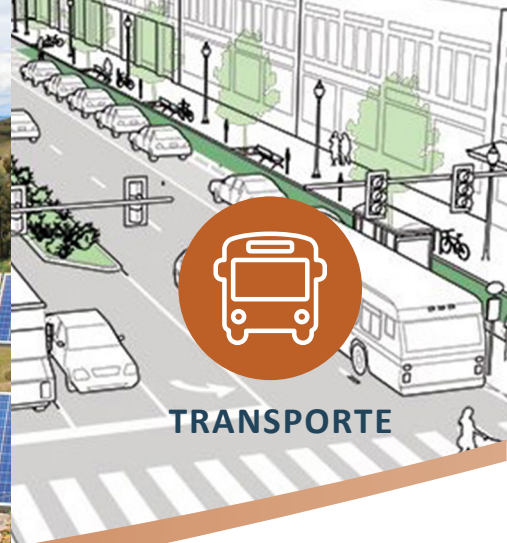




**VIVIENDA**



**DESARROLLO  
ECONÓMICO**



**TRANSPORTE**

# Taller y audiencia públicos sobre el Borrador 2045 MTP/ SCS y el Borrador EIR

Asista a un taller virtual y a una audiencia pública sobre el Borrador del Plan de transporte metropolitano y la Estrategia de comunidades sostenibles para 2045 (Metropolitan Transportation Plan and Sustainable Communities Strategy, MTP/SCS) de AMBAG y el Borrador del informe de impacto ambiental (Draft Environmental Impact Report, EIR). Tendrá la oportunidad de hacer comentarios sobre el Borrador del plan y el EIR durante la parte de la audiencia pública de la reunión.

¿No puede asistir al taller virtual? Envíe sus comentarios por correo electrónico, [info@ambag.org](mailto:info@ambag.org), o por correo, 24580 Silver Cloud Ct, Monterey, CA 93940. El período de comentarios públicos cierra el 31 de enero de 2022.

Las copias del Borrador del plan y del EIR están disponibles para descargar en [www.ambag.org](http://www.ambag.org)

## PROGRAMA

**Miércoles 12 de enero**  
Consejo de administración  
de AMBAG  
6:00 p. m.

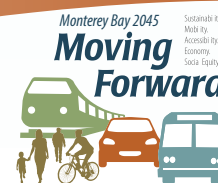
**Miércoles 19 de enero**  
6:00 p. m. a 7:30 p. m.

**Lunes 24 de enero**  
6:00 p. m. a 7:30 p. m.

**Jueves 27 de enero**  
6:00 p. m. a 7:30 p. m.



Para inscribirse en uno de  
los talleres, visite  
[www.ambag.org](http://www.ambag.org)







**MEMORANDUM**

**TO:** AMBAG Board of Directors

**FROM:** Maura F. Twomey, Executive Director

**RECOMMENDED BY:** Heather Adamson, Director of Planning

**SUBJECT:** 6<sup>th</sup> Cycle Regional Housing Needs Allocation Methodology

**MEETING DATE:** January 12, 2022

**RECOMMENDATION:**

A. Hold public hearing to receive public comment on the draft 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) methodology for allocation of housing need to the region's jurisdictions consistent with the objectives of Government Code § 65584(d) and factors of Government Code § 65584.04(e).

B. Approve a draft RHNA methodology and authorize Association of Monterey Area Governments (AMBAG) staff to submit the draft RHNA methodology to the California Department of Housing and Community Development (HCD) for review and approval.

**BACKGROUND:**

California State Housing Element Law governs the process for local governments to adequately plan to meet the housing needs of everyone within their communities. The RHNA process is used to determine how many new homes, and the affordability of those homes, each local government must plan for in its Housing Element to meet the housing needs of households of all income levels.

The Housing Element Law requires AMBAG, acting in the capacity of Council of Governments (COG), to develop a methodology for allocating existing and projected housing needs to local jurisdictions within the AMBAG region, located in Monterey and Santa Cruz Counties. The Housing Element Law sets forth a process, schedule, objectives, and factors to use in developing the RHNA methodology. The methodology must address

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allocation of housing units by jurisdiction, housing units by income group, and must further all five statutory objectives and include consideration of 13 factors to develop the methodology that allocates regional housing needs (Attachment 1). The Council of San Benito County Governments (SBtCOG) performs this same function for San Benito County.

RHNA is an estimate of additional housing units needed for all income levels in the region from the start until the end date of the projection period. RHNA is not a prediction of building permits, construction, or housing activity, nor is it limited due to existing land use capacity or growth. A community is not obligated to provide housing to all in need. RHNA is a distribution of housing development capacity that each city and county must zone for in a planning period and is not a construction need allocation.

As part of the RHNA process, State law (Government Code 65584 et seq.) requires AMBAG to develop a methodology to allocate a portion of the Regional Housing Need Determination (RHND) to every local government in the AMBAG Region. AMBAG received its 6th Cycle RHND of 33,274 units from HCD in late August 2021 for the planning period beginning June 30, 2023 and ending December 15, 2031. The RHNA produces regional, subregional, and local targets for the amount and type of housing needed over the planning period.

AMBAG is responsible for developing a methodology to allocate 33,274 units amongst all the jurisdictions within the COG region. Throughout this process, the Planning Directors Forum (PDF) representatives from member jurisdictions in Monterey and Santa Cruz counties serve as a technical working group and assisted in the development of the 2023-2031 RHNA methodology and plan, similar to the process used for the 2014-2023 RHNA Plan.

RHNA methodologies are unique to every region throughout the state in response to each region's unique housing situation and needs. The AMBAG region is predominately a suburban/rural region and has unique demographic and housing issues, such as a predominance of rural jurisdictions and significant farmworker housing needs. The AMBAG RHNA methodology focuses on furthering, supporting, and balancing between each of the five statutory RHNA objectives and 13 RHNA factors (See Attachment 2).

### ***Revised RHNA Schedule***

AMBAG has revised the RHNA schedule as shown in Figure 1.

**Figure 1: Revised RHNA Schedule**

<b>TARGET SCHEDULE</b>	<b>TASK</b>
<b>Spring - Fall 2021</b>	Discussions with Planning Directors Forum on potential RHNA methodology options and factors
<b>Summer – Fall 2021</b>	Potential RHNA methodology options discussed by AMBAG Board
<b>September 8, 2021</b>	HCD presents at AMBAG Board Meeting
<b>January 12, 2022</b>	Approval of draft RHNA methodology by AMBAG Board
<b>January – March 2022</b>	HCD reviews draft methodology
<b>April 13, 2022</b>	Approval of final RHNA methodology by AMBAG Board
<b>April 22, 2022</b>	Release Draft RHNA plan with RHNA allocations by jurisdiction
<b>April 22 – June 6, 2022</b>	Local jurisdictions and HCD may appeal RHNA allocation within 45 days of release of the draft RHNA plan/allocations
<b>May 2022</b>	AMBAG releases final 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) accommodating RHNA
<b>June 7 – July 22, 2022</b>	Local jurisdictions and HCD may comment on appeals within 45 days of the close of the appeal period <b>(if appeal(s) are received)</b>
<b>June 8, 2022</b>	Adoption of Final 2045 MTP/SCS AMBAG Board
<b>August 10, 2022</b>	Adoption of Final 2023-31 RHNA Plan with RHNA allocations by AMBAG Board <b>(if no appeal(s) are received)</b>
<b>August 10, 2022</b>	AMBAG to hold public hearing on appeals <b>(if appeals are received)</b>
<b>September 23, 2022</b>	AMBAG makes final determination that accepts, rejects, modifies appeals and issues final proposed allocation plan
<b>October 12, 2022</b>	Adoption of Final 2023-31 RHNA Plan with RHNA allocations by AMBAG Board <b>(if appeal(s) are received)</b>
<b>December 2023</b>	Jurisdiction's 6th Cycle Housing Elements are due to HCD

### ***Revised Final Draft RHNA Methodology***

For the past nine months, AMBAG staff has been discussing with the PDF and AMBAG Board potential options for developing a RHNA methodology based on HCD's 6th Cycle RHND. A revised draft RHNA methodology was presented at the November 1, 2021 Planning Directors Forum and November 10, 2021 AMBAG Board of Directors meeting for discussion and input. Based on direction received from AMBAG Board, HCD, and public comments received during the November 10, 2021 public hearing, AMBAG staff proposed a revised draft RHNA methodology. Revised methodology options were presented at the November 29, 2021 Planning Directors Forum and December 8, 2021 AMBAG Board of Directors meeting for discussion and input. Based on additional direction received from the AMBAG

Board and public comments received during the December 8, 2021 public hearing, as well as additional feedback from HCD staff on January 4, 2022, AMBAG staff evaluated several revised final draft RHNA methodology options.

### ***Feedback from HCD on the RHNA Methodology Options***

Under new RHNA laws, HCD must approve each COG's RHNA methodology and confirm it furthers the RHNA objectives. On December 9, 2021, HCD staff offered to do an informal review of the revised final draft methodology options. AMBAG and HCD staff met on January 4, 2022, to discuss their comments. Based on its informal review, HCD staff informed AMBAG that none of the four options (Options A-D) met the AFFH objective as best as it could in providing more RHNA units to higher resource jurisdictions and provided some suggestions. HCD staff recommended that AMBAG use a 40% income shift since it placed more lower income units in the higher resource areas. In addition, HCD suggested that we further reduce the weighting of the Regional Growth Forecast and increase the weighting of the AFFH allocation factor. Finally, HCD staff suggested that AMBAG incorporate the California Tax Credit Allocation Committee (TCAC) opportunity maps in addition to the Racially Concentrated Area of Affluence (RCAA) data to provide a more nuanced AFFH analysis. In response to this feedback, AMBAG developed two additional methodology options: Option A+ and Option B+. Since the Board of Directors directed AMBAG staff to specifically create Options C and D at the December 8, 2021 Board meeting, AMBAG staff did not make modifications to those options. However, AMBAG staff created Option Z, which takes into account recommendations from HCD staff as well as recent Board direction.

### ***Final Draft RHNA Methodology Options***

Based on comments received, feedback from HCD staff, and discussions at the PDF and AMBAG Board of Directors meeting, AMBAG staff are presenting the following several final draft methodologies as shown in Table 1.

**Table 1: AMBAG RHNA Allocation Methodology Options**  
**Units by Allocation Factor**

	<b>Option A</b>	<b>Option A+</b>	<b>Option B</b>	<b>Option B+</b>	<b>Options C and D</b>	<b>Option Z</b>
2022 Regional Growth Forecast	12,524	6,260	12,524	6,260	12,524	6,260
Employment	10,374	10,374	8,299	8,299	3,111	4,000
Jobs/Housing Ratio	0	0	4,150	4,150	7,263	8,449
Transit	1,038	1,038	1,038	1,038	1,038	1,038
Resiliency Factor (Wildfire and Sea Level Rise)	2,075	2,075	2,075	2,075	2,075	2,075
Affirmatively Furthering Fair Housing (AFFH), based on RCAA or Combination of RCAA and TCAC Areas	7,263	13,527	5,188	11,452	7,263	11,452
<b>Total Units</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>

In addition to the distributions listed above, at the December 8, 2021 meeting, the AMBAG Board directed staff to assess additional adjustments to the methodology, including the following:

- Adding a third criteria—percent below the poverty level—to the RCAA index. The data for this adjustment can be found in Attachment 3, and the adjustment appears in Options C and D.
- Normalize the RCAA—Option D evaluates the Resiliency and AFFH allocation factors by considering the developable land in each jurisdiction rather than by forecasted units. Developable area was calculated as area excluding parks and open space (with data from the California Protected Areas Database), Williamson Act agricultural preserve (CA Department of Conservation database), and industrial lands (County Assessor database).

All data used in the development of RHNA methodology is based on the following publicly available sources:

- Regional Growth Forecast (RGF): Housing growth from either a 4-year or 8-year RHNA period from the AMBAG 2022 RGF (accepted for planning purposes by the AMBAG Board in November 2020), based on California Department of Finance (2020)
- Employment: AMBAG 2022 RGF, based on InfoUSA and California Employment Development Department (2020)

- Transit: Existing (2020) transit routes with 15- and 30-minutes headways, based on existing transit routes and stops from transit operators
- Resiliency: Percent not in high fire risk or 2' sea level rise risk, CALFIRE, California Public Utilities Commission (CPUC), and National Oceanic and Atmospheric Administration (NOAA)
- Jobs-Housing Ratio (included in Options B and B+ only): Number of jobs in 2020 divided by number of housing units, both jobs and housing data are from AMBAG 2022 RGF, based on InfoUSA and California Employment Development Department, and California Department of Finance (2020).
- Affirmatively Furthering Fair Housing (AFFH) Unit Allocation (Options A, B, C and D): Jurisdictions with higher than the regional average for percentage above 200% of the poverty level and percentage white are defined as RCAAs. Jurisdictions that qualify under one category receive a partial allocation. U.S. Census Bureau, American Community Survey (2015-2019) and 2020 Census
- Affirmatively Furthering Fair Housing (AFFH) Unit Allocation (Options A+, B+, and Z): Jurisdictions with higher than the regional average for percentage above 200% of the poverty level and percentage white are defined as RCAAs. Jurisdictions that qualify under one category receive a partial allocation. U.S. Census Bureau, American Community Survey (2015-2019) and 2020 Census. Jurisdictions are also evaluated based on their share of households in high/highest resource areas. California Tax Credit Allocation Committee (TCAC) Opportunity Map Database (2021) and U.S. Census Bureau, American Community Survey (2015-2019).
  - In Options A+ and B+ the AFFH factor is the average of a jurisdiction's RCAA and TCAC scores.
  - In Option Z the AFFH factor is the average of their RCAA and TCAC score for incorporated jurisdictions. For unincorporated areas the AFFH factor is the TCAC score alone and does not include RCAA. This is to address the wide diversity of communities within the unincorporated areas.
- Affirmatively Furthering Fair Housing (AFFH) Income Allocation: Redistribute a portion of very low and low income units out of non-RCAA jurisdictions and shift those units to RCAA jurisdictions. U.S. Census Bureau, American Community Survey (2015-2019) and 2020 Census

***First Step in RHNA Methodology: 2022 Regional Growth Forecast Base Allocation***

This RHNA methodology allocates a portion of housing units (6,260 or 12,524) based on data for projected housing growth for either a four-year or eight-year planning period from

the Regional Growth Forecast (RGF). The 2022 RGF was used in the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The use of the same data within the RGF is important to meeting the RHNA plan statutory objectives of protecting environmental and agricultural resources and achieving the region's greenhouse gas reduction targets. (Gov. Code, § 65584(d)(2).) Use of the 2022 RGF ensures that this RHNA methodology would be consistent with the 2045 MTP/SCS, which was released for public review and comment in November 2021.

The 2022 RGF is the most accurate growth forecast available for the region, is more granular than any other available projections, included significant quality control, was reviewed and approved by executive planning staff in all jurisdictions for accuracy, and was accepted by the AMBAG Board. Using the 2022 RGF in this RHNA methodology assures that large jurisdictions do not get inappropriately small allocations which do not fulfill the needs of their populations, and small jurisdictions do not get inappropriately large allocations that exceed the feasible capacity of developable land. This supports the furtherance of a RHNA plan statutory objective, which focuses on promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets. (Gov. Code, § 65584.04(d)(2).)

The 2022 RGF allocation step is just one factor in the RHNA methodology; jobs, transit, and resiliency and affirmatively furthering fair housing are all used to allocate housing units, which go above and beyond existing jurisdictions' general plans. In fact, HCD's 6th Cycle RHND of 33,274 units is higher than the number of units that jurisdictions within the AMBAG region have planned for through 2050, so general plan changes will be necessary and are not precluded by using the 2022 RGF as a part of the allocation.

***Second Step in RHNA Methodology: Jobs, Transit, Resiliency, AFFH and Additional Jobs-Housing Ratio Factor (Options B-Z)***

Under Option A, the second step in the RHNA methodology is to allocate the remaining units (20,750 units) based on jobs, transit, resiliency and AFFH factors. Existing (2020) jobs account for 50% of the remaining housing units, jurisdictions with existing (2020) transit routes with 15- and 30-minute headways account for 5%, and 10% of units are allocated those jurisdictions who have the smallest percentages of high fire or high sea level risk. Finally, 35% of the housing units are allocated based on RCAAs. Jurisdictions qualifying as RCAAs or partial RCAAs are shown in Attachment 3.

Under Option A+, the second step in the RHNA methodology is to allocate the remaining units (27,014) based on jobs, transit, resiliency and AFFH factors. Existing (2020) jobs account for 38% of the remaining housing units, jurisdictions with existing (2020) transit routes with 15- and 30-minute headways account for 4%, and 8% of units are allocated those jurisdictions that have the smallest percentages of high fire or high sea level risk. Finally, 50% of the housing units are allocated based on AFFH. Under Option A+, both the TCAC opportunity area and RCAA data is used. Jurisdictions qualifying as RCAAs, partial RCAAs, or TCAC opportunity areas are shown in Attachment 3.

Under Option B, the second step in the RHNA methodology would add an additional factor of a jobs-housing ratio for 20% of the unit allocation. The addition of this factor would reduce the jobs and AFFH allocation factors to 40% and 25% respectively. The request for a jobs-housing ratio factor to be considered was discussed at the November 29, 2021 PDF and AMBAG staff is including this option for consideration in response to comments received.

Under Option B+, the second step in RHNA methodology is similar to Option B, however a higher percentage of units are allocated to the AFFH allocation factor based on HCD feedback. Existing (2020) jobs account for 31% of the remaining units while 15% of the units are allocated based on a jobs-housing ratio factor. Jurisdictions with existing (2020) transit routes with 15- and 30-minute headways and jurisdictions that have the smallest percentages of high fire or high sea level risk account for 4% and 8% of units, respectively. Finally, 42% of the housing units are allocated based on AFFH. Under Option B+, both the TCAC and RCAA data is used.

Under Options C and D, the second step in the RHNA methodology also includes a jobs-housing ratio similar to Option B but for 35% of the unit allocation. In Options C and D, the existing (2020) jobs factor weighting is reduced to 15%.

Under Option Z, the second step in the RHNA methodology is a hybrid of Options B+ and D. 27,014 units are divided as follows: 15% jobs, 31% jobs/housing, 4% transit, 8% resilience, and 42% of the AFFH. The higher weighting for jobs/housing reflects direction from the AMBAG Board as well as public comment.

One additional change in Option Z is normalizing the resiliency factor by 2020 households, rather than by expected unit change or area. This reflects HCD's request to reduce the weight of the RGF as well as guidance from the Board and public comment to reduce



allocations in the unincorporated areas. Under Option Z, both the TCAC and RCAA data is used for incorporated jurisdictions, and TCAC alone is used for unincorporated areas. Given the size of the unincorporated areas, TCAC better reflects the diversity of high- and low-income communities within the unincorporated areas.

### ***Third Step in RHNA Methodology: Income Allocation***

Addressing the income equity disparities of the AMBAG region's jurisdictions was a key focus of the income allocation methodology. Though jurisdiction level disparities cannot be completely corrected within a single RHNA cycle, PDF and AMBAG Board members recommended to allocate a high weight to this factor.

As a result of concerns with the TCAC data, AMBAG developed a local measure of Racially Concentrated Areas of Affluence (RCAA), based on data from the U.S. Census Bureau and a framework described by the U.S. Department of Housing and Urban Development. Consensus from the PDF was that the RCAAs analysis better reflected the AMBAG region's areas of opportunity than the HCD/TCAC Opportunity Map data (see Attachment 3, Racially Concentrated Areas of Affluence and Tax Credit Allocation Committee Areas for the AMBAG Region). All seven draft RHNA methodology options shift Above Moderate units to Very Low and Moderate units to Low.

In addition to incorporating the RCAA data, the percentage of units shifted from Above Moderate/Moderate units to Low/Very Low units could be either 30% or 40%. All options shown here result in RCAAs getting a higher share of their RHNA in the lower income categories. Under the 30% shift, in RCAA jurisdictions, more than 50% of the RHNA allocation is Very Low or Low income. In partial RCAA jurisdictions, approximately 40% of the RHNA allocation is Very Low or Low income. The comparable share for non-RCAA jurisdictions is less than 30%. Under the 40% shift, in RCAA jurisdictions, nearly 60% of the RHNA allocation is Very Low or Low income. In partial RCAA jurisdictions, approximately 40% of the RHNA allocation is Very Low or Low income. The comparable share for non-RCAA jurisdictions is approximately 25%. The final draft RHNA methodologies options' unit allocation estimates by factor and for income allocation—both 30% and 40%—are provided in Attachment 4a-4g

Attachment 5 includes a summary of the unit allocation estimates for all final draft RHNA methodology options, as well as the option proposed by LandWatch. The LandWatch option

assumes that the job/housing ratio should be based on housing shortfall, rather than the total number of jobs in imbalanced jurisdictions.

Based on feedback from HCD as well as public comment received, AMBAG staff recommends that whatever option the Board of Directors selects should include a 40% income shift. Attachment 5 also shows RHNA per household and RHNA per capita metrics for all draft methodologies as well as for the LandWatch option. While all options attempt to meet the requirements of supporting and furthering the 5 RHNA objectives and 13 factors, Options A+, B+, and Z allocate the most units to higher resource areas which is a high priority based on feedback from HCD. Option Z also attempts to direct growth into incorporated jurisdictions, which has been a high priority in public comment. While Option A allocates a slightly lower number of units to higher resource areas compared to Option A+, it does support and further all of the RHNA objectives and performs well in the evaluation metrics. The other options do not allocate as many units to higher resources areas which is a high priority for HCD staff. Ultimately, it is up to the AMBAG Board of Directors to select and approve a methodology to submit to HCD for their final review and approval.

### ***Statutory Adjustments***

AMBAG has received several comments and questions regarding statutory adjustments to the RHNA methodology allocations. Based on ongoing discussions with and feedback from HCD staff, AMBAG staff does not plan to propose any statutory adjustments to the RHNA methodology.

### **Next Steps**

Upon approval from the Board of Directors on a final draft RHNA methodology, AMBAG will submit the draft methodology to HCD for review and approval. Following approval from HCD, the AMBAG Board of Directors is scheduled to consider approval of the final RHNA methodology and direct AMBAG staff to issue the Draft RHNA Plan with RHNA allocations by jurisdiction in April 2022.

### **ALTERNATIVES:**

The Board of Directors may modify the final draft methodology or choose not to accept a draft methodology to send to HCD for review. If a draft methodology is not approved at the January 12, 2022 Board meeting, it will further delay the scheduled release of the Draft

RHNA Plan and approval of the Final RHNA Plan, which in turn will reduce the amount of time local jurisdictions have to complete their 6th Cycle Housing Element, which must be completed by December 15, 2023. Any further delay to selecting a draft RHNA methodology puts AMBAG at serious risk of not meeting statutory deadlines for preparing a RHNA Plan.

**FINANCIAL IMPACT:**

Planning activities for RHNA are funded with Regional Early Access Planning and Senate Bill 1 planning funds and are programmed in the Fiscal Year 2021-22 Overall Work Program and Budget.

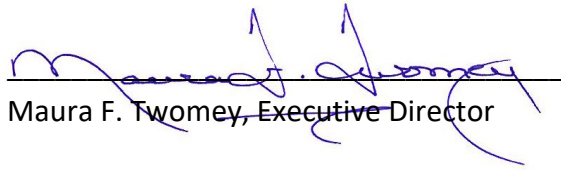
**COORDINATION:**

All RHNA planning activities are coordinated with the HCD, SBtCOG, and the Planning Directors Forum, which includes all the local jurisdictions within the AMBAG region.

**ATTACHMENTS:**

1. Regional Housing Needs Allocation Objectives and Factors
2. Summary of Factors for Consideration in 6<sup>th</sup> Cycle RHNA
3. Defining Racially Concentrated Areas of Affluence and Tax Credit Allocation Committee Areas for the AMBGA Region
- 4a. Option A - Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
- 4b. Option A+ - Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
- 4c. Option B - Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
- 4d. Option B+ - Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
- 4e. Option C - Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
- 4f. Option D - Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
- 4g. Option Z – Final Draft Methodology RHNA Unit Allocation & Income Allocation Estimates
5. Comparison of Final Draft RHNA Methodologies
6. Summary of Comments Received as of January 5, 2022

**APPROVED BY:**



Maura F. Twomey, Executive Director

**ATTACHMENT 1**  
**REGIONAL HOUSING NEEDS ALLOCATION OBJECTIVES AND FACTORS (§65584.04.E)**

This section describes the Regional Housing Needs Allocation (RHNA) objectives and factors identified in state statute which AMBAG must consider. Objectives must be met in all RHNA methodologies. Factors must be considered to the extent sufficient data is available when developing its RHNA methodology.

**RHNA Plan Objectives, Government Code 65584(d)**

The regional housing needs allocation plan shall further all of the following objectives:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very-low-income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.
3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
5. Affirmatively furthering fair housing.

**RHNA Plan Factors, Government Code 65584(e)**

**1. Jobs and housing relationship**

*"Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period." - §65584.04(e)*

## **2. Opportunities and constraints to development of additional housing (see below)**

### **2a. Capacity for sewer and water service**

*"Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period." - §65584.04(e)*

### **2b. Availability of land suitable for urban development**

*"The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding." - §65584.04(e)*

### **2c. Lands preserved or protected from urban development**

*"Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to non-agricultural uses." - §65584.04(e)*

### **2d. County policies to preserve prime agricultural land**

*"County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to non-agricultural uses." - §65584.04(e)*

### **3. Opportunities to maximize transit and existing transportation infrastructure**

*"The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure." - §65584.04(e)*

### **4. Policies directing growth toward incorporated areas**

*"Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to non-agricultural uses." - §65584.04(e)*

### **5. Loss of units contained in assisted housing developments**

*"The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions." - §65584.04(e)*

### **6. High housing cost burdens**

*"The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent."*

### **7. Rate of Overcrowding**

*Factor undefined. - §65584.04(e)*

### **8. Housing needs of farmworkers**

*Factor undefined. - §65584.04(e)*

### **9. Housing needs of UC and Cal State students**

*"The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction." - §65584.04(e)*

### **10. Individuals and families experiencing homelessness**

*Factor undefined. - §65584.04(e)*

**11. Loss of units during an emergency**

*"The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis." - §65584.04(e)*

**12. SB 375 Greenhouse Gas Reduction Targets**

*"The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080." - §65584.04(e)*

**13. Other factors adopted by Council of Governments**

*"Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions." - §65584.04(e)*



## Factors for Consideration in 6th Cycle RHNA

*Highlight Reflects Jurisdictions Where Factor Should be Considered*

Region	2020 Census Population	Jobs & Housing Relationship J/H Ratio	Sq.Mi.	Opportunities & Constraints to Development % Resilient	Resil. Sq. Mi.	Max. Transit & Transportation Infrastructure High Qual. Transit	Directing Growth to Incorporated Areas Agreement	High Housing Cost Burdens % Burdened
<b>Monterey County</b>	<b>709,896</b>	<b>1.5</b>						<b>41%</b>
<b>Monterey County</b>	<b>439,035</b>							<b>40%</b>
Carmel-By-The-Sea	3,220	1.0	1	64%	< 1	no		41%
Del Rey Oaks	1,592	1.0	< 1	44%	< 1	yes		32%
Gonzales	8,647	3.2	2	100%	2	no	yes (more)	39%
Greenfield	18,937	2.0	2	100%	2	no	yes (more)	50%
King City	13,332	2.4	4	100%	4	no		50%
Marina	22,359	0.8	10	89%	9	yes		38%
Monterey	30,218	3.0	12	63%	8	yes		43%
Pacific Grove	15,090	1.0	4	95%	4	no		36%
Salinas	163,542	1.8	24	100%	24	yes	yes (more)	43%
Sand City	325	11.1	3	100%	3	yes		59%
Seaside	32,366	1.0	9	77%	7	yes		47%
Soledad	24,925	2.2	5	96%	4	no	yes (more)	36%
Uninc. Monterey	104,482	1.5	3695	19%	695	yes	yes (less)	33%
<b>Santa Cruz County</b>	<b>270,861</b>							<b>41%</b>
Capitola	9,938	2.2	2	83%	1	no		46%
Santa Cruz	62,956	1.8	16	75%	12	yes		45%
Scotts Valley	12,224	2.1	5	50%	2	yes		37%
Watsonville	52,590	2.0	7	95%	6	yes		49%
Uninc. Santa Cruz	133,153	0.8	578	13%	77	yes		37%

Sources:

Jobs: AMBAG 2022 RGF, based on InfoUSA and California Employment Development Department (2020)

Housing: AMBAG 2022 RGF, based on California Department of Finance (2020)

Area: U.S. Census Bureau TIGER geographic files (2019)

Resilience (percent not in high fire risk or 2' sea level rise risk): CALFIRE, CPUC, NOAA

High Quality Transit (has at least 30 minute headways): AMBAG 2015-2020 transit routes and stops

Directing growth: Jurisdiction survey

Cost Burden: U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS)

## Factors for Consideration in 6th Cycle RHNA

*Highlight Reflects Jurisdictions Where Factor Should be Considered*

Region	Rate of Overcrowding % Crowded	Farmworker Housing Needs % Reg. Ag. Jobs	Housing Needs of College Students	Improving Equity	
				Poverty Rate	% Above 200% Pov. % White
<b>Monterey County</b>	14%			13%	64%
Carmel-By-The-Sea	6%	0%		3%	88%
Del Rey Oaks	1%	0%		5%	87%
Gonzales	18%	5%		10%	59%
Greenfield	29%	16%		13%	56%
King City	20%	2%		19%	45%
Marina	12%	0%	CSUMB	13%	64%
Monterey	4%	0%		11%	80%
Pacific Grove	8%	0%		7%	85%
Salinas	19%	22%		17%	58%
Sand City	10%	0%		16%	66%
Seaside	12%	0%	CSUMB	13%	65%
Soledad	24%	5%		14%	52%
Uninc. Monterey	10%	31%	CSUMB	9%	72%
<b>Santa Cruz County</b>	7%			13%	71%
Capitola	7%	0%		16%	72%
Santa Cruz	5%	0%	UCSC	21%	66%
Scotts Valley	3%	0%		4%	87%
Watsonville	21%	11%		15%	53%
Uninc. Santa Cruz	5%	8%		10%	79%

Sources:

Overcrowding, Poverty, Percent White: U.S. Census Bureau, American Community Survey (2015-2019) and 2020 Census

Jobs: AMBAG 2022 RGF, based on InfoUSA and California Employment Development Department (2020)

Other factors (data not available):

Loss of assisted housing units.

Housing needs of those experiencing homelessness.

Loss of units during emergency

SB 375 GHG reduction targets.

## Defining Racially Concentrated Areas of Affluence (RCAAs) and Tax Credit Allocation Committee (TCAC) for the AMBAG Region

Region	Affluent		Concentrated		RCAA	In Poverty		RCAA-Pov		TCAC
	% Above	Above	%	Above		%	Below	Low Pov.,		
	200% of	Reg.	White	Reg.	Higher Income	Below	Reg.	High Inc.,		
	Poverty	Avg.		Avg.	& Less Diverse	Poverty	Avg.	Less Diverse		
	67%		37%			13%				% HHs in High/Highest Resource Areas (including rural)
Monterey County										
Carmel-By-The-Sea	88%	yes	87%	yes	full	3%	yes	full		100%
Del Rey Oaks	87%	yes	68%	yes	full	5%	yes	full		0%
Gonzales	59%		5%			10%	yes	1 of 3		0%
Greenfield	56%		3%			13%				0%
King City	45%		7%			19%				0%
Marina	64%		33%			13%	yes	1 of 3		0%
Monterey	80%	yes	63%	yes	full	11%	yes	full		73%
Pacific Grove	85%	yes	71%	yes	full	7%	yes	full		100%
Salinas	58%		11%			17%				0%
Sand City	66%		50%	yes	partial	16%		1 of 3		0%
Seaside	65%		29%			13%				0%
Soledad	52%		8%			14%				0%
Uninc. Monterey	72%	yes	45%	yes	full	9%	yes	full		48%
Santa Cruz County										
Capitola	72%	yes	65%	yes	full	16%		2 of 3		97%
Santa Cruz	66%		58%	yes	partial	21%		1 of 3		23%
Scotts Valley	87%	yes	72%	yes	full	4%	yes	full		100%
Watsonville	53%		12%			15%				0%
Uninc. Santa Cruz	79%	yes	66%	yes	full	10%	yes	full		50%

Data sources: U.S. Census Bureau, American Community Survey (2015-2019), 2020 Census, and California Tax Credit Allocation Committee

**DRAFT FOR DISCUSSION PURPOSES**

### Option A: with AFFH Unit Allocation Estimate

RHNA Total 33,274	Housing 8-year Unit Change	Jobs 50%		Transit 5%		Resiliency (Wildfire & Sea Level Rise) 10%				AFFH 35%				RHNA		
		Jobs 2020	% Reg.	Units	Trans. Score	% Reg.	Units	% Area Not in High Risk	Normalize (% Area x Unit Chg)	% Reg.	Units	RCAA	Normalize (% RCAA x Unit Chg)		% Reg.	Units
Region	12,524	10,374		1,038		2,075				7,263				33,274		
Monterey County																
Carmel	10	3,566	0.9%	97	0	0%	0	64%	6	0.1%	1	100%	10	0.4%	31	139
Del Rey Oaks	69	748	0.2%	20	1	8%	87	44%	30	0.3%	6	100%	69	2.9%	214	396
Gonzales	1,426	6,326	1.7%	171	0	0%	0	100%	1,426	13.1%	272	0%	0	0.0%	0	1,869
Greenfield	550	7,882	2.1%	213	0	0%	0	100%	550	5.1%	105	0%	0	0.0%	0	868
King City	488	8,195	2.1%	222	0	0%	0	100%	488	4.5%	93	0%	0	0.0%	0	803
Marina	790	6,548	1.7%	177	1	8%	87	89%	706	6.5%	135	0%	0	0.0%	0	1,189
Monterey	403	40,989	10.7%	1,110	1	8%	87	63%	252	2.3%	48	100%	403	17.2%	1,249	2,897
Pacific Grove	98	8,016	2.1%	218	0	0%	0	95%	93	0.9%	18	100%	98	4.2%	304	638
Salinas	4,333	78,874	20.6%	2,136	2	17%	168	100%	4,333	39.9%	829	0%	0	0.0%	0	7,466
Sand City	108	2,092	0.5%	57	1	8%	87	100%	108	1.0%	21	50%	54	2.3%	167	440
Seaside	649	10,476	2.7%	284	1	8%	87	77%	503	4.6%	96	0%	0	0.0%	0	1,116
Soledad	473	9,010	2.4%	244	0	0%	0	96%	455	4.2%	87	0%	0	0.0%	0	804
Uninc. Monterey	510	60,293	15.7%	1,633	1	8%	87	19%	96	0.9%	18	100%	510	21.8%	1,579	3,827
Santa Cruz County																
Capitola	178	12,250	3.2%	332	0	0%	0	83%	147	1.4%	28	100%	178	7.6%	552	1,090
Santa Cruz	789	43,865	11.5%	1,188	1	8%	87	75%	594	5.5%	113	50%	395	16.8%	1,223	3,400
Scotts Valley	57	10,109	2.6%	274	1	8%	87	50%	28	0.3%	5	100%	57	2.4%	177	600
Watsonville	1,023	28,514	7.4%	772	1	8%	87	95%	969	8.9%	185	0%	0	0.0%	0	2,067
Uninc. Santa Cruz	570	45,264	11.8%	1,226	1	8%	87	13%	76	0.7%	15	100%	570	24.3%	1,767	3,665

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

For example 0% in the table above may be 0.00-0.49%.

Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.

# DRAFT FOR DISCUSSION PURPOSES

Jan. 12, 2022

## Option A: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group Totals			RHNA		
	V.L.	Low	Mod.	A.M.	30%	30%	Shift	Shift	Very Low	Low	Mod.	Above Mod.	Very Low	Low	Mod.		Above Mod.	
Monterey County	7,868	5,146	6,167	14,093						7,661	5,011	6,302	14,300	7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	33	21	26	59	100%	10	6			43	27	20	49	44	28	20	47	139
Del Rey Oaks	94	61	73	168	100%	28	18			122	79	55	140	125	81	54	136	396
Gonzales	442	289	346	792	0%	-133	-87			309	202	433	925	317	207	424	921	1,869
Greenfield	205	134	161	368	0%	-62	-40			143	94	201	430	147	97	197	427	868
King City	190	124	149	340	0%	-57	-37			133	87	186	397	137	89	182	395	803
Marina	281	184	220	504	0%	-84	-55			197	129	275	588	202	132	269	586	1,189
Monterey	685	448	537	1,227	100%	206	134			891	582	403	1,021	915	598	394	990	2,897
Pacific Grove	151	99	118	270	100%	45	30			196	129	88	225	201	132	86	219	638
Salinas	1,764	1,154	1,385	3,161	0%	-529	-346			1,235	808	1,731	3,692	1,268	830	1,694	3,674	7,466
Sand City	104	68	82	186	50%	0	0			104	68	82	186	107	70	80	183	440
Seaside	264	173	207	473	0%	-79	-52			185	121	259	551	190	124	253	549	1,116
Soledad	190	124	149	341	0%	-57	-37			133	87	186	398	137	89	182	396	804
Uninc. Monterey	905	592	709	1,621	100%	272	178			1,177	770	531	1,349	1,209	791	520	1,307	3,827
Santa Cruz County																		
Capitola	258	169	202	462	100%	77	51			335	220	151	384	344	226	148	372	1,090
Santa Cruz	804	526	630	1,440	50%	0	0			804	526	630	1,440	826	540	617	1,417	3,400
Scotts Valley	142	93	111	254	100%	43	28			185	121	83	211	190	124	81	205	600
Watsonville	489	320	383	875	0%	-147	-96			342	224	479	1,022	351	230	469	1,017	2,067
Uninc. Santa Cruz	867	567	679	1,552	100%	260	170			1,127	737	509	1,292	1,158	758	497	1,252	3,665

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

RCAA = Racially Concentrated Areas of Affluence.

AFFH adjustments shift units between Above Moderate and Very Low (V.L.) categories, and between Moderate and Low.

# DRAFT FOR DISCUSSION PURPOSES

Jan. 12, 2022

## Option A: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group				RHNA	
	V.L.		Mod.		A.M.		40%		40%		Totals							
	V.L.	Low	Mod.	A.M.	RCAA	Shift	Shift	Very	Low	Low	Mod.	Above	Mod.	Above				
Monterey County	7,868	5,146	6,167	14,093						7,591	4,963	6,350	14,370	7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	33	21	26	59	100%	13	8			46	29	18	46	48	30	17	44	139
Del Rey Oaks	94	61	73	168	100%	38	24			132	85	49	130	137	88	48	123	396
Gonzales	442	289	346	792	0%	-177	-116			265	173	462	969	275	179	449	966	1,869
Greenfield	205	134	161	368	0%	-82	-54			123	80	215	450	127	83	209	449	868
King City	190	124	149	340	0%	-76	-50			114	74	199	416	118	77	193	415	803
Marina	281	184	220	504	0%	-112	-74			169	110	294	616	175	114	286	614	1,189
Monterey	685	448	537	1,227	100%	274	179			959	627	358	953	994	650	348	905	2,897
Pacific Grove	151	99	118	270	100%	60	40			211	139	78	210	219	144	76	199	638
Salinas	1,764	1,154	1,385	3,161	0%	-706	-462			1,058	692	1,847	3,869	1,097	717	1,794	3,858	7,466
Sand City	104	68	82	186	50%	0	0			104	68	82	186	108	71	80	181	440
Seaside	264	173	207	473	0%	-106	-69			158	104	276	578	164	108	268	576	1,116
Soledad	190	124	149	341	0%	-76	-50			114	74	199	417	118	77	193	416	804
Uninc. Monterey	905	592	709	1,621	100%	362	237			1,267	829	472	1,259	1,313	860	458	1,196	3,827
Santa Cruz County																		
Capitola	258	169	202	462	100%	103	68			361	237	134	358	374	246	130	340	1,090
Santa Cruz	804	526	630	1,440	50%	0	0			804	526	630	1,440	833	545	612	1,410	3,400
Scotts Valley	142	93	111	254	100%	57	37			199	130	74	197	206	135	72	187	600
Watsonville	489	320	383	875	0%	-196	-128			293	192	511	1,071	304	199	496	1,068	2,067
Uninc. Santa Cruz	867	567	679	1,552	100%	347	227			1,214	794	452	1,205	1,258	823	438	1,146	3,665

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

RCAA = Racially Concentrated Areas of Affluence.

AFFH adjustments shift units between Above Moderate and Very Low (V.L.) categories, and between Moderate and Low.

Jan. 12, 2022

**DRAFT FOR DISCUSSION PURPOSES**

Option A+: with AFFH Unit Allocation Estimate

RHNA Total 33,274	Housing 4-year Unit Change	Jobs 38%		Transit 4%		Resiliency (Wildfire & Sea Level Rise) 8%				AFFH 50%		RHNA						
		Jobs	Units	Trans.	%	% Area	Not in High Risk	Normalize (% Area x Unit Chg)	% Reg.	Units	RCAA	TCAC	Avg.	Unit Chg	% Reg.	Units	Total	
		2020	% Reg.	2020	% Reg.	Score	Reg.	Units	Score	Reg.	Units	Score	Reg.	Units	Score	Reg.	Units	Total
Region	6,260		10,374		1,038											13,527	33,274	
Monterey County																		
Carmel	5	3,566	0.9%	97	0	0%	0	64%	3	0.1%	1	100%	100%	100%	5	0.5%	73	176
Del Rey Oaks	34	748	0.2%	20	1	8%	87	44%	15	0.3%	6	100%	0%	50%	17	1.8%	249	396
Gonzales	713	6,326	1.7%	171	0	0%	0	100%	713	13.1%	272	0%	0%	0%	0	0.0%	0	1,156
Greenfield	275	7,882	2.1%	213	0	0%	0	100%	275	5.1%	105	0%	0%	0%	0	0.0%	0	593
King City	244	8,195	2.1%	222	0	0%	0	100%	244	4.5%	93	0%	0%	0%	0	0.0%	0	559
Marina	395	6,548	1.7%	177	1	8%	87	89%	353	6.5%	135	0%	0%	0%	0	0.0%	0	794
Monterey	202	40,989	10.7%	1,110	1	8%	87	63%	126	2.3%	48	100%	73%	87%	175	19.0%	2,568	4,015
Pacific Grove	49	8,016	2.1%	218	0	0%	0	95%	46	0.9%	18	100%	100%	100%	49	5.3%	719	1,004
Salinas	2,166	78,874	20.6%	2,136	2	17%	168	100%	2,166	39.9%	829	0%	0%	0%	0	0.0%	0	5,299
Sand City	54	2,092	0.5%	57	1	8%	87	100%	54	1.0%	21	50%	0%	25%	14	1.5%	198	417
Seaside	324	10,476	2.7%	284	1	8%	87	77%	251	4.6%	96	0%	0%	0%	0	0.0%	0	791
Soledad	236	9,010	2.4%	244	0	0%	0	96%	227	4.2%	87	0%	0%	0%	0	0.0%	0	567
Uninc. Monterey	255	60,293	15.7%	1,633	1	8%	87	19%	48	0.9%	18	100%	48%	74%	189	20.5%	2,767	4,760
Santa Cruz County																		
Capitola	89	12,250	3.2%	332	0	0%	0	83%	74	1.4%	28	100%	97%	98%	87	9.5%	1,283	1,732
Santa Cruz	394	43,865	11.5%	1,188	1	8%	87	75%	296	5.5%	113	50%	23%	37%	144	15.6%	2,116	3,898
Scotts Valley	28	10,109	2.6%	274	1	8%	87	50%	14	0.3%	5	100%	100%	100%	28	3.0%	411	805
Watsonville	512	28,514	7.4%	772	1	8%	87	95%	485	8.9%	185	0%	0%	0%	0	0.0%	0	1,556
Uninc. Santa Cru:	285	45,264	11.8%	1,226	1	8%	87	13%	38	0.7%	15	100%	50%	75%	214	23.2%	3,143	4,756

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

For example 0% in the table above may be 0.00-0.49%.

Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.

RCAA = Racially Concentrated Areas of Affluence.

TCAC = California Tax Credit Allocation Committee

# DRAFT FOR DISCUSSION PURPOSES

Jan. 12, 2022

## Option A+: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group				RHNA
	V.L.		Mod.		A.M.		30%		30%		Totals						
	V.L.	Low	Mod.	A.M.	RCAA	Shift	Shift	Very Low	Low	Mod.	Above Mod.	Very Low	Low	Mod.	Above Mod.	Total	
Monterey County	7,868	5,146	6,167	14,093					8,319	5,438	5,875	13,642	7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	42	27	33	75	100%	13	8	55	35	25	61	52	33	26	65	176	
Del Rey Oaks	94	61	73	168	100%	28	18	122	79	55	140	115	75	58	148	396	
Gonzales	273	179	214	490	0%	-82	-54	191	125	268	572	181	118	281	576	1,156	
Greenfield	140	92	110	251	0%	-42	-28	98	64	138	293	93	61	145	294	593	
King City	132	86	104	237	0%	-40	-26	92	60	130	277	87	57	136	279	559	
Marina	188	123	147	336	0%	-56	-37	132	86	184	392	125	81	193	395	794	
Monterey	949	621	744	1,701	100%	285	186	1,234	807	558	1,416	1,167	764	586	1,498	4,015	
Pacific Grove	237	155	186	425	100%	71	47	308	202	139	355	291	191	146	376	1,004	
Salinas	1,252	820	984	2,243	0%	-376	-246	876	574	1,230	2,619	827	542	1,290	2,640	5,299	
Sand City	99	64	77	177	50%	0	0	99	64	77	177	94	61	81	181	417	
Seaside	187	122	147	335	0%	-56	-37	131	85	184	391	124	80	193	394	791	
Soledad	134	88	105	240	0%	-40	-26	94	62	131	280	89	59	138	281	567	
Uninc. Monterey	1,126	736	882	2,016	100%	338	221	1,464	957	661	1,678	1,385	906	694	1,775	4,760	
Santa Cruz County																	
Capitola	410	268	321	734	100%	123	80	533	348	241	610	504	329	253	646	1,732	
Santa Cruz	922	603	722	1,651	50%	0	0	922	603	722	1,651	872	571	758	1,697	3,898	
Scotts Valley	190	124	149	341	100%	57	37	247	161	112	285	234	152	118	301	805	
Watsonville	368	241	288	659	0%	-110	-72	258	169	360	769	244	160	378	774	1,556	
Uninc. Santa Cruz	1,125	736	881	2,014	100%	338	221	1,463	957	660	1,676	1,384	906	693	1,773	4,756	

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

RCAA = Racially Concentrated Areas of Affluence.

AFFH adjustments shift units between Above Moderate and Very Low (V.L.) categories, and between Moderate and Low.



# **DRAFT FOR DISCUSSION PURPOSES**

Jan. 12, 2022

## **Option A+: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low**

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group				RHNA		
	V.L.		Mod.		A.M.		40%		40%		Totals								
Monterey County	7,868	5,146	6,167	14,093															
Carmel-By-The-Sea	42	27	33	75	100%	17	11												
Del Rey Oaks	94	61	73	168	100%	38	24												
Gonzales	273	179	214	490	0%	-109	-72												
Greenfield	140	92	110	251	0%	-56	-37												
King City	132	86	104	237	0%	-53	-34												
Marina	188	123	147	336	0%	-75	-49												
Monterey	949	621	744	1,701	100%	380	248												
Pacific Grove	237	155	186	425	100%	95	62												
Salinas	1,252	820	984	2,243	0%	-501	-328												
Sand City	99	64	77	177	50%	0	0												
Seaside	187	122	147	335	0%	-75	-49												
Soledad	134	88	105	240	0%	-54	-35												
Uninc. Monterey	1,126	736	882	2,016	100%	450	294												
Santa Cruz County																			
Capitola	410	268	321	734	100%	164	107												
Santa Cruz	922	603	722	1,651	50%	0	0												
Scotts Valley	190	124	149	341	100%	76	50												
Watsonville	368	241	288	659	0%	-147	-96												
Uninc. Santa Cruz	1,125	736	881	2,014	100%	450	294												

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

RCAA = Racially Concentrated Areas of Affluence.

AFFH adjustments shift units between Above Moderate and Very Low (V.L.) categories, and between Moderate and Low.

DRAFT FOR DISCUSSION PURPOSES  
Option B: with AFFH Unit Allocation and Jobs/Housing Ratio

Jan. 12, 2022

RHNA Total 33,274	Housing Change	Jobs 40%		Jobs/Housing Ratio 20%			Transit 5%		Resiliency (Wildfire & Sea Level Rise) 10%			AFFH 25%		RHNA						
		Jobs 2020	% Reg.	Units	J/H	Jobs		Transit Score	% Reg.	Units	% Area Not in High Risk Zone	Normalize (% Area x Unit Chg)			RCAA	RCAA x Unit Chg	% Reg.	Units		
						2020	% Reg.					Units								
Region	12,524	8,299		4,150	1,038									2,075	5,188	33,274				
Monterey County																				
Carmel	10	3,566	0.9%	77	1.0	0	0.0%	0	0	0%	0	64%	6	0.1%	1	100%	10	0.4%	22	110
Del Rey Oaks	69	748	0.2%	16	1.0	0	0.0%	0	1	8%	87	44%	30	0.3%	6	100%	69	2.9%	153	331
Gonzales	1,426	6,326	1.7%	137	3.2	6,326	2.5%	106	0	0%	0	100%	1,426	13.1%	272	0%	0	0.0%	0	1,941
Greenfield	550	7,882	2.1%	171	2.0	7,882	3.2%	132	0	0%	0	100%	550	5.1%	105	0%	0	0.0%	0	958
King City	488	8,195	2.1%	178	2.4	8,195	3.3%	137	0	0%	0	100%	488	4.5%	93	0%	0	0.0%	0	896
Marina	790	6,548	1.7%	142	0.8	0	0.0%	0	1	8%	87	89%	706	6.5%	135	0%	0	0.0%	0	1,154
Monterey	403	40,989	10.7%	888	3.0	40,989	16.5%	686	1	8%	87	63%	252	2.3%	48	100%	403	17.2%	892	3,004
Pacific Grove	98	8,016	2.1%	174	1.0	0	0.0%	0	0	0%	0	95%	93	0.9%	18	100%	98	4.2%	217	507
Salinas	4,333	78,874	20.6%	1,710	1.8	78,874	31.8%	1,318	2	17%	168	100%	4,333	39.9%	829	0%	0	0.0%	0	8,358
Sand City	108	2,092	0.5%	45	11.1	2,092	0.8%	35	1	8%	87	100%	108	1.0%	21	50%	54	2.3%	120	416
Seaside	649	10,476	2.7%	227	1.0	0	0.0%	0	1	8%	87	77%	503	4.6%	96	0%	0	0.0%	0	1,059
Soledad	473	9,010	2.4%	195	2.2	9,010	3.6%	151	0	0%	0	96%	455	4.2%	87	0%	0	0.0%	0	906
Unincorporated Monterey	510	60,293	15.7%	1,306	1.5	0	0.0%	0	1	8%	87	19%	96	0.9%	18	100%	510	21.8%	1,129	3,050
Santa Cruz County																				
Capitola	178	12,250	3.2%	265	2.2	12,250	4.9%	205	0	0%	0	83%	147	1.4%	28	100%	178	7.6%	394	1,070
Santa Cruz	789	43,865	11.5%	950	1.8	43,865	17.7%	734	1	8%	87	75%	594	5.5%	113	50%	395	16.8%	873	3,546
Scotts Valley	57	10,109	2.6%	219	2.1	10,109	4.1%	169	1	8%	87	50%	28	0.3%	5	100%	57	2.4%	126	663
Watsonville	1,023	28,514	7.4%	618	2.0	28,514	11.5%	477	1	8%	87	95%	969	8.9%	185	0%	0	0.0%	0	2,390
Unincorporated Santa Cruz	570	45,264	11.8%	981	0.8	0	0.0%	0	1	8%	87	13%	76	0.7%	15	100%	570	24.3%	1,262	2,915

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
Jobs/housing ratio is the 2020 number of jobs divided by the 2020 number of housing units. A higher number reflects a larger imbalance between jobs and housing.  
Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.  
RCAA = Racially Concentrated Areas of Affluence.

DRAFT FOR DISCUSSION PURPOSES

Option B: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group Totals				RHNA	
	V.L.	Low	Mod.	A.M.	30%	Shift	30%	Very			Above			Very		Above		
									Low	Mod.	Above	Low	Mod.	Above	Low	Mod.		Above
Monterey County	7,868	5,146	6,167	14,093														33,274
Carmel-By-The-Sea	26	17	20	47														110
Del Rey Oaks	78	51	61	140														331
Gonzales	459	300	360	822														1,941
Greenfield	227	148	178	406														958
King City	212	139	166	379														896
Marina	273	178	214	489														1,154
Monterey	710	465	557	1,272														3,004
Pacific Grove	120	78	94	215														507
Salinas	1,978	1,293	1,550	3,539														8,358
Sand City	98	64	77	176														416
Seaside	250	164	196	449														1,059
Soledad	214	140	168	384														906
Unincorporated Monterey	721	472	565	1,292														3,050
Santa Cruz County																		
Capitola	253	165	198	453														1,070
Santa Cruz	838	548	657	1,502														3,546
Scotts Valley	157	103	123	281														663
Watsonville	565	370	443	1,012														2,390
Unincorporated Santa Cruz	689	451	540	1,235														2,915

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
RCAA = Racially Concentrated Areas of Affluence.

DRAFT FOR DISCUSSION PURPOSES

Option B: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group Totals				RHNA	
	V.L.	Low	Mod.	A.M.	40%	Shift	40%	Very	Low	Mod.	Above	Very	Low	Mod.		Above
						RCAA	V.L. Shift									
Monterey County	7,868	5,146	6,167	14,093												
Carmel-By-The-Sea	26	17	20	47		100%	10	36	24	13	-26	39	26	12	33	110
Del Rey Oaks	78	51	61	140		100%	31	109	71	41	-81	118	77	39	97	331
Gonzales	459	300	360	822		0%	-184	275	180	480	-113	296	194	453	998	1,941
Greenfield	227	148	178	406		0%	-91	136	89	237	-56	147	96	223	492	958
King City	212	139	166	379		0%	-85	127	83	222	-53	137	89	209	461	896
Marina	273	178	214	489		0%	-109	164	107	285	-67	177	115	269	593	1,154
Monterey	710	465	557	1,272		100%	284	994	651	371	-744	1,072	702	350	880	3,004
Pacific Grove	120	78	94	215		100%	48	168	109	63	-125	181	118	59	149	507
Salinas	1,978	1,293	1,550	3,539		0%	-791	1,187	776	2,067	-491	1,278	836	1,950	4,294	8,358
Sand City	98	64	77	176		50%	0	98	64	77	-63	106	69	73	168	416
Seaside	250	164	196	449		0%	-100	150	98	262	-61	162	106	247	544	1,059
Soledad	214	140	168	384		0%	-86	128	84	224	-52	138	91	211	466	906
Unincorporated Monterey	721	472	565	1,292		100%	288	1,009	661	376	-754	1,088	713	355	894	3,050
Santa Cruz County																
Capitola	253	165	198	453		100%	101	354	231	132	-264	382	249	124	315	1,070
Santa Cruz	838	548	657	1,502		50%	0	838	548	657	-541	904	591	620	1,431	3,546
Scotts Valley	157	103	123	281		100%	63	220	144	82	-165	237	155	77	194	663
Watsonville	565	370	443	1,012		0%	-226	339	222	591	-140	365	239	557	1,229	2,390
Unincorporated Santa Cruz	689	451	540	1,235		100%	276	965	631	360	-721	1,041	680	339	855	2,915

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
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DRAFT FOR DISCUSSION PURPOSES  
Option B+: with AFFH Unit Allocation and Jobs/Housing Ratio

Jan. 12, 2022

RHNA Total 33,274	Housing	Jobs 31%		Jobs/Housing Ratio 15%		Transit 4%		Resiliency (Wildfire & Sea Level Rise) 8%				AFFH 42%		RHNA									
		Jobs		Jobs		Transit		Normalize		Normalize		Normalize		Total									
		2020	% Reg.	Units	J/H	2020	% Reg.	Units	Score	% Reg.	Units	Zone	High Risk	Unit Chg	% Reg.	Units	RCAA	TCAC	Avg.	Chg	% Reg.	Units	Total
Region	4-year Unit Change	6,260		8,299		4,150		1,038		2,075		11,452		33,274									
Monterey County	Carmel	5	3,566	0.9%	77	1.0	0	0.0%	0	0%	0	64%	3	0.1%	1	100%	100%	100%	5	0.5%	62	145	
	Del Rey Oaks	34	748	0.2%	16	1.0	0	0.0%	1	8%	87	44%	15	0.3%	6	100%	0%	50%	17	1.8%	211	354	
	Gonzales	713	6,326	1.7%	137	3.2	6,326	2.5%	0	0%	0	100%	713	13.1%	272	0%	0%	0%	0	0.0%	0	1,228	
	Greenfield	275	7,882	2.1%	171	2.0	7,882	3.2%	0	0%	0	100%	275	5.1%	105	0%	0%	0%	0	0.0%	0	683	
	King City	244	8,195	2.1%	178	2.4	8,195	3.3%	0	0%	0	100%	244	4.5%	93	0%	0%	0%	0	0.0%	0	652	
	Marina	395	6,548	1.7%	142	0.8	0	0.0%	1	8%	87	89%	353	6.5%	135	0%	0%	0%	0	0.0%	0	759	
	Monterey	202	40,989	10.7%	888	3.0	40,989	16.5%	1	8%	87	63%	126	2.3%	48	100%	73%	87%	175	19.0%	2,174	4,085	
	Pacific Grove	49	8,016	2.1%	174	1.0	0	0.0%	0	0%	0	95%	46	0.9%	18	100%	100%	100%	49	5.3%	608	849	
	Salinas	2,166	78,874	20.6%	1,710	1.8	78,874	31.8%	2	17%	168	100%	2,166	39.9%	829	0%	0%	0%	0	0.0%	0	6,191	
	Sand City	54	2,092	0.5%	45	11.1	2,092	0.8%	1	8%	87	100%	54	1.0%	21	50%	0%	25%	14	1.5%	168	410	
Unincorporated Monterey	Seaside	324	10,476	2.7%	227	1.0	0	0.0%	1	8%	87	77%	251	4.6%	96	0%	0%	0%	0	0.0%	0	734	
	Soledad	236	9,010	2.4%	195	2.2	9,010	3.6%	0	0%	0	96%	227	4.2%	87	0%	0%	0%	0	0.0%	0	669	
		255	60,293	15.7%	1,306	1.5	0	0.0%	1	8%	87	19%	48	0.9%	18	100%	48%	74%	189	20.5%	2,342	4,008	
	Santa Cruz County																						
	Capitola	89	12,250	3.2%	265	2.2	12,250	4.9%	0	0%	0	83%	74	1.4%	28	100%	97%	98%	87	9.5%	1,086	1,673	
Santa Cruz		394	43,865	11.5%	950	1.8	43,865	17.7%	1	8%	87	75%	296	5.5%	113	50%	23%	37%	144	15.6%	1,792	4,070	
	Scotts Valley	28	10,109	2.6%	219	2.1	10,109	4.1%	1	8%	87	50%	14	0.3%	5	100%	100%	100%	28	3.0%	348	856	
	Watsonville	512	28,514	7.4%	618	2.0	28,514	11.5%	1	8%	87	95%	485	8.9%	185	0%	0%	0%	0	0.0%	0	1,879	
Unincorporated Santa Cruz	285	45,264	11.8%	981	0.8	0	0.0%	1	8%	87	13%	38	0.7%	15	100%	50%	75%	214	23.2%	2,661	4,029		

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

Jobs/housing ratio is the 2020 number of jobs divided by the 2020 number of housing units. A higher number reflects a larger imbalance between jobs and housing.

Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.

RCAA = Racially Concentrated Areas of Affluence.

TCAC = California Tax Credit Allocation Committee

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Option B+: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group Totals				RHNA	
	V.L.	Low	Mod.	A.M.	30%	Shift	30%	Very Low	Low	Mod.	Above	Very Low	Low	Mod.		Above
Monterey County	7,868	5,146	6,167	14,093				8,096	5,297	6,016	13,865	7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	34	22	27	61	100%	10	7	44	29	20	52	43	28	21	53	145
Del Rey Oaks	84	55	66	150	100%	25	17	109	72	49	124	106	70	50	128	354
Gonzales	290	190	228	520	0%	-87	-57	203	133	285	607	197	129	292	610	1,228
Greenfield	162	106	127	289	0%	-49	-32	113	74	159	337	110	72	163	338	683
King City	154	101	121	276	0%	-46	-30	108	71	151	322	105	69	155	323	652
Marina	179	117	141	321	0%	-54	-35	125	82	176	376	121	80	180	378	759
Monterey	966	632	757	1,730	100%	290	190	1,256	822	567	1,440	1,221	799	581	1,484	4,085
Pacific Grove	201	131	157	360	100%	60	39	261	170	118	300	254	165	121	309	849
Salinas	1,464	958	1,146	2,622	0%	-439	-287	1,025	671	1,433	3,062	996	652	1,469	3,074	6,191
Sand City	97	63	76	174	50%	0	0	97	63	76	174	94	61	78	177	410
Seaside	174	114	136	311	0%	-52	-34	122	80	170	362	119	78	174	363	734
Soledad	158	103	124	283	0%	-47	-31	111	72	155	331	108	70	159	332	669
Unincorporated Monterey	948	620	743	1,698	100%	284	186	1,232	806	557	1,413	1,197	783	571	1,457	4,008
Santa Cruz County																
Capitola	396	259	310	709	100%	119	78	515	337	232	589	500	327	238	608	1,673
Santa Cruz	962	629	754	1,724	50%	0	0	962	629	754	1,725	935	611	773	1,751	4,070
Scotts Valley	202	132	159	363	100%	61	40	263	172	119	302	256	167	122	311	856
Watsonville	444	291	348	796	0%	-133	-87	311	204	435	929	302	198	446	933	1,879
Unincorporated Santa Cruz	953	623	747	1,706	100%	286	187	1,239	810	560	1,420	1,204	787	574	1,464	4,029

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
RCAA = Racially Concentrated Areas of Affluence.

DRAFT FOR DISCUSSION PURPOSES

Option B+: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group				RHNA	
	V.L.		A.M.		40%		Shift		40%		Totals		Totals			
	Low	Mod.	Low	Mod.	Low	Mod.	Low	Mod.	Low	Mod.	Low	Mod.	Low	Mod.		
Monterey County	7,868	5,146	6,167	14,093												
Carmel-By-The-Sea	34	22	27	61	100%	14	9									
Del Rey Oaks	84	55	66	150	100%	34	22									
Gonzales	290	190	228	520	0%	-116	-76									
Greenfield	162	106	127	289	0%	-65	-42									
King City	154	101	121	276	0%	-62	-40									
Marina	179	117	141	321	0%	-72	-47									
Monterey	966	632	757	1,730	100%	386	253									
Pacific Grove	201	131	157	360	100%	80	52									
Salinas	1,464	958	1,146	2,622	0%	-586	-383									
Sand City	97	63	76	174	50%	0	0									
Seaside	174	114	136	311	0%	-70	-46									
Soledad	158	103	124	283	0%	-63	-41									
Unincorporated Monterey	948	620	743	1,698	100%	379	248									
Santa Cruz County																
Capitola	396	259	310	709	100%	158	104									
Santa Cruz	962	629	754	1,724	50%	0	0									
Scotts Valley	202	132	159	363	100%	81	53									
Watsonville	444	291	348	796	0%	-178	-116									
Unincorporated Santa Cruz	953	623	747	1,706	100%	381	249									

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
RCAA = Racially Concentrated Areas of Affluence.

DRAFT FOR DISCUSSION PURPOSES  
Option C: Alternative Ratios

Jan. 12, 2022

RHNA Total 33,274	Housing  8-year Unit Change 12,524	Jobs 15%		Jobs/Housing Ratio 35%			Transit 5%		Resiliency (Wildfire & Sea Level Rise) 10%			AFFH 35%		RHNA			
		Jobs 2020	% Reg.	Units	J/H	Jobs		Transit Score	% Reg.	Units	% Area Not in High Risk Zone	Normalize (% Area x Unit Chg)			Poverty		
						2020	% Reg.					% Chg)	RCAA with RCAA x Unit				
Region																	
Monterey County																	
Carmel	10	3,566	0.9%	29	1.0	0	0.0%	0	0	0%	0	64%	6	0.1%	100%	10	65
Del Rey Oaks	69	748	0.2%	6	1.0	0	0.0%	0	1	8%	87	44%	30	0.3%	100%	69	342
Gonzales	1,426	6,326	1.7%	51	3.2	6,326	2.5%	185	0	0%	0	100%	1,426	13.1%	33%	475	3,136
Greenfield	550	7,882	2.1%	64	2.0	7,882	3.2%	231	0	0%	0	100%	550	5.1%	0%	0	950
King City	488	8,195	2.1%	67	2.4	8,195	3.3%	240	0	0%	0	100%	488	4.5%	0%	0	888
Marina	790	6,548	1.7%	53	0.8	0	0.0%	0	1	8%	87	89%	706	6.5%	33%	263	1,731
Monterey	403	40,989	10.7%	333	3.0	40,989	16.5%	1,200	1	8%	87	63%	252	2.3%	100%	403	3,090
Pacific Grove	98	8,016	2.1%	65	1.0	0	0.0%	0	0	0%	0	95%	93	0.9%	100%	98	429
Salinas	4,333	78,874	20.6%	641	1.8	78,874	31.8%	2,308	2	17%	168	100%	4,333	39.9%	0%	0	8,279
Sand City	108	2,092	0.5%	17	11.1	2,092	0.8%	61	1	8%	87	100%	108	1.0%	33%	36	385
Seaside	649	10,476	2.7%	85	1.0	0	0.0%	0	1	8%	87	77%	503	4.6%	0%	0	917
Soledad	473	9,010	2.4%	73	2.2	9,010	3.6%	264	0	0%	0	96%	455	4.2%	0%	0	897
Unincorporated Monterey	510	60,293	15.7%	490	1.5	0	0.0%	0	1	8%	87	19%	96	0.9%	100%	510	2,393
Santa Cruz County																	
Capitola	178	12,250	3.2%	99	2.2	12,250	4.9%	359	0	0%	0	83%	147	1.4%	67%	119	964
Santa Cruz	789	43,865	11.5%	356	1.8	43,865	17.7%	1,284	1	8%	87	75%	594	5.5%	33%	263	3,294
Scotts Valley	57	10,109	2.6%	82	2.1	10,109	4.1%	296	1	8%	87	50%	28	0.3%	100%	57	671
Watsonville	1,023	28,514	7.4%	232	2.0	28,514	11.5%	835	1	8%	87	95%	969	8.9%	0%	0	2,362
Unincorporated Santa Cruz	570	45,264	11.8%	368	0.8	0	0.0%	0	1	8%	87	13%	76	0.7%	100%	570	2,481

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
Jobs/housing ratio is the 2020 number of jobs divided by the 2020 number of housing units. A higher number reflects a larger imbalance between jobs and housing.  
Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.  
RCAA = Racially Concentrated Areas of Affluence.



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Option C: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group Totals				RHNA	
	V.L.	Low	Mod.	A.M.	30%	Shift	30%	Very			Above			Totals				
								Low	Low	Mod.	Mod.	Mod.	Above	Low	Low	Mod.		Mod.
Monterey County	7,868	5,146	6,167	14,093				7,559	4,943	6,370	14,402			7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	15	10	12	28	100%	5	3	20	13	9	23			21	14	9	21	65
Del Rey Oaks	81	53	63	145	100%	24	16	105	69	47	121			109	72	46	115	342
Gonzales	742	485	581	1,328	33%	0	0	742	485	581	1,328			772	505	562	1,297	3,136
Greenfield	225	147	176	402	0%	-68	-44	157	103	220	470			163	107	213	467	950
King City	210	137	165	376	0%	-63	-41	147	96	206	439			153	100	199	436	888
Marina	409	268	321	733	33%	0	0	409	268	321	733			426	279	311	715	1,731
Monterey	731	478	573	1,309	100%	219	143	950	621	430	1,089			989	647	416	1,038	3,090
Pacific Grove	101	66	80	182	100%	30	20	131	86	60	152			136	90	58	145	429
Salinas	1,956	1,280	1,533	3,507	0%	-587	-384	1,369	896	1,917	4,097			1,425	932	1,856	4,066	8,279
Sand City	91	60	71	163	33%	0	0	91	60	71	163			95	62	69	159	385
Seaside	217	142	170	388	0%	-65	-43	152	99	213	453			158	103	206	450	917
Soledad	212	139	166	380	0%	-64	-42	148	97	208	444			154	101	201	441	897
Unincorporated Monterey	566	370	444	1,014	100%	170	111	736	481	333	843			766	501	322	804	2,393
Santa Cruz County																		
Capitola	228	149	179	408	67%	34	22	262	171	157	374			273	178	152	361	964
Santa Cruz	779	509	611	1,395	33%	0	0	779	509	611	1,395			811	530	592	1,361	3,294
Scotts Valley	159	104	124	284	100%	48	31	207	135	93	236			215	141	90	225	671
Watsonville	559	365	438	1,000	0%	-168	-110	391	255	548	1,168			407	265	531	1,159	2,362
Unincorporated Santa Cruz	587	384	460	1,051	100%	176	115	763	499	345	874			795	519	334	833	2,481

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
RCAA = Racially Concentrated Areas of Affluence.

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Option C: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group Totals				RHNA
	V.L.	Low	Mod.	A.M.											
Monterey County	7,868	5,146	6,167	14,093											
Carmel-By-The-Sea	15	10	12	28	100%	6	4	21	14	8	22	15	8	20	65
Del Rey Oaks	81	53	63	145	100%	32	21	113	74	42	119	78	40	105	342
Gonzales	742	485	581	1,328	33%	0	0	742	485	581	783	512	557	1,284	3,136
Greenfield	225	147	176	402	0%	-90	-59	135	88	235	142	93	225	490	950
King City	210	137	165	376	0%	-84	-55	126	82	220	133	87	211	457	888
Marina	409	268	321	733	33%	0	0	409	268	321	432	283	308	708	1,731
Monterey	731	478	573	1,309	100%	292	191	1,023	669	382	1,079	706	366	939	3,090
Pacific Grove	101	66	80	182	100%	40	26	141	92	54	149	97	52	131	429
Salinas	1,956	1,280	1,533	3,507	0%	-782	-512	1,174	768	2,045	1,239	808	1,957	4,275	8,279
Sand City	91	60	71	163	33%	0	0	91	60	71	96	63	68	158	385
Seaside	217	142	170	388	0%	-87	-57	130	85	227	137	90	218	472	917
Soledad	212	139	166	380	0%	-85	-56	127	83	222	134	88	213	462	897
Unincorporated Monterey	566	370	444	1,014	100%	226	148	792	518	296	836	547	284	726	2,393
Santa Cruz County															
Capitola	228	149	179	408	67%	46	30	274	179	149	289	189	143	343	964
Santa Cruz	779	509	611	1,395	33%	0	0	779	509	611	822	537	585	1,350	3,294
Scotts Valley	159	104	124	284	100%	64	42	223	146	82	235	154	79	203	671
Watsonville	559	365	438	1,000	0%	-224	-146	335	219	584	353	231	560	1,218	2,362
Unincorporated Santa Cruz	587	384	460	1,051	100%	235	154	822	538	306	868	568	293	752	2,481

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
RCAA = Racially Concentrated Areas of Affluence.

RHNA Total 33,274	Housing	Jobs 15%			Jobs/Housing Ratio 35%			Transit 5%			Resiliency (Wildfire & Sea Level Rise) 10%				AFFH 35%			RHNA		
		Units	Jobs 2020	% Reg.	J/H	Jobs 2020	% Reg.	Units	Transit Score	% Reg.	Zone	High Risk Area x Not at Developable	Risk	% Reg.	Units	Poverty	RCAA with Acreage not at risk		RCAA x RCAA	Normalize (%)
Region	12,524	3,111			7,263			1,038							2,075				7,263	33,274
Monterey County	Carmel	10	3,566	0.9%	29	1.0	0	0.0%	0	0	0%	64%	1	0.6%	12	100%	1	1.1%	82	133
	Del Rey Oaks	69	748	0.2%	6	1.0	0	0.0%	0	1	8%	44%	0	0.2%	3	100%	0	0.3%	24	189
	Gonzales	1,426	6,326	1.7%	51	3.2	6,326	2.5%	185	0	0%	100%	2	1.4%	30	33%	1	0.9%	69	1,761
	Greenfield	550	7,882	2.1%	64	2.0	7,882	3.2%	231	0	0%	100%	2	1.7%	36	0%	0	0.0%	0	881
	King City	488	8,195	2.1%	67	2.4	8,195	3.3%	240	0	0%	100%	3	3.1%	64	0%	0	0.0%	0	859
	Marina	790	6,548	1.7%	53	0.8	0	0.0%	0	1	8%	89%	8	6.8%	142	33%	3	4.5%	328	1,400
	Monterey	403	40,989	10.7%	333	3.0	40,989	16.5%	1,200	1	8%	63%	3	3.0%	63	100%	3	6.0%	438	2,524
	Pacific Grove	98	8,016	2.1%	65	1.0	0	0.0%	0	0	0%	95%	3	2.9%	60	100%	3	5.7%	414	637
	Salinas	4,333	78,874	20.6%	641	1.8	78,874	31.8%	2,308	2	17%	100%	21	19.0%	394	0%	0	0.0%	0	7,844
	Sand City	108	2,092	0.5%	17	11.1	2,092	0.8%	61	1	8%	100%	2	2.1%	45	33%	1	1.4%	103	421
Unincorporated Monterey	Seaside	649	10,476	2.7%	85	1.0	0	0.0%	0	1	8%	77%	7	5.9%	121	0%	0	0.0%	0	942
	Soledad	473	9,010	2.4%	73	2.2	9,010	3.6%	264	0	0%	96%	4	3.7%	77	0%	0	0.0%	0	887
		510	60,293	15.7%	490	1.5	0	0.0%	0	1	8%	19%	29	26.0%	539	100%	29	51.7%	3,752	5,378
	Santa Cruz County																			
	Capitola	178	12,250	3.2%	99	2.2	12,250	4.9%	359	0	0%	83%	1	1.1%	23	67%	1	1.5%	106	765
Santa Cruz		789	43,865	11.5%	356	1.8	43,865	17.7%	1,284	1	8%	75%	7	6.6%	136	33%	2	4.3%	316	2,968
	Scotts Valley	57	10,109	2.6%	82	2.1	10,109	4.1%	296	1	8%	50%	2	1.9%	39	100%	2	3.8%	273	834
	Watsonville	1,023	28,514	7.4%	232	2.0	28,514	11.5%	835	1	8%	95%	5	4.6%	96	0%	0	0.0%	0	2,273
Unincorporated Santa Cruz	570	45,264	11.8%	368	0.8	0	0.0%	0	1	8%	13%	10	9.4%	195	100%	10	18.7%	1,358	2,578	

Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.

Jobs/housing ratio is the 2020 number of jobs divided by the 2020 number of housing units. A higher number reflects a larger imbalance between jobs and housing.

Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.

RCAA = Racially Concentrated Areas of Affluence.

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Option D: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group Totals				RHNA	
	V.L.	Low	Mod.	A.M.	30%	Shift	30%	Very Low	Low	Mod.	Above	Very Low	Low	Mod.		Above
Monterey County	7,868	5,146	6,167	14,093												
Carmel-By-The-Sea	31	21	25	56	100%	9	6	40	27	19	47	40	27	19	47	133
Del Rey Oaks	45	29	35	80	100%	14	9	59	38	26	66	60	38	26	65	189
Gonzales	416	272	326	746	33%	0	0	416	272	326	747	420	275	324	742	1,761
Greenfield	208	136	163	373	0%	-62	-41	146	95	204	436	147	96	202	436	881
King City	203	133	159	364	0%	-61	-40	142	93	199	425	143	94	197	425	859
Marina	331	217	259	593	33%	0	0	331	217	259	593	334	219	257	590	1,400
Monterey	597	390	468	1,069	100%	179	117	776	507	351	890	783	512	348	881	2,524
Pacific Grove	151	99	118	270	100%	45	30	196	129	88	224	198	130	87	222	637
Salinas	1,854	1,212	1,454	3,322	0%	-556	-364	1,298	848	1,818	3,880	1,310	855	1,804	3,875	7,844
Sand City	100	65	78	178	33%	0	0	100	65	78	178	101	66	77	177	421
Seaside	223	146	175	399	0%	-67	-44	156	102	219	465	157	103	217	465	942
Soledad	210	137	164	376	0%	-63	-41	147	96	205	439	148	97	203	439	887
Unincorporated Monterey	1,272	832	997	2,278	100%	382	250	1,654	1,082	747	1,895	1,670	1,092	742	1,874	5,378
Santa Cruz County																
Capitola	181	118	142	324	67%	27	18	208	136	124	297	210	137	123	295	765
Santa Cruz	702	459	550	1,257	33%	0	0	702	459	550	1,257	709	463	547	1,249	2,968
Scotts Valley	197	129	155	353	100%	59	39	256	168	116	294	258	170	115	291	834
Watsonville	537	352	421	963	0%	-161	-106	376	246	527	1,124	379	248	523	1,123	2,273
Unincorporated Santa Cruz	610	399	478	1,092	100%	183	120	793	519	358	908	801	524	356	897	2,578

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RCAA = Racially Concentrated Areas of Affluence.

DRAFT FOR DISCUSSION PURPOSES

Option D: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments						Rebalance to Income Group Totals				RHNA	
	V.L.	Low	Mod.	A.M.	40%		Shift	40%		Very		Above		Very	Above			
					RCAA	V.L. Shift Low		Low	Mod.	Low	Mod.	Low	Mod.		Low	Mod.		Low
Monterey County	7,868	5,146	6,167	14,093														33,274
Carmel-By-The-Sea	31	21	25	56	100%	12	8	43	29	17	-33		44	29	17	43	133	
Del Rey Oaks	45	29	35	80	100%	18	12	63	41	23	-47		64	41	23	61	189	
Gonzales	416	272	326	746	33%	0	0	416	272	326	-268		421	275	323	742	1,761	
Greenfield	208	136	163	373	0%	-83	-54	125	82	217	-51		127	83	215	456	881	
King City	203	133	159	364	0%	-81	-53	122	80	212	-50		124	81	210	444	859	
Marina	331	217	259	593	33%	0	0	331	217	259	-214		335	220	256	589	1,400	
Monterey	597	390	468	1,069	100%	239	156	836	546	312	-625		845	553	309	817	2,524	
Pacific Grove	151	99	118	270	100%	60	40	211	139	78	-158		214	141	77	205	637	
Salinas	1,854	1,212	1,454	3,322	0%	-742	-485	1,112	727	1,939	-456		1,125	735	1,920	4,064	7,844	
Sand City	100	65	78	178	33%	0	0	100	65	78	-65		101	66	77	177	421	
Seaside	223	146	175	399	0%	-89	-58	134	88	233	-56		136	89	231	486	942	
Soledad	210	137	164	376	0%	-84	-55	126	82	219	-51		128	83	217	459	887	
Unincorporated Monterey	1,272	832	997	2,278	100%	509	333	1,781	1,165	664	-1,332		1,803	1,178	657	1,740	5,378	
Santa Cruz County																		
Capitola	181	118	142	324	67%	36	24	217	142	118	-153		220	144	117	284	765	
Santa Cruz	702	459	550	1,257	33%	0	0	702	459	550	-454		711	465	545	1,247	2,968	
Scotts Valley	197	129	155	353	100%	79	52	276	181	103	-207		279	183	102	270	834	
Watsonville	537	352	421	963	0%	-215	-141	322	211	562	-132		326	214	556	1,177	2,273	
Unincorporated Santa Cruz	610	399	478	1,092	100%	244	160	854	559	318	-639		865	566	315	832	2,578	

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RCAA = Racially Concentrated Areas of Affluence.

DRAFT FOR DISCUSSION PURPOSES  
Option Z: with AFFH Unit Allocation and Jobs/Housing Ratio

Jan. 12, 2022

RHNA Total 33,274	Housing Change	Jobs 15%		Jobs/Housing Ratio 31%			Transit 4%		Resiliency (Wildfire & Sea Level Rise) 8%			AFFH 42%		RHNA												
		Jobs 2020	% Reg.	Units	J/H	Jobs		Transit Score	% Reg.	Units	Zone	Normalize (Avg. x 2020 HHs)			Total											
						2020	% Reg.					RCAA	TCAC			Avg.	% Reg.	Units								
Region	4-year Unit Change	6,260																								
Monterey County				4,000																						
	Carmel	5	3,566	0.9%	37	1.0	0	0.0%	0	0%	0	64%	3	0.1%	1	100%	100%	100%	2,129	2.7%	306				349	
	Del Rey Oaks	34	748	0.2%	8	1.0	0	0.0%	0	8%	87	44%	15	0.3%	6	100%	0%	50%	342	0.4%	49				184	
	Gonzales	713	6,326	1.7%	66	3.2	6,326	2.5%	215	0	0%	0	100%	713	13.1%	272	0%	0%	0	0.0%	0				1,266	
	Greenfield	275	7,882	2.1%	82	2.0	7,882	3.2%	268	0	0%	0	100%	275	5.1%	105	0%	0%	0	0.0%	0				730	
	King City	244	8,195	2.1%	86	2.4	8,195	3.3%	279	0	0%	0	100%	244	4.5%	93	0%	0%	0	0.0%	0				702	
	Marina	395	6,548	1.7%	68	0.8	0	0.0%	0	1	8%	87	89%	353	6.5%	135	0%	0%	0	0.0%	0				685	
	Monterey	202	40,989	10.7%	428	3.0	40,989	16.5%	1,396	1	8%	87	63%	126	2.3%	48	100%	73%	87%	10,386	13.0%	1,493				3,654
	Pacific Grove	49	8,016	2.1%	84	1.0	0	0.0%	0	0	0%	0	95%	46	0.9%	18	100%	100%	100%	6,779	8.5%	974				1,125
	Salinas	2,166	78,874	20.6%	824	1.8	78,874	31.8%	2,687	2	17%	168	100%	2,166	39.9%	829	0%	0%	0%	0	0.0%	0				6,674
Sand City	54	2,092	0.5%	22	11.1	2,092	0.8%	71	1	8%	87	100%	54	1.0%	21	50%	0%	25%	36	0.0%	5				260	
Seaside	324	10,476	2.7%	109	1.0	0	0.0%	0	1	8%	87	77%	251	4.6%	96	0%	0%	0%	0	0.0%	0				616	
Soledad	236	9,010	2.4%	94	2.2	9,010	3.6%	307	0	0%	0	96%	227	4.2%	87	0%	0%	0%	0	0.0%	0				724	
Unincorporated Monterey	255	60,293	15.7%	629	1.5	0	0.0%	0	1	8%	87	19%	48	0.9%	18	n/a	48%	48%	16,268	20.4%	2,337				3,326	
Santa Cruz County																										
Capitola	89	12,250	3.2%	128	2.2	12,250	4.9%	417	0	0%	0	83%	74	1.4%	28	100%	97%	98%	4,691	5.9%	674				1,336	
Santa Cruz	394	43,865	11.5%	458	1.8	43,865	17.7%	1,494	1	8%	87	75%	296	5.5%	113	50%	23%	37%	8,279	10.4%	1,190				3,736	
Scotts Valley	28	10,109	2.6%	106	2.1	10,109	4.1%	344	1	8%	87	50%	14	0.3%	5	100%	100%	100%	4,522	5.7%	650				1,220	
Watsonville	512	28,514	7.4%	298	2.0	28,514	11.5%	971	1	8%	87	95%	485	8.9%	185	0%	0%	0%	0	0.0%	0				2,053	
Unincorporated Santa Cruz	285	45,264	11.8%	473	0.8	0	0.0%	0	1	8%	87	13%	38	0.7%	15	n/a	50%	50%	26,259	33.0%	3,774				4,634	

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Jobs/housing ratio is the 2020 number of jobs divided by the 2020 number of housing units. A higher number reflects a larger imbalance between jobs and housing.

Transit Score: 1 = has transit service with 30-minute headways. 2 = has transit service with both 15- and 30-minute headways.

RCAA = Racially Concentrated Areas of Affluence.

TCAC = California Tax Credit Allocation Committee

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Option Z: Shifts 30% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group Totals				RHNA			
	V.L.	Low	Mod.	A.M.	RCAA	Shift	30%	30%	Very Low	Low	Mod.	Above Mod.						
						V.L. Shift Low												
Monterey County	7,868	5,146	6,167	14,093						8,035	5,255	6,058	13,926	7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	83	54	65	148	100%	25	16			108	70	49	122	106	69	50	124	349
Del Rey Oaks	44	28	34	78	100%	13	8			57	36	26	65	56	35	26	67	184
Gonzales	299	196	235	536	0%	-90	-59			209	137	294	626	205	134	299	628	1,266
Greenfield	173	113	135	309	0%	-52	-34			121	79	169	361	118	77	172	363	730
King City	166	109	130	297	0%	-50	-33			116	76	163	347	114	74	166	348	702
Marina	162	106	127	290	0%	-49	-32			113	74	159	339	111	72	162	340	685
Monterey	864	565	677	1,548	100%	259	170			1,123	735	507	1,289	1,100	720	516	1,318	3,654
Pacific Grove	266	174	209	476	100%	80	52			346	226	157	396	339	221	160	405	1,125
Salinas	1,579	1,031	1,237	2,826	0%	-474	-309			1,105	722	1,546	3,301	1,080	707	1,574	3,313	6,674
Sand City	61	40	48	110	50%	0	0			61	40	48	111	60	39	49	112	260
Seaside	146	95	114	261	0%	-44	-29			102	66	143	305	100	65	146	305	616
Soledad	171	112	134	307	0%	-51	-34			120	78	168	358	118	76	171	359	724
Unincorporated Monterey	786	514	616	1,409	100%	236	154			1,022	668	462	1,174	1,001	654	470	1,201	3,326
Santa Cruz County																		
Capitola	316	207	248	566	100%	95	62			411	269	186	470	402	263	189	482	1,336
Santa Cruz	883	578	692	1,582	50%	0	0			883	578	692	1,583	865	566	704	1,601	3,736
Scotts Valley	288	189	226	517	100%	86	57			374	246	169	431	366	241	172	441	1,220
Watsonville	485	318	381	870	0%	-146	-95			339	223	476	1,015	332	218	485	1,018	2,053
Unincorporated Santa Cruz	1,096	717	859	1,963	100%	329	215			1,425	932	644	1,633	1,395	915	656	1,668	4,634

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RCAA = Racially Concentrated Areas of Affluence.

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Option Z: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Jan. 12, 2022

Region	Baseline Income Allocation				RCAA		Raw RCAA Adjustments				Rebalance to Income Group				RHNA		
	V.L.		A.M.		RCAA	Shift	40%	40%	Very		Above		Totals				
	Low	Mod.	Low	Mod.					Low	Mod.	Low	Mod.					
Monterey County	7,868	5,146	6,167	14,093					8,092	5,296	6,017	-5,312	7,868	5,146	6,167	14,093	33,274
Carmel-By-The-Sea	83	54	65	148	100%	33	22		116	76	43	-87	113	74	44	118	349
Del Rey Oaks	44	28	34	78	100%	18	11		62	39	23	-46	60	38	24	62	184
Gonzales	299	196	235	536	0%	-120	-78		179	118	313	-74	173	115	321	657	1,266
Greenfield	173	113	135	309	0%	-69	-45		104	68	180	-43	101	66	184	379	730
King City	166	109	130	297	0%	-66	-44		100	65	174	-42	97	63	178	364	702
Marina	162	106	127	290	0%	-65	-42		97	64	169	-40	94	62	173	356	685
Monterey	864	565	677	1,548	100%	346	226		1,210	791	451	-904	1,177	769	462	1,246	3,654
Pacific Grove	266	174	209	476	100%	106	70		372	244	139	-279	362	237	142	384	1,125
Salinas	1,579	1,031	1,237	2,826	0%	-632	-412		947	619	1,649	-389	920	600	1,692	3,462	6,674
Sand City	61	40	48	110	50%	0	0		61	40	48	-39	59	39	49	113	260
Seaside	146	95	114	261	0%	-58	-38		88	57	152	-36	86	55	156	319	616
Soledad	171	112	134	307	0%	-68	-45		103	67	179	-42	100	65	183	376	724
Unincorporated Monterey	786	514	616	1,409	100%	314	206		1,100	720	410	-821	1,070	700	420	1,136	3,326
Santa Cruz County																	
Capitola	316	207	248	566	100%	126	83		442	290	165	-331	430	282	169	455	1,336
Santa Cruz	883	578	692	1,582	50%	0	0		883	578	692	-571	859	562	709	1,606	3,736
Scotts Valley	288	189	226	517	100%	115	76		403	265	150	-301	392	257	154	417	1,220
Watsonville	485	318	381	870	0%	-194	-127		291	191	508	-120	283	186	521	1,063	2,053
Unincorporated Santa Cruz	1,096	717	859	1,963	100%	438	287		1,534	1,004	572	-1,147	1,492	976	586	1,580	4,634

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RCAA = Racially Concentrated Areas of Affluence.



## Comparison of Draft RHNA Methodologies: Total Units

Region	RCAA	TCAC	Option A	Option A+ Add'l HCD Concepts	Option B	Option B+ Add'l HCD Concepts	Option C New % and RCAA-Pov.	Option D Opt. C + Normalize by Area	Option Z	LandWatch	
										Option Opt C by Unit	Option Shortfall
<b>Monterey County</b>			<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>	<b>33,274</b>
Carmel-By-The-Sea	100%	100%	139	176	110	145	65	133	349	65	65
Del Rey Oaks	100%	0%	396	396	331	354	342	189	184	342	342
Gonzales	0%	0%	1,869	1,156	1,941	1,228	3,136	1,761	1,266	3,322	3,322
Greenfield	0%	0%	868	593	958	683	950	881	730	916	916
King City	0%	0%	803	559	896	652	888	859	702	977	977
Marina	0%	0%	1,189	794	1,154	759	1,731	1,400	685	1,731	1,731
Monterey	100%	73%	2,897	4,015	3,004	4,085	3,090	2,524	3,654	4,147	4,147
Pacific Grove	100%	100%	638	1,004	507	849	429	637	1,125	429	429
Salinas	0%	0%	7,466	5,299	8,358	6,191	8,279	7,844	6,674	7,316	7,316
Sand City	50%	0%	440	417	416	410	385	421	260	529	529
Seaside	0%	0%	1,116	791	1,059	734	917	942	616	917	917
Soledad	0%	0%	804	567	906	669	897	887	724	931	931
Unincorp. Monterey	100%	48%	3,827	4,760	3,050	4,008	2,393	5,378	3,326	2,394	2,394
<b>Santa Cruz County</b>			<b>10,822</b>	<b>12,747</b>	<b>10,584</b>	<b>12,507</b>	<b>9,772</b>	<b>9,418</b>	<b>12,979</b>	<b>9,258</b>	<b>9,258</b>
Capitola	100%	97%	1,090	1,732	1,070	1,673	964	765	1,336	1,023	1,023
Santa Cruz	50%	23%	3,400	3,898	3,546	4,070	3,294	2,968	3,736	2,791	2,791
Scotts Valley	100%	100%	600	805	663	856	671	834	1,220	692	692
Watsonville	0%	0%	2,067	1,556	2,390	1,879	2,362	2,273	2,053	2,271	2,271
Unincorp. Santa Cruz	100%	50%	3,665	4,756	2,915	4,029	2,481	2,578	4,634	2,481	2,481

## Comparison of Draft RHNA Methodologies: RHNA Per Household

Region	RCAA	TCAC	Option A	Option A+ Add'l HCD Concepts	Option B 0.15	Option B+ Add'l HCD Concepts	Option C New % and RCAA-	Option D Opt. C + Normalize by Area	Option Z Hybrid	LandWatch	
										Opt C by Unit	Option Shortfall
<b>Monterey County</b>											
Carmel-By-The-Sea	100%	100%	0.18	0.16	0.18	0.16	0.19	0.19	0.16	0.19	0.19
Del Rey Oaks	100%	0%	0.07	0.08	0.05	0.07	0.03	0.06	0.16	0.03	0.03
Gonzales	0%	0%	0.58	0.58	0.48	0.52	0.50	0.28	0.27	0.50	0.50
Greenfield	0%	0%	0.99	0.61	1.03	0.65	1.66	0.93	0.67	1.76	1.76
King City	0%	0%	0.24	0.16	0.26	0.19	0.26	0.24	0.20	0.25	0.25
Marina	0%	0%	0.25	0.17	0.28	0.20	0.27	0.26	0.22	0.30	0.30
Monterey	0%	0%	0.16	0.11	0.16	0.10	0.24	0.19	0.09	0.24	0.24
Pacific Grove	100%	73%	0.24	0.34	0.25	0.34	0.26	0.21	0.30	0.35	0.35
Salinas	100%	100%	0.09	0.15	0.07	0.13	0.06	0.09	0.17	0.06	0.06
Sand City	0%	0%	0.18	0.13	0.20	0.15	0.20	0.19	0.16	0.18	0.18
Seaside	50%	0%	3.06	2.90	2.89	2.85	2.67	2.92	1.81	3.67	3.67
Soledad	0%	0%	0.11	0.08	0.11	0.07	0.09	0.10	0.06	0.09	0.09
Unincorp. Monterey	0%	0%	0.21	0.15	0.24	0.18	0.23	0.23	0.19	0.24	0.24
Unincorp. Monterey	100%	48%	0.11	0.14	0.09	0.12	0.07	0.16	0.10	0.07	0.07
<b>Santa Cruz County</b>											
Capitola	100%	97%	0.11	0.13	0.11	0.13	0.10	0.10	0.13	0.09	0.09
Santa Cruz	100%	97%	0.23	0.36	0.22	0.35	0.20	0.16	0.28	0.21	0.21
Scotts Valley	50%	23%	0.15	0.17	0.16	0.18	0.15	0.13	0.17	0.12	0.12
Watsonville	100%	100%	0.13	0.18	0.15	0.19	0.15	0.18	0.27	0.15	0.15
Unincorp. Santa Cruz	0%	0%	0.15	0.11	0.17	0.14	0.17	0.17	0.15	0.16	0.16
Unincorp. Santa Cruz	100%	50%	0.07	0.09	0.06	0.08	0.05	0.05	0.09	0.05	0.05

## Comparison of Draft RHNA Methodologies: RHNA Per Capita

Region	RCAA	TCAC	Option A	Option A+	Option B	Option B+	Option C	Option D	Option Z	LandWatch
				Add'l HCD Concepts		Add'l HCD Concepts	New % and RCAA-Pov.	Opt. C + Normalize by Area		Option Opt C by Unit
<b>Monterey County</b>			<b>0.05</b>	<b>0.05</b>	<b>0.05</b>	<b>0.05</b>	<b>0.05</b>	<b>0.05</b>	Hybrid	Shortfall
Carmel-By-The-Sea	100%	100%	0.05	0.05	0.03	0.05	0.05	0.05	<b>0.05</b>	<b>0.05</b>
Del Rey Oaks	100%	0%	0.25	0.25	0.21	0.22	0.21	0.12	0.12	0.21
Gonzales	0%	0%	0.22	0.13	0.22	0.14	0.36	0.20	0.15	0.38
Greenfield	0%	0%	0.05	0.03	0.05	0.04	0.05	0.05	0.04	0.05
King City	0%	0%	0.06	0.04	0.07	0.05	0.07	0.06	0.05	0.07
Marina	0%	0%	0.05	0.04	0.05	0.03	0.08	0.06	0.03	0.08
Monterey	100%	73%	0.10	0.13	0.10	0.14	0.10	0.08	0.12	0.14
Pacific Grove	100%	100%	0.04	0.07	0.03	0.06	0.03	0.04	0.07	0.03
Salinas	0%	0%	0.05	0.03	0.05	0.04	0.05	0.05	0.04	0.04
Sand City	50%	0%	1.35	1.28	1.28	1.26	1.18	1.30	0.80	1.63
Seaside	0%	0%	0.03	0.02	0.03	0.02	0.03	0.03	0.02	0.03
Soledad	0%	0%	0.03	0.02	0.04	0.03	0.04	0.04	0.03	0.04
Unincorp. Monterey	100%	48%	0.04	0.05	0.03	0.04	0.02	0.05	0.03	0.02
<b>Santa Cruz County</b>	0	0	<b>0.04</b>	<b>0.05</b>	<b>0.04</b>	<b>0.05</b>	<b>0.04</b>	<b>0.03</b>	<b>0.05</b>	<b>0.03</b>
Capitola	100%	97%	0.11	0.17	0.11	0.17	0.10	0.08	0.13	0.10
Santa Cruz	50%	23%	0.05	0.06	0.06	0.06	0.05	0.05	0.06	0.04
Scotts Valley	100%	100%	0.05	0.07	0.05	0.07	0.05	0.07	0.10	0.06
Watsonville	0%	0%	0.04	0.03	0.05	0.04	0.04	0.04	0.04	0.04
Unincorp. Santa Cruz	100%	50%	0.03	0.04	0.02	0.03	0.02	0.02	0.03	0.02

Public Comments Received on the AMBAG 6th Cycle RHNA Methodology

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
1	Public	Lee	Ruckus	In Consideration of 5th Cycle Results and •Historical exclusion of Extremely-Low Income (ELI) category from RHNA goals despite statutory objectives [Equal representation does not necessitate an asterisk] •AMBAG 6th Cycle RHNA goals for the lowest-incomes: ratios of Very-Low Income (VLI) over "Above 120% AMI" (56%) and Low Income (LI) over "Above 120% AMI" (37%), per Agenda, p8 •Available land historically prioritized for luxury/market-rate housing while "kicking can down the road" on "truly affordable" housing (ELI, VLI, LI) via in-lieu fees and/or land donations without developer under contract •Silicon Valley boundary encroachment into AMBAG counties •AMI increase due to that encroachment, e.g., rental rates @100% AMI 1-person (only, regardless of square footage) household unit, monthly rental rate, per 2021 AMI Santa Cruz County: \$1958.75 (= \$78,350/12 x 0.3); "Above 120% AMI" = above \$2350.50 San Benito County: \$1587.50 (= \$63,500/12 x 0.3); "Above 120% AMI" = above \$1905 Monterey County: \$1427.50 (= \$57,100/12 x 0.3); "Above 120% AMI" = above \$1713  1-person (only, regardless of square footage) household unit, monthly rental rate, per 2018 AMI Santa Cruz County: \$1522.50 (= \$60,900/12 x 0.3) San Benito County: \$1418.75 (= \$56,750/12 x 0.3) Monterey County: \$1208.75 (= \$48,350/12 x 0.3)	HCD provides the units by income categories as part of its Regional Housing Need Determination.	Email	9/7/2021
2	Public	Lee	Ruckus	Either •Establish an overriding timeline in each of the AMBAG designated areas for the lowest-income RHNA goals FOR EVERY TWO YEARS of the 8.5-year 6th Cycle (6/30/23 – 12/15/31), similar to AMBAG 6th Cycle RHNA goal ratios of Very-Low Income (VLI) over "Above 120% AMI" (56%) and Low Income (LI) over "Above 120% AMI" (37%), per Agenda, p8 Suspend permit approvals for "Above 120% AMI" housing units should that timeline goal for the lowest-income-level housing units not be accomplished at the end of each two-year period. Or Require the State to provide the funds up front (not via grant lotteries, tax credits, etc.) to fulfill the lowest-income RHNA goals. How about taxing Tech and luxury-rate real estate developers —those purveyors of rooftop pools and bars— to contribute to that purpose?	AMBAG does not have land use authority. Each local jurisdiction is responsible for preparing a housing element and permitting housing units.	Email	9/7/2021
3	Public	Lee	Ruckus	The Hubris of Density Up in a Seismic Zone No engineer or architect can design an "earthquake-proof" structure. That concept does not exist in reality, despite its common usage. They design toward the goal of "earthquake-resistance" to minimize lateral movement, but they cannot guarantee that any structure they design will be habitable... or standing... after every earthquake. They can cite a low probability of failure based on statistical analyses, but earthquakes are unique and unpredictable. And there are other variables, including the inherent faulty construction practices and materials that may not be discovered until after successive ground movement has occurred to expose them. "Earthquake design is a fuzzy proposition. You can't ask an engineer to guarantee that a building will never collapse in an earthquake. That is not fair, and it is not the deal that society has made with the construction world. You can ask that it will behave as well as possible, meeting at least the code requirements. Even that's a heavy responsibility. " —Leonard Joseph, Principal, Seismic Performance-Based Design, Thornton Tomasetti	Comment noted.	Email	9/7/2021
4	Santa Cruz YIMBY	Sonnenfeld	Rafa	Santa Cruz YIMBY advocates for more affordable housing to meet the needs of our growing population in response to the ever-increasing cost of living and the housing crisis in our region. We have been closely following the RHNA methodology discussion that has been occurring this year, and recommend the following changes to the staff-proposed RHNA allocation  methodologies in order to improve the housing-construction feasibility and social equity that come out of the RHNA allocation:  Use AFFH as a significant factor in allocation housing totals, not just adjusting the share of allocation for Low/Very Low Income. This will ensure that high opportunity areas receive higher numbers of both low income units as well as market rate units, instead of the proposed income shift methodology that assigns more market rate units to low opportunity communities, which could exacerbate gentrification.	AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.  The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.	Letter	9/20/2021
5	Santa Cruz YIMBY	Sonnenfeld	Rafa	Use jobs access as the other major factor, and base that on jobs proximity instead of within jurisdiction jobs-housing balance.	By putting more housing where the largest number of jobs are, that meets the statutory RHNA objective of improving jobs/housing balance. Objective 2 of RHNA states “Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.” ABAG’s assessment of Objective 2, recommended by HCD, was to assess RHNA’s performance based on jurisdiction-level jobs data, not job proximity.	Letter	9/20/2021
6	Santa Cruz YIMBY	Sonnenfeld	Rafa	Set up a strong evaluative framework to assess methodology performance (and base it primarily on the number of units allocated, not the % at different income levels).	AMBAG’s evaluation framework is to ensure the allocation meets the five statutory objectives and addresses the 13 statutory factors. AMBAG proposes using an evaluation framework of metrics as presented in the revised draft methodology to the Planning Directors meeting on November 1, 2021. Evaluation of each jurisdiction’s progress towards fulfilling their RHNA allocation is done by HCD through their Annual Progress Reporting process.	Letter	9/20/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
7	Santa Cruz YIMBY	Sonnenfeld	Rafa	We find that the proposed methodologies presented in the August planning directors meeting do not adequately account for the need for Farmworker Housing. Farmworker jobs are not necessarily accurately captured in the Census data; to ensure that homes are adequately distributed to farmworker communities, we suggest a methodology factor that explicitly allocates approximately 900-1000 80% AMI farmworker housing units (the number of farmworker housing units identified as feasible to construct in the Pajero/Salinas Valley Farmworker Housing study) between the following jurisdictions: Unincorporated Santa Cruz and Monterey Counties, Watsonville, and all Salinas Valley jurisdictions including Gonzalez, Greenfield, King City, Salinas, and Soledad.	Ag jobs are included in our jobs data. We are not using “Census” jobs data—we’re using address-level data from the California Employment Development Department, InfoUSA, and nearly a year of extensive ground-truthing the data by AMBAG staff. These data sources do include agricultural jobs as well as agricultural support jobs. If the number of ag jobs in the 2022 RGF appears low, it is not because we missed ag jobs, it’s because of industry classifications. Within NAICS classifications, support activities for agricultural or animal production (e.g., harvesting contractors, farm labor contractors, crop packaging, warehousing) appear in manufacturing, transportation and warehousing, or wholesale. In addition, a comprehensive review of AMBAG region firms listed in the agriculture NAICS sector showed many support activities. AMBAG staff re-classified these to manufacturing, wholesale, or retail. For these reasons, allocating by total jobs does help to ensure that housing will be planned where farmworkers live. Perhaps more importantly: The listed jurisdictions (Gonzales, Greenfield, King City, Salinas, Soledad, Unincorporated Monterey, Watsonville, and Unincorporates Santa Cruz) account for nearly 2/3rds of the Very Low and Low income allocation (more than 8,000 units) under the proposed framework. Allocating an additional 1,000 units to those jurisdictions (many of which are already lower-income) would necessitate taking lower-income units away from high-resource jurisdictions, and thus perpetuating existing inequalities—a principle RHNA is designed to protect against.	Letter	9/20/2021
8	Santa Cruz YIMBY	Sonnenfeld	Rafa	We recommend using separate allocation methodologies for low-income units assigned to jurisdictions in Monterey County vs Santa Cruz County: in Santa Cruz County, it is reasonable for jurisdictions in Santa Cruz County to plan for low-income units assigned to them on the basis of AFFH high opportunity areas. However in Monterey County, the unincorporated portion of the county has many high opportunity areas that are not good candidates for low income housing due to lack of transportation and other infrastructure necessary to be competitive for affordable housing tax credit financing. We recommend using a methodology that results in reassigning AFFH-based low-income units in Monterey County that would have been assigned to the unincorporated county to instead be allocated to incorporated cities with high opportunity such as Monterey, Pacific Grove, and Carmel.	AMBAG receives one number for both counties. There is a process for becoming a subregion and receiving a separate determination from HCD for that subregion. The timing for that has passed. Monterey and Santa Cruz counties share a number the same characteristics such as: a sizable inter-county commute flow, need for farmworker and college housing, jobs/housing imbalance, a large share of agriculture and tourism based jobs, etc.	Letter	9/20/2021
9	Monterey Bay Economic Partnership (MBEP)	Madrigal	Elizabeth	I would like to submit the attached policy brief as written comment under agenda item 10.B, 6th Cycle Regional Housing Needs Allocation Methodology for the 10/13 AMBAG Board of Directors meeting.  Introduction: MBEP’s housing initiative is aimed at promoting the increase of housing at all income levels in the Monterey Bay region via data driven policies, funding solutions, and advocacy. The purpose of this brief is to bring clarity to the methodology options that are best suited to equitably meet the housing demands of our region, as well as the intricate issues we face. MBEP’s goal is to play a proactive role in convening housing advocates to build a common understanding and developing housing production oriented recommendations for consideration by local government staff and elected officials  The Regional Housing Needs Assessment (RHNA) is one of the tools available to the State of California to address our state wide housing crisis. RHNA requires that jurisdictions adequately plan for existing and future growth within their respective region. The RHNA process can be summed up in four phases, which include: 1) Regional Housing Needs Determination (RHND), 2) RHNA methodology, 3) RHNA plan, and 4) Housing Element updates. For additional information on the Housing Element and all it entails, please refer to MBEP’s Housing Element FAQ.  The Association of Monterey Bay Area Governments (AMBAG) prepares the RHNA plan for Monterey and Santa Cruz counties. The Council of San Benito County Governments (SBCOG) assumes the same role as AMBAG, but for San Benito County. As of the writing of this brief, AMBAG is in Phase 2 - preparing a draft methodology which will be used to allocate a share of the Regional Housing Needs Determination (RHND) to each locality within AMBAG. SBCOG is recently received its Regional Housing Needs Determination from HCD, and is beginning to embark on Phase 2.	Thank you for your comments.	Letter	10/8/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
10	MBEP	Madrigal	Elizabeth	<p>Overview: Historically, the Monterey Bay Region has fallen short of permitting the units needed in order to fulfill the RHNA numbers stipulated for each jurisdiction. As of the latest state reporting period ending July 2021, AMBAG has only met 58.8% of its 5th Housing Element Cycle RHNA allocation, which spans 2014-2023. Further analysis determined that jurisdictions defined as high opportunity areas by the California Department of Housing and Community Development were least likely to be on track to meet their very low and low income RHNA targets. Of the six jurisdictions in AMBAG that have a minimum of three high opportunity areas within them, they were cumulatively found to have only produced 11.94% of AMBAG's overall RHNA allocation. Of note is that between all six jurisdictions in AMBAG that have a minimum of three high opportunity areas tracts within them, they have collectively only permitted 294 very low income and low income units - 7% of AMBAG's allocation for very low income and low income units (4,155 total very low and low income goal). We must continue to track and evaluate the specific practices that have led to high opportunity areas within our region underperforming, especially when it comes to very low income and low income units. As a result of HCD now taking both existing and project housing needs into account when determining the Regional Housing Determination for each COG, the determinations under the 6th Housing Element cycle have turned out to be significantly higher than past determinations. The final regional housing need determination for AMBAG is 33,274 units across four income categories - very-low (extremely-low units are included within this category), low, moderate, and above-moderate. This is a 219% increase from AMBAG's total 5th Housing Element cycle RHNA allocation of 10,430. As for SBCOG, their final regional housing need determination for the 6th Housing Element cycle is 5,005 units across the four income categories of very-low (extremely-low units are included within this category), low, moderate, and above-moderate. This amounts to a 128% increase from SBCOG's total 5th Housing Element cycle RHNA allocation of 2,194.</p> <p>Now that AMBAG has received its RHND from HCD, it is tasked with determining the methodology that will be utilized to allocate the Monterey Bay Region's housing need across jurisdictions. The priority factors AMBAG has identified in developing its methodology are: regional growth forecast, employment, transit, resiliency, and affirmatively furthering fair housing (AFFH). Of note is that the AFFH allocation approach does not affect the number of units a jurisdiction is assigned - it only adjusts the share of allocation for very low &amp; low income units.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	10/8/2021
11	MBEP	Madrigal	Elizabeth	<p>Methodology Approach Case Study: In order to offer a view into a comparable region in the state, the methodology the Santa Barbara County Association of Governments (SBCAG) adopted will be broken down. Similar to AMBAG in that SBCAG is comprised of subregions that are distinct from one another, SBCAG chose to divide their allocation between the North County and South Coast subregions in order to focus on the region's sub-regional jobs-housing imbalance. Afterwards, a jobs-balance allocation method was applied, which includes a 60% weighing on current jobs, and a 40% weighing on forecasted 2020-2030 jobs from SBCAG's Regional Growth Forecast. The result of this first step allocated 60% of the region's RHNA determination to South Coast jurisdictions as this subregion is host to 60% of the region's current jobs. The remaining 40% of the RHNA determination was allocated to North County jurisdictions. Subsequently, SBCAG elected to distribute the subregional allocations to jurisdictions based on equal weighting (50%) for both overcrowding and cost burden. Lastly, SBCAG elected to have the methodology adjusted per RHNA's four income categories. This adjustment made it so that any jurisdiction with a high share of housing from a specific income category would receive a lower proportion of units of that very income category. As a result of this strong equity adjustment, 75% of the lower income RHNA figure was allocated towards high opportunity areas with access to jobs. The methodology approach SBCAG opted to move forward with ought to be further explored by AMBAG as our respective regions are both distinct subregions in which one approach would not adequately take into account the intricacies underlying each subregion. A strong equity adjustment similar to the one SBCAG implemented should also be highly considered by AMBAG in order for high resource areas within AMBAG's jurisdiction to build their fair share of very low and low income units.</p>	<p>Objective 1 of RHNA states: Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households. Housing law does not allow any jurisdiction to get 0 low- and very low income units. By allocating units to jurisdictions based on their number of jobs and their access to high-quality transit, and then shifting across income categories, the proposed methodology does funnel more very low and low income RHNA units to higher-income areas with access to key resources. In assessing the results of the draft methodology, we have also noted that jurisdictions with higher per capita unit allocations have current housing shortages, as illustrated by high rates of overcrowding and high need for farmworker housing. The proposed methodology balances existing housing needs by locating housing where it is needed, and balances equity by shifting across income categories.</p>	Letter	10/8/2021
12	MBEP	Madrigal	Elizabeth	<p>Recommendations to Consider: Farmworker Housing - The Monterey Bay Area region is distinct from various regions in the state in that it is comprised of a multi billion dollar agricultural industry primarily concentrated in the Salinas Valley, as well as a booming tourism industry in the coastal regions of the Monterey Peninsula and Santa Cruz. On the point of economic drivers within the Monterey Bay Region, it is imperative that AMBAG specifically account for the housing needs of farmworkers, especially when factoring in the significant rates of overcrowding in our region when it comes to this special needs population. According to the Farmworker Housing Study and Action Plan for Salinas Valley and Pajaro Valley, farmworker households were found to be occupied at 7 People Per Dwelling (PPD) to the average PPD of 3.23 in Monterey County, and 2.60 PPD in Santa Cruz County. It is recommended that AMBAG staff explore incorporation of a factor allocating very low &amp; low income farmworker housing units throughout the Salinas Valley jurisdictions, Watsonville, and unincorporated Monterey &amp; Santa Cruz counties. AMBAG staff also ought to consider measures that can be taken to address the jobs-housing imbalance prevalent within coastal areas of our region with large hospitality and service sector employees.</p>	<p>While farmworker needs must be taken into account through the RHNA process, AMBAG is mandated to allocate units based on income, not on occupant type. While the farmworker and hospitality/service sectors are located in different places, on balance the distribution jobs across lower-wage industries (ag, retail, services) very closely mirrors that of total jobs across the region. Thus, while it might seem counter-intuitive, the total jobs factor results in an allocation that also distributes units to places with lower-wage industries. Finally, AMBAG explored such an such as allocating RHNA based on type of job based on discussions with the Planning Directors Forum. Ultimately, the consensus was that total jobs made more sense. We also double checked the numbers and found if we did use such a factor as suggested, more units would be allocated to lower income areas and less units allocated to higher opportunity areas. Staff does not feel that this meets the equitable distribution factor as compared to option staff presented.</p>	Letter	10/8/2021
13	MBEP	Madrigal	Elizabeth	<p>Affirmatively Furthering Fair Housing - Another large question to consider is whether AMBAG's methodology is effectively incorporating the Affirmatively Furthering Fair Housing factor. As it currently stands, the Affirmatively Furthering Fair Housing metric AMBAG is utilizing does not affect the total number of housing units a jurisdiction is allocated - it is simply used as a shifting mechanism to adjust the share of very low &amp; low income units a jurisdiction receives. Santa Cruz YIMBY has flagged this usage of the Affirmatively Furthering Fair Housing metric as a concern as it would in effect assign more market rate units to low opportunity communities, which has the potential to lead to gentrification. AMBAG staff ought to review and take into consideration Affirmatively Furthering Fair Housing factors other COGs in the state have utilized that have been shown to produce larger lower income RHNA allocations within high opportunity areas, such as the strong AFFH factors SBCAG and SCAG developed into their methodologies. As stated on the previous page of this brief, SBCAG was able to have 75% of the lower income RHNA numbers allocated towards high opportunity areas. As for SCAG, this COG was able to allocate 95% of their lower income RHNA figures to high and highest resource areas (with the exception of the cities of Industry and Vernon) due to their strong AFFH factor in their methodology.</p>	<p>There is no guidance under state law that suggests total units should be reduced in lower-income jurisdictions. Instead the law states that the RHNA plan must “(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.” [Emphasis added.] In many cases reducing the total number of units could be counter-productive for equity as lower-opportunity jurisdictions tend to have high overcrowding rates and are in need of additional housing. Moreover the research on market rate housing and gentrification is mixed at best.</p>	Letter	10/8/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
14	MBEP	Madrigal	Elizabeth	Water for Housing - Lastly, a distinct issue that AMBAG must take into consideration when developing the RHNA methodology is that of the water supply problem the Monterey Peninsula is faced with. While AMBAG chose to adjust the RHNA allocation of cities within the Monterey Peninsula downwards during the 5th Housing Element cycle, we urge AMBAG to explore options that would not decrease the RHNA allocations of jurisdictions in the Monterey Peninsula, especially as most high opportunity areas within Monterey County are located within the Monterey Peninsula. Detailed in length in MBEP's Study on the Impact of Water on Housing Development in the Monterey Peninsula, a possible solution would be for AMBAG to develop an alternative distribution of the RHNA numbers in order to assign additional units to Peninsula jurisdictions once the Carmel River Cease and Desist order is lifted by the deadline the California State Water Resources Control Board has imposed of December 31st, 2021.9 It is equally important to acknowledge that while water is often cited as a barrier to the production of new housing in the Monterey Peninsula, it is not the main, nor the only barrier to housing development in these communities. Such barriers include community opposition to high density housing, high costs of construction on new housing development, and there not existing a guaranteed source of local affordable housing financing - to name a few. Establishing solutions to combat these challenges well before a new supply of water is available must be accomplished in order for jurisdictions to be well positioned to take advantage, and partner with developers to build housing without any delays.	Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:  1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Letter	10/8/2021
15	MBEP	Madrigal	Elizabeth	Conclusion: The RHNA methodology established by AMBAG must address the housing demands of Monterey Bay residents, both existing and projected, as well as the unique issues we face. Incorporating the considerations above including a strong Affirmatively Furthering Fair Housing factor, adequately accounting for farmworker & hospitality service housing needs, and making production oriented adjustments regarding the Monterey Peninsula's water challenges are vital when equitably planning for the future of our region. Once AMBAG and SBCOG have established their respective methodologies, they will be used to allocate a share of the Regional Housing Needs Determination to each locality that resides within AMBAG and SBCOG. After this step has been completed, each jurisdiction will have to create a Housing Element, which is required to detail how the allocated number of units will be accommodated, and any zoning changes that will need to be made to account for the units stipulated under RHNA. MBEP will be involved throughout the duration of the RHNA process, and urges advocacy groups and community members to become involved in this undertaking that directly shapes the future of our region.	Thank you for your comments.	Letter	10/8/2021
16	Public	Porter	Ed	This Ambag meeting is upon us with its planned big numbers of market rate homes and above. I'm hoping AMBAG Board members will realize that the proposed numbers are upside down. The low and very low numbers are absurdly small! (not to mention that State density bonus law RETARDS and BLOCKS application of our legally required 20% inclusionary mandate! ) Guess who dreamed THAT up as a dishonest pretext to get more affordable housing! It seems like the people who proposed the published schedule (below) have not read newspapers for a few years. (haven't noticed the homeless camps?) I would challenge their methodology because it clearly delivered a ridiculous set of numbers that do not address our true and clear needs especially for very low income units. Very Low (0-50% AMI) = 817 units Low (50-80% AMI) = 534 units Moderate (80-120% AMI) = 427 units Above Moderate (120% or more of AMI) = 1,092 units	HCD provides the units by income categories as part of its Regional Housing Need Determination.	Email	10/10/2021
17	Public	Porter	Ed	As far as I am concerned, the need for moderate and especially above moderate is negligible and that's clearly demonstrated by lack of residents (vacancies) at 555 Pacific Ave. and probably at other Downtown locations like 2030 N. Pacific. Way back when I was on the SC City Council, AMBAG was setting absolutely absurd, ridiculous numbers for the City of Santa Cruz. Fact is, we had to take AMBAG to court to get reasonable numbers! I hope our elected friends who understand these things will put ideas something like this on the AMBAG record for the Wednesday meeting. Is this reasonable? "The state's requirements for the number of homes built in Santa Cruz and Monterey counties will more than triple starting in June 2023. NO! Not reasonable. It's bizarre! And how on Earth can they say with a straight face that the quota for above Moderate (120% or more of AMI) = 1,092 units? THAT's what I am calling gentrification insurance. (or Gentrification guarantees!) Regarding AMGAG methodology, I think the decline in the California 2020 US census population should send them back to their "drawing boards"! If there was an emergency in previous years, with a population decline since, and increased housing production on record, the emergency has ended by definition. Let's address the true deficiency especially of very low income units! THAT is a true emergency!	HCD provides the units by income categories as part of its Regional Housing Need Determination.	Email	10/10/2021

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18	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	California YIMBY, Santa Cruz YIMBY, and YIMBY Law are submitting this letter to the Association of Monterey Bay Area Governments to provide recommendations for adopting a Regional Housing Needs Allocation methodology, based on best practices developed through rigorous academic analysis by experts in the field of planning and housing development, of various methodologies that have already been adopted by Councils of Governments in other regions during the 6th Housing Element Cycle. We also offer our own analysis of the ability of the currently proposed RHNA methodology to meet the statutory requirements for the RHNA process, and make specific recommendations for modifications to the methodology that would further the required statutory objectives, beyond what has been proposed, which we believe to be inadequate.  Accompanying this letter we have included a copy of the RHNA Methodologies Best Practices report from the UC Berkeley Turner Center for Housing Innovation. This report highlights some important policy considerations which we believe AMBAG have, to date, not incorporated sufficiently into its proposed allocation methodology. There are a number of best practices COGs can use to increase the likelihood that their allocation promotes the statutory objectives of RHNA. These are highlighted in this letter with bullet points.	Thank you for your comments.	Letter	10/15/2021
19	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	Put more emphasis on strategies that promote both RHNA’s equity and environmental goals simultaneously. Allocating RHNA near existing job centers promotes both equity and environmental goals because workers are often forced to commute long distances when adequate housing isn’t available near jobs. COGs should put more emphasis on factors such as proximity to jobs that can simultaneously promote both the state’s equity and environmental goals.  In an equitable distribution, we would expect to see, at the very least, no pattern of lower-income jurisdictions consistently taking on a larger share of the RHNA allocation relative to their share of the region’s population or jobs. Ideally, given that wealthier jurisdictions have historically used exclusionary policies to limit growth within their jurisdictional boundaries, we would see higher-income jurisdictions taking on a larger share of the regional RHNA allocation relative to their share of the region’s population and jobs. On the following page is a chart of AMBAG’s RHNA distribution as currently proposed in the staff’s recommended methodology compared to existing housing stock. This chart shows the total number of housing units in each jurisdiction according to the 2020 US Census, as well as the Attachment 5 percentage growth that the proposed allocation has, based on their 2020 total number of housing units.  As currently proposed, AMBAG’s regional methodology does an extremely poor job at promoting equity. According to the 2020 US Census, the AMBAG region has a total of 249,976 housing units. With a determination of 33,274 units for the region, the total regional growth is 13.3%. As currently proposed, some of the wealthiest, most exclusive jurisdictions in our region, such as Carmel and Pacific Grove, are being allocated much smaller growth rates, less than 6%, compared to the region as a whole; while less affluent, more rural communities such as Greenfield and King City are being allocated over 25% growth rates, and two jurisdictions, Sand City and Gonzales, are each being allocated over 100% growth rates. We strongly encourage AMBAG to adopt a more equitable allocation strategy to ensure areas of highest opportunity and access to employment are allocated higher than average growth rates, not lower than average growth rates, as is currently the case.	A substantial share of the proposed RHNA allocation is based on jobs. The proposed methodology balances existing housing needs by locating housing where it is needed, and balances equity by shifting across income categories.	Letter	10/15/2021
20	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	Consider equity directly when determining how many total RHNA units a jurisdiction will receive. Using explicit equity-focused factors—such as measures of segregation or opportunity—when determining each jurisdiction’s total RHNA allocation can help ensure lower-income and racially segregated areas are not taking on more than their fair share of RHNA, while also funneling more RHNA to higher income areas with access to key resources that promote economic mobility. We note that AMBAG’s current methodology does not consider equity directly when determining total RHNA allocations. Instead, staff have proposed an “income-shift” approach that swaps low-income units from lower-opportunity jurisdictions with the higher-income units from higher opportunity areas. The intended outcome of the staff approach is to affirmatively further fair housing by increasing the percentage of low-income units planned for in higher opportunity areas, however, we believe a better approach would be to instead allocate additional total numbers of low income units to areas of high opportunity, instead of just shifting the percentages.	AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.  The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.	Letter	10/15/2021



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21	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	ABAG calls our preferred approach the “Bottom-Up” AFFH methodology. In contrast to the Income Shift, the Bottom-Up income allocation approach does not start with a total allocation assigned with a factor-based methodology. Instead, this approach builds up the total allocation by using factors to determine allocations for the four income categories separately. Factors are selected for the lower two income categories, and then for the upper two income categories, and a jurisdiction’s allocation within each income category is determined based on how the jurisdiction scores relative to the rest of the region on the selected factors. The jurisdiction’s total allocation is calculated by summing the results for each income category. The bottom-up approach ensures that more low income units go to where they are needed most: near higher paying jobs, and in historically exclusive communities. COG planning staff in other regions argue that simply performing an income shift to affirmatively further fair housing for RHNA allocation is sufficient, given that what really matters is how much lower-income RHNA wealthier jurisdictions receive, not their total RHNA allocation. This is due to the fact that lower-income RHNA must be accommodated with a higher zoned density (generally 30 units per acre). Therefore, if suburban or rural jurisdictions receive a large allocation of lower-income units, they will likely accommodate the RHNA with parcels located near the urban core (given that they won’t want high density buildings located on the outskirts of town). On the other hand, if these jurisdictions receive a large allocation of higher-income units, they may find that the easiest way to accommodate their RHNA is to zone for single family housing on undeveloped land – which could lead to sprawl. Consequently, some COGs argue that ensuring non-urban jurisdictions receive a high percentage of lower-income units and a relatively small total RHNA allocation is the best strategy for promoting both RHNA’s equity and environmental objectives. The proposed methodology that AMBAG staff are recommending does not follow the recommended strategy of low total allocations to non-urban jurisdictions. In fact, unincorporated Monterey County, the most rural jurisdiction in the region, is proposed to be allocated the second highest total number of housing units of any jurisdiction in the region after the city of Salinas, while another relatively rural jurisdiction, Gonzales, is proposed to be allocated over a 100% unit increase from 2020 levels, with over 66% of the proposed 2,261units being moderate or above moderate housing units. Gonzales’ proposed total allocation is nearly as large as the proposed allocation for unincorporated Santa Cruz County, which is a much larger, more urban, higher resourced jurisdiction with over ten times the existing housing stock. Using a bottom-up approach to affirmatively further fair housing would not only help to reduce the likelihood of sprawl development in rural communities such as Gonzales, but would help ensure more homes in our region will be built for people of lower incomes in areas of the highest opportunities.	AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.  The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.	Letter	10/15/2021
22	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	Consider a jurisdiction’s connection to the regional job market, rather than the number of jobs located within a jurisdiction. There is existing data that measures how many jobs are within a 30-minute commuting distance by car of census blocks across the state. Using this data to allocate RHNA can ensure that smaller, wealthier jurisdictions that might be located adjacent to a job center, but don’t have a large number of jobs within their jurisdictional boundary, are still allocated their fair share of RHNA.  Consider a jurisdiction’s connection to the regional job market, rather than the number of jobs located within a jurisdiction. There is existing data that measures how many jobs are within a 30-minute commuting distance by car of census blocks across the state. Using this data to allocate RHNA can ensure that smaller, wealthier jurisdictions that might be located adjacent to a job center, but don’t have a large number of jobs within their jurisdictional boundary, are still allocated their fair share of RHNA.	Looking at any factor—including jobs--without considering jurisdiction size could lead to unreasonable results (such as thousands of units allocated to a city that is just a few square miles in area). Objective 2 of RHNA states “Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.”  Statute, and thus the methodology, centers on jobs “in each jurisdiction.” As a legacy of Prop 13, job-heavy jurisdictions have fiscal incentives to avoid planning for housing within their jurisdiction. Diluting their imbalance by looking at neighboring areas could undermine this RHNA objective.	Letter	10/15/2021
23	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	Carefully weigh whether basing the RHNA allocation on the land use projections in the SCS is appropriate. Some SCS land use projections incorporate factors—such as the speed by which jurisdictions approve housing permits and a jurisdiction’s current zoned capacity—that arguably should not be considered at any point in the RHNA allocation process based on statutory guidelines. Further, allocating RHNA based on these land use projections can result in an allocation that does not further the statutory objectives of RHNA. In these cases, COGs should not assume they are legally required to allocate RHNA based on the SCS. The AMBAG Sustainable Communities Strategy states that “All growth is consistent with General Plans and was based on direction from jurisdiction planning staff.” This makes it problematic to use the SCS as the primary basis for assigning RHNA when RHNA may specifically require general plan amendments to implement. Relying on the SCS for a baseline allocation bakes in the constraints from jurisdictions existing general plans, and doubles down on existing patterns of systemic segregation and inequity to the extent that those are undressed in the existing general plans. AMBAG staff currently propose to allocate part of the RHNA, approximately half, based on the land use projections in their SCS, which is primarily designed to help the region meet its greenhouse gas reduction goals. When equity is taken into account, it is as a secondary step that only affects what percentage of a jurisdiction’s RHNA allocation falls into each of the four income buckets. AMBAG’s SCS gives jurisdictions that believe they are already “built out” a lower proportion of the projected population growth, even if they also have high access to jobs and other key resources. AMBAG’s SCS incorporates factors—such as the speed by which jurisdictions approve housing permits and a jurisdiction’s current zoned capacity—that should not be considered at any point in the RHNA allocation process given statutory guidelines. Further, depending on how the SCS incorporates existing zoned capacity into its growth projections, predominantly using the SCS to allocate RHNA could result in a distribution that does not further any of the five statutory objectives.	In the current proposal, more than half of the RHNA allocation is based on factors other than the Regional Growth Forecast (RGF). Having the RHNA consistent with the MTP SCS is important but is not the only—nor the dominant factor being proposed. Also, objective 2 of RHNA states “Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.” Allocating a share based on the plan that underlies the RTP SCS is important to meeting the goals of protecting environmental and agricultural resources and achieving the region’s greenhouse gas reduction targets. While this is not the only factor under consideration, future plans are an important consideration toward meeting this objective. Finally, your letter references the existing 2040 MTP/SCS which was adopted in June 2018. Over the past two years, AMBAG has been preparing its updated 2045 MTP/SCS in which we worked very closely with local jurisdictions in identifying changes in land uses out to 2045. Most current general plans only go to 2030. Many jurisdictions are currently updating their general plans or conducting other planning efforts which are being reflected in the Draft 2045 MTP/SCS which is scheduled to be released in November 2021.	Letter	10/15/2021

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24	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	Use publicly available data from objective, external sources. Allocating RHNA based on COGs’ internal data that incorporates local input raises equity concerns, because it allows small, wealthy jurisdictions that have a significant political incentive to minimize local housing development an opportunity to bias the RHNA allocation. Wherever possible, COGs should use publicly available data from external sources within their RHNA allocation methodology. We request that all sources of data be cited and made available to the public and to the AMBAG Directors prior to the draft methodology approval. We are particularly concerned that the data selected for the proposed draft methodology to date does not identify the cities of Del Rey Oaks or Scotts Valley to be jurisdictions of high opportunity, despite the fact that they both have much higher than average median incomes compared to the region as a whole. Without datasets that reflect our shared understanding of reality, it is hard to believe the intended outcomes of the selected methodology will accurately reflect the values AMBAG emphasizes in its allocation approach. More transparency for datasets is crucial for an informed decision-making process.	All data used in RHNA is publicly available.  The 2022 RGF was approved by the AMBAG Board of Directors through public meetings and is available on the AMBAG website. <a href="https://www.ambag.org/sites/default/files/2020-12/Final%20Draft%202022%20Regional%20Growth%20Forecast_PDF_A.pdf">https://www.ambag.org/sites/default/files/2020-12/Final%20Draft%202022%20Regional%20Growth%20Forecast_PDF_A.pdf</a>  The majority of the RHND is proposed to be allocated based on: - Jobs (Employment), published as part of the RGF (see link above) and was based on data from the California Employment Development Department and InfoUSA. - Wildfire—CPUC and the Office of the State Fire Marshal - Sea Level Rise—NOAA - AFFH: TCAC/HCD Opportunity Area Maps or RCAs (U.S. Census Bureau, American Community Survey (2015-2019), and 2020 Census)  AMBAG staff has submitted a request to EDD to allow us to share the confidential jurisdictional level EDD employment data. The county level data is already available. In addition, AMBAG has shared the InfoUSA data with any local jurisdiction who has requested it. Finally, the AMBAG Board could choose to direct staff to use a different data source for jobs data.	Letter	10/15/2021
25	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	Develop strategies that allow stakeholders to meaningfully participate in discussions about how to allocate RHNA. The RHNA process is very complex, but some COGs have developed tools that allow the public to understand more intuitively how different RHNA allocation strategies affect the spatial distribution of RHNA. More COGs should use these tools to ensure that stakeholders can meaningfully weigh in during the RHNA methodology development process. We are dismayed that AMBAG has not been able to produce a tool that allows the public to understand how various allocation strategies, as determined by any proposed methodology, will result in distribution of housing units to each of the jurisdictions. We have only been able to estimate distributions based on the calculations staff have produced for their recommended methodology, but both the public and AMBAG Directors have not been afforded the opportunity to review calculations for alternative methodological options to see how those options might change the distributions assigned to each city or unincorporated county in the Monterey Bay Area. While at this stage we recognize it’s unreasonable to develop a tool such as ABAG’s methodology visualization tool, we encourage the staff to at least provide calculations for distributions of multiple methodology alternatives, including those we are recommending in this letter. Understanding the extent to which a methodology promotes RHNA’s statutory objectives requires not only understanding the broad theoretical approach employed by a COG, but also an analysis of the plan’s actual output.	AMBAG has limited resources as compared to other large CA COGs such as ABAG. AMBAG has worked to provide very technical information in a way that staff, elected officials, stakeholders and members of the public can understand. AMBAG will continue to work on improving how we present this information the RHNA plan.	Letter	10/15/2021
26	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse  Sonnenfeld	Aaron  Rafa	We hope that the leaders of the Monterey Bay Area region recognize the seriousness of the task at hand: planning for the region’s state-mandated future growth for the next decade. While this process may be new to some of you, or familiar to others, what differentiates RHNA and the Housing Element now, in this current planning cycle, from previous cycles is the added legal weight that the state has placed on local jurisdictions to ensure that the planned housing goals are actually achieved. In years past, a city or county could get away with failing to zone for affordable housing at the required densities, or failing to facilitate the planned housing growth by falling short of its RHNA objectives; that is no longer the case. Now that state lawmakers have beefed up the enforcement mechanisms to ensure compliance with state law, with potential fines, reductions in funding, and loss of control of local land use decision making, it is imperative that the RHNA process be executed carefully and intentionally. Since housing growth based on RHNA allocations is now expected to actually be achieved, and since there are serious consequences for failing to meet the requirements of the law, it’s important that the RHNA methodology be adopted with as much care and diligence as possible. We believe the best outcomes for the Monterey Bay Area region: more affordable housing where it’s needed most; reduced greenhouse gas emissions, more opportunities for social mobility, economic growth, and improved quality of life, will be best achieved by learning from what worked and what didn’t work in other regions, and applying those lessons to the task at hand. Please take heed of our recommendations and review the attached RHNA Methodologies Best Practices report from the UC Berkeley Turner Center on Housing Innovation. We also want to extend an offer to meet with any representative from any AMBAG Jurisdiction who would like to discuss our recommendations in greater detail prior to the adoption of the draft methodology at your November board meeting.	Thank you for your comments.	Letter	10/15/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
27	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	I write on behalf of LandWatch Monterey County regarding the draft proposed RHNA methodology and to follow up on the concerns we raised at the Planning Director’s Forum Monday. LandWatch suggests a substantial reduction in the initial allocation of 3,083 units that would be assigned to the unincorporated area of Monterey County on the basis of the draft proposed methodology. In particular, LandWatch recommends no units be allocated to the unincorporated area of Monterey County on the basis of its share of regional jobs because the draft proposed methodology over-allocates units on that basis: the unincorporated area of the County does not have a jobs/housing imbalance. LandWatch proposes that AMBAG staff recommend this reduction as an adjustment when applying the 13 statutory factors mandated by Government Code Section 65584.04(e) because a number of these statutory factors justify such a reduction.	Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:  1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Letter	11/2/2021
28	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	Over-allocation of units to unincorporated Monterey County based on jobs. The primary factors used to make the initial allocation in the proposed draft methodology are the housing units for each jurisdiction projected in the Regional Growth Forecast from 2025-2035 (637 units for the County) and the percentage of regional jobs for each jurisdiction (resulting in an additional 2,357 units allocated to the County). LandWatch generally supports using jobs as a primary basis to allocate RHNA for cities. This is consistent with the statutory objective to promote an “improved intraregional relationship between jobs and housing.” (Gov. Code, § 65584(d)(3).) For cities, the focus on employment is also consistent with the statutory objective to promote “infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.” (Gov. Code, § 65584(d)(2).) However, for the unincorporated area of Monterey County the allocation of housing units based on the percentage of regional jobs conflicts with the objective to promote infill development, protection of the environment and agricultural resources, efficient development patterns, and attainment of GHG reduction targets. Although locating housing units in a city that has jobs can minimize GHG emissions by limiting commutes to the dimensions of the city, there can be no assurance that the County can or will develop housing that is proximate to jobs. Average VMT is higher for both home-based and employment-based trips in the unincorporated County than it is in incorporated areas, so it makes sense to concentrate new units in cities. The zoning the County may create to respond to the County’s RHNA allocation may be very distant from the available jobs, whereas workers in jobs dispersed in the County, e.g., the 13.3% of County workers who are in agricultural work, could likely be housed in the cities proximate to their jobs. We note almost five times as many agricultural workers in Monterey County live in cities than in unincorporated areas.	In assessing the results of the draft methodology, we have also noted that jurisdictions with higher per capita unit allocations have current housing shortages, as illustrated by high rates of overcrowding and high need for farmworker housing. The proposed methodology balances existing housing needs by locating housing where it is needed, and balances equity by shifting across income categories.	Letter	11/2/2021
29	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	Furthermore, allocating housing units to the unincorporated area of the County is the antithesis of supporting compact urban growth and efficient development patterns. And allocating housing units to the County is likely to consume farmland. LandWatch is also concerned that the draft methodology allocates so many units to the County based on jobs even though the unincorporated County does not have a jobs/housing imbalance. This is evident from your presentation to the Planning Directors, in which the unincorporated area is not identified as one of the seven areas in Monterey County in which the jobs/housing relationship “should be considered.” The jobs/housing ratio for unincorporated Monterey County is 1.5, equal to the regional average and lower than the County average of 1.7.5 In short, there is no jobs/housing problem in the unincorporated area that needs to be fixed by allocating so many housing units. Despite this, the draft methodology assigns 2,357 additional units to the unincorporated area on the basis of a jobs/housing imbalance, almost four times as many as the 637 units that are allocated to meet the Regional Growth Forecast. No other jurisdiction except the cities of Monterey and Carmel are allocated more units for jobs than for their Regional Growth Forecast. However, unlike the unincorporated County, Monterey and Carmel are clearly communities suffering huge jobs/housing imbalances, as evidenced by substantial in-commuting.6 Carmel has a net in-commute of 1,604 persons, i.e., persons living outside the city commuting into it minus persons living in the city commuting out of it. Monterey has a net in-commute of 11,506 persons. By contrast, the unincorporated County has a net out-commute of 421 persons.	Part of AMBAG’s high Regional Housing Need Determination from HCD was to accommodate the existing housing demand that has not been met in the region. Monterey County has a large share of agriculture jobs and needs farmworker housing.	Letter	11/2/2021



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30	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	Statutory factors warrant a substantial reduction in the allocation to unincorporated Monterey County. While the employment-based allocation may work for cities, it does not work for the unincorporated area of Monterey County. Fortunately, the over-allocation to the County can be corrected without disturbing the employment-based allocation to cities, simply by applying one or more of the 13 statutory factors enumerated in Government Code Section 65584.04(e)(1) through (13). The AMBAG staff's proposed methodology expressly contemplates that adjustments will be made to the initial allocation to account for the other factors set out in Government Code Section 65584.04(e). These factors mandate a substantial reduction in the allocation to unincorporated Monterey County. (Gov. Code, § 65584.04(e) [where data available, the COG “shall include the following factors to develop the methodology that allocates regional housing needs . . .”].) First, Government Code Section 65584.04(e)(4) mandates that the RHNA methodology shall include as one of its factors any “agreements between a county and cities in a county to direct growth toward incorporated areas of the county.” The County has previously recognized the need to focus growth in cities by entering into just such MOAs and MOUs with cities to direct growth into incorporated areas. Second, Government Code Section 65584.04(e)(2)(D) mandates that the RHNA methodology shall include consideration of “County policies to preserve prime agricultural land.” Monterey County General Plan Agricultural Element contains numerous policies that seek to preserve prime agricultural land, and in particular, seek to avoid conversion of that land to non-agricultural use. For example, Policy AG-1.4 provides that on lands classified as Prime, of Statewide Importance, Unique, or of Local Importance, agriculture uses shall be conserved and that “agriculture shall be established as the top land use priority for guiding further economic development on agricultural lands.” Third, Government Code Section 65584.04(e)(12) mandates that the RHNA methodology shall include consideration of the region’s greenhouse gas targets. As noted above, VMT associated with unincorporated Monterey County housing and employment is higher than the average VMT for the rest of the County, i.e., higher than the VMT for the cities within the County. Thus, GHG emissions are higher. Again, no fundamental change to the initial allocation methodology is required in order to reduce the County’s allocation in recognition of these statutory factors and in recognition that jobs/housing imbalance rationale does not fit the unincorporated area the way it fits cities. Thus, in applying the Government Code Section 65584.04(e) factors, LandWatch proposes that the units initially allocated to the unincorporated area of Monterey County be reduced by the 2,357 units representing the over-allocation of units based on employment.	Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e) . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:  1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Letter	11/2/2021
31	City of Monterey	Uslar	Hans	The City of Monterey requests that the AMBAG Board delay adoption of the Regional Housing Needs Allocation until AMBAG staff provides a detailed presentation on the two sources of data that were used to develop the employment numbers (InfoUSA and State of California Employment Development Department - EDD). Eighty-five percent of the proposed RHNA allocation is weighted on employment and regionally we need confidence in the employment numbers for the allocation to proceed. AMBAG signed a confidentiality agreement with EDD regarding the data, and AMBAG staff recently recommended that each City contact EDD for their own agreement to verify the information. In our opinion, this is an inefficient and not transparent approach. We are asking that the Board direct the AMBAG staff to have the agreement with EDD modified so they can share the data with qualified staff members from each jurisdiction so we can verify the numbers. It would also be helpful if AMBAG shared the InfoUSA data in a format that can be verified by the local jurisdictions (versus the raw GIS data). Alternatively, the City and other cities will need adequate time to enter into an agreement with EDD and prepare the GIS maps.  In contrast, the confidential EDD data used in the AMBAG projections estimates 40,989 jobs in Monterey in 2020. AMBAG staff explained that the Census and publicly available EDD data is based on number of employees versus jobs. Our City, and we suspect other cities as well, needs to understand the employment data in more detail to gain confidence in the difference between 24,926 and 40,989 jobs. In summary, the City is urging the AMBAG Board to delay adoption of the Regional Housing Needs Allocation until clarification of the employment data can be provided at a detailed level to qualified staff members and the Board of Directors. We hope that this clarification could occur before the end of the calendar year.	The 2022 Regional Growth Forecast (RGF) was developed over a two-year period which included multiple meetings with the Planning Directors Forum and local jurisdictions. AMBAG met with each local jurisdiction multiple times to review all the jobs, population and housing data in 2019 and 2020. No concerns were identified with the jobs data at that time. In November 2020, the AMBAG Board unanimously approved the use of the 2022 RGF for planning purposes in the development of RHNA and the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy.  It is important to note that there are multiple sources of jobs data, and multiple ways to define jobs. It was suggested that jobs data from other sources, such as the U.S. Census Bureau LODES data, would be better for use in the RHNA methodology. However, the U.S. Census Bureau LODES database excludes military, self-employed, and informal jobs as well as well-documented challenges associated with “headquartering” whereby all jobs are assigned to a headquarters location, such as a school district office, rather than to the place of work, such as the school. More importantly, if another jobs dataset were to be used, the distribution of jobs across jurisdictions or percent share for each jurisdiction would largely be the same. Because the RHNA methodology is based on the distribution of jobs or percent share, rather than total number of jobs, there would not be any substantial changes in the RHNA allocation regardless of what jobs data was uses.  Finally, reaching an agreement with EDD to share the jobs data took nearly several years to finalize and states “No confidential data will be disclosed to any AMBAG member cities or counties.” AMBAG has submitted a request to EDD for disclosure of additional data, but notes that this limitation has been imposed to protect 3rd party privacy information pursuant to Gov. Code Section 6254(c).	Letter	11/5/2021

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32	SC YIMBY	Sonnenfeld	Rafa	I wanted to direct your organization's attention to the proposed RHNA methodology that AMBAG staff are set to bring to the BOD for a vote next week (Wednesday, 11/10). There was a final meeting of the AMBAG planning director's forum yesterday where staff presented a new preferred methodology. We have been advocating for significant changes to the methodology being considered by AMBAG, but it appears our concerns are falling on deaf ears. Our most recent letter is included in the attached agenda packet for yesterday's meeting. Below are a few concerns about the AMBAG approach to AFFH and 65584.04(e)(4) which are particularly problematic in how they affect the unincorporated Monterey County, and the RHNA as a whole. According to AMBAG staff, upon conversations with HCD, they have been asked to increase the weighting of their equity adjustment, so they have. You'll notice that there is a new category called "RCAA," which stands for Racially Concentrated Areas of Affluence, that is basically the revised equity adjustment. The proposal is now to give a 50% adjustment for Affirmatively Furthering Fair Housing (AFFH) after the base allocation, to shift low and very low income units into high opportunity areas and out of low opportunity areas based on whether or not the jurisdiction has both higher than average white population and a higher than average affluent population. This is generally good a good concept, and makes sense for most cities, but it's executed poorly and it now highlights how inadequate the base allocation methodology is, because it results in assigning over 17% of the region's low income housing to unincorporated Monterey County, a jurisdiction that has a legal settlement that prevents them from AFFH. Pasted below is the staff-recommended methodology table Option B, which also changes the methodology of their AFFH income shifting within jurisdictions by swapping VLI units for above moderate units and LI units for moderate units instead of the previous method (Option A) which swapped VLI for moderate units and LI for above-moderate units. HCD strongly encourages the Option B approach to income shift as opposed to the previous Option A.	Unincorporated Monterey County is identified as a RCAA and similar to other RCAAs under the revised draft methodology, additional low and very low units are shifted to RCAA jurisdictions.	Email	11/5/2021
33	SC YIMBY	Sonnenfeld	Rafa	The Carmel Valley area of unincorporated Monterey County has a hard development cap of 190 units due to a legal settlement agreement with the Carmel Valley Association. That area is the reason why the unincorporated county has received so many affordable units (to further AFFH, which the county is legally prevented from doing--see the settlement agreement [ec2-34-221-130-80.us-west-2.compute.amazonaws.com]); relevant section about the growth cap is pasted below). So it will be virtually impossible for the County to achieve its AFFH requirements through its housing element process because it is legally prevented from increasing development in its highest opportunity community. The practical effect of Monterey County's RHNA allocation will be to up-zone areas like unincorporated Castroville for the purposes of providing affordable housing, even though that will directly conflict with the goals of AFFH; 17% of the region's very low income housing will be directed to areas that result in exacerbation of economic segregation. My hope would be if AMBAG approves this flawed methodology and HCD does sign off on this plan, that Monterey County commit to try to achieve their VLI RHNA through on-farm farmworker housing programs or something else that will be a real commitment to production of affordable housing instead of a paper pushing exercise. The other thing AMBAG staff has done is made it so that a jurisdiction loses 50% of their allocation of low and very low income if it's not a "Racially Concentrated Area of Affluence." And their definition of RCAA is that a city has to be both above-average wealthy, and above-average white. There is no sliding scale; it's all or nothing. Under the previously proposed income shift methodology, the city of Santa Cruz would have had 817 VLI units and 534 LI units. But because the city is only 66% affluent and not 67% or 68% affluent, it's getting just 424 VLI units and 278 LI units. A simple solution to this would be to give partial credit to jurisdictions like the City of Santa Cruz, which meets 98% of AMBAG's definition of an RCAA.	The Board of Directors could direct staff to modify the definition of RCAA and include those jurisdictions that qualify as a partial RCAA.	Email	11/5/2021
34	SC YIMBY	Sonnenfeld	Rafa	There was also an attorney representing LandWatch Monterey County on the call as well, who brought up an important context that seems to be missing from AMBAG's analysis: that Monterey County has MOUs with several cities regarding development. He forwarded me a letter he sent to AMBAG. They are arguing for a reduction to unincorporated Monterey County's total allocation, and I agree with their reasoning. "The County has previously recognized the need to focus growth in cities by adopting policies to limit residential development in the unincorporated area and by entering into MOAs and MOUs with cities to direct growth into incorporated areas. (See, e.g., agreements with Greenfield, Gonzales, and Salinas at https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/resources/mous [co.monterey.ca.us]). Indeed, Government Code Section 65584.04(e)(4) mandates that the RHNA methodology "shall include" as one of its factors any policies that direct growth toward cities, including "agreements between a county and cities in a county to direct growth toward incorporated areas of the county."	These comments are included as Comments #27-30.	Email	11/5/2021

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35	SC YIMBY	Sonnenfeld	Rafa	We still feel a more equitable approach to the overall methodology is to use the "bottom up" approach as outlined in our letter, that creates a separate allocation methodology for each bucket of affordability, rather than the income-shift methodology that is on the fast track to adoption. There will still need to be adjustments for statutory requirements, especially concerning the situation in unincorporated Monterey County. To account for farmworker housing, which was a concern several jurisdictions, such as Soledad, feel is being overlooked, the original idea we had was to create a farmworker housing threshold/adjustment so that we could be sure that each jurisdiction with a farmworker housing need would be sure to get at that minimum number of units for low/very low. One way that could be done is by re-allocating the huge number of VLI units in unincorporated Monterey County to the other farmworker jurisdictions. Monterey County will almost certainly need to be adjusted down to fulfil the statutory requirement of directing housing to infill and AFFH.	Areas with the most agricultural jobs, and thus highest need for farmworker housing are Unincorporated Monterey and Salinas, followed by Greenfield, Watsonville, Unincorporated Santa Cruz, Gonzales, Soledad, and King City. Creating a separate farmworker housing factor would add units to those jurisdictions. Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:  1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Email	11/5/2021
36	SC YIMBY	Sonnenfeld	Rafa	I wanted to make sure you and your staff are aware of some of the problems with AMBAG's proposed RHNA methodology, which is being voted on next week. I'm forwarding you an email thread raising some of our concerns. In addition to those comments, I have some additional technical details about the problematic proposal as it relates to unincorporated Monterey County. It may be helpful to start from the beginning of this thread (at the bottom). Based on the allocation recommended by staff at the Monday meeting, Monterey County would have to have to find somewhere to zone for 1,370 very low and 896 low income units. Since Monterey County's 2010 General Plan bars sprawl development (GP Policy LU-1.19), the affordable units would have to be located in <ul style="list-style-type: none"> <li>the "Community Areas" of Castroville, Chualar, Boronda, East Garrison, and Pajaro, of which Pajaro and Chualar are the highest priority (LU-2.23)</li> <li>the "Rural Centers" of Bradley, Lockwood, Pine Canyon, Playto, River Road, San Ardo, and San Lucas, or</li> <li>the 3 Affordable Housing Overlay districts (see Policy LU-2.11)</li> </ul> o AHO1 - 13-acre Mid-Carmel Valley - see map at <a href="https://www.co.monterey.ca.us/home/showpublisheddocument/45880/636389941503600000">https://www.co.monterey.ca.us/home/showpublisheddocument/45880/636389941503600000</a> [co.monterey.ca.us] o AHO2 - 85-acre Airport Area AHO - see map at <a href="https://www.co.monterey.ca.us/home/showpublisheddocument/45940/636389942172030000">https://www.co.monterey.ca.us/home/showpublisheddocument/45940/636389942172030000</a> [co.monterey.ca.us] o AHO3 - 31-acre Highway 68/Reservation Road AHO - see map at <a href="https://www.co.monterey.ca.us/home/showpublisheddocument/45942/636389942179370000">https://www.co.monterey.ca.us/home/showpublisheddocument/45942/636389942179370000</a> [co.monterey.ca.us]	Comment noted.	Email	11/5/2021
37	SC YIMBY	Sonnenfeld	Rafa	These are the only areas in which the General Plan permits Monterey County to focus future growth. (GP Policy LU-1.19.) And at this point, no additional development would be allowed in the Mid-Carmel Valley AHO in light of the 190-unit cap in the Carmel Valley Master Plan. (GP Policy CV-1.6.) Ironically, only the Mid-Carmel Valley site actually has the resources and opportunities that are supposed to be the rationale for allocating so many lower income units to the County.  There are various prerequisites to non-affordable project development in the Community Areas and Rural Centers, including the adoption of a Community Plan for Community Areas (Policy LU-2.23) and adoption of a Capital Improvement and Financing Plan for Rural Centers (Policy LU-2.29). The purpose of a Community Plan is to create a livable community by implementing General Plan Policy LU-2.22, which requires the following elements: LU-2.22 Community Areas shall be designed to achieve a sustainable, balanced, and integrated community offering: a) A vision for that community b) Various types and nature of land use designations including: o A diverse range of residential densities and housing types. o A mix of retail commercial businesses and offices. o Industrial development where appropriate. o A variety of recreational opportunities and public amenities integrating enhancement of existing natural resources into the community where possible. c) Adequate public facilities and services including public water and sewer, an extensive road network, public transit, safety and emergency response services, adequate flood control, parks, and schools. d) Opportunities for workers to live near jobs.	Comment noted.	Email	11/5/2021



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38	SC YIMBY	Sonnenfeld	Rafa	<p>To our knowledge, Monterey County has not yet adopted any community plans for Community Areas or Capital Improvement and Financing Plans for Rural Centers. However, Community Plans and Capital Improvement and Financing Plans are not required for 100% affordable projects in Rural Centers and Community Areas. (GP Policy LU-2.11 b, f, g.) The only requirement for a 100% affordable development in these areas is that it take care of its own infrastructure needs. (Policy LU -2.11, f, g.)</p> <p>If the current allocation is adopted, Monterey County’s revised Housing Element will have to upzone at least 113 acres of land in the Community Areas, Rural Centers, or AHOs to high density, i.e., at least the 20 units per acre required to meet HCD’s density mandate for low income units (1370+896=2266 units, divided by 20 units per acre=113 acres). In effect, this means that the only way that Monterey County could develop its Low and Very Low Income affordable housing at this point would be to locate it in</p> <ul style="list-style-type: none"> <li>Community Areas, but without the Community Plans that are supposed to make the areas livable,</li> <li>Rural Centers, but without Capital Improvement and Infrastructure Plans and far from jobs and other opportunities,</li> <li>in the 116 acres of AHOs at Reservation Road and Highway 68 or around the Airport, where there would be no space to develop any other uses since essentially all of the space would be needed for the VL and L Income units</li> </ul> <p>This would result in isolated low income affordable units without community plans or comprehensive infrastructure plans. This segregation without resources or opportunities is contrary to the intent to affirmatively further fair housing, and will likely make it impossible to obtain necessary subsidies.</p>	<p>Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:</p> <ol style="list-style-type: none"> <li>Jobs and housing relationship</li> <li>Opportunities and constraints to development of additional housing (see below)</li> <li>2a. Capacity for sewer and water service</li> <li>2b. Availability of land suitable for urban development</li> <li>2c. Lands preserved or protected from urban development</li> <li>2d. County policies to preserve prime agricultural land</li> <li>3. Opportunities to maximize transit and existing transportation infrastructure</li> <li>4. Policies directing growth toward incorporated areas</li> <li>5. Loss of units contained in assisted housing developments</li> <li>6. High housing cost burdens</li> <li>7. Rate of Overcrowding</li> <li>8. Housing needs of farmworkers</li> <li>9. Housing needs of UC and Cal State students</li> <li>10. Individuals and families experiencing homelessness</li> <li>11. Loss of units during an emergency</li> <li>12. SB 375 Greenhouse Gas Reduction Targets</li> <li>13. Other factors adopted by Council of Governments</li> </ol>	Email	11/5/2021
39	SC YIMBY	Sonnenfeld	Rafa	<p>Again, this problem is a result of the over-allocation of units to the unincorporated Monterey County on the basis of its percentage of regional employment despite the fact that there is no jobs/housing imbalance in the unincorporated County. This base allocation to the unincorporated area is contrary to the statutory objective to promote “infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.” (Gov. Code, § 65584(d)(2).)</p> <p>The over-allocation of units to the unincorporated area of Monterey County is also contrary to the Government Code Section 65584.04(e)(4) mandate that the RHNA methodology shall include as one of its factors any “agreements between a county and cities in a county to direct growth toward incorporated areas of the county. The County has in fact entered into agreements with cities to direct growth into incorporated areas. These agreements are consistent with the County policies calling for City Centered Growth. (See GP Policies LU-2.14 through LU-2.17.) For example, Policy LU-2.14 requires the County to “[w]ork with AMBAG and cities to direct the majority of urban growth including higher density housing development into cities and their spheres of influence with an emphasis on redevelopment and infill.”</p> <p>Finally, it should be noted that in speaking with affordable housing developers whose job it is to try to build affordable housing in rural communities, it’s just not feasible to develop the above-listed areas, no matter the zoning: they don’t have the necessary infrastructure to be developable. If AMBAG and HCD allow the proposed methodology to proceed and give hundreds of units of our region’s low income RHNA allocation to unincorporated Monterey county, it is a plan doomed to fail, and our RHNA process will have been a wasted exercise for the thousands of low income families who depend on this process to work to build the affordable housing we need.</p>	<p>Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:</p> <ol style="list-style-type: none"> <li>Jobs and housing relationship</li> <li>Opportunities and constraints to development of additional housing (see below)</li> <li>2a. Capacity for sewer and water service</li> <li>2b. Availability of land suitable for urban development</li> <li>2c. Lands preserved or protected from urban development</li> <li>2d. County policies to preserve prime agricultural land</li> <li>3. Opportunities to maximize transit and existing transportation infrastructure</li> <li>4. Policies directing growth toward incorporated areas</li> <li>5. Loss of units contained in assisted housing developments</li> <li>6. High housing cost burdens</li> <li>7. Rate of Overcrowding</li> <li>8. Housing needs of farmworkers</li> <li>9. Housing needs of UC and Cal State students</li> <li>10. Individuals and families experiencing homelessness</li> <li>11. Loss of units during an emergency</li> <li>12. SB 375 Greenhouse Gas Reduction Targets</li> <li>13. Other factors adopted by Council of Governments</li> </ol>	Email	11/5/2021
40	SC YIMBY	Sonnenfeld	Rafa	<p>1) We generally like the approach of using Racial Concentrated Areas of Affluence (RCAA) as the way of AFFH’ing jurisdiction’s allocations, but the all-or-nothing approach that lets the city of Santa Cruz reduce its low and very low allocation by 50% because it is only 66% affluent instead of 68% affluent is not acceptable. AMBAG should change its methodology for determining RCAAs-based allocations for jurisdictions that are more than 50% white by reducing the percentage of low and very low units by the relative amount of affluence compared to the region. So for Santa Cruz, instead of a full 50% reduction to low income units, it should be a reduction of ~1%.</p>	<p>The Board of Directors could direct staff to modify the definition of RCAA and include those jurisdictions that qualify as a partial RCAA.</p>	Email	11/5/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
41	SC YIMBY	Sonnenfeld	Rafa	2) Ensure that the statutory adjustments mentioned to reduce sprawl and directing units to infill are given enormous weight for unincorporated Monterey County, due to their legal barriers to AFFH.	Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:  1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Email	11/5/2021
42	SC YIMBY	Sonnenfeld	Rafa	3) Recommend that AMBAG implement a bottom-up approach for the allocation like ABAG did that integrates equity into the total allocation (or at the very least, include it as an option with draft allocation numbers for the Directors to consider) rather than the income shift approach, which is the only methodology which the directors have seen draft numbers for, and which has never been presented to them as a real possibility.	AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.	Email	11/5/2021
43	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	Monterey Bay Economic Partnership’s Housing Initiative is aimed at promoting the increase of housing at all income levels in the Monterey Bay region via data driven policies, funding solutions, and advocacy. In coordination with other housing advocates in Santa Cruz and Monterey counties, we have been closely tracking the AMBAG RHNA methodology process, and have some recommendations for a more equitable distribution of housing units throughout our region:  1. Adopt a bottom-up methodology approach to result in more housing units allocated to jurisdictions with the most access to opportunity instead of incorporating Affirmatively Furthering Fair Housing (AFFH) via an income-shifting mechanism that does not affect the absolute number of units a jurisdiction receives. As it currently stands, jurisdictions in the Salinas Valley are seeing the largest growth rates, although none of these communities are designated as Racially Concentrated Areas of Affluence (RCAA). While we understand that it is difficult to balance the range of housing needs in a region as diverse as ours, we do not believe that low growth rates in Racially Concentrated Areas of Affluence fulfill the statutory objective of AFFH that AMBAG is required to meet per Government Code Section 65584(d). The bottom-up approach results in a more equitable outcome since it not only allocates more RHNA to jurisdictions with higher access to resources on a per capita basis, but also higher-resourced jurisdictions receive a larger amount of lower income RHNA on a per capita basis. We recommend the bottom-up approach so that access to Racially Concentrated Areas of Affluence is directly factored into the methodology, followed by the existing priority factors that the Board of Directors choose to incorporate for each income category, which includes employment, transit, and resiliency factors.	AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.  The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.	Letter	11/9/2021
44	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	2. Establish a jobs-proximity factor in order to counter the jobs-housing imbalance that the proposed methodology exacerbates. The purpose of the jobs-proximity factor is to consider the relationship between jobs and transportation with the intent of encouraging more housing in jurisdictions either within, or with easier access to a relevant job center. One example of the methodology exacerbating the jobs-housing imbalance are draft allocations for Watsonville and Santa Cruz. As demonstrated in the change to the existing housing stock chart that Santa Cruz YIMBY prepared in its letter dated October 15th, the City of Watsonville is projected to have a growth rate of 18%, and the City of Santa Cruz a growth rate of 12%. <sup>1</sup> While this is not problematic at face value, when we take into account 28,514 existing jobs in 2020 for the City of Watsonville versus 43,865 for the City of Santa Cruz, that’s a 54% difference in existing jobs. More housing units must be directed towards jurisdictions in which existing job centers are located until more job centers and much needed infrastructure are developed in jurisdictions where it is deficient. Allocating more housing units towards existing job centers will also promote RHNA’s environmental goals by way of reducing Vehicle Miles Traveled and Greenhouse Gas Emissions.	Looking at any factor—including jobs--without considering jurisdiction size could lead to unreasonable results (such as thousands of units allocated to a city that is just a few square miles in area). Objective 2 of RHNA states “Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.” Statute, and thus the methodology, centers on jobs “in each jurisdiction.” As a legacy of Prop 13, job-heavy jurisdictions have fiscal incentives to avoid planning for housing within their jurisdiction. Diluting their imbalance by looking at neighboring areas could undermine this RHNA objective.	Letter	11/9/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
45	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	3. Explicitly account for farmworker housing units. This can be achieved by ensuring that jurisdictions with a high number of farmworker jobs have a floor number of lower income units that are available to low income farmworkers, even if other factors, such as RCAA, reduce that total. The Farmworker Housing Study and Action Plan for Salinas Valley and Pajaro Valley found that an additional 45,560 units of farmworker housing are needed to alleviate critical overcrowding in farmworker households that are occupied at 7.00 PPD to the average PPD of 3.23 in Monterey County and the average PPD 2.60 in Santa Cruz County.2 The Plan includes the goal of producing 5,300 permanent affordable farmworker housing units over the next five years across the Salinas and Pajaro Valleys. We know that this data matters greatly to the Board of Directors given that AMBAG, along with MBEP, the Counties, and others, were funding partners of the Study and committed to the implementation of the Action Plan. The past 20 months have reminded us that farmworkers are essential workers in our regional economy and a safe and secure food supply requires a healthy stable trained workforce living in safe and secure affordable housing. It is important to note that H2A farmworkers are not a part of this unit count, given that they do not live in the region year round and are provided housing by their employer.	Ag jobs are included in our jobs data. We are not using “Census” jobs data—we’re using address-level data from the California Employment Development Department, InfoUSA, and nearly a year of extensive ground-truthing the data by AMBAG staff. These data sources do include agricultural jobs as well as agricultural support jobs. If the number of ag jobs in the 2022 RGF appears low, it is not because we missed ag jobs, it’s because of industry classifications. Within NAICS classifications, support activities for agricultural or animal production (e.g., harvesting contractors, farm labor contractors, crop packaging, warehousing) appear in manufacturing, transportation and warehousing, or wholesale. In addition, a comprehensive review of AMBAG region firms listed in the agriculture NAICS sector showed many support activities. AMBAG staff re-classified these to manufacturing, wholesale, or retail. For these reasons, allocating by total jobs does help to ensure that housing will be planned where farmworkers live. Perhaps more importantly: The listed jurisdictions (Gonzales, Greenfield, King City, Salinas, Soledad, Unincorporated Monterey, Watsonville, and Unincorporates Santa Cruz) account for nearly 2/3rds of the Very Low and Low income allocation (more than 8,000 units) under the proposed framework. Allocating an additional 1,000 units to those jurisdictions (many of which are already lower-income) would necessitate taking lower-income units away from high-resource jurisdictions, and thus perpetuating existing inequalities—a principle RHNA is designed to protect against. Areas with the most agricultural jobs, and thus highest need for farmworker housing are Unincorporated Monterey and Salinas, followed by Greenfield, Watsonville, Unincorporated Santa Cruz, Gonzales, Soledad, and King City. Creating a separate farmworker housing factor would add units to those jurisdictions. In addition, AMBAG had extensive conversations with HCD about H2A, and H2A units are included in the base data that HCD used to determine the region’s existing need. An additional 11,410 was added to our RHNA number due to overcrowding, of which is due in large part to lack of farmworker housing.	Letter	11/9/2021
46	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	4. Push out approval of the draft methodology until equity concerns are wholly addressed, and a presentation on the sources of employment data is presented to jurisdictions that request them. At the Planning Directors Forum held on November 1st, several jurisdictions expressed concerns around the lack of transparency regarding the data sources used for employment figures. All data sources utilized for purposes of the methodology should be fully transparent and easily accessible in order for all involved decision makers to be as informed as possible going forward.  We commend the Association of Monterey Bay Area Governments for their work on the 6th Cycle Housing Element and look forward to having a methodology in place that we can fully stand behind as our region seeks approval from the State. Thank you for your leadership. For questions, please contact Elizabeth Madrigal at emadrigal@mbep.biz.	Given the feedback we’ve heard from local jurisdictions and stakeholders and the preliminary review of a draft methodology by HCD, AMBAG staff is not recommending approval from the Board tonight.  All data used in RHNA is publicly available. The 2022 RGF was approved by the AMBAG Board of Directors through public meetings and is available on the AMBAG website. <a href="https://www.ambag.org/sites/default/files/2020-12/Final%20Draft%202022%20Regional%20Growth%20Forecast_PDF_A.pdf">https://www.ambag.org/sites/default/files/2020-12/Final%20Draft%202022%20Regional%20Growth%20Forecast_PDF_A.pdf</a> The majority of the RHND is proposed to be allocated based on: - Jobs (Employment), published as part of the RGF (see link above) and was based on data from the California Employment Development Department and InfoUSA. - Wildfire—CPUC and the Office of the State Fire Marshal - Sea Level Rise—NOAA - AFFH: TCAC/HCD Opportunity Area Maps or RCAs (U.S. Census Bureau, American Community Survey (2015-2019), and 2020 Census)  AMBAG staff has submitted a request to EDD to allow us to share the confidential jurisdictional level EDD employment data. The county level data is already available. In addition, AMBAG has shared the InfoUSA data with any local jurisdiction who has requested it. Finally, the AMBAG Board could choose to direct staff to use a different data source for jobs data.	Letter	11/9/2021
47	City of Salinas	Carrigan	Steve	The City of Salinas (City) requests that the AMBAG Board delay adoption of the Regional Housing Needs Allocation (RHNA) Methodology until it directly considers equity in its total unit allocation. The City of Salinas always has recognized that it would receive the largest share of units. With the planned Future Growth Area and recent developments such as Moon Gate Plaza and Project Homekey conversion of the Good Nite Inn, Salinas is demonstrating its commitment to increasing housing opportunities across all income levels. Throughout the process, we have asked that the allocation be equitable and that jurisdictions with high resources have a larger role in providing future housing. AMBAG staff have done a commendable job of meeting deadlines while breaking down a very complicated process in the creation of a fair base methodology. We thank them and the Board of Directors for their hard work and diligence in this project. Unfortunately, because something is fair, does not necessarily mean that it is equitable. The City feels the results of this methodology places an inequitable emphasis on Salinas and Salinas Valley jurisdictions to shoulder future housing production, failing to further RHNA Plan Objectives (Government Code 65584(d)) of affirmatively furthering fair housing (AFFH) and promoting an intraregional jobs-housing balance. The City of Salinas has the following specific concerns:	Given the feedback we’ve heard from local jurisdictions and stakeholders and the preliminary review of a draft methodology by HCD, AMBAG staff is not recommending approval from the Board tonight.	Letter	11/10/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
48	City of Salinas	Carrigan	Steve	<p>a) While Salinas is the largest community in the region, according to AMBAG's 2022 Subregional Growth Forecast, as of 2020 it has 22.7% of the region's (Monterey and Santa Cruz counties) population but is being given 28% (9,353 units) of the region's housing allocation. For comparison, the next highest allocation goes to unincorporated Monterey County, which receives just over nine percent (3,083 units), but has almost 15% of the region's population.</p> <p>b) According to 2020 US Census data compiled by California YIMBY (see letter in AMBAG Memorandum to Planning Directors Forum November 1, 2021, pages 18-25), this allocation would represent a 21 % growth in housing stock. Salinas Valley communities are being asked to accommodate growth of 22% (Soledad), 26% (Greenfield), 29% (King City), and 108%(Gonzales). The only Monterey Peninsula communities being allocated growth over 20% are Del Rey Oaks and Sand City, which amounts to just over 500 units. Carmel and Pacific Grove would each only have to accommodate about a five percent change to existing housing stock.</p> <p>c) The City appreciates the inclusion of Racially-Concentrated Areas of Affluence (RCAA's) as a step toward a more equitable allocation. However, by just shifting allocation among income groups within a jurisdiction, rather than re-allocating any total units based on affluence, there is a missed opportunity to require jurisdictions with significant resources, including those in unincorporated areas, to contribute more to solving the housing crisis and address regional patterns in inequity.</p>	RHNA must consider a variety of factors, including current housing need. Of the region's 33,274 unit allocation, 11,410 were allocated based on overcrowding. The highest rates of overcrowding in the region are in the Salinas Valley jurisdictions. Based on the 2015-2019 American Community Survey data, Salina's overcrowding rate is just over 19% compared with just under 10% in unincorporated Monterey County.	Letter	11/10/2021
49	City of Salinas	Carrigan	Steve	<p>d) AMBAG states that it did not shift total units based on equity because it "would have resulted in lower unit total allocations to areas with high overcrowding and high need for farmworker housing" (AMBAG Memorandum to Planning Directors Forum November 1, 2021, page 6). There is room to consider equity directly in total allocation numbers while holding such communities accountable for addressing these needs. For example, even a methodology shift that simply brings the City's' RHNA share in line with its population share would still allocate over 7,500 units to Salinas, which is still more than double the next highest allocation.</p> <p>e) By allocating so much growth inland, this methodology also risks exacerbating regional traffic and commute struggles. Morning commutes to the Monterey Peninsula on US 101 and Route 68 are already grueling because people cannot afford housing where they work.</p> <p>f) Under SB 35 (Wiener, 2017) in communities that fail to meet RHNA production targets, developers may elect to use a ministerial process to get project approval for certain residential projects. Building 9,353 units over the course of eight years means building over 1,000 per year. From 2015-2020 there were 708 total units developed in Salinas. The City is not a housing developer, and while it can plan to accommodate many units, it has much less control over the actual pace of development. Such a high unit allocation could result in loss of local control and poor-quality housing development as the City currently allows housing in certain areas via conditional use to mitigate adverse environmental factors. The current allocation risks punishing one of the region's most pro-housing communities.</p>	<p>The Board of Directors could direct AMBAG staff to consider a population-based factor as part of the allocation methodology.</p> <p>Many of the region's jurisdictions already fall, or may in the future fall, under the purview of SB 35 and may have to rezone.</p>	Letter	11/10/2021
50	City of Salinas	Carrigan	Steve	<p>Salinas is pursuing every opportunity possible to develop new housing. In addition to the aforementioned projects, it is in the process of upzoning parking lots and underutilized commercial properties through SB 2, updating its general plan to facilitate more kinds of housing throughout the city, and is constantly pursuing funding to close financing gaps. To make a true difference in the housing crisis, and to affirmatively further fair housing, however, requires efforts from every community in the region, including those with significant resources. The City of Salinas asks that the Board delay approval of the draft methodology until written concerns have been addressed and has the following recommendations:</p> <ol style="list-style-type: none"> <li>1. Directly consider equity when determining total RHNA units a jurisdictions receives and use RCAA's and AFFH as a significant factor in allocating housing totals as well as shifting income level determinations.</li> <li>2. Consider a jurisdiction's connectedness to the regional job market and commute times to jobs, in addition to job locations.</li> </ol>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	11/10/2021
51	City of Salinas	Carrigan	Steve		<p>Objective 2 of RHNA states "Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction." Statute, and thus the methodology, centers on jobs "in each jurisdiction." As a legacy of Prop 13, job-heavy jurisdictions have fiscal incentives to avoid planning for housing within their jurisdiction. Diluting their imbalance by looking at neighboring areas could undermine this RHNA objective.</p>	Letter	11/10/2021
52	City of Salinas	Carrigan	Steve	3.If the Board feels strongly about making a final decision on 11/10/21, the City of Salinas urges the selection of Option B as the more equitable of the two.	Thank you for your comments.	Letter	11/10/2021
Public Comments Received at the November 10, 2021 Public Hearing							
53	City of Salians	Hunter	Megan	<p>Thank you, my name is Megan Hunter. I'm the Community Development Director for the City of Salinas. And I just wanted to thank the Board, and especially the staff, and listening to something that I know is not easy to do. We strongly support the allocation based on a AFFH, if you look at the percentage of growth that is being assigned to the Salinas Valley communities, in relation to those higher resourced areas. I'm just as comparison Carmel is receiving a 5% growth increase, and all of the jurisdictions in the Salinas Valley, communities are over 20%, the highest being Gonzales. So, um, we think that that's a much fairer way of allocating resources and then I just wanted to mention, in terms of overcrowding, why is housing overcrowded in our jurisdictions? And it really has to do with the fact that there isn't affordable housing located in areas in tourist areas that people work in. There should be more allocations to those, and you can see it on route 68. Know, if you're driving from Salinas to Monterey, that is a horrible commute, and that really speaks to the lack of affordable housing for working people that work on the peninsula. So we strongly commend the allocation. And I do think it probably doesn't make sense to have a partial AFFH. First hand City in Santa Cruz, given that they're so close to being on the edge and then Sand City, although it doesn't affect our allocation, per se. I think that's probably fairer for the region. And that concludes my comments. Thank you.</p>	<p>The AMBAG Board of Directors provided direction at the November 8, 2021 Board meeting to explore a methodology that considered an AFFH factor as an allocation factor and partial RCAA definitions. These modifications will be brought back to the November 29, 2021 Planning Directors Forum for discussion.</p>	Public Hearing	11/10/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
54	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	<p>Land Watch has two basic concerns. First we think that the units have been substantially over allocated to the unincorporated county based on using percentage of regional jobs. Is the primary factor, 2400 units were allocated to county even though the county is doesn't have a jobs housing imbalances. And the purpose of the jobs allocation methodology is to make sure there is an imbalance that the county has a better jobs housing balanced the average. So it just doesn't make sense to allocate tons units to the county unincorporated area on bases. That it's also conflicts with the statutory objectives to promote in sale, protect ag, protect the environment, and to minimize transit and greenhouse gas, transportation, greenhouse gas emissions.</p> <p>We think that there should be a substantial downward adjustment to the county if they're going to continue to use the jobs allocation, and there are a couple of statutory factors that would warrant that, including me, presence of agreements with cities, to direct growth toward cities, County has those agreements. County policies to preserve Prime Ag land, county has those clauses, and also consideration of VMT. With regard to the RCAA versus TCC Opportunity areas, if you're going to re-allocate based on affirmatively further fair housing, I really recommend you go back to TCC. There may be some little glitches and it can be fixed, but Monterey County only has 10% of its area in high resource areas. And to treat it as if it is RCAA, based on income and race factors will result in allocating a tremendous number of units, too. It basically isn't, it doesn't present the opportunity areas. It's an unincorporated territory. It doesn't have the amenities that would justify moving a large allocation. So, we'd like you to revisit the county allocation.</p>	<p>Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e) . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:</p> <ol style="list-style-type: none"> <li>1. Jobs and housing relationship</li> <li>2. Opportunities and constraints to development of additional housing (see below)</li> <li>2a. Capacity for sewer and water service</li> <li>2b. Availability of land suitable for urban development</li> <li>2c. Lands preserved or protected from urban development</li> <li>2d. County policies to preserve prime agricultural land</li> <li>3. Opportunities to maximize transit and existing transportation infrastructure</li> <li>4. Policies directing growth toward incorporated areas</li> <li>5. Loss of units contained in assisted housing developments</li> <li>6. High housing cost burdens</li> <li>7. Rate of Overcrowding</li> <li>8. Housing needs of farmworkers</li> <li>9. Housing needs of UC and Cal State students</li> <li>10. Individuals and families experiencing homelessness</li> <li>11. Loss of units during an emergency</li> <li>12. SB 375 Greenhouse Gas Reduction Targets</li> <li>13. Other factors adopted by Council of Governments</li> </ol>	Public Hearing	11/10/2021
55	SC YIMBY	Sonnenfeld	Rafa	<p>First, I wanted to appreciate that staff seems to be moving in the right direction on tweaking the equity allocation. I'm encouraged by the direction with RCAA+, but I think there are still some tweaks that need to be made. What I wanted to point out is that the City of Santa Cruz has the highest poverty rate of any jurisdiction in the region, but at the same time it is or should be a regional, racially concentrated area of affluence. The methodology should not be taking away needed, affordable units from Santa Cruz, because it's only 1% less affluent than the region as a whole, according to poverty rates. On the, Santa Cruz is the average rent, according to the 2019 American Community survey for two bedroom apartment minutes, \$2,112 a month. Carmel Valley, which is also a recent, racially concentrated area of affluence, is \$1,763. So, you know, how does it affirmatively further fair housing to take away affordable units from a jurisdiction that has a 20% higher market rent than the jurisdiction that's supposedly more affluent? Santa Cruz rates are higher than six of the eight cities in our region, except for Carmel and Del Rey Oaks. The other thing I wanted to mention is, you know, to look at this bottom-up approach, again, staff's argument has been that we shouldn't use the bottom-up approach, because it might take away units from jurisdictions with overcrowding problems. Well, think about this for a minute. Under the current approach, a city like Greenfield does, which is the most overcrowded city in our region at 29% of households, is being assigned 1,085 units using the allocation methodology based on the SCS, jobs, transit, resiliency. And there are 425 lower, very low units using that methodology. But then, with the, the income shift, those units are being reduced to a total of 265 low-income units. So, if is using a bottom-up approach?</p>	<p>The AMBAG Board of Directors provided direction at the November 8, 2021 Board meeting to explore a methodology that considered an AFFH factor as an allocation factor and partial RCAA definitions. These modifications will be brought back to the November 29, 2021 Planning Directors Forum for discussion.</p>	Public Hearing	11/10/2021
56	Monterey Bay Economic Partnership (MBEP)	Madrigal	Elizabeth	<p>Now, along with other public commenters, we just really wanted to commend and thanks, for the work that they've put into this methodology, especially extending the Board out until December 8th. We think it's a good amount of time to be able to incorporate recommendations that would make the methodology as well as it can be for our region. And they really want to recommend and that staff and the board of directors to incorporate AFFH into the methodology, as it will result in a fair allocation of units on the lines of permanently affirmatively furthering fair housing in all communities within our region. And I also want to make the case for another one of our recommendations, which is for the methodology to explicitly account for farmworker housing units. This can be achieved as a set aside. I know you all are aware of that farm workers in our region, are one of the populations that face the most acute housing needs and travels, so we want to ensure that. But then this methodology, this thing that can be solved for. And that's a part of our farm worker housing study, actually makes it, we make the case for the goal of producing 5,300 permanent affordable farmworker housing units over the next five years, across the Salinas and Pajaro Valleys. And I think if this were to be incorporated within the methodology, we'd be able to tackle that goal directly. And serve one of our neediness populations in the region. Thank you very much.</p>	<p>The AMBAG Board of Directors provided direction at the November 8, 2021 Board meeting to explore a methodology that considered an AFFH factor as an allocation factor and partial RCAA definitions. These modifications will be brought back to the November 29, 2021 Planning Directors Forum for discussion.</p> <p>Areas with the most agricultural jobs, and thus highest need for farmworker housing are Unincorporated Monterey and Salinas, followed by Greenfield, Watsonville, Unincorporated Santa Cruz, Gonzales, Soledad, and King City. Creating a separate farmworker housing factor would add units to those jurisdictions. In addition, AMBAG had extensive conversations with HCD about H2A, and H2A units are included in the base data that HCD used to determine the region's existing need. An additional 11,410 was added to our RHNA number due to overcrowding, of which is due in large part to lack of farmworker housing.</p>	Public Hearing	11/10/2021
Public Comments Received after the November 10, 2021 Public Hearing							

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
57	City of Pacific Grove	Hunter	Alyson	<p>The affordable housing crisis affects all jurisdictions in Monterey County. The City of Pacific Grove (PG) is committed to increasing the supply and choice of affordable housing within its city limits and throughout the region. The RHNA process and the Housing Element are two fundamental tools for affordable housing planning if and when they are properly implemented. The AMBAG region is in critical need of affordable housing. However the draft distribution neglects to place units in locations where they have the greatest chance of being built. If units are not assigned in a more practical and equitable way, the region risks not having units built altogether and possible state penalties for not building the units as some jurisdictions have very real and persistent limitations.</p> <p>Unique local conditions must be considered when developing the RHNA methodology. Considerations for the City of Pacific Grove:</p> <p>compared to other jurisdictions in Monterey County, PG is very limited in its land availability as reflected in the attached Vacant and Underutilized maps from the City's 2015-2023 Housing Element. Based on this limitation, the City would need to realistically determine where and how it could accommodate the proposed units within the next eight year period. The City anticipates continuing building ADU's and expects this would be feasible and rezoning/upzoning parcels that could accommodate density bonus and other incentives to accommodate more density and affordable units. Planning for high numbers of units in a city that is built-out with few vacant parcels must be considered. The City is approximately 3.5 square miles and built out with about 6,835 households and infill is the only form of development that could occur as confirmed in the analyses of the current Housing Element 2015-2023.</p> <ul style="list-style-type: none"> <li>• The City is implementing tools to support near-term affordable housing production such as ADUs, a local density bonus ordinance, objective design and development standards, and identifying key opportunity sites that can be leveraged through partnerships with affordable housing developers.</li> <li>• PG and other peninsula cities are subject to the State Water Resources Control Board 2009 Cease-and-Desist Order (CDO) on water extraction from the Carmel River. As a result, jurisdictions within the Monterey Peninsula Water Management District are prohibited from establishing or setting new meters and from changing use at existing sites. This policy is critically limiting our ability to move forward with shovel-ready projects and planning for future housing on the Peninsula.</li> <li>• The cost of construction has skyrocketed since the onset of the COVID-19 pandemic and now requires even higher levels of subsidy. PG and other small jurisdictions have severely limited access to housing subsidies, land, and related resources needed to produce lower income housing units at the numbers indicated in the draft distribution of RHNA numbers.</li> </ul>	Comment noted.	Letter	11/19/2021
58	City of Pacific Grove	Hunter	Alyson	<p>RHNA Methodology – The two methodologies proposed by AM BAG include the Racially Concentrated Areas of Affluence (RCAAs) and HCD/TCAC Opportunity Map methodology. Implementing one or the other would result in very different outcomes for PG. The table below shows the results of the RCAA methodology that increases very low income units by 33%, a 32% increase in low income units, a decrease of 50% in moderate income units and a 38% decrease in above moderate income units.</p> <p>Racially Concentrated Areas of Affluence (RCAAs) – The proposed RHNA methodology utilizing the Racially Concentrated Areas of Affluence (RCAAs), which reflects areas of advantage in the region and directs a higher share of lower-income housing to RCAA's, results in approximately 74% of the very low or low income RHNA allocation to those jurisdictions including the City of Pacific Grove. This methodology puts undue burden on cities like Pacific Grove who are small, do not have federal or state direct subsidies to develop very low, low, or moderate income housing, and do not have the land to build sufficient above moderate units that could yield lower income units through other incentives.</p> <p>Examining Tools to Build Affordable Housing and Meet RHNA Goals - Over the last year, PG examined how it would accommodate new RHNA numbers on existing sites through a robust community engagement process for its Welcome Home initiative. The City looked at underutilized and vacant parcels as well as examined zoning. Carefully determining eligible sites and the right tools that will yield units is part of the creativity that needs to occur in order to squeeze higher density development on any available parcels.</p> <p>City of Pacific Grove Local Water Project and ADU Development - Through great ingenuity, PG created a new water supply through the Local Water Project, a new satellite recycled water treatment plant (SRWTP) that recycles a portion of Pacific Grove's wastewater. If unused water meters exist on a property, the City can sell that allocation of water and use the revenue for ADU and JADU development. In the past two years, 104 permits have been pulled for ADU's/JADU's and of those, 29 have received their final inspection, and 21 are in the process of building plan review. The remaining 54 are somewhere in between. The City expects it could continue to accommodate more ADU development even with the CDO in place.</p>	RHNA methodologies must address affirmatively furthering fair housing (AFFH). Feedback from HCD indicates that including AFFH as a factor to allocate units as well as shifting income units based on AFFH is a priority. The final draft methodology proposes to reduce the income shift percentage from 50% to 30%.	Letter	11/19/2021
59	City of Pacific Grove			<p>Density Bonus - The table below details minimum scenarios to meet proposed RHNA allocations with density bonus incentives. If a density bonus project was hypothetically proposed to meet just the very low income requirements, the development would need to be over 400 units to yield the very low income requirement with 50% very low income affordability. Additional developments of approximately an additional 284 units would be needed to meet the affordable units proposed. There are no developments of that size in PG. The City would need to have many density bonus developments and upzone many parcels and include density bonus incentives to meet the needs of the lower income units to accommodate the number of lower income units required by the proposed RHNA allocation. It is highly unlikely that a density bonus development would occur with 100% affordability, so realistically, these are minimum numbers and far greater numbers would be needed to accommodate the lower income units.</p> <p>Inclusionary Zoning - The City has examined implementing an Inclusionary Zoning Ordinance. The table below details the RHNA numbers needed to meet affordability requirements. If an inclusionary requirement comparable to the County of Monterey were applied, after the threshold of about six or more housing units is met and a hypothetical 20% inclusionary requirement is applied at the distribution of 6% very low income, 6% low income, and 8% moderate income units; in order to reach 202 very low income units, the City would need to develop 3,367 units, 2,200 additional units to meet the low income requirement of 132 units, and 300 units to meet the 24 unit moderate requirement. The total number of units through an inclusionary requirement to meet those affordability requirements alone in the RCCA model would be 5,867 units, or an 86% increase in the total housing stock of Pacific Grove.</p>	It is expected that many jurisdictions in the AMBAG region and across the California will need to modify its zoning to meet the new requirements of the 6th Cycle RHNA.	Letter	11/19/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
60	City of Pacific Grove	Hunter	Alyson	<p>Cost to Build Lower Income Units - The latest development estimates from non-profit housing developers to build a lower income unit is approximately \$550,000/unit and this estimate is for a studio or 1-bedroom unit. The cost to build 358 subsidized units would be approximately \$196,900,000.</p> <p>Very Low Income Units and Additional Subsidies - Very-low income units often require additional subsidies for supportive housing services. The cost of these services have been estimated by the State's No Place Like Home (NPLH) funding program to be about an additional \$6,500/year/unit in operating subsidies to support clients in retaining housing. Some estimates locally can be as high as approximately \$16,000/year/unit. In order to meet the subsidy for one year after averaging the supportive service cost estimates, an additional \$2,272,500 might be needed annually to maintain the services for very low income households.</p> <p>Limited Access to regional funds for affordable housing - Project based Section 8/Housing Choice Vouchers are significant in developing affordable housing but the City of Pacific Grove is at a disadvantage in accessing them. The City of Salinas receives the largest investment from the County's Housing Authority that develops affordable housing. The Housing Authority has the majority of their low-income housing development in the City of Salinas and owns many properties in Salinas. Additionally, other housing developers, such as Eden, Mid Pen, EAH Housing, and CHISPA focus most of their development efforts in Salinas and South County. A lot of this has to do with the availability of land, water, and subsidies. Additionally, Salinas can invest an initial subsidy from HOME funds that makes TCAC applications more competitive.</p> <p>Conclusion/Request: When it comes to the allocation of RHNA numbers, one unit of lower income housing, especially very low and low, is not equal to one unit of above moderate housing. If AM BAG selected this methodology, the City would require serious subsidies to ensure its share of lower income units are built. More importantly, it would require development of additional above moderate units to yield lower income units. The RCAA methodology is technically giving the City more above moderate units. The City proposes moving toward a methodology that more equitably and reasonably distributes lower income units. The RCAA methodology is unrealistic for the City and needs to be adjusted based on the City's unique limitations to succeed in the next RHNA cycle.</p>	<p>RHNA methodologies must address affirmatively furthering fair housing (AFFH). Feedback from HCD indicates that including AFFH as a factor to allocate units as well as shifting income units based on AFFH is a priority. The final draft methodology proposes to reduce the income shift percentage from 50% to 30%.</p> <p>AMBAG agrees that it will be important for the state to identify and provide more affordable housing funding in order to implement and build the housing units proposed in the 6th Cycle RHNA.</p>	Letter	11/19/2021
61	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	<p>I write on behalf of LandWatch Monterey County regarding the draft proposed RHNA methodology to follow up on the concerns LandWatch raised at the Planning Director's Forum on November 1, 2021 and the AMBAG Directors' meeting on November 10, 2021. LandWatch asks that AMBAG base its jobs-related allocation on the relationship of jobs to housing in each jurisdiction rather than just that jurisdiction's percent share of regional jobs. The proposed jobs-related allocation method is not in conformance with the Housing Element Law, which mandates consideration of this relationship. LandWatch provides an alternative allocation that properly considers the jobs to housing relationship and that is consistent with all statutory objectives in Attachment 1.</p>	Comments noted.	Letter	11/24/2021
62	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	<p>A. The allocation of units based only on a jurisdiction's jobs conflicts with the statutory objective to promote "an improved intraregional relationship between jobs and housing" because it fails to consider the housing part of that relationship. The methodology now proposed by AMBAG staff in its staff report for the November 29 Planning Directors' meeting would allocate 10,374 units of HCD's Regional Housing Needs Determination (RHND) based on each jurisdiction's share of regional jobs. The allocation of the 10,374 jobs-related portion of the RHND should not be based merely on each jurisdiction's share of regional jobs. This approach fails to meet the statutory objective to promote "an improved intraregional relationship between jobs and housing." (Gov. Code, § 65584(d)(3).) There is simply no statutory basis for an allocation based on a jurisdiction's jobs that ignores the "relationship" and "balance" between jobs and housing. Promoting an improved intraregional relationship between jobs and housing requires that the allocation take existing housing units into account, not simply the existing jobs. Furthermore, the method used to promote an "improved" jobs/housing relationship must allocate proportionately more units to jurisdictions that have higher than average jobs/housing balances, because the purpose of this statutory objective is to remedy those high jobs/housing balances. The method used to improve the intraregional jobs/housing balance should not allocate units to those jurisdictions that have acceptable jobs/housing balances because that will divert units from jurisdictions that need the remedy. Jurisdictions with acceptable jobs/housing balances can and will be allocated units based on other statutory objectives. However, the allocation method now proposed in the November 29, 2021 staff report, simply fails to take the jobs/housing balance into account because it allocates units based only on the percentage of regional jobs and pays no attention to existing housing units. Thus, the currently proposed method allocates thousands of units to jurisdictions like Marina, Seaside, Pacific Grove, Carmel, Del Rey Oaks, unincorporated Monterey County, and unincorporated Santa Cruz County, even though these jurisdictions do not have a jobs/housing imbalance. The method also allocates disproportionately large numbers of units to jurisdictions like Salinas and Santa Cruz that have only slightly higher than average jobs/housing balance. And because the method diverts units are to jurisdictions with lower than average jobs/housing balances, it does not allocate enough units to jurisdictions with high jobs/housing balances to materially improve those balances. An analysis of RHNA best practices prepared for HCD endorses methodologies that "specifically targeted areas where the existing jobs housing imbalance was the largest. "The method proposed in the current staff report fails to do this. In sum, the proposed method does not meet the statutory objective to promote an improved relationship between jobs and housing.</p>	<p>AMBAG staff has prepared an RHNA methodology option that includes a job-housing ratio factor for Board consideration at their December 8, 2021 special Board meeting.</p>	Letter	11/24/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
63	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	B. The proposed allocation also conflicts with the statutory objective to promote infill, protect environmental and agricultural resources, and reduce GHG. The disproportionate allocation of units to unincorporated areas that have below average jobs/housing balances is also inconsistent with the mandatory objective of “promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.” (Gov. Code, § 65584(d)(2).) For example, average VMT and thus GHG are higher for both home-based and employment-based trips in the unincorporated Monterey County than in incorporated areas, so it makes sense to concentrate new units in cities.4 The analysis of RHNA best practices prepared for HCD cites research explaining that assigning rural areas 3 to 4 times more housing units than their expected growth is inconsistent with the objective of lowering GHG emissions.5 Exactly the same misallocation is proposed here: the 1,633 units assigned to unincorporated Monterey County based on jobs would be more than 3 times its expected growth of 510 units. And the total proposed assignment to unincorporated Monterey County of 3,827 units is more than 7 times its expected growth. No other jurisdiction with expected growth over 200 units has a higher total allocation in proportion to its expected growth. In preparing the Sustainable Communities Strategy, AMBAG staff may find it difficult or impossible to meet CARB’s GHG reduction targets if AMBAG allocates thousands of units to rural areas instead of the areas with severe jobs/housing imbalances. And rural development clearly presents few opportunities for infill and efficient development patterns. Rural development does not protect environmental and agricultural resources. The November 29, 2021 staff report contends that the objectives to promote infill, environmental protection, preservation of agricultural land, and GHG reduction is met by allocating some units on the basis of the Regional Growth Forecast (RGF). However, the proposed methodology allocates only 12,524 units based on the RGF and then misallocates another 10,374 units based only on regional jobs shares rather than based on the statutory objective to improve intraregional jobs/housing imbalances. Since that misallocation does not further the Government Code Section 65584(d)(3) objective, and since thousands of the misallocated units would be going to rural areas, the misallocation conflicts with the Government Code Section 65584(d)(2) objective to promote infill, environmental protection, preservation of agricultural land, and GHG reduction. Obviously, some statutory objectives can be in tension with each other. But when units are misallocated without statutory justification, the conflict with other statutory objectives cannot be justified. The analysis of RHNA best practices prepared for HCD highlights the importance of a common sense review of the results against the statutory objectives. “To truly understand the extent to which an allocation plan furthers the statutory objectives of RHNA –especially within the context of each region, it is necessary to analyze the actual output of the methodology.” The proposed allocation of 3,827 units to unincorporated Monterey County, the second largest allocation to any jurisdiction, does not support the statutory objectives.	AMBAG staff has prepared an RHNA methodology option that includes a job-housing ratio factor for Board consideration at their December 8, 2021 special Board meeting.		
64	M.R. Wolfe & Associates, P.C. on behalf of LandWatch Monterey County	Farrow	John	C. The draft allocation can and should be revised to allocate units to improve poor jobs/housing balances. AMBAG should not allocate units based on the jurisdictions’ shares of 2020 regional jobs (hereinafter, the “Percent of Regional Jobs Method”) because it is does not comply with the statutory mandate. Instead AMBAG should revise its draft methodology to allocate units based on the statutory objective to improve the jobs/housing balance for jurisdictions with poor balances. Such a method would comply with the statutory mandate. LandWatch has prepared a spreadsheet that provides an alternative method to allocate the 10,374 units proposed for a jobs-related allocation. This proposed “Jobs-Housing Balance Method” allocates units to promote better jobs/housing balances by focusing on the relationship between each jurisdiction’s 2020 jobs and its 2020 housing units. The allocation appears in Attachment 1, which sets out and compares the Jobs-Housing Balance Method and the Percent of Regional Jobs Method. The Jobs-Housing Balance Method we propose starts by determining each jurisdiction’s jobs/housing balance, using the same Regional Growth Forecast data that AMBAG staff used in its November 29 staff report. The method also determines the regional average jobs/housing balance, which is 1.55 jobs per housing unit, again consistent with the November 29 AMBAG staff report. The method then determines how many additional units each jurisdiction would have to build to attain the regional average of 1.55 jobs per housing unit. Because many jurisdictions have much higher jobs/housing balances than the regional average, 41,266 units would have to be built for all of these jurisdictions to attain the regional average balance. However, the previously proposed methodology starts with the assumption that only a certain fixed number of units will be allocated based on any jobs-related data, i.e., the 10,374 units representing 50% of the total RHND that is not to be allocated based on the Regional Growth Forecast. Thus, in order to conform to the 10,374-unit limit for a jobs related housing allocation, the Jobs-Housing Balance Method makes a pro-rata reduction to the units needed by each jurisdiction so that the total allocated by this method is not 41,266 units but only 10,374 units. Although each jurisdiction would not attain the regional average jobs/housing balance, the Jobs-Housing Balance Method does allocate units just to the jurisdictions that actually need to improve their jobs/housing balances, and it allocates units in proportion to the severity of their jobs/housing imbalance. And the Jobs-Housing Balance Method does not allocate additional units to jurisdictions that already have better than average jobs/housing balance. In conclusion, LandWatch asks that the Planning Directors endorse the use of the Jobs-Housing Balance Method. Unlike the Percent of Jobs Method, the Jobs-Housing Balance Method meets the statutory objective to improve the jobs/housing relationship and furthers the objectives to promote infill, protect environmental and agricultural resources, encourage efficient development patterns, and achieve GHG reductions targets.	AMBAG staff has prepared an RHNA methodology option that includes a job-housing ratio factor for Board consideration at their December 8, 2021 special Board meeting.		

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65	Public	Roberts	Douglas	<p>I am an architect in Monterey, living in unincorporated Monterey Co. south of Salinas. I chair the Governmental Affairs Committee for the Monterey Peninsula Chamber of Commerce, although I am writing this email as an individual Monterey County citizen concerned with this process.</p> <p>Regarding the upcoming votes on regional affordable housing allocations:</p> <p>As I understand it, the state has placed a new parameter on AMBAG in the RCAA methodology. Anyone aware of the statistics being used recognizes that RCAA is just the state counting how many white people live in concentrated areas of wealth, and the state has decided it should try to reduce that effect. This is a grossly oversimplified way to look at how people select where they want to live, and has little relationship to reality, at least in California. People in a free society tend to congregate with people of like mind and similar values, and in housing, they will congregate with others of similar economic class and aspiration, based on local housing costs and availability. These factors have little to no correlation with skin color or national background. “Successful outcomes” for an individual are far more closely correlated with family structure and education. Did the person grow up with both biological parents in the household, and did they graduate from high school/possibly college? But unfortunately, those issues are not within AMBAG’s tool kit, and the state has saddled you with assigning jurisdictions an impossible task.</p> <p>Race is a very different consideration than economic diversity, and the two have little causal correlation. At this point in our history, economic standing is a much more accurate description of how we separate ourselves into groups and classes than is race. Further, if we’re going to allocate housing based on skin color or national origin, then the purposeful implementation of that allocation is impossible without discriminating against people based on their skin color or national origin, which is a Constitutional non-starter. The RCAA methodology must be ignored, or at the very least, reduced to the lowest percentage that the state will tolerate, and prioritize economic diversity. Even that is not the ideal solution, but it’s better than race.</p> <p>Bottom line, the economics of developers providing affordable housing must work. They must be able to fill a need for a price that pencils out or you get nothing. A methodology should prioritize affordable and available land. And even if the price is right, for areas within the MPMWD, the water must be available, or again, you get nothing. You must help move the water board toward a sustainable, abundant water supply if you want to make any headway in the peninsula jurisdictions.</p> <p>On a related note, the local redistricting committee has found that some non-white groups are unwilling to have other areas brought into their voting district as it “reduces their voice”. Promoting racial diversity has the potential of setting groups against each other as they vie for political power. The state needs to get out of the social engineering experiment and work out ways to promote economic flourishing and successful outcomes of all its citizens. But, for AMBAG, having housing that people in the workforce can afford is the priority.</p>	As stated in Housing Element Law, one of the five RHNA objectives that AMBAG must consider is affirmatively furthering fair housing. The California Department of Housing and Community Develop will evaluate AMBAG’s RHNA methodology to ensure that it is supporting or furthering all RHNA objectives.	Email	11/30/2021
66	LandWatch Monterey County	DeLapa	Michael	<p>I write to follow up on the concerns LandWatch has raised regarding the draft proposed RHNA methodology. For context, LandWatch’s advocates for housing that is both climate-friendly and affordable to local working families. To be climate-friendly by reducing reliance on automobiles, housing must be located in urban areas that are near to public and private services and opportunities, e.g., jobs, schools, and shopping. To be affordable for local working families, housing must be higher density, smaller, and available for rent.1 Achieving both goals means avoiding sprawling into areas where long commutes by cars are mandatory (and expensive) and where public services and opportunities are unavailable (and escalating). To these ends, LandWatch asks that AMBAG base its jobs-related allocation on each jurisdiction’s jobs/housing balance rather than just its share of regional jobs. The statutory objective calls for improving the “intra-regional relationship between jobs and housing,” which requires consideration of both jobs and available housing units. LandWatch proposes an alternative allocation in Attachment 1 based on the jobs/housing relationship. This method better fits the statutory objective related to jobs and housing, better meets other statutory objectives, and is well within your discretion as a Board.</p>	Comment noted.	Letter	11/30/2021
67	LandWatch Monterey County	DeLapa	Michael	<p>A. The allocation of units based only on a jurisdiction’s jobs does not adequately fulfill the statutory objective to promote “an improved intra-regional relationship between jobs and housing” because it fails to consider the housing part of that relationship. The methodology now proposed by AMBAG staff would allocate 10,374 units of HCD’s Regional Housing Needs Determination (RHND) based on each jurisdiction’s share of regional jobs. However, the allocation of the jobs/housing-related portion of the RHND should also take into account each jurisdiction’s available housing units. The statutory objective is phrased in terms of promoting “an improved intra-regional relationship between jobs and housing.” (Gov. Code, § 65584(d)(3).) Promoting that improved intra-regional relationship between jobs and housing requires that the allocation take into account existing housing units, not simply existing jobs. Furthermore, the method used to promote an improved jobs/housing relationship should allocate proportionately more units to jurisdictions that have the worst jobs/housing balances, because the purpose of this statutory objective is to remedy those high jobs/housing balances. Conversely, the method should not allocate units to those jurisdictions that have acceptable jobs/housing balances because that will divert units from jurisdictions that need the remedy. The proposed jobs/housing balance allocation method does not target the jobs/housing balance because it simply ignores the denominator. Thus, the proposed method allocates thousands of units to jurisdictions like Marina, Seaside, Pacific Grove, Carmel, Del Rey Oaks, unincorporated Monterey County, and unincorporated Santa Cruz County, even though these jurisdictions do not have a jobs/housing imbalance. The method also allocates disproportionately large numbers of units to jurisdictions like the cities of Salinas and Santa Cruz that have only slightly higher than average jobs/housing balances. And because the method diverts units to jurisdictions with the best jobs/housing balances, it does not allocate enough units to jurisdictions with the worst jobs/housing balances to materially improve those balances. An analysis of RHNA best practices prepared for HCD endorses methodologies that “specifically targeted areas where the existing jobs housing imbalance was the largest.” The proposed method fails to do this.</p>	AMBAG staff has prepared an RHNA methodology option that includes a job-housing ratio factor for Board consideration at their December 8, 2021 special Board meeting.	Letter	11/30/2021

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68	LandWatch Monterey County	DeLapa	Michael	<p>B. The proposed allocation does not support the statutory objectives to promote infill, protect environmental and agricultural resources, and reduce GHG. The disproportionate allocation of units to unincorporated areas that have below average jobs/housing balances does not support the statutory objectives of “promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.” (Gov. Code, § 65584(d)(2).) For example, average VMT, and resulting GHG emissions, are higher for both home-based and employment-based trips in the unincorporated Monterey County than in incorporated areas, so it makes sense to concentrate new units in cities. The analysis of RHNA best practices prepared for HCD cites research explaining that assigning rural areas 3 to 4 times more housing units than their expected growth is inconsistent with the objective of lowering GHG emissions.<sup>6</sup> Exactly the same misallocation is proposed here: the 1,633 units assigned to unincorporated Monterey County based on jobs is more than 3 times its expected growth of 510 units, and the total proposed assignment of 3,827 units is more than 7 times its expected growth. In preparing the Sustainable Communities Strategy, ABMBAG staff may find it difficult or impossible to meet CARB’s GHG reduction targets if AMBAG allocates thousands of units to rural areas instead of the areas with severe jobs/housing imbalances. Locating housing near jobs is a critical method to meet GHG reduction targets. And rural development clearly presents few opportunities for infill and efficient development patterns. Rural development does not protect environmental and agricultural resources. In sum, the proposed misallocation of jobs-related units to rural jurisdictions conflicts with the objectives to promote infill, protect environmental and agricultural resources, and reduce GHG. The analysis of RHNA best practices prepared for HCD highlights the importance of a common sense review of the methodology’s results against the statutory objectives. “To truly understand the extent to which an allocation plan furthers the statutory objectives of RHNA – especially within the context of each region, it is necessary to analyze the actual output of the methodology.” The proposed allocation of 3,827 units to unincorporated Monterey County, the second largest allocation to any jurisdiction, does not support the statutory objectives. While some tension in objectives may be inevitable, the tension created by the proposed jobs-related allocation cannot be justified because it does not actually further the jobs/housing objective. Finally, we note that the other statutory objectives are implemented through other factors in the proposed methodology, and the jurisdictions with acceptable jobs/housing balances will be allocated units based on those other factors. So, for instance, staff’s proposed jobs-based allocation should not be rationalized based on the claim of incidental and untargeted effects on the statutory objective to affirmatively further fair housing (AFFH). This critical equity issue is directly addressed through the separate proposed allocation of 35% of the RHND based on a formula identifying Racially Concentrated Areas of Affluence and based on the separate targeted income shift process. LandWatch supports these separate targeted equity allocation processes. If there is a need for further revisions in order to target equity, revisions should be made through those separate processes.</p>	<p>AMBAG staff has prepared an RHNA methodology option that includes a job-housing ratio factor for Board consideration at their December 8, 2021 special Board meeting.</p>	Letter	11/30/2021
69	LandWatch Monterey County	DeLapa	Michael	<p>C. The draft allocation can and should be revised to allocate units to improve poor jobs/housing balances. AMBAG should revise its draft methodology to allocate the jobs-related units based on the objective to improve the jobs/housing balance in jurisdictions with poor balances. Such a method would directly and proportionately further the statutory objective without the dilution caused by misallocation of these units to jurisdictions with acceptable jobs/housing balances. LandWatch has prepared a spreadsheet that provides an alternative method to allocate the 10,374 units proposed for a jobs-related allocation. This proposed “Jobs-Housing Balance Method” allocates units to promote better jobs/housing balances by focusing on the relationship between each jurisdiction’s 2020 jobs and its 2020 housing units. The allocation appears in Attachment 1, which sets out and compares the Jobs-Housing Balance Method and the Percent of Regional Jobs Method. The Jobs-Housing Balance Method we propose starts by determining each jurisdiction’s jobs/housing balance, using the same Regional Growth Forecast data that AMBAG staff used in its November 29 staff report.<sup>8</sup> The method also determines the regional average jobs/housing balance, which is 1.55 jobs per housing unit, again consistent with the November 29 AMBAG staff report. The method then determines how many additional units each jurisdiction would have to build to attain the regional average of 1.55 jobs per housing unit.<sup>9</sup> Because many jurisdictions have much higher jobs/housing balances than the regional average, a total of 41,266 units would have to be built for all of these jurisdictions to attain the regional average balance. However, the proposed methodology starts with the assumption that only a certain fixed number of units will be allocated based on any jobs-related data, i.e., the 10,374 units representing 50% of the total RHND that is not to be allocated based on the Regional Growth Forecast. Thus, in order to conform to the 10,374-unit limit for a jobs-related housing allocation, the Jobs-Housing Balance Method makes a pro-rata reduction to the units needed by each jurisdiction so that the total allocated by this method is not 41,266 units but only 10,374 units. Although each jurisdiction would not attain the regional average jobs/housing balance, the Jobs-Housing Balance Method does allocate units just to the jurisdictions that actually need to improve their jobs/housing balances, and it allocates units in proportion to the severity of their jobs/housing imbalance. And the Jobs-Housing Balance Method does not allocate additional units to jurisdictions that already have better than average jobs/housing balance. This is clearly a better fit to the statutory objective to improve intraregional jobs/housing balances. In conclusion, LandWatch asks that the members of the Board of Directors approve a methodology that uses the attached Jobs-Housing Balance Method. The Jobs-Housing Balance Method better meets the statutory objective to improve the jobs/housing relationship and furthers the objectives to promote infill, protect environmental and agricultural resources, encourage efficient development patterns, and achieve GHG reductions targets.</p>	<p>AMBAG staff has prepared an RHNA methodology option that includes a job-housing ratio factor for Board consideration at their December 8, 2021 special Board meeting.</p>	Letter	12/1/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
70	City of Salinas	Carrigan	Steven	<p>The City of Salinas (City) thanks the AMBAG Board of Directors and staff for delaying adoption of the draft Regional Housing Needs Allocation (RHNA) Methodology. The City's primary concern with the version of the draft Methodology presented to the Board in November was the lack of equity as a direct allocation factor, which was also shared by others at the meeting. The City commends the Board and staff for listening to these concerns and quickly taking action to prepare an alternative in a very short timeframe. The revised draft methodology, using Racially Concentrated Areas of Affluence in total unit allocations as well as income category shifts, takes a significant step towards a more equitable distribution by calling for these communities, large and small, to make a fair contribution to housing production in the region.</p> <p>Every community in the AMBAG region faces hurdles which will challenge the realization of these production targets, including geographical size, exclusionary policies, water availability, the conversion of agricultural lands, and a shortage of funding. With the changes to the draft methodology, AMBAG staff has done an admirable job of balancing these hurdles with other complex issues such as climate risks, and existing density and overcrowding, while more effectively affirmatively furthering fair housing.</p> <p>This significant increase to every jurisdiction's RHNA comes at a time where penalties are increasing for failure to meet these goals. To re-emphasize another point in the City's November 10 letter to the Board, local governments can make every effort to accommodate more housing, but they are not developers, and have much less control over the actual pace of construction. The housing crisis is a moment that demands more accountability. However, penalties should not be leveled at communities that are taking every possible action within their control.</p>	Comment noted.	Letter	12/1/2021
71	City of Salinas	Carrigan	Steven	<p>The California Department of Housing and Community Development (HCD) recently introduced the Prohousing Designation Program. For cities and counties that achieve this designation, the Program provides incentives such as additional scoring points and preference in housing and related grant programs. The City of Salinas urges AMBAG, and other local governments and partners, to work with HCD and state legislators to explore immunity to penalties for not meeting RHNA production targets for communities that achieve the Prohousing Designation. This would encourage more jurisdictions to adopt regulations and programs that promote housing development and offer protection against a loss of local control or funding to those that are making a best-faith effort to address the housing crisis.</p> <p>Once again, we thank AMBAG staff and the Board of directors for recognizing the importance of equity and for all of your hard work on this RHNA process. We look forward to continuing work with you on 6th Cycle Housing Elements and other projects critical to the region. The City recognizes that statutory adjustments may change the ultimate allocation but supports the current proposed draft RHNA Methodology.</p>	Comment noted.	Letter	12/1/2021
72	City of Monterey	Ulsar	Hans	<p>This letter addresses the proposed RHNA methodology and shares with you some of my thoughts. I am suggesting to the Board the following:</p> <ul style="list-style-type: none"> <li>Consider the expectations you create when you approve the RHNA numbers - make it clear to your constituents that you approve a set of numbers, which have little chance to be implemented without a solution for water in place.</li> <li>Do not destroy existing neighborhoods by forcing multi-story buildings. Or: let your constituents know that this will be expected from future elected officials.</li> <li>Do not move forward until you have clarity about the job numbers. The numbers for Monterey are simply false until we hear otherwise.</li> <li>Consider approving a set of numbers which are HCD compliant such as the TCAC data. Do not go beyond HCD's requirements by adding RCAA factors.</li> <li>Continue to look through the noise and decide what is best for our existing and future communities.</li> </ul> <p>We all know and understand that the actual construction of affordable housing units on the Monterey Peninsula depends on new allocations of water. In Monterey, we have projects for around 600 housing units in the pipeline; however, developers are prevented from building housing units due to a lack of water. As such, it is my sincere wish that the Board explicitly points out that water allocations for the Monterey Peninsula will drive what will actually be built. The proposed RHNA numbers should be characterized as aspirational with zero chance of implementation unless the questions around water will be addressed and solved.</p> <p>For the most part, our City has been built out - the chances for infill are slim. Our City Council and staff need to be commended for identifying various opportunities for housing developments within our existing commercial areas. Available land exists in the former Fort Ord area and potentially by rezoning along the HWY 68 corridor. And, we all know that it is likely that an organization like LandWatch may consider suing the City over any proposed development, including 100% affordable housing, on the former Fort Ord and loss of the Highway 68 scenic corridor.</p>	Comment noted.	Letter	12/3/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
73	City of Monterey	Ulsar	Hans	<p>Looking at the overall numbers and considering the future challenges we face with sea level rise, the conclusion is that AMBAG numbers will drive our City into building 6 - 8 story-high buildings across various areas while destroying our traditional neighborhood and networks. Is that what the majority of your constituents want?</p> <p>LandWatch's latest letter and the job-housing relationship simply fails the common-sense test of reality. People will pick their jobs where they will receive the highest income and they will pick their homes in areas they can afford to live in. It does not make sense to assume that human behavior will manifest itself outside of this casualty.</p> <p>It is my hope that the board understands that the current progressive push for housing to be located next to their places of work does not work in a built-out community limited by infill opportunities, threats of CEQA based lawsuits, and zero water. Just to remind everyone: today, thanks to restrictions imposed on us by the State Water Resources Control Board (SWRCB), we cannot even set a new water meter or are allowed to intensify the use for existing sites in Monterey.</p> <p>In sum: what you will implement as our next RHNA will certainly create false hopes with our housing advocates, who work so tirelessly on behalf of thousands of residents trying to find adequate housing. I believe the Board owes our residents to make this clear when they pass the RHNA number.</p>	Comment noted.	Letter	12/3/2021
74	City of Monterey	Ulsar	Hans	<p>With respect to the proposed numbers: The presented 2020 job numbers are hypothetical at best. All relevant openly available data sources contradict the 40,989 jobs allocated to the City of Monterey. Despite Monterey's best efforts to get transparency with respect to the data sources and AMBAG's inquiries with the EDD, we still have not seen the rationale for the job number that drives a great deal of the follow-on calculations and recommendations.</p> <p>As a matter of fact, it is my hope that the Board understands that the numbers are (apparently) based on a statistical model, which has not been shared with any of the cities. To this date, the sources for these job numbers have not been shared with the public. While AMBAG has been forthcoming in their attempts to explain the methodology behind those numbers, it is clear that an outside agency, using a not published algorithm based on structured surveys, interviews and incomprehensible forecasting received by EDD, has laid the foundation for the proposed job numbers. EDD's response to AMBAG that cities can contract separately through them to gain further clarity and insights into their numbers represents an approach which I feel is arrogant and disrespectful to our communities.</p> <p>Unless we have clarity on how those numbers were created, the Board should not decide on future RHNA numbers. Otherwise, your vote, will be a vote based on numbers generated by a black box no one completely understands and has access to.</p> <p>The numbers for MoCo are inflated by at least 40,000 jobs. AMBAG's numbers assume 243,015 jobs in Monterey County (383,017 in Mo and SC) of which 40,989 are located in the City of Monterey.</p> <p>Using the data publicly available by the US Census and an accepted benchmark for economists to use when trying to quantify the labor market is the ACS. The 2019 ACS numbers show a total of 24,926 of all jobs. By definition includes all jobs available, thus including employees, who hold multiple jobs; i.e. a teacher might work during daytime at a school and work evenings/weekends in a retail store. In other words: according to the ACS data, the numbers used by AM BAG and LandWatch for Monterey are false by a factor of 16,063. Do you really think that the City of Monterey had 40,989 jobs in 2020?</p>	<p>The 2022 RGF was developed over a two-year period which included multiple meetings with the Planning Directors Forum and local jurisdictions. AMBAG met with each local jurisdiction multiple times to review all the jobs, population and housing data in 2019 and 2020. No concerns were identified with the jobs data at that time. In November 2020, the AMBAG Board unanimously approved the use of the 2022 RGF for planning purposes in the development of RHNA and the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy.</p> <p>It is important to note that there are multiple sources of jobs data, and multiple ways to define jobs. It was suggested that jobs data from other sources, such as the U.S. Census Bureau LODES data, would be better for use in the RHNA methodology. However, the U.S. Census Bureau LODES database excludes military, self-employed, and informal jobs as well as well-documented challenges associated with "headquartering" whereby all jobs are assigned to a headquarters location, such as a school district office, rather than to the place of work, such as the school.</p> <p>More importantly, if another jobs dataset were to be used, the distribution of jobs across jurisdictions or percent share for each jurisdiction would largely be the same. Because the RHNA methodology is based on the distribution of jobs or percent share, rather than total number of jobs, there would not be any substantial changes in the RHNA allocation regardless of what jobs data was uses. The Board could direct staff to use LODES data instead of the 2022 RGF.</p> <p>Finally, reaching an agreement with EDD to share the jobs data took nearly several years to finalize and states "No confidential data will be disclosed to any AMBAG member cities or counties." AMBAG submitted a request to EDD for disclosure of additional data, but notes that this limitation has been imposed to protect 3rd party privacy information pursuant to Gov. Code Section 6254(c). The request was recently denied by EDD but EDD noted that Monterey can request this data directly from EDD.</p>	Letter	12/3/2021
75	City of Monterey	Ulsar	Hans	<p>To sum this up: Board, I suggest you discuss more in-depth the source of the numbers. If EDD does not want to show you the secret sauce (which clearly, they have indicated to your staff), then you should wait with your vote.</p> <p>Additionally, I am suggesting that the Board considers AMBAG's staff proposal without the Racially-Concentrated Areas of Affluence (RCAAs). Instead, the City recommends the previously agreed to TCAC data be utilized. This request is based on the statements made by HCD indicating that the RCAA factor is not required by them. If it is not required AND you are using unrealistic RHNA numbers, why add to the false assumptions the not required factors, which inflate hopes? In conclusion:</p> <ul style="list-style-type: none"> <li>Consider the expectations you create when you approve the RHNA numbers - make it clear to your constituents that you approve a set of numbers, which have little chance to be implemented without a solution for water in place.</li> <li>Do not destroy existing neighborhoods by forcing multi-story buildings.</li> <li>Do not move forward until you have clarity about the job numbers. The numbers for Monterey are simply false until we hear otherwise.</li> <li>Consider approving a set of numbers which are HCD compliant such as the TCAC data. Do not go beyond HCD's requirements by adding RCAA factors.</li> <li>Continue to look through the noise and decide what is best for our existing and future communities.</li> </ul>	<p>HCD staff has indicated that allocating units by an Affirmatively Furthering Fair Housing (AFFH) factor should be included in AMBAG's RHNA methodology. AMBAG staff developed the Racially Concentrated Areas of Affluence (RCCAs) approach due to feedback received from the Board of Directors that the TCAC Opportunity data was incomplete and lacking in the AMBAG region. The Board of Directors could choose to direct staff to use the TCAC Opportunity data instead of the RCAA approach but an AFFH factor for allocating units needs to be included in a draft RHNA methodology.</p>	Letter	12/3/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
76	Monterey Peninsula Chamber of Commerce	Lal	Monica	<p>The Monterey Peninsula Chamber of Commerce urges the Association of Monterey Bay Area Governments (AMBAG) to focus in particular on the relationship and balance between jobs and housing when it establishes methodology for Regional Housing Needs Allocations (RHNA) for local jurisdictions in Monterey County. Attached is some information that shows why the Chamber has for several years identified housing supply as a priority issue.</p> <p>We also encourage you to take a close look at population and school district enrollment statistics. One local jurisdiction in Monterey County has experienced a whopping 32.6% reduction in population since 1980. The second most populous city in Monterey County had a 2% decline in population from 2010 to 2020. Student enrollment at the Monterey Peninsula Unified School District MPUSD's enrollment has dropped 36% over the last 30 years. Other Monterey County school districts are experiencing significant enrollment declines, in part because families are no longer able to afford a place to live.</p> <p>You may hear an argument that AMBAG should assign a low housing allocation to Monterey Peninsula cities because of water scarcity. Note that some Monterey Peninsula residents and their elected representatives have known about looming water scarcity since the early 1990s. Their choice has been to perpetuate an artificial and unnecessary water shortage, thus creating a convenient excuse for the region to avoid fulfilling future regional housing needs. Obviously, something is amiss in Monterey County, and AMBAG can play an important role in opening up the area as a welcome home for younger generations, including families with children.</p>	The December 8, 2021 Special AMBAG Board meeting agenda includes an RHNA methodology option (Option B) that does include a jobs/housing ratio factor for allocating housing units.	Letter	12/3/2021
77	LandWatch Monterey County	DeLapa	Michael	<p>I write again to follow up LandWatch's November 29 letter regarding the proposed RHNA methodology and to respond to the staff report for the December 8 meeting. LandWatch seeks a RHNA allocation that is both climate-friendly and affordable to local working families. This requires locating housing near jobs and the public and private services and opportunities in urban areas, and avoiding sprawl development in rural areas.</p> <p>A. Landwatch supports the consensus weighting of the allocation goals. The RHNA methodology must further the five statutory objectives in Government Code Section 65584(d) and reflect the 13 factors set out in Government Code section 65584.04(e). Some of these goals are in tension. For example, allocation of units to affirmatively further fair housing (AFFH) by increasing unit assignments in affluent areas may be in tension with remedying overcrowding and cost burdens in less affluent communities. Assignment of units to address jobs/housing imbalances in lower income communities may also be in tension with the AFFH objective. Thus, the Directors should recognize that their most fundamental policy choice is their relative weighting of the allocation goals, even though some of the allocation methods may point in different directions and the results cannot maximize every statutory objective. Landwatch supports the weighting consensus that has emerged, which is first to assign the 12,524 units needed to meet each jurisdiction's Regional Growth Forecast and then to assign the remaining 20,750 units using four separate methods as follows:</p> <ul style="list-style-type: none"> <li>• 50%, or 10,374 units, to improve the intraregional jobs/housing relationship</li> <li>• 35%, or 7,263 units, to affirmatively further fair housing (AFFH) by allocating units just to jurisdictions that are Racially Concentrated Areas of Affluence (RCAA)</li> <li>• 10%, or 2,075 units, to areas that are resilient to wildfire and sea level rise</li> <li>• 5%, or 1,038 units, to areas best served by transit</li> </ul> <p>We urge the Directors to affirm this weighting. Improving the intraregional jobs/housing balance is an independent statutory objective, and it is closely linked to the other statutory objectives to promote infill, protect environmental and agricultural resources, and reduce GHG. The AFFH objective is also a critical statutory objective intended to ensure equity in the RHNA process. The consensus to weight allocation methods primarily based on the jobs/housing balance and AFFH objectives, and to do so at a 50% and 35% respective weighting, is appropriate and defensible, regardless of the tension in these objectives. The consensus weighting is particularly defensible in light of the proposal to further the AFFH objective both by assigning 35% of the total units based on the "bottom up" application of the RCAA criteria and by assigning a higher proportion of very low and low income units to RCAA jurisdictions via the "income shift" process. LandWatch supports using both approaches.</p>	Comment noted.	Letter	12/4/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
78	LandWatch Monterey County	DeLapa	Michael	<p>B. The Directors should adopt LandWatch’s proposed allocation of jobs-related units because it furthers the objectives to improve intraregional jobs/housing balance and the staff proposals do not.</p> <p>Regardless of the weighting of statutory objectives, the Directors should ensure that the chosen allocation methods actually further these statutory objectives. As LandWatch has objected, the proposed jobs-related allocation method does not adequately further the statutory objective of “an improved intraregional relationship between jobs and housing.” (Gov. Code, § 65584(d)(3).) The fundamental problem with staff’s recommended proposal, now identified as “Option A” in the staff report, is that it considers only the jurisdiction’s share of regional jobs and not its jobs/housing balance. Thus, this allocation assigns thousands of units to jurisdictions that have a high job share but do not have a jobs/housing imbalance. And it fails to assign proportionately more units to jurisdictions that do have a severe imbalance. Furthermore, because this allocation assigns thousands of units to rural unincorporated areas without a jobs/housing imbalance, it also needlessly conflicts with the other statutory objectives to promote infill, protect environmental and agricultural resources, and reduce GHG. Accordingly, LandWatch continues to recommend that the jobs-related allocation focus on improving the relationship of both jobs to housing. TAMBAG should assign the jobs-related units to the jurisdictions that actually have jobs/housing imbalances and should do so in proportion to the severity of that imbalance. We ask that the Directors adopt the alternative allocation of the jobs-related units set out in our November 29 letter, which does just that. We attach it again for your reference.</p> <p>In response to previous comments, the staff report constructs, but does not recommend, an “Option B” in order to “add an additional factor of a jobs-housing ratio for 20% of the unit allocation.” However, Option B would still allocate 40% of the units based on regional job shares alone, without reference to housing units, thus continuing to assign thousands of units to jurisdictions that do not have jobs/housing imbalances and away from jurisdictions that do. Furthermore, Option B’s assignment of 20% of the units to the jurisdictions with worse than average jobs/housing ratios is still based on the jurisdiction’s share of regional jobs instead of being proportionate to the severity of its imbalance. Finally, Option B unaccountably changes the consensus weighting of the allocation objectives by reducing the AFFH weighting from 35% to 25%. Instead of assigning 50% of units based on jobs-related criteria, it assigns 60% (40% based on jobs share for each jurisdiction and 20% based on the jobs share of the jurisdictions with the worst jobs/housing balances). To increase the jobs share allocation by 10 percentage points, Option B arbitrarily reduces the AFFH weighting by 10 points.</p>	LandWatch’s proposal is included in Attachments 7 and 8 of the RHNA agenda item in the December 8, 2021 Special AMBAG Board of Directors meeting agenda.	Letter	12/4/2021
79	Santa Cruz YIMBY and YIMBY Law	Sonnenfeld	Rafa	<p>Santa Cruz YIMBY, and YIMBY Law are submitting this letter to the Association of Monterey Bay Area Governments to provide a final recommendation for adopting a Regional Housing Needs Allocation methodology.</p> <p>Our primary recommendation which differs from what is included in the AMBAG staff report/recommendations is to increase the income shift percentage for affirmatively furthering fair housing (AFFH) from 30% to 40% for each jurisdiction. Regardless of which allocation methodology is selected, it is important to ensure that units which are allocated to jurisdictions on the basis of affirmatively furthering fair housing, (ie the RCAA+ allocation methodology), are certain to be low or very-low income units. Under the staff-proposed 30% income shift approach, there are jurisdictions that have been allocated units for AFFH purposes, but even with a 30% or 35% income shift, those jurisdiction’s total number of low income units are fewer than the number of units allocated via AFFH/RCAA+; a result which is antithetical to the goal of affirmatively furthering fair housing.</p> <p>Increasing the income-shift to 40% ensures that wealthy, exclusionary communities in our region who are assigned units on the basis of their future residents' access to higher opportunities are required to have an adequate number of those new units be for persons of low or very low income.</p> <p>Concerning the choices of an allocation methodology before you, we believe both Options A and Option B, as well as LandWatch’s proposal to use only the Jobs/Housing imbalance for the jobs portion of the allocation are solid choices worthy of consideration. Each option represents trade-offs: Option A maximizes assigning housing to our most exclusionary communities, while Option B and LandWatch’s recommendation both help get folks living closer to where they work. We would support any selection of one of these choices as long as the income shift is increased to 40%.</p> <p>For your convenience, we have also prepared an allocation chart which approximates the distribution of units at a 40% income shift for each jurisdiction.</p>	Both Options A and B reflect feedback received from HCD on the income shift percentage. The AMBAG Board of Directors can choose to modify one of the RHNA methodology options and/or direct staff to explore a different option.	Letter	12/6/2021
80	City of Capitola	Herlihy	Katie	<p>First and foremost, thank you for all the hard work that has been put into the draft RHNA calculations over the past year. Your team at AMBAG has worked closely with each jurisdiction and I appreciate all the work that was done on the front end on the Regional Growth Forecast for the current planning period. As we work through the second step of allocating the remaining 20,750 units, I have concerns with the formula utilized for the calculation of Resiliency and RCAA units.</p> <p>The current methodology identifies the regional average for percent population above 200 percent of poverty level (67%) and regional average for racial concentration of white (37%). The jurisdictions that are assigned units within the RCAA category are above the average of either or both categories. The 8-year growth projection for housing units is utilized as the baseline for additional units in the formula. I suggest two modifications to this method. The Resiliency and RCAA allocation formulas should be based on land area adequate for development, not the 8-year housing unit change. Also, RCAA should include a sliding scale.</p>	Comment noted.	Letter	12/6/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
81	City of Capitola	Herlihy	Katie	1. The formula for RCAA should be tied to land area adequate for development, not each City's growth projections (8-year housing unit change). Using the current RCAA formula, and comparing the outcome to each city's total land area yields, shows extreme fluctuations between high resource cities. This fluctuation is because the formula is based on each city's 8-year housing projections. Those 8-year housing projections are largely based on a city's existing General Plan and Zoning. No City in our region can accommodate the units being contemplated in this RHNA cycle, therefore every city will likely need to update their General Plan and zoning to accommodate their RHNA allocation. To fairly distribute additional units (beyond the 8-year housing projections) the formula to allocate RCAA should be tied to land area, or land area suitable for development. The table below demonstrates the illogical outcomes in the current formula by presenting the proposed number of RCAA unit divided by total land area in high resources cities. The significant outliers are highlighted in red.  Land area adequate for development should be considered when assigning 2,075 units for Resiliency and 7,623 for Resiliency. The current process to allocate Resiliency units does not take into account total land area, only a jurisdiction's percentage of land in high hazard zones relative to the 8-year housing unit change. This leads to illogical results, wherein a very small city with few constraints get's far more Resiliency units than a much larger jurisdiction with more constraints even though the into jurisdiction has far more total unconstrained suitable for land than development, the small not just city. The formula percentage should of the take 8-year housing account the unit total change land that area is that is constrained.	RHNA assumes that local jurisdictions may need to rezone. The RGF does take development constraints into account and because it goes beyond the horizon of general plans it is not constrained by existing zoning. RHNA requires a balance between all of the objectives and factors. AMBAG evaluated land area based options, but those failed to meet other RHNA objectives that HCD staff have identified as their priorities for evaluating the methodology.	Letter	12/6/2021
82	City of Capitola	Herlihy	Katie	2. The RCAA formula should utilize a sliding scale so the jurisdictions that are close to the average are assigned less units and the jurisdictions with higher-than-average fewest number incomes/racial concentrations are assigned more units. The current methodology assigns the fewest number of units per capita to three of the four most wealthy and least diverse jurisdictions.  To ignore the size of a jurisdiction until the next step in the RHNA process (statutory adjustments) does not intuitively make sense when assigning units for development. I urge you to consider land area at this time in order to make the RHNA plan statutory objectives "to ensure the overall size of jurisdiction is considered to assure that large jurisdictions do not get inappropriately small allocations which do not fulfill the needs of their populations, and small jurisdictions do not get inappropriately large allocations that exceed the feasible capacity of developable land."	The AMBAG Board of Directors can choose to modify one of the RHNA methodology options and/or direct staff to explore a different option.	Letter	12/6/2021
83	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	The Monterey Bay Economic Partnership (MBEP) supports AMBAG's 6th Cycle RHNA final draft methodology of Option A, with a minor modification regarding the AFFH income shift percentage currently weighed at 30% to be applied at 40%. AMBAG staff has found the methodology supports and/or furthers the five statutory RHNA objectives of: 1) increasing housing supply and mix; 2) promoting infill, equity, and environment; 3) ensuring jobs-housing balance/fit; 4) promoting regional income parity; and 5) affirmatively furthering fair housing. We ask that you approve staff's recommendation of accepting a final draft RHNA methodology after incorporating the AFFH income shift at 40% and authorize AMBAG staff to submit it for formal review by the California Department of Housing and Community Development at the special AMBAG board meeting taking place on December 8th.  California's Regional Housing Need Determination (RHND) requires our region to plan for 33,274 new homes by 2031 through its 6th Cycle Housing Element update, including 13,014 that are affordable to lower-income households. Through the final draft methodology, the estimated allocations of these homes grants every Monterey Bay jurisdiction the opportunity to promote equity, sustainability, and racially & economically diverse communities.  We thank AMBAG staff for implementing MBEP's previous recommendation of incorporating Affirmatively Furthering Fair Housing (AFFH) as an allocation factor, as opposed to AFFH only being integrated via an income shifting mechanism. This has resulted in a more equitable distribution of homes to all jurisdictions within our region. In regards to the AFFH income shift percentage being weighed at 30%, we believe this should be applied at 40% to ensure that the allocations Racially Concentrated Areas of Affluence are receiving are completely satisfying the goal of Affirmatively Furthering Fair Housing by both having a larger allocation due to this factor, as well as receiving a substantive proportion of very low and low income units within said allocation.  Thank you for your leadership in moving our region forward on our existing and projected housing needs. We look forward to working with all eighteen municipalities within the purview of AMBAG as they embark on the next step of updating their respective Housing Elements. For questions, please contact Elizabeth Madrigal at emadrigal@mbep.biz.	Comment noted.	Letter	12/7/2021
84	City of Salinas	Hunter	Megan	The City of Salinas thanks the AMBAG Board and staff for listening to concerns regarding the lack of equity as a direct factor in the draft RHNA methodology, and moving quickly to prepare an alternative. On December 1, the City submitted a letter supporting the revised methodology presented at the November 29 Planning Directors Forum. Titled "Option A" in the Board's agenda packet, this methodology takes a significant step towards a more equitable distribution by using affluence directly in unit allocations as well as in income category shifts.  This letter was submitted prior to the release of the agenda and "Option B". Option B directs units away from wealthier communities and does not do enough to affirmatively further fair housing, and is therefore not supported by the City of Salinas. The City also expresses its support for increasing the AFFH income shift from 30% to 40%, as proposed in the letters from MBEP and YIMBY Law. With this increase, Option A ensures communities in our region with significant resources must plan for a fair contribution to housing production and for all income levels.  Thanks for your consideration. We know it is difficult to balance the feedback of various different stakeholders with competing interests. However, we firmly believe that equity needs to be at the heart of these allocations to ensure the most vulnerable have access to opportunity and are able to live near they work even in wealthier communities.	The AMBAG Board of Directors can choose to modify one of the RHNA methodology options and/or direct staff to explore a different option.	Email	12/8/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
85	City of Marina	Long	Layne	<p>I'm writing this letter on behalf of the Mayor and Marina City Council. The City of Marina, like other AM BAG cities, is committed to providing more affordable housing in our region. We appreciate the work and the public outreach efforts the AMBAG Board and staff have put into developing the Regional Housing Needs Allocation (RHNA) methodology.</p> <p>At the AMBAG Planning Directors Forum on November 29, 2021, feedback on the final draft RHNA methodology was provided. We support HCD's recommendations to consider affirmatively furthering fair housing (AFFH) as an allocation factor and to consider a partial scale for identifying racially concentrated areas of affluence (RCAs). We support the 5% transit and 10% resiliency factors.</p> <p>However, we disagree with the allocation of housing based on a percentage of jobs in the area. The jobs allocation should be based on the jobs/housing balance rather than a jurisdiction's share of regional jobs. The methodology as proposed pays no attention to existing housing units, which is critical in determining where future housing should be located. As a region we should be adopting policy that incentivizes or corrects areas where we have housing imbalances. Additionally, adopting a job/housings balance further supports the five RHNA objectives particularly "ensuring jobs-housing balance/fit".</p> <p>According to Robert Cervero, some of the benefits of adopting a jobs/housing balance approach include commute distances would be shortened and the share of nonmotorized trips, including walking and cycling would increase. The number of miles driven on areawide roads each day would decrease, as would energy consumption and emission of vehicle pollutants. Perhaps equally important, jobs/housing balance would produce well-defined commute sheds wherein local neighborhood traffic is segregated from regional through-traffic. A jobs/housing balance can help address some of our most pressing and persistent concerns - congestion, energy depletion, air pollution, sprawl, and class segregation.</p>	<p>The AMBAG Board of Directors can choose to modify one of the RHNA methodology options and/or direct staff to explore a different option.</p>	Letter	12/8/2021
86	City of Marina	Long	Layne	<p>The location of housing away from jobs increases commute times which has both social and economic implications. Longer commutes mean less time with family and lower real earnings for workers. If the wage is constant but the commute time increases, the net wage is lower. Increased commute time also impacts the ability of business firms to attract workers. Longer commutes mean that workers are more tired and distracted on the job. In short, and as has been pointed out by the Healthy Cities, Compassionate Cities, Smart Cities, Mindful Cities, Sustainable Cities, and other wholistic city movements, this translates to a lower quality of life.</p> <p>To achieve jobs/housing balance, the available housing choices should match earning potential of available jobs in an area. RHNA policy adopted by AM BAG should be encouraging more housing to be built where the jobs are located. It should be encouraging less reliance on automobiles and the climate and regional impacts associated with increased automobile usage.</p> <p>We encourage using a jobs/housing balance methodology that allocates housing units to the jurisdictions that actually need to improve their jobs/housing balances and allocates units in proportion to the severity of their jobs/housing imbalance. This methodology would not allocate units to jurisdictions that already have a better than average jobs/housing balance in our region.</p>	<p>The AMBAG Board of Directors can choose to modify one of the RHNA methodology options and/or direct staff to explore a different option.</p>	Letter	12/8/2021
Public Comments Received at the December 8, 2021 Public Hearing							
87	Santa Cruz YIMBY	Sonnenfeld	Rafa	<p>I'm calling in on behalf of Santa Cruz YIMBY. First, I just wanted to thank all of the stakeholders and especially the Planning Staff's and Heather Adamson who's really done a remarkable job given the limited resources that AMBAG has for the task. I just wanted to highlight some of the comments that that my organization's submitted. You know, we think that the, the recommendations have come a long way, on both, Option A and Option B, are much better than, than previous methodologies that have been considered. We would like to recommend the 40% income shift. And we've included a table in, in our letter, which you all have a copy of, to see how the 40% income shifts for affirmatively furthering fair housing. 30% isn't adequate because there are some jurisdictions that are receiving an allocation based on the RCAA model. That doesn't actually assign all of those units as low-income jurisdictions that are receiving units based on the fact that they are high opportunity and good place for low-income housing. But they're actually not getting all of that low income housing, but that shouldn't be assigned to them, for the purposes of a affirmatively furthering fair housing. So we'd recommend increasing up to 40%. Thank you very much.</p>	<p>Comment noted.</p>	Public Hearing	12/8/2021
88	Public	Dayton	Kevin	<p>I am Kevin Day, resident of Monterey and representing various business groups, such as Salinas Valley Chamber of Commerce, Monterey Peninsula, Chamber of Commerce, and other associations. First, I want to mention something that it's a harsh reality that probably won't be said otherwise here. Earlier this year, a couple outside academics at UC San Diego did a poll, was released as a report. They asked if California is still moving in the right direction. Do they see themselves moving out of California? And that's very discouraging statistic in there. To quote from the report, growth is not a goal. For most Californian's asked to look ahead 10 years, 35% of respondents believe it would be better if the population decreases significantly and 46% wanted to stay about the same. Only 19% of those surveyed said that the state would be better off as its population increases. And I understand this is the pressure that is put on. All of you on the AMBAG Board, you consider this. You know what people at home or state are seeing. And I'm guessing that if this poll was done in the Monterey Bay counties, you probably come up with similar results. They want their regional housing needs allocation to be zero. However, that's the wrong approach, and the wise approach that will benefit the future of California, is making sure that there's enough housing for everyone. The job housing balance is very important. It's a real shame to see those traffic jams going in and out of the Monterey Peninsula every day as people drive long distances to their jobs. We need to see people have the opportunity to live where they work, and have a better life for that reason, and to have these regional housing needs allocations used as a way to prod communities, to understand that many people's lives, the quality of it depends on living near their job. Thank you very much.</p>	<p>Comment noted.</p>	Public Hearing	12/8/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
89	LandWatch Monterey County	Farrow	John	Briefly, we've written about this, Land Watch as primary concern is the Jobs Related Allocation Plan supports the allocation of the rest of the units, and it supports what it thinks is the consensus waiting. The key point is that the proposed mechanism for the jobs related allocation in Option A doesn't further the statutory objectives. That objective is not job share, it's to promote improved regional jobs, housing balance. That means you have to look not just at the numerator, the city share of regional jobs, but also the denominator, the city's housing units, option A doesn't do that, ignores it denominator. So the effect is to allocate thousands of units to jurisdictions that don't have a jobs housing imbalance, not to allocate sufficient units to the cities that do have an imbalance not to allocate units in proportion to that imbalance. But we've proposed something that does just focus on the jobs housing imbalance, which is what the statute calls for. And our proposal would allocate in proportion to the imbalance. The new option B moves in that direction, but it doesn't go far enough. It still allocates twice as many of the units is on the basis of job share, which is simply not a statutory criteria. And the units and it does allocate to the cities that have severe imbalances are still allocated based on job share. Instead of in proportion to their imbalances, then inexplicably it reduces the asset's H waiting from 35 to 25%. And then staff reject Option B, because it doesn't put enough in opportunity areas, which is kind of a self inflicted wound. Again, the overall waiting is very statutory objectives. Just argue that AMBAG has to make sure that it's methodology actually furthers the statutory objective, which is a jobs housing balance. not just a job share calculation.	The AMBAG Board of Directors can choose to modify one of the RHNA methodology options and/or direct staff to explore a different option.	Public Hearing	12/8/2021
90	Monterey Bay Economic Partnership (MBEP)	Madrigal	Elizabeth	I am calling on behalf of Economic Partnership, and that supports AMBAG six cycle RHNA, final draft methodology of Option A What the minor modification regarding the AFFH income shift percentage to be weighed at 40% City of Salinas per comments by Santa Cruz YIMBY and Land Watch Monterey County. And most recently, the City of Soledad have also signified support for California's regional housing needs which requires our region to plan for 33,274 new homes by 2031 through 6 cycle Housing Element Update. Including 13,014 that are affordable to lower income households through the final draft methodology, the estimated allocations of these homes, and every Monterey Bay jurisdiction opportunity to promote equity, sustainability and racially and economically diverse communities. We would like to thank AMBAG for highlighting the tie the placement of allocations hold to job centers on climate change. These must be central principles as each jurisdiction develops their housing element. We would also like to thank AMBAG for implementing MBEP's previous recommendation, incorporating a AFFH as an allocation factor, as opposed to AFFH only being integrated via an income shifting mechanism. This has resulted in a more equitable distribution of units within our region. In regards to the AFFH income share percentage, mainly the 30%, should be applied at 40% to ensure that the allocations jurisdictions are receiving are completely satisfying the goal of a AFFH. I, both having larger allocation due to this factor, as well as receiving a substantive proportion of very low and low-income units within set allocation. Thank you for your leadership in moving our region forward on our existing unprotected housing needs. We look forward to working with all 18 municipalities within the purview as they embark on the next step of updating their respective housing elements.	Comment noted.	Public Hearing	12/8/2021
91	Public	Black	Alex	The question is, how do we get more units? And I don't believe that this is the appropriate time for that question, but I don't know where else to ask if none of the board would be willing to answer that question. But, that's my big question, is, how do we get more units?	Comment noted.	Public Hearing	12/8/2021
92	City of Salinas	Moore	Jonathan	I'm with the City of Salinas. I would like to express its support for option A, we feel this is the best option for furthering for housing, for equity, and will help with the jobs, housing balance, by putting jobs or houses, excuse me, where people work but cannot currently afford. We'd also like to express support for increasing the income shift percentage from 30 to 40% along with others and express that as well. We know that none of us jurisdictions are developers that this is a challenging process but you think Option A is the fair way for the future of housing in the region and puts less only some burden on communities of color, more for the wealthier jurisdictions.	Comment noted.	Public Hearing	12/8/2021
93	Public	Kelley	Kyle	I want to thank the Board and staff as well as HCD for putting this together. I'm really excited for communities in California to, to do their part and approving that's housing. I live in Santa Cruz now and I grew up in California. And I never understood why it was too difficult to find an apartment or why, I wrote was so high. And I think, for the sake of, you know, our children's future, our grandchildren's future, we're going to make sure that we do the right thing and then we make sure that we're making sure to build housing in all places, including in, in the wealthy communities, where, you know, there's access to resources and jobs and maybe better transit. This is just this is a great chance to be able to, you know, build this out of, kind of the missteps that we've had in the past and make sure that we've got enough in our, in our coastal community here. And so, I just want to re-iterate my support for Option A.	Comment noted.	Public Hearing	12/8/2021
94	Public	Pisano	Michael	The question was: how is the trending score calculated? I missed that.	Comment noted.	Public Hearing	12/8/2021
95	City of Watsonville	Hurst	Lowell	Good evening. Ladies and gentlemen, board members And staff, I just wanted to say, thank you for your diligent, hard work. No, it's not, it's not an easy task, by any means, lots of considerations You know, I was around in the last century and we really got it in a pickle with the arena numbers and we came up with the general plan, what turned out to be Well, it wasn't legal, according to the courts. And so, know, my, my cautionary message is, let's whatever you do, let's make it practical and doable. And every jurisdiction certainly needs to do their fair share of housing, but some jurisdictions just don't have any land, and that that creates, you know, a unique circumstance for various reasons. So, let's keep it practical and doable. And let's get something done. Thank you very much.	Comment noted.	Public Hearing	12/8/2021

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
96	City of Salinas	Hunter	Megan	Thank you so much for this opportunity to speak, We are very pleased at the work that has done and all of the listening that they've done to the jurisdictions. We, as Jon, Jonathan Moore, mentioned, are in favor of option A And I think it's really important to point out that option a results in a lot more equity. In terms of providing affordable housing across the region, some of the smaller communities which are densely populated, are under option B, would get a much larger share of the unit. And a lot of the communities of color has people who works in wealthier jurisdictions, but cannot afford to live there. And I would argue that, as Jonathan mentioned, that in the AFFH factor, as 35% is necessary, not only to ensure equity and opportunity areas for people of color and low income areas, but it will also help with the jobs, housing, balance. And, at the very least, I think that percentage of 35% needs to be retained if Option B is looked at and maybe shifting us a little bit jobs, but maintaining the jobs, Housing ratio, would make sense.	Comment noted.	Public Hearing	12/8/2021
Public Comments Received after the December 8, 2021 Public Hearing							
97	Public	Booolootian	Mark	I'm dismayed to see what has come of the RHNA plan. No good deed goes unpunished and the plans for Santa Cruz will certainly be punishing. While water seems to receive lip service, I did not see mention of our current over-capacity situation with acute care beds in the hospitals, or the constant overwhelm in the ER. Nor any mention of the over capacity call volume for fire and police, and the complete overwhelm experienced by our police in dealing with mental health issues. Speaking of which, there is no mention of the rapidly escalating mental health and social service crisis we are experiencing, and increasing the population will only serve to increase the numbers in those areas. And what of traffic? Our roads have been over capacity in Santa Cruz for decades, posing frustration for travelers and potentially life threatening delays for first responders. More people means more cars. And UCSC wants to grow enrollment by almost 50% (obviously helping apply pressure to the housing crisis). How is it that we fail to understand that we cannot grow our way out of a problem that is coming from growth itself? It is unfortunate that the RHNA plan will drive the City of Santa Cruz further into crisis. While we might help reduce a problem in one area (more affordable housing), we will more than compensate for it by increasing problems in several other areas, making life harder and more stressful for all. Sorry to rant, but it is just incredibly depressing to see what is taking place. I'm not sure there really are any good solutions, and our society will simply need to cycle through what societies throughout history have faced, until we end up a story in a history book.	Comment noted.	Email	12/14/2021
98	Public	Pisano	Michael	<p>Thank you - Amazing work on the RHNA... Just to comment: Every City, County, College &amp; University has underutilized properties to expand on (Not just on vacant land)...</p> <p>Like the Circles Church development on the Westside of Santa Cruz;</p> <ul style="list-style-type: none"> <li>• This is where a group of local teachers, police, firefighters &amp; public workers that bought a property together to build affordable housing for themselves. Since one person could not afford to build by themselves, but together they were able to save money and use their joined equity to build something nice. <ul style="list-style-type: none"> <li>o How can AMBAG expand on this idea of using joint equity to build needed housing &amp; bring interested parties together (Like: UCSC staff &amp; faculty)...</li> </ul> </li> </ul> <p>I still do not understand the transportation calculation?:</p> <p>Capitola has the same headways as Santa Cruz, Watsonville &amp; Scotts Valley – as Capitola has a transit center at the Capitola Mall. I think the headways are 15 minutes...especially apparent on the UCSC Campus for Santa Cruz.</p> <p>Just to note:</p> <ul style="list-style-type: none"> <li>• Given that retail rents may go up with new buildings &amp; possible loss of long time unique tenants - unless an entity steps in (for example - Mt. View kept a long-time tenant's rent at the same level prior to the new building (they were a small tailor) - when the property was redeveloped as mix-use affordable housing on Castro St &amp; El Camino).</li> </ul>	Comment noted.	Email	12/16/2021



Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
99	County of Santa Cruz	Levine	Paia	<p>Planning staff in the jurisdictions in Santa Cruz County have been discussing the Board direction to AMBAG staff to recalculate the resiliency factor using acreage, instead of % area not within a hazard area. We will be continuing that conversation next week. However, I wanted to get the following comment and suggestion in front of you sooner than later. Please consider it to be my input at this time, there could be more input from myself or others on this topic next week.</p> <p>The resiliency factor is intended to ensure the RHNA accounts for the fact that high fire and other hazardous areas are not prudent locations for new units and population. However, a revised calculation based on unmodified gross acreage will skew the result away from that goal, because it considers all acreage to be equivalent. The Board direction, which is intended to give consideration to the small geographic size of some jurisdictions, will be an equitable refinement that furthers the resiliency purpose IF it compares size using similarly situated acreage, rather than gross acres. From the perspective of resilience and development potential, rural mountain acreage with no access to public water, sewer or even adequate road access is not comparable with urban acreage where all services are available.</p> <p>Below, please find calculations of acreage in the jurisdictions in Santa Cruz County. For a revised resilience factor calculation using acreage, as directed, to continue to further the goal of resilience, I suggest using these values as the acreage in the revised calculation for Santa Cruz County. At minimum, the unincorporated County's acreage should reflect the geographic area within urban area, defined by the Urban Services Line, as opposed to area County wide. That would address the most egregious error that would be introduced by using unrefined gross acreage.</p> <p>Thank you for considering this approach and I am available if you would like to discuss. Thanks for all you do.</p>	AMBAG staff developed a definition for developable land based on data that was available for all jurisdictions. Developable area was calculated as area excluding parks and open space (with data from the California Protected Areas Database), Williamson act agricultural preserve (CA Department of Conservation database), and industrial lands (County Assessor database).	Email	12/20/2021

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The 2022 AMBAG Board of Directors meeting locations are subject to change and may be held remotely in light of Governor Newsom's State of Emergency declaration regarding the COVID-19 outbreak and in accordance with AB 361.

### **2022 AMBAG Calendar of Meetings**

<b>February 9, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>March 9, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>April 13, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>May 11, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>June 8, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>July 2022</b>	<b>No Meeting Scheduled</b>
<b>August 10, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>September 14, 2022</b>	<b>TBD</b> Meeting Time: 6 pm

## **2022 AMBAG Calendar of Meetings (continued)**

<b>October 12, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>November 9, 2022</b>	<b>TBD</b> Meeting Time: 6 pm
<b>December 2022</b>	<b>No Meeting Scheduled</b>



<b>AMBAG Acronym Guide</b>	
ABM	Activity Based Model
ADA	Americans Disabilities Act
ALUC	Airport Land Use Commission
AMBAG	Association of Monterey Bay Area Governments
ARRA	American Reinvestment and Recovery Act
3CE	Central Coast Community Energy
CAAA	Clean Air Act Amendments of 1990 (Federal Legislation)
Caltrans	California Department of Transportation
CAFR	Comprehensive Annual Financial Report
CalVans	California Vanpool Authority
CARB	California Air Resources Board
CCJDC	Central Coast Joint Data Committee
CEQA	California Environmental Quality Act
CHTS	California Households Travel Survey
CMAQ	Congestion Mitigation and Air Quality Improvement
CPUC	California Public Utilities Commission
CTC	California Transportation Commission
DEIR	Draft Environmental Impact Report
DEM	Digital Elevation Model
DOF	Department of Finance (State of California)
EAC	Energy Advisory Committee
EIR	Environmental Impact Report
FAST Act	Fixing America's Surface Transportation Act
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FTIP	Federal Transportation Improvement Program
GHG	Greenhouse Gas Emissions
GIS	Geographic Information System
ICAP	Indirect Cost Allocation Plan
ITS	Intelligent Transportation Systems
JPA	Joint Powers Agreement

LTA	San Benito County Local Transportation Authority
LTC	Local Transportation Commission
MAP-21	Moving Ahead for Progress in the 21 <sup>st</sup> Century Act
MBARD	Monterey Bay Air Resources District
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MPAD	Monterey Peninsula Airport District
MPO	Metropolitan Planning Organization
MST	Monterey-Salinas Transit
MTP	Metropolitan Transportation Plan
MTIP	Metropolitan Transportation Improvement Program
OWP	Overall Work Program
PG&E	Pacific Gas & Electric Company
PPP	Public Participation Plan
RAPS, Inc.	Regional Analysis & Planning Services, Inc.
RFP	Request for Proposal
RHNA	Regional Housing Needs Allocation
RTDM	Regional Travel Demand Model
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SB 375	Senate Bill 375
SBtCOG	Council of San Benito County Governments
SCCRTC	Santa Cruz County Regional Transportation Commission
SCMTD	Santa Cruz Metropolitan Transit District
SCS	Sustainable Communities Strategy
S RTP	Short-Range Transit Plan
STIP	State Transportation Improvement Program
TAMC	Transportation Agency for Monterey County
TAZ	Traffic Analysis Zone
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
VT	Vehicle Trips