

# **Final 6<sup>th</sup> Cycle Regional Housing Needs Allocation Plan 2023-2031**

**October 2022**

**Association of Monterey Bay Area Governments**



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## Executive Summary

In August 2021, the California Department of Housing and Community Development (HCD) issued a Regional Housing Need Determination to the AMBAG region for the 6th Cycle planning period of June 30, 2023 to December 15, 2031 and determined that the region must zone to accommodate a minimum of 33,274 housing units during this period. California housing law (Government Code § 65580 et seq.) requires AMBAG, acting in the capacity of Council of Governments (COG), to develop a Regional Housing Needs Allocation (RHNA) Plan to allocate existing and projected housing needs to local jurisdictions within Monterey and Santa Cruz Counties.

Based on the final RHNA Plan, each city and county must update its housing element to demonstrate how the jurisdiction will meet the expected growth in housing need over this period of time. The table below shows the final regional housing need allocation for each jurisdiction in the AMBAG region, broken into four income categories.

**Table 1 – RHNA for the AMBAG Region, June 30, 2023 to December 15, 2031**

Region	Income Group Totals				RHNA
	Very Low	Low	Mod.	Above Mod.	Total
Region	7,868	5,146	6,167	14,093	<b>33,274</b>
<b>Monterey County</b>					
Carmel-By-The-Sea	113	74	44	118	<b>349</b>
Del Rey Oaks	60	38	24	62	<b>184</b>
Gonzales	173	115	321	657	<b>1,266</b>
Greenfield	101	66	184	379	<b>730</b>
King City	97	63	178	364	<b>702</b>
Marina	94	62	173	356	<b>685</b>
Monterey	1,177	769	462	1,246	<b>3,654</b>
Pacific Grove	362	237	142	384	<b>1,125</b>
Salinas	920	600	1,692	3,462	<b>6,674</b>
Sand City	59	39	49	113	<b>260</b>
Seaside	86	55	156	319	<b>616</b>
Soledad	100	65	183	376	<b>724</b>
Unincorporated Monterey	1,070	700	420	1,136	<b>3,326</b>
<b>Santa Cruz County</b>					
Capitola	430	282	169	455	<b>1,336</b>
Santa Cruz	859	562	709	1,606	<b>3,736</b>
Scotts Valley	392	257	154	417	<b>1,220</b>
Watsonville	283	186	521	1,063	<b>2,053</b>
Unincorporated Santa Cruz	1,492	976	586	1,580	<b>4,634</b>

## Introduction

Since 1969, the State of California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. The California Department of Housing and Community Development (HCD) issued a Regional Housing Need Determination to the AMBAG region for the 6<sup>th</sup> Cycle planning period of June 30, 2023 to December 15, 2031. HCD determined that the region must zone to accommodate a minimum of 33,274 housing units during this period. HCD calculates the regional determination using information provided by the California Department of Finance and the most recent U.S. Census Bureau data regarding overcrowding, cost burden, and vacancy rate. The regional determination includes an overall housing need number, as well as a breakdown of the number of units required in four income distribution categories.

Once HCD issues their determination, the Regional Housing Needs Allocation (RHNA) Plan establishes the total number of housing units that each city and county must plan for within the eight-year planning period. The allocation is based on factors that address the five statutory RHNA objectives, as described below. The RHNA methodology and RHNA Plan are part of the state-mandated housing element law (Government Code §65580 et seq.). Based on the adopted RHNA, each city and county must update its housing element to demonstrate how the jurisdiction will meet the expected growth in housing need over this period of time.

This document, the RHNA Plan, officially assigns the allocations to cities and counties for two of the three counties within the Monterey Bay Area, Monterey and Santa Cruz Counties. San Benito County conducts a separate RHNA, as explained below. The RHNA Plan describes the adopted RHNA methodology including total unit allocations and allocations by income category. This plan also describes how the allocation meets the five statutory RHNA objectives. The appendix includes documents that were part of the planning process such as official correspondence from HCD regarding the regional determination and methodology review, AMBAG Board agenda items, and results of a statutorily-required jurisdiction survey. Table 1 above shows the result of this planning process—an allocation of housing units by income level that jurisdictions plan to accommodate in their housing elements over the June 30, 2023 to December 15, 2031 timeframe.

## Housing Element Law and RHNA Objectives

State housing element law, Government Code §65584 (d), requires the RHNA to be consistent with five objectives:

## Regional Housing Needs Allocation Plan: 2023 - 2031

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties with the region in an equitable manner, which shall result in all jurisdictions 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 §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.

As explained below, AMBAG's Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS) and the RHNA Plan are consistent with these objectives.

### **The Metropolitan Transportation Plan/Sustainable Communities Strategy and RHNA**

Senate Bill (SB) 375, passed into state law in 2008, requires the coordination of housing planning with regional transportation planning through the MTP/SCS. This requires consistency in growth forecasts for land use, housing, and transportation purposes. In prior plans, the RHNA and the MTP/SCS were prepared independently and had different timelines and planning periods. SB 375 requires that the RHNA and MTP/SCS process be undertaken together in order to integrate housing, land use, and transportation planning to ensure that the state's housing goals are met and to help reduce greenhouse gas emissions (GHG) from cars and light duty trucks. The goal of this integrated planning is to create opportunities for residents of all incomes to have access to jobs, housing, services, and other common needs by a variety of means, including public transit, walking, and bicycling.

Prior to SB 375, RHNA was updated every five years and the MTP was updated every four years. Because SB 375 requires better coordination between transportation planning with land use and housing planning, the RHNA process is now tied to the adoption of every two cycles of the regional MTP/SCS. As a result, the RHNA Plan must be adopted every eight years, aligning with the adoption of the MTP/SCS. This also means that each city and county with a compliant

housing element will update its housing element every eight years instead of every five years, as required before SB 375.

## **2022 Regional Growth Forecast**

As the MPO, AMBAG carries out many planning functions for the tri-county area including development and maintenance of the regional travel demand model (RTDM), long range transportation planning and programming, and acting as a regional forum for dialogue on issues facing the region. Most of AMBAG's projects are carried out in support of these major functions, including but not limited to the regional growth forecast. AMBAG develops the forecast with a horizon year that matches the planning timeline of the MTP/SCS and the model years for the RTDM. In addition to informing MTP/SCS, the regional growth forecast (RGF) is an important reference point in the RHNA process.

The 2045 MTP/SCS includes a planning period through 2045. The years forecasted include 2025, 2030, 2035, 2040, and 2045. The forecast uses a model that predicts employment growth using a shift-share model based on local data as well as state and national trends. Population growth is then driven by employment growth. Household and housing growth are driven by population growth, demographic factors and external factors. This approach was vetted and approved by the AMBAG Board of Directors in 2014 for use in the metropolitan transportation plan, *Moving Forward 2035 Monterey Bay*. The framework was used again in 2018 for the 2040 MTP/SCS, and again in 2022 for the 2045 MTP/SCS. While the methodology for the 2022 RGF has remained the same through three planning cycles, the models have been updated for the *Moving Forward 2045 Monterey Bay Plan* to include current data, a revised base year of 2015 and a new horizon year of 2045.

## **Process for Development of the 2022 Regional Growth Forecast**

In consultation with local planning departments, AMBAG prepared an estimated 2045 growth forecast for the region. The Planning Directors Forum was the primary venue for ongoing coordination between local agency planning staff and AMBAG; however, a number of jurisdiction-specific meetings and comment periods also were held, including over 100 one-on-one meetings held by AMBAG staff with each of the jurisdictions, the University of California, Santa Cruz, and the California State University, Monterey Bay. The development of the 2022 Regional Growth Forecast and the methodology is documented in detail as part of the 2045 MTP/SCS. Both of these documents can be found on the AMBAG website. The Regional Growth Forecast was used as part of the criteria in selecting the final RHNA methodology for the 2023-2031 6<sup>th</sup> Cycle RHNA period.

## Geography

The local jurisdictions addressed in the RHNA process for the AMBAG region include the sixteen incorporated cities and two counties as shown in Table 3. University of California Santa Cruz, California State University Monterey Bay, the Salinas Valley State Prison (SVSP), the Correctional Training Facility (CTF) in Soledad, the Defense Language Institute (DLI), the Naval Post Graduate School (NPS) are not allocated any regional housing need since they are not city or county agencies, located on State or federal lands, and considered exempt entities not part of the RHNA process.

The AMBAG RHNA area is predominantly rural, with urban development clustered along the Monterey Bay coastline and in agricultural inland valleys along U.S. 101. Major urban development in the Monterey Bay Area primarily occurs along the Bay coastal plains and foothills of the Monterey Peninsula from the City of Santa Cruz in the north to the City of Carmel-by-the-Sea to the south. The Santa Cruz, Watsonville, Seaside-Monterey, and Salinas urbanized areas are the most densely developed in the region.

**Table 3: Cities and Counties Participating in the AMBAG RHNA Process**

Carmel-by-the-Sea	Del Rey Oaks	Gonzales	Greenfield
King City	Marina	Monterey	Pacific Grove
Salinas	Sand City	Seaside	Soledad
Capitola	Santa Cruz	Scotts Valley	Watsonville
County of Monterey	County of Santa Cruz		

A substantial portion of the AMBAG area is forested and hence at an elevated risk of fire. Large forests and wooded areas border many cities and are prevalent throughout County unincorporated areas. In 2020, the Santa Cruz County area was affected by one of the top 20 most destructive fires in California history, destroying 1,490 structures including homes, burning over 86,000 acres of rural forested land including multiple unincorporated communities and towns. In 2016, the Soberanes Fire in Monterey County burned over 132,000 acres and dozens of homes, and in 2020, the Dolan Fire in Monterey County burned over 124,000 acres. These risks make developing housing in suburban and rural areas near forested areas particularly difficult.

Many population centers in the Monterey Bay Area are located on the coast and subject to flooding due to continuing sea level rise. During the plan period, the coastal region in AMBAG will be affected by sea level rise according to the National Oceanic and Atmospheric Administration (NOAA). This threatens existing housing, and limits where new housing can be

constructed. Jurisdictions affected include Santa Cruz, Capitola, the County of Santa Cruz, Marina, Seaside, Sand City, Monterey, Pacific Grove, Carmel, and the County of Monterey. Also affected are the unincorporated communities of Aptos, Live Oak, Moss Landing, and Pebble Beach.

**Figure 1: Map of AMBAG RHNA Area**



## Process for Developing RHNA

The State of California, through the Housing and Community Development Department (HCD), issued a Regional Housing Needs Determination to (RHND) AMBAG for Monterey and Santa Cruz Counties (see Appendix D for the letter of determination). HCD calculated the regional determination using information provided by the California Department of Finance. The regional determination includes an overall housing need number, as well as a breakdown of the percentage of units required in four income distribution categories, as further defined below. The region's overall allocation for Monterey and Santa Cruz Counties is 33,274 housing units. San Benito County receives its own Regional Housing Needs Determination from HCD and must complete its own RHNA.

## **San Benito County**

The state mandate for distributing the RHNA is tied to the state designation of a Council of Governments (COG). Each COG is expected to distribute the RHNA to their member jurisdictions. AMBAG is the Metropolitan Planning Organization for the Counties of San Benito, Santa Cruz, and Monterey and has prepared a 2045 MTP/SCS for the tri-county region. However, it is the COG for only the Counties of Santa Cruz and Monterey. For this reason HCD makes a separate determination for San Benito County and tasks the San Benito County Council of Governments (SBtCOG) with developing its own RHNA Plan. AMBAG does coordinate with SBtCOG so that its RHNA Plan is consistent with the 2045 MTP/SCS.

## **AMBAG's Role in RHNA**

Based on the regional determination provided by HCD, AMBAG must develop the allocation of units to each jurisdiction, along with the plan document that contains the allocations. It is AMBAG's responsibility to coordinate with HCD prior to its determination of the regional housing need. Once AMBAG receives the regional determination, including the overall need number and the income category distribution, it must adopt a methodology for distributing the regional growth number throughout the region. The methodology is the basis for the final RHNA Plan that AMBAG adopts.

The methodology used for the RHNA distribution is developed in coordination with the local jurisdictions via the Planning Directors Forum and the AMBAG Board of Directors, as well as with input from the public. The state mandated RHNA Plan establishes the total number of housing units that each city and county must plan for within the eight-year planning period broken into four income categories as described above. Based on the adopted RHNA, each city and county must update its housing element by December 2023.

## **Importance of RHNA for Local Governments**

RHNA allows communities to anticipate growth so that the region can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, affirmatively furthering fair housing, and address fair share housing needs for all members of the community. Local governments were key to the development of the RHNA allocation methodology and will determine how their jurisdiction's allocation will be accommodated through their Housing Elements.

Once it receives its allocation, each local government must update the Housing Element of its General Plan and its zoning to show how it plans to accommodate its RHNA requirements and meet the housing needs in its community. It is in the community's Housing Element that local governments make decisions about where future housing units could be located and the

policies and strategies for addressing specific housing needs within a given jurisdiction, such as addressing homelessness, meeting the needs of specific populations, affirmatively furthering fair housing, or minimizing displacement. Having a housing element which is compliant with HCD requirements is critical to securing and maintaining state funding for all cities and counties.

State funding programs often consider a local jurisdiction's compliance with housing element law. These competitive funds can be used for fixing roads, adding bike lanes, improving transit, or providing much needed affordable housing to communities. In some cases, funding from state/federal housing programs can only be accessed if the jurisdiction has a compliant housing element. In other cases, a compliant housing element allows grant applicants to receive extra points on their application if they do have a compliant housing element, increasing their chances in the competitive application process. Moving forward, more state grant funds may include housing element compliance factors. State funds which tie housing element compliance to eligibility or scoring include the following:

- Community Development Block Grant Program
- Infill Infrastructure Grant Program
- Local Housing Trust Fund Program
- Affordable Housing and Sustainable Communities Program
- Permanent Local Housing Allocation Program
- Caltrans Sustainable Communities Grant Program
- Local Partnership Program
- Transit and Intercity Rail Capital Program
- Active Transportation Program
- Solutions for Congested Corridors Program
- HOME Investment Partnerships Program

This list may not be exhaustive and additional state funding programs may include housing element compliance requirements in the future.

## **The Regional Housing Needs Determination (RHND)**

The California Department of Housing and Community Development (HCD) determines the total number of homes for which each region in California must plan in order to meet the housing needs of people at all income levels. The total number of housing units from HCD is separated into four income categories that cover from housing for very low-income households to above-moderate income housing. AMBAG is responsible for developing a methodology to allocate a portion of this housing need to every local jurisdiction in the region.

The four income categories included in the RHND are:

Regional Housing Needs Allocation Plan: 2023 - 2031

- Very Low Income: Less than 50% of Area Median Income
- Low Income: 50-80% of Area Median Income
- Moderate Income: 80-120% of Area Median Income
- Above Moderate Income: 120% or more of Area Median Income

In a letter dated August 31, 2021 the California Department of Housing and Community Development (HCD) provided AMBAG with the RHND for use in this cycle of RHNA (See Appendix D).

**Table 2: RHND from HCD for AMBAG – June 30, 2023 to December 15, 2031**

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	23.6%	7,868
Low	15.5%	5,146
Moderate	18.5%	6,167
Above-Moderate	42.4%	14,093
<b>Total</b>	<b>100.0%</b>	<b>33,274</b>
*Extremely-Low	13.1%	Included in Very-Low Category

*Income Distribution: Income categories are prescribed by California Health and Safety Code (§ 50093, et. Seq.). Percentages are derived based on Census/ACS reported household income brackets and county median income.*

The RHND is based on a population and household forecast for the region from the California Department of Finance (DOF) and the application of specific adjustments to determine the total amount of housing needs for the region. Certain adjustments are a result of recent legislation that sought to incorporate an estimate of existing housing need, per Government Code 65584.01, shown below.

- The vacancy rates in existing housing stock, and the vacancy rates for healthy housing market functioning and regional mobility, as well as housing replacement needs. For purposes of this subsection, the vacancy rate for a healthy rental housing market shall be considered no less than 5 percent.
- The percentage of households that are overcrowded and the overcrowding rate for a comparable housing market. For purposes of this subparagraph:
  - The term “overcrowded” means more than one resident per room in each room in a dwelling.
  - The term “overcrowded rate for a comparable housing market” means that the overcrowding rate is no more than the average overcrowding rate in comparable regions throughout the nation, as determined by the council of governments.

- The percentage of households that are cost burdened and the rate of housing cost burden for a healthy housing market. For the purposes of this subparagraph:
  - The term “cost burdened” means the share of very low, low-, moderate-, and above moderate-income households that are paying more than 30 percent of household income on housing costs.
  - The term “rate of housing cost burden for a healthy housing market” means that the rate of households that are cost burdened is no more than the average rate of households that are cost burdened in comparable regions throughout the nation, as determined by the council of governments.

The RHNA process only considers the needs of the population in households who are housed in the regular housing market, and excludes the population living in group quarters, which are non-household dwellings, such as jails, nursing homes, dorms, and military barracks. HCD uses the age cohorts of the forecasted population from the California Department of Finance to understand the rates at which people are expected to form households. This can vary for people at different stages of life. These calculations result in HCD’s estimate of the total number of households that will need a housing unit in 2031, which is the end date of the projection period for AMBAG’s RHNA cycle.

The total number of projected households is then adjusted using the factors related to vacancy rate, overcrowding, and an estimate of the need for replacement housing for units that were demolished or lost. These adjustments result in a forecast of the number of housing units that will be needed to house all households in the region in 2031. The number of expected occupied housing units at the beginning of the RHND period is subtracted from the total number of housing units needed, which results in the number of additional housing units necessary to meet housing demand. The final step is an adjustment related to cost-burdened households, which leads to the total RHND.

## **Distributing the RHNA and Income Categories**

California’s Housing Element Law (Government Code §65580 et seq.) mandates that AMBAG develop and approve a RHNA methodology and RHNA Plan for Monterey and Santa Cruz Counties and the cities within. Once AMBAG receives the regional determination, including the overall need number and the income category distribution, it must adopt a methodology for distributing those numbers throughout the region. The methodology is the basis for the final RHNA Plan that AMBAG adopts.

The RHNA has two parts as required by state law:

## Regional Housing Needs Allocation Plan: 2023 - 2031

- Overall Allocation: AMBAG receives a total housing unit number for growth during the planning period for Monterey and Santa Cruz Counties. AMBAG is required to distribute this regional housing growth number to the jurisdictions within the region for the period from January 30, 2023 to December 15, 2031.
- Income Category Distributions: HCD also provides a household income distribution of the total regional housing unit number. As defined by state law, four income categories make up this distribution: very low income (less than 50 percent area median income [AMI]); low income (50 to 80 percent AMI); moderate income (80 to 120 percent AMI); and above moderate income (above 120 percent AMI). The total housing unit growth AMBAG allocates to each jurisdiction must be further allocated into the four household income categories.

### **Coordination with Jurisdictions**

The most critical factor in the RHNA process is the development of the RHNA methodology for allocating housing units within the region. The meetings of the regional Planning Directors Forum, comprised of local government planning staff but open to the public, served as the forum for the technical development of the draft methodologies. The Planning Directors Forum met monthly and provided input on approaches to different methodologies. AMBAG staff developed different methodology options for inquiry, review, and input from the planning directors. The AMBAG Board of Directors received regular updates on the development of the RHNA and the methodologies being considered. Of the various methodologies discussed at the Planning Directors Forum and the Board of Directors' meetings, the methodology that emphasizes AFFH and a balanced jobs/housing ratio was selected as the preferred method and was recommended to the Board of Directors. The Board of Directors approved this methodology on April 13, 2022.

### **Coordination with Regional Stakeholders and the Public**

The methodology used in this RHNA allocation was discussed multiple times at the Board of Directors and the Planning Directors Forum as well as presented at city council meetings and other stakeholder meetings. Opportunities for public comment were provided at all Board of Directors and Planning Directors Forum meetings. At those meetings and through direct communications, AMBAG also received comments from the public and stakeholders. Specific recommendations from the public were included in the selected methodology. These groups expressed support for the preferred methodology and indicated that it was a good representation of housing need in the region.

## Timeline

The RHNA Plan is adopted by the AMBAG Board of Directors in Fall 2022. Based on state statutory timelines prescribed in Government Code §65584.04, below are the key milestones dates for the RHNA:

- February 2021 to December 2021 – The Planning Directors Forum, comprised of the planning directors and local government planners for all of the cities and counties in the region, met seven times over eleven months to discuss RHNA and to develop and evaluate draft RHNA methodologies. The AMBAG Board of Directors were informed regularly on the development of the different draft methodologies. As meetings open to the public, these meetings also served as opportunities for the public and advocacy groups to provide comments on the process.
- June 2021 to January 2022 – The Board of Directors met seven times over eight months to review progress on the RHNA methodologies, take input from the Planning Directors Forum, and provide feedback on the process. As meetings open to the public, these meetings also served as opportunities for the public and advocacy groups to provide comments on the process.
- January 12, 2022 – The AMBAG Board of Directors adopted the draft RHNA methodology.
- January – March 2022 – HCD reviews and approves draft methodology.
- April 13, 2022 – Approval of the final RHNA methodology by the AMBAG Board
- April 22, 2022 – Draft RHNA plan released with RHNA allocations by jurisdictions
- April 22 to June 6, 2022 – Local jurisdictions and HCD appeal RHNA allocation within 45 days of release of the draft RHNA plan/allocations
- May 2022 – AMBAG released the final 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) accommodating RHNA
- June 7 to July 22, 2022 - Local jurisdictions and HCD comment on appeals within 45 days of the close of the appeal period
- June 15, 2022 – Adoption of Final 2045 MTP/SCS by AMBAG Board
- August 10, 2022 – AMBAG held public hearing on appeals
- September 14, 2022 – AMBAG made final determination that rejects appeals and directed staff to issue final allocation plan
- September 23, 2022 – AMBAG released Final 2023-31 RHNA Plan
- October 12, 2022 - Adoption of Final 2023-31 RHNA Plan with RHNA allocations by AMBAG Board (scheduled)
- December 15, 2023 - Jurisdiction's 6th Cycle Housing Elements are due to HCD

## Housing Elements

Once a local government receives its final RHNA from AMBAG, it must revise the Housing Element of its general plan and update zoning ordinances to accommodate its portion of the region's housing need. For this cycle, that process must be completed by December 2023. Communities are also required to report their progress to HCD annually.

The four income categories, as listed above, must be addressed in a jurisdiction's housing element. Specifically, accommodations must be made to ensure that the jurisdiction provides sufficient zoning capacity to accommodate the projected housing need in each income category. For the very low and low income categories, jurisdictions generally are required to identify sites (constructed or vacant) zoned at multifamily residential densities.

It is important to note that each jurisdiction is responsible for providing sufficient zoning capacity for the units allocated to all four economic income categories, but is not responsible for the construction of these units. The intent of the housing element law is to ensure that jurisdictions do not impede the construction of housing in any income category. Other factors, such as market forces, are beyond a jurisdiction's control and have considerable influence over whether or not housing units in each income category are actually constructed. The HCD website contains more information about Housing Element compliance at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml>.

## Adopted RHNA Methodology and Distribution

Once HCD issued the Regional Housing Need Determination of 33,274 housing units for our region, state housing element law required AMBAG to formulate a methodology to assign a share of the RHND to each jurisdiction in the region. The RHNA methodology was approved by the Board of Directors on April 13, 2022. Before asking the Board to approve a methodology AMBAG reviewed all of the HCD approved RHNA methodologies to date for the 6th Cycle from other COGs and presented the results to the Planning Directors Forum and the Board. The list of options was refined and narrowed with recommendations from the Planning Directors Forum before presentation to the Board. The final methodology that was chosen distributes the RHNA based on the Regional Growth Forecast, affirmatively further fair housing jobs/housing balance, jobs, climate resiliency, and transit service. Using this method creates a direct tie to the objectives of the Housing Element law as well as the goals and concepts in the 2045 MTP/SCS.

## **RHNA Methodology**

This section describes the draft methodology that the AMBAG Board of Directors approved on January 12, 2022. Appendix A provides the RHNA unit and income allocation estimates based on the approved methodology. To satisfy the requirements of Government Code §65584.04(a) AMBAG, in consultation with HCD staff, elected to pursue a three-step methodology. The first and second steps allocate the total number of units for the AMBAG region. The third step allocates by income category.

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

This RHNA methodology allocates a portion of housing units (6,260) based on data for projected housing growth for the four-year RHNA planning period from the 2022 Regional Growth Forecast (RGF). The 2022 RGF was used in the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The use of the 2022 RGF data 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 is consistent with the 2045 MTP/SCS, which was approved in June 2022.

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 for planning purposes in November 2020 and approved in June 2022. Allocating some of the RHND based on the RGF 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 element in the RHNA methodology; jobs, jobs/housing balance, transit, resiliency, and AFFH 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.

The data source for this factor is described below:

- 2022 RGF: Housing growth from 4-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)
  - The full RGF can be found at the following location:  
[https://ambag.org/sites/default/files/2021-11/PDFAAppendix%20A\\_2022%20RGF.pdf](https://ambag.org/sites/default/files/2021-11/PDFAAppendix%20A_2022%20RGF.pdf) and  
<https://www.ambag.org/plans/regional-growth-forecast>

### **Second Step in RHNA Methodology: Jobs, Jobs/Housing Balance, Transit, Resiliency, and AFFH Unit Allocation**

The second step in the RHNA methodology allocates the remaining units (27,014) for the AMBAG region by the following categories: 15% jobs (4,000 units), 31% jobs/housing (8,449 units), 4% transit (1,038 units), 8% resilience (2,075 units), and 42% of AFFH (11,452 units). The draft methodology presented here is the result of several rounds of methodology revision to include feedback from the AMBAG Board, Planning Directors forum, and the community. Revisions also accommodated additional feedback from the public and HCD staff, including adding jobs/housing and AFFH factors and reducing the weight of the RGF in the allocation.

Another revision made to reflect suggestions from HCD staff was to include both the California State Treasurer's Tax Credit Allocation Committee (TCAC) and Racially Concentrated Areas of Affluence (RCAA) data to calculate the AFFH allocation factor for incorporated jurisdictions.

Data sources used for this second step in the RHNA methodology are described below.

- Employment: AMBAG 2022 RGF, based on InfoUSA and California Employment Development Department (2020)
  - Jobs data reflects the pre-pandemic distribution of employment opportunities throughout the AMBAG region. Future job growth in Monterey and Santa Cruz Counties is expected to be concentrated in the same areas. Since such a large share of the region's jobs are agricultural, allocating based on jobs helps the region address the housing needs of farmworkers. (Gov. Code, §65584.04(e)(8).)
  - Focusing a significant share of the RHNA allocation on jobs helps to correct existing jobs/housing imbalances.
- Jobs-Housing Ratio: 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).

## Regional Housing Needs Allocation Plan: 2023 - 2031

- Transit: Existing (2020) transit routes with 15- and 30-minute headways, based on existing transit routes and stops from transit operators
  - While the AMBAG region does not have the kind of extensive transit system found in larger urban areas, transit access is important for the sustainability of future growth.
  - Focusing future growth in developing in areas with the region's highest quality transit promotes infill development and encourages efficient development patterns. (Gov. Code, §65584(d)(2).)
- 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)
  - The AMBAG region includes areas at great risk due to climate change, including areas at high risk of wildfire and areas at risk of inundation due to sea level rise. These constraints to development must be considered as the region plans for climate change.
  - This factor furthers the objective of promoting infill development, protecting environmental resources, and encourages efficient development patterns. (Gov. Code, §65584(d)(2).)
- Affirmatively Furthering Fair Housing (AFFH) Unit Allocation: The AFFH factor is the average of a jurisdiction's RCAA and TCAC score for incorporated jurisdictions, both of which are explained below. For unincorporated areas the AFFH factor is the TCAC score alone and does not include RCAA. Given the size of the unincorporated areas, TCAC better reflects the diversity of high- and low-income communities within the unincorporated areas. Jurisdictions qualifying as RCAAs, partial RCAAs, or TCAC Opportunity Areas are shown in Appendix B.
  - RCAA: 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. Data are from the U.S. Census Bureau, American Community Survey (2015-2019) and 2020 Census.
  - TCAC: This score reflects the percent of each jurisdiction's households in high/highest opportunity areas. Data are from the TCAC Opportunity Map Database (2021) and U.S. Census Bureau, American Community Survey (2015-2019).

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

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

There are several ways to measure socioeconomic disparities across jurisdictions. After considering alternatives, the AMBAG Board of Directors suggested a 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. Using the most recent data available from the U.S. Census Bureau, jurisdictions that are both high income (higher than the regional average for percentage above 200% of the poverty level) and racially-concentrated (above the regional average for percent white non-Hispanic) are defined as RCAAs. Jurisdictions that were either higher income or racially-concentrated, but did not meet both criteria, were identified as "partial RCAA." Consensus from the PDF was that the RCAAs analysis better reflected the AMBAG region's areas of opportunity than alternative measures such as the HCD/TCAC Opportunity Map data.

The third step of the methodology shifts Above Moderate units to Very Low and Moderate units to Low in jurisdictions that qualify as RCAAs. This results in RCAA jurisdictions getting a higher share of their RHNA in the lower income categories. In the final methodology presented here, just over 53% of the RHNA allocation is Very Low or Low income in jurisdictions that are RCAAs. In partial RCAA jurisdictions, approximately 38% of the RHNA allocation is Very Low or Low income. The comparable share for non-RCAA jurisdictions is less than 23%.

The data sources used for this step are described below.

- RCAA: 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. Data are from the U.S. Census Bureau, American Community Survey (2015-2019) and 2020 Census.

### **RHNA Objectives**

The following section summarizes how the development of the RHNA allocation methodology and the income group allocation methodology satisfies the five objectives. Development of the RHNA allocation methodology and the income group allocation methodology was focused on satisfying the five RHNA objectives (Govt. Code §65584(d)(1-5). Appendix A illustrates the methodology in further detail.

- 1. Increase 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.*

The 6th Cycle RHNA methodology allocates units to all jurisdictions in the AMBAG region. The proposed RHNA methodology affirmatively furthers fair housing by allocating units based on TCAC/RCAA data and by allocating a larger share of very low and low income housing in jurisdictions that have an above-average share of households in advantaged areas.

To promote a mix of housing types, the methodology adjusts jurisdictions' allocations by income levels, and provides larger shares of very low- and low-income categories to jurisdictions that have historically been racially concentrated areas of affluence (Carmel by the Sea, Del Rey Oaks, Monterey, Pacific Grove, unincorporated Monterey County, Scotts Valley, and unincorporated Santa Cruz). Jurisdictions which already contain a disproportionately high share of very low and low income households are allocated higher proportions of moderate and above-moderate housing allocations. In accordance with State law, each jurisdiction is allocated housing in all four income groups.

- 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.*

The methodology directly complements the region's SCS which seeks to reduce greenhouse gases emitted by light-duty vehicles. AMBAG's SCS achieves the required greenhouse gas emissions (GHG) with a critical strategy that addresses the region's jobs-housing imbalance. AMBAG achieves its GHG target of a 6% reduction per capita for 2035. AMBAG's SCS promotes infill development, socioeconomic equity, and the protection of agricultural resources. In excess of 76% of the region's determination is allocated to incorporated cities, thereby advancing this objective by promoting infill development. In addition, the allocation provided to the unincorporated counties could reasonably be assumed to be accommodated within currently developed areas. In its planning survey responses, both Monterey and Santa Cruz Counties noted that substantial proportions of their unincorporated areas are preserved or protected from urban development as conservation land, state parks, federal ownership, via land trusts, or are protected under federal and state species protection regulations or under the Williamson Act. This largely constrains new development in the unincorporated areas. Much of the existing development in the unincorporated counties is indistinguishable to that of the abutting cities; therefore, it is not expected to place demand on not expected to place demand on more rural areas.

By allocating 4% of RHNA by transit, the methodology further promotes more housing in jurisdictions with better transit access, which will further reduce GHG emissions and promote efficient development patterns. By allocating 8% of RHNA using a resiliency factor, the methodology promotes protection of coastal and forest areas by shifting allocations away from these sensitive environmental resources.

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.*

By allocating a substantial share of the RHND based on jobs (15%) and jobs/housing balance (31%), AMBAG's methodology directly addresses the imbalance between jobs and housing. The methodology allocates a majority of units to jurisdictions with jobs-to-housing imbalances.

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.*

Addressing the income-equity disparities of the 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 members recommended, and the AMBAG Board of Directors assured this was a significant consideration within the RHNA.

Using the RCAA and TCAC adjustments for AFFH, the RHNA places a higher proportion of very low and low income units in more affluent areas which have a shortage of these types of units. This shift necessarily allocated a significant portion of very low and low income units away from jurisdictions which a preponderance of lower income units, placing more moderate and above moderate units in these communities. The AMBAG methodology directs a higher share of total units to TCAC/RCAA jurisdictions, and a higher share of lower income housing to RCAA jurisdictions. In RCAA jurisdictions, more than 53% of the RHNA allocation is Very Low or Low income. In partial RCAA jurisdictions, approximately 38% of the RHNA allocation is Very Low or Low income. The comparable share for non-RCAA jurisdictions is less than 23%.

5. *Affirmatively furthering fair housing.*

The proposed RHNA methodology affirmatively furthers fair housing by allocating units based on TCAC and RCAA data. The proposed RHNA methodology allocates a large portion of the RHNA based on AFFH. The methodology assigns additional units to jurisdictions that are above the regional average for percentage of population above 200% of the poverty level and/or

which have a higher racially concentrated white population than the regional average and/or have areas of high/highest opportunity. The methodology also focuses a larger share of very low and low income housing in jurisdictions that have an above-average share of advantaged households, as described in Objective 4 above.

### **RHNA Methodology Metrics**

AMBAG evaluated the draft methodology to ensure that it performed well in meeting all of the RHNA objectives. Appendix C highlights how the draft methodology supports and furthers the RHNA objectives.

### **RHNA Factors**

To the extent that sufficient data is available, the COG must consider 13 factors when developing the methodology that allocates regional housing needs. The following section summaries how the development of the RHNA allocation methodology satisfies the 13 factors.

- 1. 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.*

The final RHNA methodology directly incorporates each jurisdiction's jobs-housing relationship. Existing conditions are expressly considered in the methodology. Projections based on the RGF for from the MTP/SCS 2045 also informed the allocation.

The final RHNA methodology improves jobs-housing balance by using factors related to job proximity to allocate a significant portion of the RHND. These factors direct housing units to those jurisdictions, allocating 8,449 units to areas with jobs to housing imbalances (higher jobs/housing ratios). The methodology also allocates 11,452 units based on AFFH, placing more units in higher income areas which correspond to areas with lower jobs to housing ratios. The final RHNA methodology helps to create a more balanced relationship between housing and jobs by directing RHNA units to job-rich jurisdictions and jurisdictions with the most imbalanced jobs-housing fit. Additionally, the jurisdictions with the worst jobs-housing fit receive a larger share of their RHNA as affordable housing than other jurisdictions. An equity adjustment is included in the methodology, directing additional lower-income units to jurisdictions with an imbalanced jobs-housing ratio.

- 2. The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following: (A) 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; (B) 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; (C) 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 nonagricultural uses; and (D) 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 nonagricultural uses.*

The final RHNA allocation assigns 2,075 units using a resiliency factor which allocates RHNA units away from forested areas at high risk of fire, and away from coastal areas that may be inundated should sea levels rise by at least two feet. This approach protects open space, environmental habitats, and natural resources, and encourages housing growth away from these sensitive resources.

All other RHNA factors assign housing units towards incorporated population centers by allocating factors such as jobs, jobs/housing ratio, transit, resiliency, and AFFH. This works to direct housing away from farmland, and towards cities which normally have adequate sewer and water service.

- 3. 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.*

The final RHNA methodology allocates 41,038 units based on a jurisdiction's transit service. The methodology will encourage higher-density housing in jurisdictions with existing transit infrastructure, which can maximize the use of public transportation in these communities.

4. *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 nonagricultural uses.*

The large majority of the RHNA allocation is within incorporated areas. Monterey County has a policy as well as several agreements with cities to direct growth into incorporated areas. AMBAG considered and incorporated these policies and agreements into the development of the 2022 Regional Growth Forecast by directing the majority of growth in the forecast towards incorporated cities. Because the RHNA is based on the 2022 Regional Growth Forecast the distribution inherently directs growth towards incorporated cities. While most of the growth within Monterey County is planned within incorporated cities, and there are policies reinforcing this growth pattern, the County has made plans to accommodate new population within Community Plan Areas. Based on this and the reality of a continued presence of low income minority populations in the unincorporated areas of the County, Monterey County will also have to plan for affordable housing as allocated in this RHNA Plan. Santa Cruz County does not have similar agreements with cities to direct development towards incorporated areas.

5. *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.*

Comprehensive data about the loss of assisted housing units is not available for all jurisdictions in a consistent format. Given the lack of consistent data, this topic was not included as a specific factor in the final RHNA methodology. Some jurisdictions indicated that there was a small loss of units contained in assisted housing developments. However, the cumulative loss for any given jurisdiction is relatively small and therefore was not considered as a factor adjustment. The loss of assisted housing units for lower income households is an issue that would be best addressed by local jurisdictions when preparing their Housing Elements.

6. *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.*

The final methodology allocates lower-income unit to all jurisdictions, particularly those with the most access to opportunity, allocating 11,452 units based on the jurisdictions' access to

opportunity according to the California Tax Credit Allocation Committee (TCAC) Opportunity Maps and Racially Concentrated Areas of Affluence (RCAA). In addition, jurisdictions that are RCAs receive a larger percentage of their RHNA as lower-income units than other jurisdictions in the region. Local governments will have additional opportunities to address jurisdiction specific issues related to cost burdened households when they update their housing elements.

*7. The rate of overcrowding.*

To address the needs of overcrowding in the region, HCD's RHNA Determination included an overcrowding adjustment which added housing units to the regional housing need to alleviate overcrowding in the region. As a result, overcrowding is considered throughout the region as part of the RHND. Since overcrowding tends to be the worst in lower income communities, including an overcrowding metric in the methodology would have placed more housing in lower income communities. This would have been counter to the AFFH objective, which requires more lower income housing be allocated to jurisdictions that have more resources and less lower income housing be allocated to jurisdictions that have historically had a disproportionately high share of lower income households. Such an allocation to would have also been counter to guidance provided by HCD during consultation on the methodology process. While the methodology does not have a specific overcrowding metric, the methodology base allocation is based on the RGF which assigns a significant share of housing growth to areas of high demand, which includes jurisdictions with higher overcrowding rates.

*8. Housing needs of farmworkers.*

The RHNA allocation benefits farmworker housing due to the rural and agricultural nature of the region. Most of the population is within a few miles of farmland, and nearly every population center is no further than 15 miles from an agricultural area. By encouraging housing development throughout the region, the RHNA will benefit the farmworker community.

*9. 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.*

The region currently has two major universities, the University of California, Santa Cruz (UCSC) and the California State University, Monterey Bay (CSUMB). Both universities place housing demands on their surrounding jurisdictions. The majority of the RHNA allocation is within the commute sheds of these two universities, primarily within the Santa Cruz metropolitan area near UCSC, and within the Monterey and Salinas metropolitan areas near CSUMB. In addition,

UCSC has made efforts to meet some of that demand as there is a binding agreement between the University and the City of Santa Cruz. CSUMB is planning for growth which has generated housing pressure on the surrounding jurisdictions. The City of Marina is actively working to meet some of this demand with plans for housing development in areas close to the campus. Not only will housing be in demand in the City of Marina, but Marina is a closer commute than the Salinas Valley is to those coastal cities that have severe restrictions on new development.

*10. Housing needs of individuals and families experiencing homelessness.*

Comprehensive jurisdiction-level data about individuals and families experiencing homelessness is not available for most AMBAG jurisdictions. As a result, this topic was not included as a specific factor in the final RHNA methodology. However, the methodology does consider the housing needs of individuals and families experiencing homelessness by allocating very low- and low-income units to all jurisdictions throughout the region.

*11. 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.*

The RHND included HCD's minimum replacement adjustment of 0.5 percent, which exceeds the region's demolition rate. This adjustment added 1,202 housing units to the RHND. Since the demolition adjustment in the RHND included significantly more units than were lost, it was not necessary to include a specific factor in the final RHNA methodology to address the loss of units.

*12. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.*

The RHNA Plan allocates the vast majority of units in existing urban areas with a strong focus on placing more units where jobs/housing ratios are imbalanced. These factors combine to place more units near jobs centers which, over time, will reduce commuting distances and associated GHG emissions throughout the region.

*13. 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.*

No other planning factors were adopted by AMBAG for the 6<sup>th</sup> Cycle RHNA.

## **Draft RHNA Plan and Appeals Process**

The Draft 2023-2031 6th Cycle Plan was released on April 22, 2022. The release of the Draft RHNA Plan initiated a 45-day appeal period allowing a member jurisdiction or HCD to appeal for a revision of the share of the regional housing need proposed to be allocated. (Gov. Code, § 65584.05(b).) The close of the appeal period was June 6, 2022.

### **Appeals and Comments Received on Draft RHNA Plan**

AMBAG received two appeals on the Draft 2023-2031 6th Cycle RHNA Plan from the cities of Sand City and Greenfield. In addition, AMBAG received comments on the Draft 6th Cycle Plan from the City of Capitola and the County of Monterey. These letters are included in Appendix G. State law requires a 45-day comment period on any appeals received on the draft Plan. The close of the comment period for jurisdictions, HCD and members of the public to comment on the appeals received was July 22, 2022. AMBAG received two comments, including one from HCD, on the appeals as shown in Appendix H. For more information on the RHNA appeals, please visit: <https://ambag.org/plans/regional-housing-planning>.

### **RHNA Appeals and Final Determination**

AMBAG conducted a public hearing to consider all appeals filed and comments received on the appeals on August 10, 2022. (Gov. Code, §65584.05(d).) Each appeal was heard individually before the AMBAG Board of Directors. The AMBAG Board discussed and provided direction on each appeal. The AMBAG Board of Directors took a preliminary vote on each appeal during the public hearing. The 6th Cycle RHNA appeals final determination for Sand City and Greenfield are included as Appendix I. Statute requires that the AMBAG Board of Directors make a final written determination that either accepts, rejects, or modifies each appeal and issue a proposed final allocation plan. (Gov. Code, §65584.05(e).) On September 14, 2022, the AMBAG Board of Directors approved the final written determination rejecting both appeals and directed staff to issue the Final RHNA Plan.

## Regional Housing Needs Allocation Plan: 2023 - 2031

The Final 2023-2031 6th Cycle RHNA Plan was released on September 23, 2022 pursuant to Gov. Code, §65584.05(e.) The AMBAG Board of Directors held a public hearing on October 12, 2022 to adopt the final RHNA Plan (scheduled). (Gov. Code, §65584.05(g).)

**Appendix A: Final AMBAG 6<sup>th</sup> Cycle RHNA Allocation**

**AMBAG RHNA Methodology Summary**

Region	Income Group Totals				RHNA
	Very Low	Low	Mod.	Above Mod.	Total
<b>Region</b>	<b>7,868</b>	<b>5,146</b>	<b>6,167</b>	<b>14,093</b>	<b>33,274</b>
<b>Monterey County</b>					
Carmel-By-The-Sea	113	74	44	118	349
Del Rey Oaks	60	38	24	62	184
Gonzales	173	115	321	657	1,266
Greenfield	101	66	184	379	730
King City	97	63	178	364	702
Marina	94	62	173	356	685
Monterey	1,177	769	462	1,246	3,654
Pacific Grove	362	237	142	384	1,125
Salinas	920	600	1,692	3,462	6,674
Sand City	59	39	49	113	260
Seaside	86	55	156	319	616
Soledad	100	65	183	376	724
Unincorporated Monterey	1,070	700	420	1,136	3,326
<b>Santa Cruz County</b>					
Capitola	430	282	169	455	1,336
Santa Cruz	859	562	709	1,606	3,736
Scotts Valley	392	257	154	417	1,220
Watsonville	283	186	521	1,063	2,053

April 13, 2022

AMBAG RHNA Methodology

Region	RHNA Total 33,274		Housing 4-year Change 6,260		Jobs 15% 2020 % Reg. 4,000		Jobs/Housing Ratio 31% J/H 2020 % Reg. 8,449		Transit 4% Transit Score % Reg. 1,038		Resiliency (Wildfire & Sea Level Rise) 8% % Area Not in High Risk Zone Normalize (% Area x Unit Chg) % Reg. 2,075		AFFH 42% RCAA TCAC Avg. % Reg. 11,452		RHNA Total 33,274			
	Units	% Reg.	Units	% Reg.	Units	% Reg.	Units	% Reg.	Units	% Reg.	Units	% Reg.	Units	% Reg.	Units	% Reg.		
Monterey County																		
Carmel	5	3,566	0.9%	37	1.0	0.0%	0	0.0%	0	0%	0	64%	3	0.1%	1	100%	100%	349
Del Rey Oaks	34	748	0.2%	8	1.0	0.0%	0	0.0%	1	8%	87	44%	15	0.3%	6	100%	0%	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%	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%	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%	702
Marina	395	6,548	1.7%	68	0.8	0	0.0%	0	1	8%	87	89%	353	6.5%	135	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%	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%	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%	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%	260
Seaside	324	10,476	2.7%	109	1.0	0	0.0%	0	1	8%	87	77%	251	4.6%	96	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%	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%	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%	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%	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%	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%	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%	4,634

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

April 13, 2022

**AMBAG RHNA Methodology**

Income Shift: Shifts 40% Units Between Above Moderate and Very Low and Between Moderate and Low

Region	Baseline Income Allocation			RCAA		40%		40%		Raw RCAA Adjustments			Rebalance to Income Group			RHNA	
	V.L.	Low	Mod.	A.M.	RCAA	Shift	Shift	Very Low	Very Mod.	Above Mod.	Above Mod.	Very Low	Very Mod.	Above Mod.	Very Low	Very Mod.	Total
	7,868	5,146	6,167	14,093				8,092	5,296	6,017	13,869	7,868	5,146	6,167	14,093	33,274	
Monterey County																	
Carmel-By-The-Sea	83	54	65	148	100%	33	22	116	76	43	114	113	74	44	118	349	
Del Rey Oaks	44	28	34	78	100%	18	11	62	39	23	60	60	38	24	62	184	
Gonzales	299	196	235	536	0%	-120	-78	179	118	313	656	173	115	321	657	1,266	
Greenfield	173	113	135	309	0%	-69	-45	104	68	180	378	101	66	184	379	730	
King City	166	109	130	297	0%	-66	-44	100	65	174	363	97	63	178	364	702	
Marina	162	106	127	290	0%	-65	-42	97	64	169	355	94	62	173	356	685	
Monterey	864	565	677	1,548	100%	346	226	1,210	791	451	1,202	1,177	769	462	1,246	3,654	
Pacific Grove	266	174	209	476	100%	106	70	372	244	139	370	362	237	142	384	1,125	
Salinas	1,579	1,031	1,237	2,826	0%	-632	-412	947	619	1,649	3,459	920	600	1,692	3,462	6,674	
Sand City	61	40	48	110	50%	0	0	61	40	48	111	59	39	49	113	260	
Seaside	146	95	114	261	0%	-58	-38	88	57	152	319	86	55	156	319	616	
Soledad	171	112	134	307	0%	-68	-45	103	67	179	375	100	65	183	376	724	
Unincorporated Monterey	786	514	616	1,409	100%	314	206	1,100	720	410	1,096	1,070	700	420	1,136	3,326	
Santa Cruz County																	
Capitola	316	207	248	566	100%	126	83	442	290	165	439	430	282	169	455	1,336	
Santa Cruz	883	578	692	1,582	50%	0	0	883	578	692	1,583	859	562	709	1,606	3,736	
Scotts Valley	288	189	226	517	100%	115	76	403	265	150	402	392	257	154	417	1,220	
Watsonville	485	318	381	870	0%	-194	-127	291	191	508	1,063	283	186	521	1,063	2,053	
Unincorporated Santa Cruz	1,096	717	859	1,963	100%	438	287	1,534	1,004	572	1,524	1,492	976	586	1,580	4,634	

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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**Appendix B: Defining RCAAs and TCAC**

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

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

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

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## Appendix C: AMBAG RHNA Methodology Metrics

### AMBAG RHNA Methodology Metrics

	Indicator	Note
<b>Regionwide (reference point)</b>		
RHNA per capita	0.047	
Percentage of RHNA as V.L. or Low	39%	
<b>Performance Indicators</b>		
<b>1a. Higher percentage of RHNA as lower income units for jurisdictions with the highest housing costs (Jurisdictions with &gt;1% of units valued at \$2 million or higher)</b>		
Percentage of RHNA as V.L. or Low	49%	Meets goal.
<b>1b. Higher percentage of RHNA as lower income units for jurisdictions with the highest housing costs (Jurisdictions with &gt;4.7% of units renting for \$3,000 or higher)</b>		
Percentage of RHNA as V.L. or Low	49%	Meets goal.
<b>2. Higher percentage of RHNA total unit allocations to jurisdictions with highest jobs/housing imbalance</b>		
% of RHNA in imbalanced jurisdictions	67%	Meets goal.
<b>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</b>		
Percentage of RHNA as V.L. or Low	46%	Meets goal.
<b>4a. Lower percentage of RHNA as lower income units for jurisdictions with a higher share of lower-income</b>		
Percentage of RHNA as V.L. or Low	28%	Meets goal.
<b>4b. Higher percentage of RHNA as lower income units for jurisdictions with a higher share of higher-income</b>		
Percentage of RHNA as V.L. or Low	52%	Meets goal.
<b>5. Higher percentage of RHNA as lower income units for RCAA jurisdictions</b>		
<b>Percentage of RHNA as Very Low or Low Income in...</b>		
RCAA jurisdictions	53%	Meets goal.
Partial RCAA jurisdictions	38%	Meets goal.
non-RCAA jurisdictions	23%	Meets goal.
<b>RHNA per Capita in...</b>		
RCAA or Partial RCAA jurisdictions	0.027	Meets goal.
non-RCAA jurisdictions	0.009	Meets goal.
Difference in RHNA per Capita	0.018	Meets goal.

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## Appendix D: Regional Housing Needs Determination Letter

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
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August 31, 2021

Maura F. Twomey, Executive Director  
Association of Monterey Bay Area Governments  
24580 Silver Cloud Court  
Monterey, CA 93940

Dear Maura F. Twomey:

### **RE: Final Regional Housing Need Determination**

This letter provides the Association of Monterey Bay Area Governments (AMBAG) with a Final Regional Housing Need Determination and Regional Housing Need Allocation (RHNA) Plan. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of AMBAG's existing and projected housing need. In assessing AMBAG's regional housing need, HCD and AMBAG staff completed a consultation process from March 2019 through August 2021 that included the methodology, data sources, and timeline for HCD's determination of the regional housing need. To inform this process, HCD also consulted with Walter Schwarm and Doug Kuczynski of the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **33,274** total units across four income categories. AMBAG is to distribute amongst the region's local governments. Attachment 2 explains the methodology applied pursuant to Government Code section 65584.01. In determining AMBAG's housing need, HCD considered all the information specified in state housing law (Government Code section 65584.01(c)).

AMBAG is responsible for adopting a methodology for RHNA and RHNA Plan for the projection period beginning June 30, 2023 and ending December 15, 2031. Pursuant to Government Code section 65584(d), the methodology to prepare AMBAG's RHNA plan must further the following objectives:

- (1) Increasing the housing supply and mix of housing types, tenure, and affordability.
- (2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
- (3) Promoting an improved intraregional relationship between jobs and housing
- (4) Balancing disproportionate household income distributions
- (5) Affirmatively furthering fair housing

Maura F. Twomey, Executive Director  
Page 2

Pursuant to Government Code section 65584.04(d), to the extent data is available, AMBAG shall include the factors listed in Government Code section 65584.04(d)(1-13) to develop its RHNA plan. Also, pursuant to Government Code section 65584.04(f), AMBAG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above.

HCD encourages all of AMBAG's jurisdictions to consider the many other affordable housing and community development resources available to local governments. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

HCD commends AMBAG leadership in fulfilling their important role in advancing the state's housing, transportation, and environmental goals. HCD looks forward to continued partnership with AMBAG and member jurisdictions and assisting AMBAG in planning efforts to accommodate the region's share of housing need.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Tom Brinkhuis, Housing Policy Specialist at (916) 263-6651 or [tom.brinkhuis@hcd.ca.gov](mailto:tom.brinkhuis@hcd.ca.gov).

Sincerely,



Tyrone Buckley  
Assistant Deputy Director of Fair Housing

Enclosures

**ATTACHMENT 1**

**HCD REGIONAL HOUSING NEED DETERMINATION  
AMBAG: June 30, 2023 through December 15, 2031**

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	23.6%	7,868
Low	15.5%	5,146
Moderate	18.5%	6,167
Above-Moderate	42.4%	14,093
<b>Total</b>	<b>100.0%</b>	<b>33,274</b>
* Extremely-Low	13.1%	Included in Very-Low Category

Income Distribution:

*Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and county median income.*

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION:  
June 30, 2023 through December 15, 2031

Methodology

AMBAG: PROJECTION PERIOD (8.5 years) HCD Determined Population, Households, & Housing Unit Need		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	<b>Population: December 31 (DOF June 30 2031 projection adjusted + 5.5 months to December 15, 2031)</b>	753,540
2.	- <i>Group Quarters Population: December 31 (DOF June 30 2031 projection adjusted + 5.5 months to December 15, 2031)</i>	-42,975
3.	<b>Household (HH) Population</b>	710,570
4.	<b>Projected Households</b>	240,325
5.	+ Vacancy Adjustment (2.83%)	+6,792
6.	+ Overcrowding Adjustment (4.75%)	+11,410
7.	+ Replacement Adjustment (.5%)	+1,202
8.	- <i>Occupied Units (HHs) estimated June 30, 2023</i>	-227,790
9.	+ Cost-burden Adjustment	+1,335
<b>Total</b>	<b>6<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA)</b>	<b>33,274</b>

Detailed background data for this chart available upon request.

Explanation and Data Sources

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Gov. Code Section 65584.01, projections were extrapolated from DOF projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons within the Household Population to form households at different rates based on American Community Survey (ACS) trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment based on the difference between a standard 5% vacancy rate and the region’s current “for rent and sale” vacancy percentage to determine healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between the standard 5% vacancy rate and the region’s current vacancy rate (2.17%), based on the 2015-2019 ACS data. For AMBAG, that difference is 2.83%.
6. Overcrowding Adjustment: In regions where overcrowding is greater than the comparable region’s overcrowding rate, provided by AMBAG, HCD applies an adjustment based on the amount the region’s overcrowding rate exceeds the comparable region’s overcrowding rate. Data is from the 2015-2019 ACS. For AMBAG, the region’s overcrowding rate (10.49%) is higher than the comparable region’s average rate (5.74%), resulting in a 4.75% adjustment.
7. Replacement Adjustment: HCD applies a replacement adjustment from between .5% and 5% to the total housing stock based on the current 10-year average of

demolitions in the region's local government annual reports to Department of Finance (DOF). For AMBAG, the 10-year average is .34%, therefore a minimum .5% adjustment was applied.

8. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2023).
9. Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost-burden by income group for the region to the cost-burden by income group for the comparable region's provided by AMBAG. The cost burden rate for lower income households is **1.82%** higher than the cost burden rate for the comparable region's average, resulting in a **232** unit increase to the lower income RHNA. The cost burden rate for moderate and above moderate-income households is **5.76%** higher than the cost burden rate for the comparable region's average, resulting in a **1,103** unit increase to the moderate and above moderate RHNA.

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## Appendix E: HCD Review of Draft Regional Housing Needs Allocation Methodology

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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Sacramento, CA 95833  
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[www.hcd.ca.gov](http://www.hcd.ca.gov)



March 16, 2022

Maura F. Twomey, Executive Director  
Association of Monterey Bay Area Governments  
24580 Silver Cloud Court  
Monterey, CA 93940

Dear Maura F. Twomey:

**RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology**

Thank you for submitting the draft Association of Monterey Bay Area Government's (AMBAG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodologies to determine whether a methodology furthers the statutory objectives described in Government Code Section 65584(d).

The draft AMBAG RHNA methodology begins with the total regional determination provided by HCD of 33,274 units. The methodology first distributes 6,260 units through a base allocation to each jurisdiction based on its anticipated household growth in the RTP/SCS over a four-year planning period. Next, the methodology allocates the remaining 27,014 units by applying five factors to establish each jurisdiction's total RHNA allocation:

- Jobs (weighted at 14.8 percent) – This factor allocates units based on each jurisdiction's percent share of regional jobs using data from AMBAG's 2022 Regional Growth Forecast, InfoUSA, and the California Employment Development Department.
- Jobs-housing Ratio (31.3 percent) – Similar to the jobs factor, this factor allocates units based on a jurisdiction's percent of regional jobs. This adjustment increases the allocation for jurisdictions with jobs-housing ratios that are above the regional average.
- Transit (3.8 percent) – This factor upwardly adjusts allocations for jurisdictions with 30-minute headways and includes a slightly larger adjustment for jurisdictions with 15-minute headways based on existing transit routes and stops.
- Resiliency (7.7 percent) – This factor increases allocations to jurisdictions with the smallest percent of area that has high fire risk or two-foot sea level rise risk. This is based on data from Cal Fire, the California Public Utilities Commission and the National Oceanic and Atmospheric Administration.
- Affirmatively Furthering Fair Housing (AFFH) (42.4 percent) – This factor uses both HCD/TCAC Opportunity data and AMBAG's own measure of Racially Concentrated Areas of Affluence (RCAs). This factor is used to upwardly adjust units to jurisdictions meeting RCA criteria with areas designated as high and higher opportunity on the HCD/TCAC Opportunity Map.

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Lastly, in order to distribute each jurisdiction's RHNA across the four income categories, the methodology uses AMBAG's RCAA measure to apply a 40 percent income adjustment. AMBAG's RCAA measure considers what percentage of a jurisdiction's population is white and above 200% the poverty level. The income adjustment results in a 40 percent increase in the low- and very low-income RHNA allocated to RCAA jurisdictions. Partial RCAAs receive no upward adjustment to their lower income RHNA allocations while non-RCAAs receive a downward adjustment.

**HCD has completed its review of the methodology and finds that the draft AMBAG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).**<sup>1</sup> AMBAG's draft methodology directs RHNA units – including more lower income units – into high income jurisdictions with lower VMT and more jobs and transit access. The draft methodology also makes adjustments that increase the number of lower income units going to RCAAs as a percentage of their total allocation. The RCAA jurisdictions align closely with the higher resourced areas identified by the HCD/TCAC Opportunity Map. HCD commends AMBAG for including factors in the draft methodology linked to the statutory objectives such as jobs-housing ratio, transit, and AFFH.

Below is a brief summary of findings related to each statutory objective described within Government Code Section 65584(d):

*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.*

On a per household basis, the methodology generally allocates more shares of RHNA to jurisdictions with more high-income households. Additionally, due to the income adjustment, these higher income jurisdictions receive much higher lower income RHNA allocations relative to their existing share of households. Lastly, jurisdictions with higher percentages of owners and single-family units receive a higher percentage of lower income RHNA relative to their total allocation.

*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.*

The draft methodology encourages a more efficient development pattern by including a combination of tools, such as including the RTP/SCS in the base allocation, two jobs-related factors, and a transit factor. Jurisdictions with access to more jobs via a 30-minute commute receive more RHNA both in terms of RHNA per household and total RHNA. Jurisdictions with access to more jobs via a 45-minute transit commute and lower VMT also receive more RHNA.

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<sup>1</sup>le HCD finds this methodology furthers statutory objectives, applying this methodology to another region or may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

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*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.*

Most cities in AMBAG have a jobs-housing fit (lower wage jobs to lower cost housing) that is imbalanced (over 1.5 low-wage jobs for every affordable housing unit). The draft methodology allocates more total RHNA and lower income RHNA per household share to the jurisdictions with the worst imbalances (over 5.0). The draft methodology allocates slightly less RHNA relative to household share to jurisdictions with a jobs-housing fit ratio between 2.0 and 5.0, while jurisdictions with jobs housing balance ratios below 2.0 receive the smallest RHNA allocations relative to household share. The overall jobs-housing ratio (total jobs to housing units) is more balanced for the region although there are several jurisdictions with a ratio over 1.5. The methodology allocates more total RHNA and lower income RHNA per household share to the jurisdictions with the worst imbalances (jobs-housing ratio over 1.5).

*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.*

On average, cities with a larger existing share of lower income households receive smaller allocations of low- and very low-income units as a percentage of their total RHNA. For cities with higher shares of lower income households, the average lower income allocation is 28 percent of total RHNA. The average lower income allocation for cities with smaller percentages of lower income households is 48 percent.

*5. Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.*

Jurisdictions with more access to opportunity receive larger lower income RHNA allocations on a per household basis. Further, low resource jurisdictions with segregated areas of poverty receive less total RHNA and lower income RHNA per household share.

For instance, jurisdictions with low-resource and high-segregation/poverty areas receive a share of the lower income RHNA that is, on average, 99 percent of their share of households, compared to roughly 200 percent for higher resourced jurisdictions.

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HCD appreciates the active role of AMBAG staff – particularly Heather Adamson, Maura Twomey, and Paul Hierling – and Beth Jarosz in providing data and input throughout the draft AMBAG RHNA methodology development and review period.

HCD looks forward to continuing our partnership with AMBAG to help its member jurisdictions meet and exceed the planning and production of the region’s housing need. Support opportunities available for the AMBAG region this cycle include, but are not limited to:

- Regional Early Action Planning (REAP) 2.0 – \$600 million in state and federal investment to advance implementation of adopted regional plans. REAP 2.0 funding may be used for planning and implementation that accelerate infill housing development and reduce per capita vehicle miles traveled. <https://hcd.ca.gov/grants-funding/active-funding/rep2.shtml>.
- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points or preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC).
- HCD also encourages all AMBAG local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation program. HCD’s programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Annelise Osterberg, Housing Policy Specialist at (916) 776-7540 or [annelise.osterberg@hcd.ca.gov](mailto:annelise.osterberg@hcd.ca.gov).

Sincerely,



Tyrone Buckley  
Assistant Deputy Director of Fair Housing

**Appendix F: Board Agenda Item Approving Final RHNA Methodology**



ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

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**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:** April 13, 2022

**RECOMMENDATION:** **HOLD PUBLIC HEARING ON AND APPROVE FINAL RHNA METHODOLOGY**

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 the final RHNA methodology and authorize Association of Monterey Area Governments (AMBAG) staff to release the Draft RHNA Plan for a 45-day public review period.

**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 **Planning Excellence!**

developing the RHNA methodology. The methodology must address 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.

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.

### ***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

***AMBAG RHNA Methodology Development Process***

The methodology used for the RHNA distribution was developed by AMBAG staff with direction from the AMBAG Board of Directors and input from local jurisdictions through the Planning Directors Forum (PDF) as well as input from the public, stakeholders and interested parties. The AMBAG Board met seven (7) times between June 2021 and January 2022 to provide direction on the RHNA methodology. AMBAG invited the region’s community development directors and planning directors to serve on the PDF to provide input on the RHNA process. The PDF met seven (7) times between May and November 2021 to advise on the RHNA methodology. HCD staff

presented the Regional Housing Need Determination (RHND) on September 8, 2021 AMBAG Board meetings. In addition, AMBAG staff met eight (8) times with HCD staff to advise on the development of the RHNA methodology and data coordination.

AMBAG also met with and/or received input from advocacy organizations Monterey Bay Regional Economic Partnership (MBEP), Santa Cruz YIMBY/YIMBY Law, and LandWatch Monterey County, who attended and participated in a number of PDF and Board meetings. In addition, AMBAG made presentations to several individual City Councils and Planning Commissions during 2021 and 2022 on the RHNA process. AMBAG diligently solicited participation in the development of the methodology and in the process of drafting and adopting the draft RHNA to achieve public participation of all economic segments of the community as well as members of protected classes. AMBAG incorporated numerous suggestions received from stakeholders and the public during the methodology development process into the draft 6<sup>th</sup> Cycle RHNA methodology.

### ***RHNA Draft Methodology***

This section describes the draft methodology that the AMBAG Board of Directors approved on January 12, 2022. Attachment 2 provides the RHNA unit and income allocation estimates based on the approved draft methodology.

To satisfy the requirements of Government Code section 65584.04(a) AMBAG, in consultation with HCD staff, elected to pursue a three-step methodology. The first and second steps allocate the total number of units for the AMBAG region. The third step allocates by income category.

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

This RHNA methodology allocates a portion of housing units (6,260) based on data for projected housing growth for the four-year RHNA planning period from the 2022 Regional Growth Forecast (RGF). The 2022 RGF was used in the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The use of the 2022 RGF data 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

## Regional Housing Needs Allocation Plan: 2023 - 2031

Board. 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 element in the RHNA methodology; jobs, jobs/housing balance, transit, 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.

Data sources for this factor is described below:

- 2022 RGF: Housing growth from 4-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)
  - The full RGF can be found at the following location:  
[https://ambag.org/sites/default/files/2021-11/PDFAAppendix%20A\\_2022%20RGF.pdf](https://ambag.org/sites/default/files/2021-11/PDFAAppendix%20A_2022%20RGF.pdf) and  
<https://www.ambag.org/plans/regional-growth-forecast>

### *Second Step in RHNA Methodology: Jobs, Jobs/Housing Balance, Transit, Resiliency, and AFFH Unit Allocation*

The second step in the RHNA methodology allocates the remaining units (27,014) for the AMBAG region by the following categories: 15% jobs (4,000 units), 31% jobs/housing (8,449 units), 4% transit (1,038 units), 8% resilience (2,075 units), and 42% Affirmatively Furthering Fair Housing (AFFH) (11,452 units). The higher weighting for jobs/housing reflects direction from both the AMBAG Board as well as suggestions from public comment and HCD staff. The methodology normalizes the resiliency factor by 2020 households. This reflects HCD's request to reduce the weight of the 2022 RGF as well as guidance from the Board and public comment to reduce allocations in the unincorporated areas.

In addition, both the California State Treasurer's Tax Credit Allocation Committee (TCAC) and Racially Concentrated Areas of Affluence (RCAA) data is used to calculate the AFFH allocation factor 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. Jurisdictions qualifying as RCAAs, partial RCAAs, or TCAC Opportunity Areas are shown in Attachment 3.

Data sources used for this second step in the RHNA methodology are described below.

- Employment: AMBAG 2022 RGF, based on InfoUSA and California Employment Development Department (2020)
  - Jobs data reflects the pre-pandemic distribution of employment opportunities throughout the AMBAG region. Future job growth in Monterey and Santa Cruz Counties is expected to be concentrated in the same areas. Since such a large share of the region's jobs are agricultural, allocating based on jobs helps the region address the housing needs of farmworkers. (Gov. Code, § 65584.04(e)(8).)
  - Focusing a significant share of the RHNA allocation on jobs helps to correct existing jobs/housing imbalances.
- Jobs-Housing Ratio: 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).
- Transit: Existing (2020) transit routes with 15- and 30-minutes headways, based on existing transit routes and stops from transit operators
  - While the AMBAG region does not have the kind of extensive transit system found in larger urban areas, transit access is important for the sustainability of future growth.
  - Focusing future developing in areas with the region's highest quality transit promotes infill development and encourages efficient development patterns. (Gov. Code, § 65584(d)(2).)
- 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)
  - The AMBAG region includes areas at great risk due to climate change, including areas at high risk of wildfire and areas at risk of inundation due to sea level rise. These constraints to development must be considered as the region plans for climate change.
  - This factor furthers the objective of promoting infill development, protecting environmental resources, and encourages efficient development patterns. (Gov. Code, § 65584(d)(2).)

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- **Affirmatively Furthering Fair Housing Unit Allocation:** 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. Data was utilized from the 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. Data was used from the TCAC Opportunity Map Database (2021) and U.S. Census Bureau, American Community Survey (2015-2019). 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.

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

Addressing the income equity disparities of the AMBAG region's member 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 allocating a high weight to this factor.

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. The RHNA methodology option shifts 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 is 40%. This results in RCAAs getting a higher share of their RHNA in the lower income categories. Under the 40% 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 25%.

The data source consulted for this factor is described below.

- **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

The City of Monterey sent a letter to the AMBAG Board of Directors on March 17, 2022 regarding an update on its immediate need for water in order to meet its RHNA allocation. (Attachment 4).

***HCD Review of Draft RHNA Methodology***

AMBAG staff submitted the AMBAG draft RHNA methodology and requested supporting data to HCD for its 60-day review on January 21, 2022. Additionally, AMBAG and HCD staff met on February 28, 2022 to respond to any questions regarding the methodology submittal. HCD has completed its review of the methodology and finds that the draft AMBAG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d) as shown in Attachment 5.

***Next Steps***

Upon approval and direction from the Board of Directors, AMBAG staff will release the Draft RHNA Plan allocating shares of the regional housing need to AMBAG’s member jurisdictions. The release of the Draft RHNA Plan initiates a 45-day appeal period allowing a member jurisdiction or HCD to appeal for a revision of the share of the regional housing need proposed to be allocated. (Gov. Code, § 65584.05(b).)

**ALTERNATIVES:**

The Board of Directors may modify the final methodology, however any modifications would require to resubmit for additional HCD review. This would 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 approving a final 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:**

Regional Housing Needs Allocation Plan: 2023 - 2031

1. Regional Housing Needs Allocation Objectives and Factors
2. AMBAG Draft RHNA Methodology as approved at the January 12, 2022 Board meeting
3. Defining Racially Concentrated Areas of Affluence and Tax Credit Allocation Committee Areas for the AMBGA Region
4. City of Monterey Letter, dated March 17, 2022
5. HCD Letter, Review of Draft Regional Housing Need Allocation (RHNA) Methodology, dated March 16, 2022

**APPROVED BY:**



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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)**

##### **14. 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)*

##### **15. 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 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)*

# Regional Housing Needs Allocation Plan: 2023 - 2031

Attachment 2

April 13, 2022

## AMBAG RHINA Methodology

Region	Housing		Jobs/Housing Ratio		Transit		Resiliency (Wildfire & Sea Level Rise)		AFFH		RHNA	
	4-year Unit Change	Jobs 2020 % Reg.	J/H	Jobs 2020 % Reg.	Transit Score	Transit % Reg.	% Area Not in High Risk Zone	% Area Not in Normalized High Risk Zone	RCAA	TCAA	Units	Total
<b>RHNA Total</b>	<b>33,274</b>								42%		11,452	<b>33,274</b>
Monterey County												
Carmel	5	3,566 0.9%	37	1.0 0.0%	0	0 0%	0	3 0.1%	1	100%	100%	349
Del Rey Oaks	34	748 0.2%	8	1.0 0.0%	0	1 8%	87	15 0.3%	6	100%	0%	184
Gonzales	713	6,326 1.7%	66	3.2 6.3%	215	0 0%	0	713 13.1%	272	0%	0%	1,266
Greenfield	275	7,882 2.1%	82	2.0 7.8%	268	0 0%	0	275 5.1%	105	0%	0%	730
King City	244	8,195 2.1%	86	2.4 8.1%	279	0 0%	0	244 4.5%	93	0%	0%	702
Marina	395	6,548 1.7%	68	0.8 0.0%	0	1 8%	87	353 6.5%	135	0%	0%	685
Monterey	202	40,989 10.7%	428	3.0 40.9%	1,396	1 8%	87	126 2.3%	48	100%	73%	3,654
Pacific Grove	49	8,016 2.1%	84	1.0 0.0%	0	0 0%	0	46 0.9%	18	100%	100%	1,125
Sallinas	2,166	78,874 20.6%	824	1.8 78.8%	2,687	2 17%	168	2,166 39.9%	829	0%	0%	6,674
Sand City	54	2,092 0.5%	22	11.1 2.0%	71	1 8%	87	54 1.0%	21	50%	0%	260
Seaside	324	10,476 2.7%	109	1.0 0.0%	0	1 8%	87	251 4.6%	96	0%	0%	616
Soledad	236	9,010 2.4%	94	2.2 9.0%	307	0 0%	0	227 4.2%	87	0%	0%	724
Unincorporated Monterey	255	60,293 15.7%	629	1.5 0.0%	0	1 8%	87	48 0.9%	18	n/a	48%	3,326
Santa Cruz County												
Capitola	89	12,250 3.2%	128	2.2 12.2%	417	0 0%	0	74 1.4%	28	100%	97%	1,386
Santa Cruz	394	43,865 11.5%	458	1.8 43.8%	1,494	1 8%	87	296 5.5%	113	50%	23%	3,736
Scotts Valley	28	10,109 2.6%	106	2.1 10.1%	344	1 8%	87	14 0.3%	5	100%	100%	1,220
Watsonville	512	28,514 7.4%	298	2.0 28.5%	971	1 8%	87	485 8.9%	185	0%	0%	2,053
Unincorporated Santa Cruz	285	45,264 11.8%	473	0.8 0.0%	0	1 8%	87	38 0.7%	15	n/a	50%	4,634

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. TCAC = California Tax Credit Allocation Committee

April 13, 2022

**AMBAG RHNA Methodology**  
**Income Shift: 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 Totals			RHNA Total					
	V.L.	Low	Mod.	A.M.	RCAA	Shift	40%	40%	Very Low	Low	Mod.		Above 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

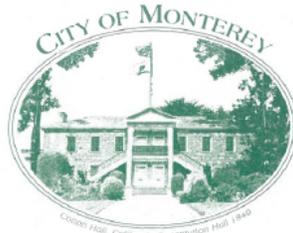
Calculations are performed on unrounded numbers. Numbers shown here are rounded to the nearest whole number.  
 RCAA = Racially Concentrated Areas of Affluence.

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

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

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

**Attachment 4**



**MAR 21 2022**

Mayor:  
CLYDE ROBERSON

Councilmembers:  
DAN ALBERT  
ALAN HAFFA  
ED SMITH  
TYLLER WILLIAMSON

City Manager:  
HANS USLAR

March 17, 2022

**Association of Monterey Bay Area Governments  
Board of Directors**

Kristen Peterson, City of Capitola  
Karen Ferlito, City of Carmel-by-the-Sea  
Kim Shirley, City of Del Rey Oaks  
Scott Funk, City of Gonzales  
Lance Walker, City of Greenfield  
Rick Perez, City of Hollister  
Carlos Victoria, City of King City  
Lisa Berkley, City of Marina  
Ed Smith, City of Monterey  
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Steve McShane, City of Salinas  
John Freeman, City of San Juan Bautista  
Mary Ann Carbone, City of Sand City  
Justin Cummings, City of Santa Cruz  
Derek Timm, City of Scotts Valley  
Jon Wizard, City of Seaside  
Ana Velazquez, City of Soledad  
Eduardo Montesino, City of Watsonville  
Mary Adams, County of Monterey  
John Phillips, County of Monterey  
Betsy Dirks, County of San Benito  
Bea Gonzales, County of San Benito  
Manu Koenig, County of Santa Cruz  
Greg Caput, County of Santa Cruz

RE: City of Monterey Regional Housing Needs Allocation

Dear Board of Directors,

The City of Monterey wanted to update the Association of Monterey Bay Area Governments (AMBAG) on the immediate need for water by 2023.

AMBAG recently completed its State-mandated task of designating the number of housing units that will need to be planned for in each jurisdiction from 2023 to 2031. The State's goal is for those units to be constructed during this timeframe as well.

The City of Monterey wants to build the expected housing units that are ultimately assigned by our fellow jurisdictions through the AMBAG RHNA process.

Monterey was assigned 3,654 housing units (1,177 very low income, 769 low income, 462 moderate-income, and 1,246 market-rate) to place housing closer to jobs and address equity metrics such as placing more housing in communities that are predominately white with higher incomes. The aspirational goal to address these issues is impossible without an immediate water supply.

The City has reviewed with MPWMD staff the water credits needed per residential type. The City estimates needing between **367to 406 acre-feet by 2023** to meet the regionally and State required RHNA.

The City also wanted to update the Board on its efforts to construct housing. In terms of upcoming development, the City continues to lose out on housing development opportunities. While the City's implementation of new policies is working and have attracted experienced and solvent developers, the inability of the SWRCB to respond to requests made by the City and the Monterey Peninsula Water Management District has led to a significant reduction in the scopes of the projects. Stated differently, while the State's legislature and the Governor have repeatedly prioritized increasing the supply of affordable housing opportunities, the SWRCB remains tone-deaf to the requests expressed by the City, the Monterey Peninsula Water Management District, Senator Laird, and housing advocates.

The following example demonstrates what our rental community is losing:

The Garden Road area allows 405 new housing units. The City received applications to construct housing at four sites along Garden Road. The original anticipated unit count was 298 units if the City could obtain additional water from the Water District's reserve category. The District conditionally allocated reserve water; however, the State Water Resources Control Staff indicated it would violate the Cease and Desist Order unless the project used no more water than it did before rezoning. As a result, this opportunity was lost, and projects were reduced to 180 units consistent with the onsite water credits/use. A loss of 118 units could have housed between 300 and 400 residents.

**Table 1  
Garden Road Housing Opportunities**

Address	Original Application - # of Units	Downsized Projects due to Water	Project Status
2000 Garden Road	72	34	AR Preliminary and Final Permit Approved
2300 Garden Road	99	64	ARC Review Scheduled 3/15
2560 Garden Road	63	25	Application Incomplete 2/2022
2600 Garden Road	64	57	ARC Preliminary Review Approved
<b>Total</b>	<b>298</b>	<b>180</b>	

Source: City of Monterey Community Development Department

There is no quick fix to reverse this fate. The projects were re-scoped, and plans were redrawn. Costs borne by the developers have been incurred.

## Regional Housing Needs Allocation Plan: 2023 - 2031

The City has also inventoried its properties for affordable housing projects. Four sites were identified for 100% affordable housing projects, and a Request for Proposal was released. The City has selected two affordable housing developers for Exclusive Negotiating Agreement (ENA) discussions. These developers can potentially build 150 units that are 100% affordable housing. However, these sites do not have adequate-sized water meters or supply for the housing to be constructed.

In sum, there have been 118 affordable housing units lost as a result of water unavailability for the Garden Road area, and 150 low-income units are in abeyance.

The City of Monterey wanted the AMBAG Board of Directors to understand from our perspective the quandary of meeting State-mandated housing requirements, being designated additional housing units to be constructed between 2023-2031, and the need for water supply to be available in 2023 to meet the City and region's housing targets. The City would appreciate the support from AMBAG in obtaining water through its various partners so that the City can build the RHNA housing allocation. The City requests that the AMBAG Board request an update from the various groups (Monterey One Water, Monterey Peninsula Water Management District, and California American Water) about the water supply and the ability for the region to obtain this water by 2023. Furthermore, the City requests that the AMBAG Board pass a resolution requesting these agencies provide this water by 2023 and that the State Water Resources Control Board immediately lift the Cease and Desist Order since the illegal diversions have ceased. If the CDO is lifted, developers could set new water meters and work within the Monterey Peninsula Water Management District credit system.

Sincerely,



Clyde Roberson,  
Mayor

cc: Maura F. Twomey, Executive Director, AMBAG ([mtwomey@ambag.org](mailto:mtwomey@ambag.org))  
Senator John Laird, 17<sup>th</sup> Senate District  
Assemblymember Mark Stone, 29<sup>th</sup> Assembly District

## Attachment 5

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



March 16, 2022

Maura F. Twomey, Executive Director  
Association of Monterey Bay Area Governments  
24580 Silver Cloud Court  
Monterey, CA 93940

Dear Maura F. Twomey:

**RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology**

Thank you for submitting the draft Association of Monterey Bay Area Government's (AMBAG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodologies to determine whether a methodology furthers the statutory objectives described in Government Code Section 65584(d).

The draft AMBAG RHNA methodology begins with the total regional determination provided by HCD of 33,274 units. The methodology first distributes 6,260 units through a base allocation to each jurisdiction based on its anticipated household growth in the RTP/SCS over a four-year planning period. Next, the methodology allocates the remaining 27,014 units by applying five factors to establish each jurisdiction's total RHNA allocation:

- Jobs (weighted at 14.8 percent) – This factor allocates units based on each jurisdiction's percent share of regional jobs using data from AMBAG's 2022 Regional Growth Forecast, InfoUSA, and the California Employment Development Department.
- Jobs-housing Ratio (31.3 percent) – Similar to the jobs factor, this factor allocates units based on a jurisdiction's percent of regional jobs. This adjustment increases the allocation for jurisdictions with jobs-housing ratios that are above the regional average.
- Transit (3.8 percent) – This factor upwardly adjusts allocations for jurisdictions with 30-minute headways and includes a slightly larger adjustment for jurisdictions with 15-minute headways based on existing transit routes and stops.
- Resiliency (7.7 percent) – This factor increases allocations to jurisdictions with the smallest percent of area that has high fire risk or two-foot sea level rise risk. This is based on data from Cal Fire, the California Public Utilities Commission and the National Oceanic and Atmospheric Administration.
- Affirmatively Furthering Fair Housing (AFFH) (42.4 percent) – This factor uses both HCD/TCAC Opportunity data and AMBAG's own measure of Racially Concentrated Areas of Affluence (RCAs). This factor is used to upwardly adjust units to jurisdictions meeting RCA criteria with areas designated as high and higher opportunity on the HCD/TCAC Opportunity Map.

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Lastly, in order to distribute each jurisdiction’s RHNA across the four income categories, the methodology uses AMBAG’s RCAA measure to apply a 40 percent income adjustment. AMBAG’s RCAA measure considers what percentage of a jurisdiction’s population is white and above 200% the poverty level. The income adjustment results in a 40 percent increase in the low- and very low-income RHNA allocated to RCAA jurisdictions. Partial RCAAs receive no upward adjustment to their lower income RHNA allocations while non-RCAAs receive a downward adjustment.

**HCD has completed its review of the methodology and finds that the draft AMBAG RHNA Methodology furthers the statutory objectives described in Government Code 65584(d).**<sup>1</sup> AMBAG’s draft methodology directs RHNA units – including more lower income units – into high income jurisdictions with lower VMT and more jobs and transit access. The draft methodology also makes adjustments that increase the number of lower income units going to RCAAs as a percentage of their total allocation. The RCAA jurisdictions align closely with the higher resourced areas identified by the HCD/TCAC Opportunity Map. HCD commends AMBAG for including factors in the draft methodology linked to the statutory objectives such as jobs-housing ratio, transit, and AFFH.

Below is a brief summary of findings related to each statutory objective described within Government Code Section 65584(d):

*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.*

On a per household basis, the methodology generally allocates more shares of RHNA to jurisdictions with more high-income households. Additionally, due to the income adjustment, these higher income jurisdictions receive much higher lower income RHNA allocations relative to their existing share of households. Lastly, jurisdictions with higher percentages of owners and single-family units receive a higher percentage of lower income RHNA relative to their total allocation.

*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.*

The draft methodology encourages a more efficient development pattern by including a combination of tools, such as including the RTP/SCS in the base allocation, two jobs-related factors, and a transit factor. Jurisdictions with access to more jobs via a 30-minute commute receive more RHNA both in terms of RHNA per household and total RHNA. Jurisdictions with access to more jobs via a 45-minute transit commute and lower VMT also receive more RHNA.

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<sup>1</sup>While HCD finds this methodology furthers statutory objectives, applying this methodology to another region or state may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

*–continued from previous page–*

*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.*

Most cities in AMBAG have a jobs-housing fit (lower wage jobs to lower cost housing) that is imbalanced (over 1.5 low-wage jobs for every affordable housing unit). The draft methodology allocates more total RHNA and lower income RHNA per household share to the jurisdictions with the worst imbalances (over 5.0). The draft methodology allocates slightly less RHNA relative to household share to jurisdictions with a jobs-housing fit ratio between 2.0 and 5.0, while jurisdictions with jobs housing balance ratios below 2.0 receive the smallest RHNA allocations relative to household share. The overall jobs-housing ratio (total jobs to housing units) is more balanced for the region although there are several jurisdictions with a ratio over 1.5. The methodology allocates more total RHNA and lower income RHNA per household share to the jurisdictions with the worst imbalances (jobs-housing ratio over 1.5).

*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.*

On average, cities with a larger existing share of lower income households receive smaller allocations of low- and very low-income units as a percentage of their total RHNA. For cities with higher shares of lower income households, the average lower income allocation is 28 percent of total RHNA. The average lower income allocation for cities with smaller percentages of lower income households is 48 percent.

*5. Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.*

Jurisdictions with more access to opportunity receive larger lower income RHNA allocations on a per household basis. Further, low resource jurisdictions with segregated areas of poverty receive less total RHNA and lower income RHNA per household share.

For instance, jurisdictions with low-resource and high-segregation/poverty areas receive a share of the lower income RHNA that is, on average, 99 percent of their share of households, compared to roughly 200 percent for higher resourced jurisdictions.

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HCD appreciates the active role of AMBAG staff – particularly Heather Adamson, Maura Twomey, and Paul Hierling – and Beth Jarosz in providing data and input throughout the draft AMBAG RHNA methodology development and review period.

HCD looks forward to continuing our partnership with AMBAG to help its member jurisdictions meet and exceed the planning and production of the region’s housing need. Support opportunities available for the AMBAG region this cycle include, but are not limited to:

- Regional Early Action Planning (REAP) 2.0 – \$600 million in state and federal investment to advance implementation of adopted regional plans. REAP 2.0 funding may be used for planning and implementation that accelerate infill housing development and reduce per capita vehicle miles traveled. <https://hcd.ca.gov/grants-funding/active-funding/reap2.shtml>.
- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points or preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC).
- HCD also encourages all AMBAG local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation program. HCD’s programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Annelise Osterberg, Housing Policy Specialist at (916) 776-7540 or [annelise.osterberg@hcd.ca.gov](mailto:annelise.osterberg@hcd.ca.gov).

Sincerely,



Tyrone Buckley  
Assistant Deputy Director of Fair Housing

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Appendix G: Appeals and Comments Received on the Draft 6<sup>th</sup> Cycle RHNA Plan

Attachment 2a



June 2, 2022

Heather Adamson, AICP  
AMBAG Director of Planning  
24580 Silver Cloud Court  
Monterey, CA 93940

sent USPS standard, certified mail, email

RE: Draft 6<sup>th</sup> Cycle RHNA Plan and Sand City Allotment

Dear Ms. Adamson:

This correspondence is in response to the Draft 6<sup>th</sup> Cycle (2023-2031) RHNA Plan and the allotment of 260 units in this cycle of the RHNA allocation to the City of Sand City. According to the Department of Finance, the City has a 2022 estimated population of 372 persons. There are approximately 184 dwelling units within the City (8 of which are currently under construction). Requiring a RHNA allocation of 260 that is approximately 141% of the existing number of all existing residential units in the City is patently unreasonable. The allocation to Sand City fails to meet the requirement of Cal. Gov. Code section 65584(d)(1) that the RHNA plan allocates in a manner that is equitable within the region. By comparison, if applied to the City of Monterey, the allocation to Sand City would be equivalent to allocating approximately 42,600 units to the City of Monterey based on its population of approximately 30,218 residents. Instead, your allocation in the draft plan allocates 3,654 units to the City of Monterey.

City Hall  
1 Pendergrass Way  
Sand City, CA  
93955

Administration  
(831) 394-3054

Planning  
(831) 394-6700

FAX  
(831) 394-2472

Police  
(831) 394-1451

FAX  
(831) 394-1038

Incorporated  
May 31, 1960

In addition, the allocation to Sand City ignores additional factors that the methodology requires be observed. For example, you are required to consider “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...” and “land preserved or protected from urban development under federal or state programs, or both, designed to protect open space... environmental habitats...” (AMBAG Draft 6<sup>th</sup> Cycle RHNA Plan, April 2022, page 20); Cal Gov. code section 65584(d)(2). Sand City is small in land area (approximately 347 acres), landlocked between other jurisdictions and the Monterey Bay, with development within constrained by the presence of environmentally sensitive species and habitat protected and regulated by both the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife. About half of the City is located west of the Highway 1 freeway

corridor within an appealable Coastal Zone overlay regulated by the City's Local Coastal Plan (LCP); yet subject to appeal to the California Coastal Commission (CCC). The CCC has previously imposed strict limits on coastal development in Sand City due to the Coastal Act's prioritization of public access, coastal recreation, and the preservation of sensitive coastal habitat over that of residential land use.

In addition, a majority of the City has already been re-zoned to either High Density Residential (R-3) or Planned Mixed Use, both enabling high density and multifamily residential development, consistent with Government Code Section 65584(d)(2) for infill and equitable housing opportunities and Government Code Section 65584(d)(3) for an improved relationship between jobs and housing. There are almost no other practical opportunities for re-zoning to accommodate additional residences without impacting the City's primary revenue source, its regional shopping centers.

The City understands the State-wide need for affordable housing and job/housing balance. However, in light of the above constraints and efforts already implemented by the City, it is inconceivable how the City could meet the goals of the current RHNA allocation. The City of Sand City requests AMBAG lower Sand City's allotment to a number that is actually achievable in light of its small size and noted constraints.

Sincerely,



Vibeke Norgaard  
City Manager

cc: Mary Ann Carbone, Mayor  
Sand City Council Members  
Adam Lindgren, City Attorney  
Charles Pooler, City Planner



## *City of Greenfield*

PO Box 127 / 599 El Camino Real  
Greenfield CA 93937  
Phone: 831-674-5591 Fax: 831-674-3149  
[www.ci.greenfield.ca.us](http://www.ci.greenfield.ca.us)

June 6, 2022

Ms. Heather Adamson, AICP  
Director of Planning  
Association of Monterey Bay Area Governments  
24580 Silver Cloud Court  
Monterey, CA 93940  
Via email: [hadamson@ambag.org](mailto:hadamson@ambag.org)

**Re: City of Greenfield Comments on Draft 6<sup>th</sup> Cycle (2023-2031) RHNA Plan**

Dear Ms. Adamson:

The City of Greenfield is in a unique position as it prepares to implement Cycle 6 Regional Housing Needs Assessment (RHNA) numbers. On a per capita basis, Greenfield is the highest production jurisdiction in the entire AMBAG region for the production of very low-, low- and moderate-income level RHNA housing goals. Greenfield's filing of its 2021 Annual Progress Report (APR) to the State Housing and Community Development Department (HCD) indicates that Greenfield has met 96.6% of its very low-income housing target, 170.2% of its low-income housing target, and 100% of its moderate-income housing target, with two years remaining in the current Cycle 5 RHNA. The RHNA Progress summary table through 2021, which was submitted to and accepted by HCD staff, is included as Attachment 1 to this letter.

In addition, there are several more housing projects in the planning entitlement and building entitlement process, such that by the conclusion of Cycle 5 RHNA, Greenfield will have far surpassed its RHNA goals, especially with respect to very low-, low-, and moderate-income housing units. In doing so, Greenfield has substantially reduced the amount of appropriately-zoned vacant or underutilized properties, which negatively impacts its ability to accommodate the aggressive housing production targets in the draft Cycle 6 RHNA.

The Housing emergency legislation in Sacramento, such as SB 35 and SB 9 were fueled by jurisdictions who have not built housing in their communities. On the other hand, with respect to AMBAG's methodology for calculating of the Cycle 6 RHNA by jurisdiction, there appears to be no consideration of a jurisdiction's performance on the current RHNA cycle. All AMBAG jurisdictions saw at least a two- or three-fold increase in RHNA goals in Cycle 6, regardless of performance on housing production in Cycle 5. At a minimum, the Cycle 6 RHNA methodology should include an adjustment to the Cycle 6 goals to account for a municipality's exceedance of the Cycle 5 RHNA goals.

Ms. Heather Adamson  
Greenfield Comments on 6<sup>th</sup> Cycle RHNA Plan  
June 6, 2022  
Page 2

The City of Greenfield respectfully requests that the AMBAG methodology for Cycle 6 RHNA goals include an adjustment or credit towards Cycle 6 RHNA production, for any units produced in exceedance of the Cycle 5 RHNA goals. Such a carry-over credit is reasonable and fair, since as stated above, the exceedance of housing production in Cycle 5 RHNA does impact the City's available lands for production of new units in Cycle 6. A carry-over credit applied towards Cycle 6 RHNA would also be in keeping with the interests of the health, safety and welfare of the community. Core infrastructure needs must catch up with this development as the high housing production in Cycle 5 has strained the City's infrastructure and services, particularly with respect to waste-water facilities and water supply. In addition, PG&E has advised the City of future constraints on electrical and natural gas services for the Southern Salinas Valley area. PG&E reports that upgrades to both systems are necessary to support continued development and that such upgrades are likely years out.

The inclusion of a carry-over provision for excess production by income-category would implement an equitable approach to Cycle 6 RHNA goals and apportionments. Municipalities that have exceeded their prior cycle RHNA goals - and have done more than their share in helping address the region and State's housing goals have also strained existing infrastructure. There should be some relief provided for these jurisdictions. Ideally, the carry-over should be applied twice: first, using the latest HCD-accepted Annual Progress Report on housing production in the current RHNA cycle, with overage in housing production by income category credited against the unadjusted Cycle 6 RHNA objectives for that jurisdiction; and second, factored into the adjusted (with carry-over provision) Cycle 6 RHNA goals upon each remaining APR filing – i.e., once the 2022 APR is filed and again once the 2023 APR is filed. Thank you for consideration of these comments and suggestion for improvements for the Cycle 6 RHNA goals.

Please do not hesitate to contact me at [pmugan@ci.greenfield.ca.us](mailto:pmugan@ci.greenfield.ca.us) or 831-304-0333 should you have any questions regarding this letter. Thank you very much for your cooperation.

Sincerely,



Paul C. Mugan  
Community Development Director

Paul Wood, CPA  
City Manager

cc: Maura Twomey, AMBAG Executive Director  
Greenfield City Council

Attachment

1. Greenfield 2022 Annual Progress Report Summary

# Regional Housing Needs Allocation Plan: 2023 - 2031

## Attachment 1

<b>Jurisdiction</b>	Greenfield	
<b>Reporting Year</b>	2021	(Jan. 1 - Dec. 31)
<b>Planning Period</b>	5th Cycle	12/31/2015 - 12/31/2023

### ANNUAL ELEMENT PROGRESS REPORT Housing Element Implementation (CCR Title 25 §6202)

This table is auto-populated once you enter your jurisdiction name and current year data. Past year information comes from previous APRs.  
Please contact HCD if your data is different than the material supplied here

Table B Regional Housing Needs Allocation Progress Permitted Units Issued by Affordability													
Income Level		1 RHNA Allocation by Income Level	2					3					4
			2015	2016	2017	2018	2019	2020	2021	2022	2023	Total Units to Date (all years)	Total Remaining RHNA by Income Level
Very Low	Deed Restricted	87	4	-	48	-	-	-	-	-	-	84	3
	Non-Deed Restricted		-	-	-	-	-	31	-	-	-		
Low	Deed Restricted	57	27	12	14	-	-	-	-	44	-	97	-
	Non-Deed Restricted		-	-	-	-	-	-	-	-	-		
Moderate	Deed Restricted	88	-	-	-	-	-	-	-	-	-	86	-
	Non-Deed Restricted		22	-	2	-	-	6	38	-	-		
Above Moderate		153	3	2	7	2	6	52	-	-	-	71	82
<b>Total RHNA</b>		<b>363</b>	<b>56</b>	<b>14</b>	<b>72</b>	<b>2</b>	<b>5</b>	<b>69</b>	<b>80</b>	<b>-</b>	<b>-</b>	<b>318</b>	<b>65</b>

Note: units serving extremely low-income households are included in the very low-income permitted units totals and must be reported as very low-income units.

Please note: For the last year of the 5th cycle, Table B will only include units that were permitted during the portion of the year that was in the 5th cycle. For the first year of the 6th cycle, Table B will include units that were permitted since the start of the planning period.

Please note: The APR form can only display data for one planning period. To view progress for a different planning period, you may login to HCD's online APR system, or contact HCD staff at [apr@hcd.ca.gov](mailto:apr@hcd.ca.gov).

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**JUN 03 2022**



May 26, 2022

AMBAG Board of Directors  
 24580 Silver Cloud Ct.  
 Monterey, CA 93940

Dear AMBAG Board of Directors,

I first want to acknowledge the current housing crisis within our region and the dire need for more affordable housing. Capitola is dedicated to planning for affordable housing and has recently launched our 6<sup>th</sup> cycle Housing Element update. However, the City of Capitola strongly opposes AMBAG’s formula to allocate RHNA housing units. **Capitola believes that not including land area adequate for development makes the current formulas ineffective, inequitable and illogical.**

AMBAG’s proposed formula to calculate AFFH units only distributes units based on existing households in a city, which results in smaller densely populated cities being required to accommodate far more units per acre than low density cities.

The following table demonstrates the inconsistent outcomes in the current formula by presenting the proposed number of AFFH units, divided by total land area in high resources cities. Each jurisdiction with RCAA and TCCA averages of 5 or below is shown in green. Jurisdiction with an average of .9 to 1 are shown in blue. If the method was logical, there should be a correlation within each category for units per square mile (excluding counties). However, the method is illogical as evidenced by **Capitola’s 401 RCAA units per square mile that is vastly higher than all other jurisdictions**, with the closest jurisdiction trailing by 112 units per square mile.

	RCAA and TCAC Average	2020 Households	Assigned AFFH Units	Total Land Area (Sq. Mile)	AFFH Units per Sq. Mile
<b>Total</b>			11,452		
<b>Monterey County</b>					
Carmel-By-The-Sea	1.0	2,129	306	1.06	288.68
Del Rey Oaks	0.5	683	49	1.06	.94
Monterey	0.9	11,981	1,493	12.27	121.67
Pacific Grove	1.0	6,779	974	4.00	243.5
Sand City	.3	144	5	2.91	1.72
Unincorporated Monterey	.5	33,922	2,337	3,695.00	.63
<b>Santa Cruz County</b>					

Regional Housing Needs Allocation Plan: 2023 - 2031

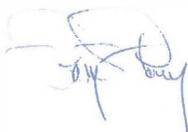
Capitola	1.0	4,773	674	1.68	401.19
Santa Cruz	.4	22,608	1,190	15.83	75
Scotts Valley	1.0	4,522	650	4.618	140.75
Unincorporated Santa Cruz	0.5	52,156	3,774	578	6.53

Capitola is proud of its planning heritage, the City is built-out with a wide variety of housing opportunities including mixed use, multifamily, mobile homes, and single-family and a 50/50 mix of ownership/rental. Capitola has historically been the most-dense city within the Santa Cruz region. Simply put, our good planning practices of previously developing at higher densities are now the source of our illogically high allocation of RHNA units. To ignore land area adequate for development within the formula is not sound planning. During the housing element update, our residents will be asked to look at future densities much higher than our neighboring jurisdictions within our 1.68 square miles.

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” has not been met. The approved AMBAG RHNA formula does not meet this objective.

In closing, the City of Capitola is objecting to the RHNA allocation formula because it does not take into account the actual facts on the ground, the actual amount of land a city has to accommodate new development.

Sincerely,



Sam Storey  
Mayor, City of Capitola

# MONTEREY COUNTY

## HOUSING AND COMMUNITY DEVELOPMENT

Erik V. Lundquist, AICP, Director

HOUSING | PLANNING | BUILDING | ENGINEERING | ENVIRONMENTAL SERVICES  
1441 Schilling Place South, 2nd Floor  
Salinas, California 93901-4527

(831)755-5025

www.co.monterey.ca.us



6 June, 2022

SENT VIA EMAIL ONLY

Heather Adamson  
AMBAG  
24580 Silver Cloud Court  
Monterey, CA 93940

hadamson@ambag.org

**Subject: Draft 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) Plan 2023-2031**

Dear Ms. Adamson,

County of Monterey Housing and Community Development (HCD) is grateful for the opportunity to provide comments on the AMBAG Draft 6<sup>th</sup> Cycle RHNA Plan 2023-2031.

It is understood that the California Department of Housing and Development (CA HCD) provided AMBAG a total regional determination of 33,274 units, and the methodology for distribution to each jurisdiction begins with the first 6,260 units allocated based on the jurisdiction's anticipated household growth in the RTP/SCS over a four-year planning period. Further, it is understood the methodology allocates the remaining 27,014 units by applying five factors to establish unit distribution to each jurisdiction. The five factors are understood as Jobs (weighted at 14.8 percent), Jobs/Housing Ratio (weighted 31.3 percent), Transit (weighted 3.8 percent), Resiliency (weighted 7.7 percent), and Affirmatively Furthering Fair Housing (AFFH, weighted 42.4 percent). AMBAG's calculation of units distributed across the income groups for Unincorporated Monterey (County of Monterey) is 1,070 (Very Low), 700 (Low), 420 (Moderate), and 1,136 (Above Moderate). The greatest number of units that Unincorporated Monterey is expected to allow occur in the Very Low and Above Moderate income groups.

The chart, AMBAG: PROJECTION PERIOD (8.5 years) in Attachment 2 – HCD Regional Housing Need Determination, under Methodology shows adjustments for Group Quarters Population, Vacancy, Overcrowding, Replacement, and Cost-burden, resulting in the 6<sup>th</sup> Cycle RHNA of 33,274 units.

The relationship of the adjustments to the weighted factors is not explained clearly. Understanding that the Cost-burden adjustment results in 1,103 unit increase of Moderate and Above-moderate income households from a 5.76% higher rate than the regional average, this explains a higher unit count in Above Moderate income level; however, this does not explain how the Moderate income level is as low as 420 if both Moderate and Above-moderate income levels are represented in the 5.76% higher rate. Does the AFFH factor weight a greater number of units in the Above Moderate income level, and if so, how is the 42.4% weight factor calculated? Presumably, adjustments for Vacancy, Overcrowding, and Replacement have correlation with the weighted factors of Jobs/Housing Ratio (31.3 percent), indicating that Very Low-income housing options are generally not located where jobs are available? Apparently, assumptions have been made within the calculations that are not indicated in the methodology. A

## Regional Housing Needs Allocation Plan: 2023 - 2031

calculable relationship of the RCAA and TCAC to the weighted factors and adjustments is also not explained clearly.

County HCD appreciates the immense coordination undertaken by AMBAG to develop the RHNA Methodology for meeting the CA HCD statutory objectives.

Thank you again for the opportunity provided County of Monterey HCD to comment on the 6<sup>th</sup> Cycle RHNA Plan. Please feel free to contact me with any questions at 831.796.6414 or email [guthriejs@co.monterey.ca.us](mailto:guthriejs@co.monterey.ca.us)

Sincerely,



---

Jaime Scott Guthrie, AICP, Planner  
Housing and Community Development

cc: File REF220034  
County of Monterey Clearinghouse

## Appendix H: Comments Received on the RHNA Appeals

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



July 21, 2022

Maura F. Twomey, Executive Director  
Association of Monterey Bay Area Governments  
24580 Silver Cloud Court  
Monterey, CA 93940

Dear Maura F. Twomey:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

The California Department of Housing and Community Development (HCD) appreciates the opportunity to comment on the two appeals that the Association of Monterey Bay Area Governments (AMBAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction may appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

HCD urges AMBAG to only consider appeals that meet the statutory criteria.

Per Government Code section 65584.05(e)(1), AMBAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings. The findings must describe how the final determination is based upon the adopted RHNA allocation methodology and why any revisions made are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

HCD has completed review of the appeals and offers the following comments. With regard to any appeal submitted according to Government Code section 65584.05(b)(1) that contends AMBAG failed to consider the lack of land suitable for development, Government Code section 65584.04(e)(2)(B) states the council of governments (COGs) may not limit its consideration of suitable housing sites to existing zoning and land use restrictions. COGs must consider the potential for increased development under alternative zoning and land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban

development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out or limited due to other natural constraints such as fire and flood risk areas must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to any appeal submitted related to Government Code section 65584.05(b)(2) that contends AMBAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed AMBAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and to accommodate statutory objectives of RHNA that shift more housing planning near jobs, transit, and resources. The Monterey Bay region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- Regional Early Action Planning (REAP) 2.0 – \$600 million investment to advance implementation of adopted regional plans. REAP 2.0 funding may be used for planning and implementation that accelerates infill housing development and reduces per capita vehicle miles traveled. <https://hcd.ca.gov/grants-funding/active-funding/reap2.shtml>.
- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points or preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC).
- HCD also encourages all AMBAG local governments to consider the many other affordable housing and community development resources available to local governments, including the Permanent Local Housing Allocation program. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Tyrone Buckley, Assistant Deputy Director of Fair Housing, [tyrone.buckley@hcd.ca.gov](mailto:tyrone.buckley@hcd.ca.gov).



Tyrone Buckley  
Assistant Deputy Director of Fair Housing

**Heather Adamson**

---

**From:** Mike Pisano <mpisanoful@gmail.com >  
**Sent:** Wednesday, June 8, 2022 8:53 AM  
**To:** Heather Adamson  
**Subject:** AMBAG Draft 6th Cycle RHNA Plan  
**Attachments:** Property Tax Rates - CA Counties 2008.pdf; Summit Meeting 2-10-22.pdf

Hi AMBAG,

The recent appeals on the Draft 6<sup>th</sup> cycle RHNA plan are not viable as each city/county has more than enough underdeveloped land available to build the necessary residential units. For example, Scotts Valley had an opportunity to let Bay Photo build employee housing on their property, but they said no (each city has similar stories or purposeful costly delays).

I can appreciate each city not wanting to build extra housing as it is not a viable equitable solution as property tax does not bring in enough revenue to justify more housing. Santa Cruz County is at 13% for every dollar collected on Property Tax - while San Francisco is at 70% (This is an unfair split). Our Tri-county area should all be at 25%, but the cost of legislation to change Prop 13 would be about \$20 million dollars. I have attached information from a recent Supervisor Manu Koenig meeting to hopefully help effect change, and encourage more affordable housing.

**2008 Numbers:**

**Prop 13 Set Rates**

- Our county gets one of the lowest shares of property taxes, despite having one of the highest shares of population in the unincorporated county.

County	% of Value in Unincorporated Area	% of Property Taxes to County
San Francisco	0%	70%
San Luis Obispo	50%	25%
Santa Barbara	46%	20%
Napa	47%	20%
Marin	28%	19%
Monterey	48%	16%
<b>Santa Cruz</b>	<b>58%</b>	<b>13%</b>



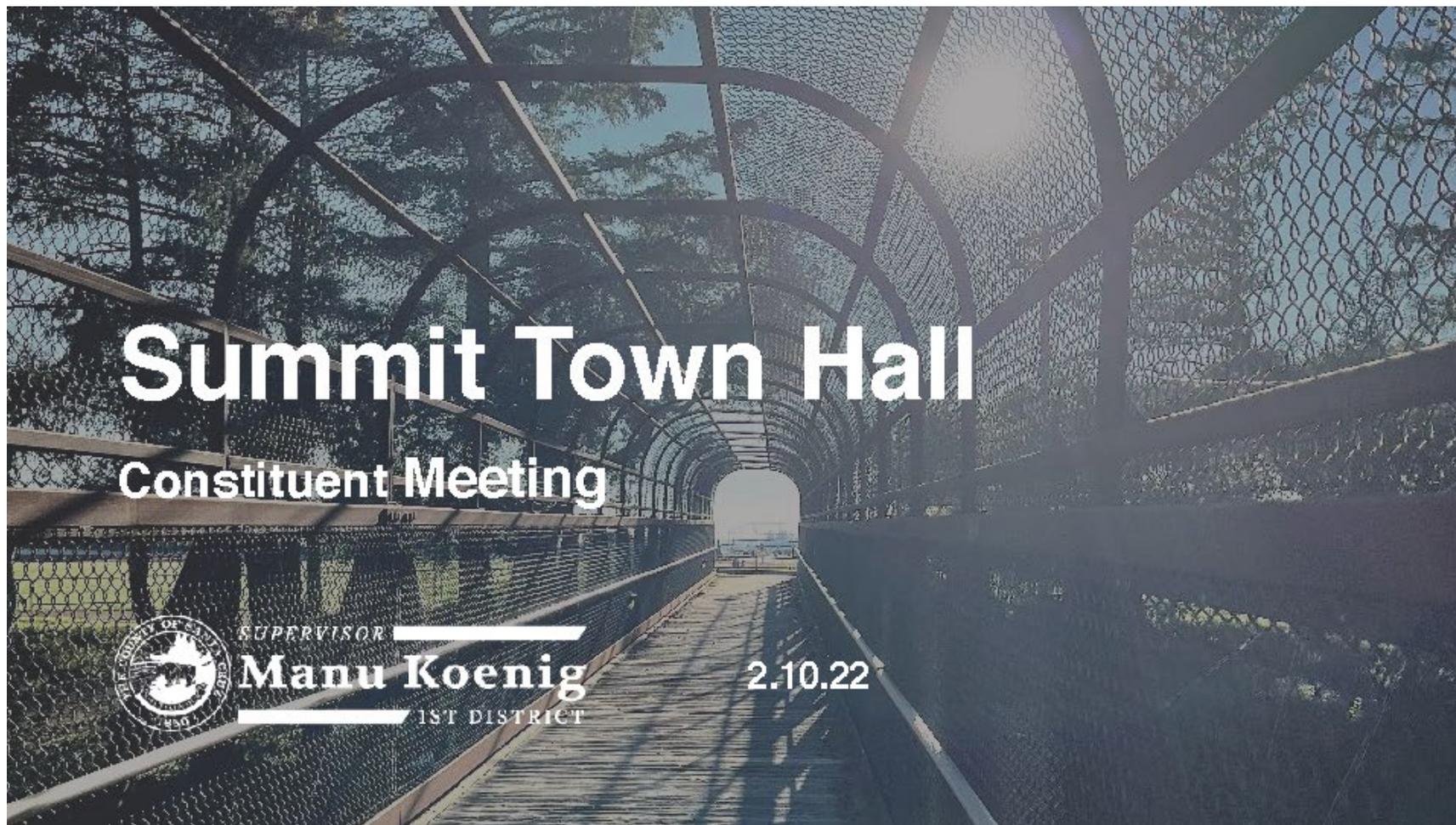
Thank You for your time and consideration  
Michael Pisano – Santa Cruz County

Regional Housing Needs Allocation Plan: 2023 - 2031

		Assessed Value	% of	Current Secured Tax	Property Tax	% of	
	Assessed Value	in Unincorporated	Assess Value in	in Total County	Revenue to	Property Taxes	
				(Approx 1% of	Each County	to County	
<b>County</b>	<b>in Total County</b>	<b>Area of County</b>	<b>Unincorp Area</b>	<b>Assessed Value)</b>	<b>General Fund</b>	<b>General Fund</b>	<b>Discrepancy</b>
San Francisco	\$130,004,478,543	-	0%	\$1,300,044,785	\$907,655,021	70%	-70%
Alpine	\$722,578,160	\$722,578,160	100%	\$7,225,782	\$4,471,493	62%	38%
Sierra	\$559,515,393	\$525,884,639	94%	\$5,595,154	\$3,016,313	54%	40%
Amador	\$4,580,089,518	\$3,384,851,277	74%	\$45,800,895	\$14,911,804	33%	41%
Trinity	\$1,073,682,276	\$1,073,682,276	100%	\$10,736,823	\$3,184,963	30%	70%
Tuolumne	\$6,319,640,283	\$5,795,976,052	92%	\$63,196,403	\$18,791,301	30%	62%
Inyo	\$3,500,152,254	\$3,098,386,034	89%	\$35,001,523	\$10,450,050	30%	59%
Mono	\$5,366,959,795	\$1,387,233,553	26%	\$53,669,598	\$16,053,630	30%	-4%
Mendocino	\$9,309,745,987	\$7,114,424,395	76%	\$93,097,460	\$27,044,904	29%	47%
Modoc	\$989,507,502	\$871,289,711	88%	\$9,895,075	\$2,735,250	28%	60%
Colusa	\$2,550,981,557	\$1,930,886,243	76%	\$25,509,816	\$6,826,376	27%	49%
Kern	\$79,198,986,938	\$48,256,253,136	61%	\$791,989,869	\$216,584,819	27%	34%
Mariposa	\$1,955,091,620	\$1,955,091,620	100%	\$19,550,916	\$5,070,187	26%	74%
Yuba	\$5,590,057,975	\$4,699,237,906	84%	\$55,900,580	\$14,227,069	25%	59%
Tehama	\$4,843,005,196	\$3,633,649,094	75%	\$48,430,052	\$12,298,597	25%	50%
San Luis Obispo	\$40,943,990,098	\$20,592,617,833	50%	\$409,439,901	\$100,695,998	25%	25%
Merced	\$20,357,037,135	\$9,225,148,045	45%	\$203,570,371	\$48,184,322	24%	21%
Kings	\$7,853,008,491	\$2,864,699,922	36%	\$78,530,085	\$19,048,417	24%	12%
Los Angeles	\$1,010,019,713,739	\$92,926,485,727	9%	\$10,100,197,137	\$2,441,016,559	24%	-15%
Lake	\$6,678,012,687	\$5,445,176,342	82%	\$66,780,127	\$15,199,819	23%	59%
El Dorado	\$26,968,207,448	\$21,954,358,983	81%	\$269,682,074	\$62,947,250	23%	58%
Plumas	\$3,959,166,127	\$3,819,505,457	96%	\$39,591,661	\$8,692,471	22%	74%
Siskiyou	\$4,023,729,679	\$2,746,860,005	68%	\$40,237,297	\$8,877,683	22%	46%
Sonoma	\$67,478,927,005	\$26,262,927,102	39%	\$674,789,270	\$151,207,516	22%	17%
Glenn	\$2,419,895,080	\$1,764,779,435	73%	\$24,198,951	\$5,052,523	21%	52%
Tulare	\$26,375,709,124	\$9,945,579,745	38%	\$263,757,091	\$54,942,343	21%	17%
San Joaquin	\$64,083,543,308	\$17,820,950,006	28%	\$640,835,433	\$133,420,665	21%	7%
Lassen	\$2,093,803,485	\$1,535,620,131	73%	\$20,938,035	\$4,208,825	20%	53%
Humboldt	\$9,994,853,377	\$5,968,123,065	60%	\$99,948,534	\$20,118,147	20%	40%
Napa	\$25,455,033,891	\$11,990,800,429	47%	\$254,550,339	\$50,169,049	20%	27%
Santa Barbara	\$58,263,332,909	\$27,056,143,538	46%	\$582,633,329	\$114,439,733	20%	26%
Calaveras	\$7,088,529,934	\$6,569,054,912	93%	\$70,885,299	\$13,635,338	19%	74%
Marin	\$52,554,005,358	\$14,604,547,091	28%	\$525,540,054	\$99,215,446	19%	9%
Del Norte	\$1,647,011,562	\$1,366,845,479	83%	\$16,470,116	\$2,970,337	18%	65%
Placer	\$57,654,914,123	\$24,073,478,293	42%	\$576,549,141	\$106,660,017	18%	24%
Sacramento	\$133,720,620,425	\$51,232,167,533	38%	\$1,337,206,204	\$243,718,027	18%	20%
Solano	\$46,415,656,374	\$4,282,430,557	9%	\$464,156,564	\$83,561,943	18%	-9%
Sutter	\$8,557,086,219	\$3,369,622,722	39%	\$85,570,862	\$14,190,857	17%	22%
Ventura	\$103,943,537,873	\$18,151,131,132	17%	\$1,039,435,379	\$179,882,104	17%	0%
Santa Clara	\$284,970,470,989	\$17,024,364,197	6%	\$2,849,704,710	\$472,462,911	17%	-11%
Monterey	\$51,579,833,274	\$24,852,472,816	48%	\$515,798,333	\$80,336,213	16%	32%

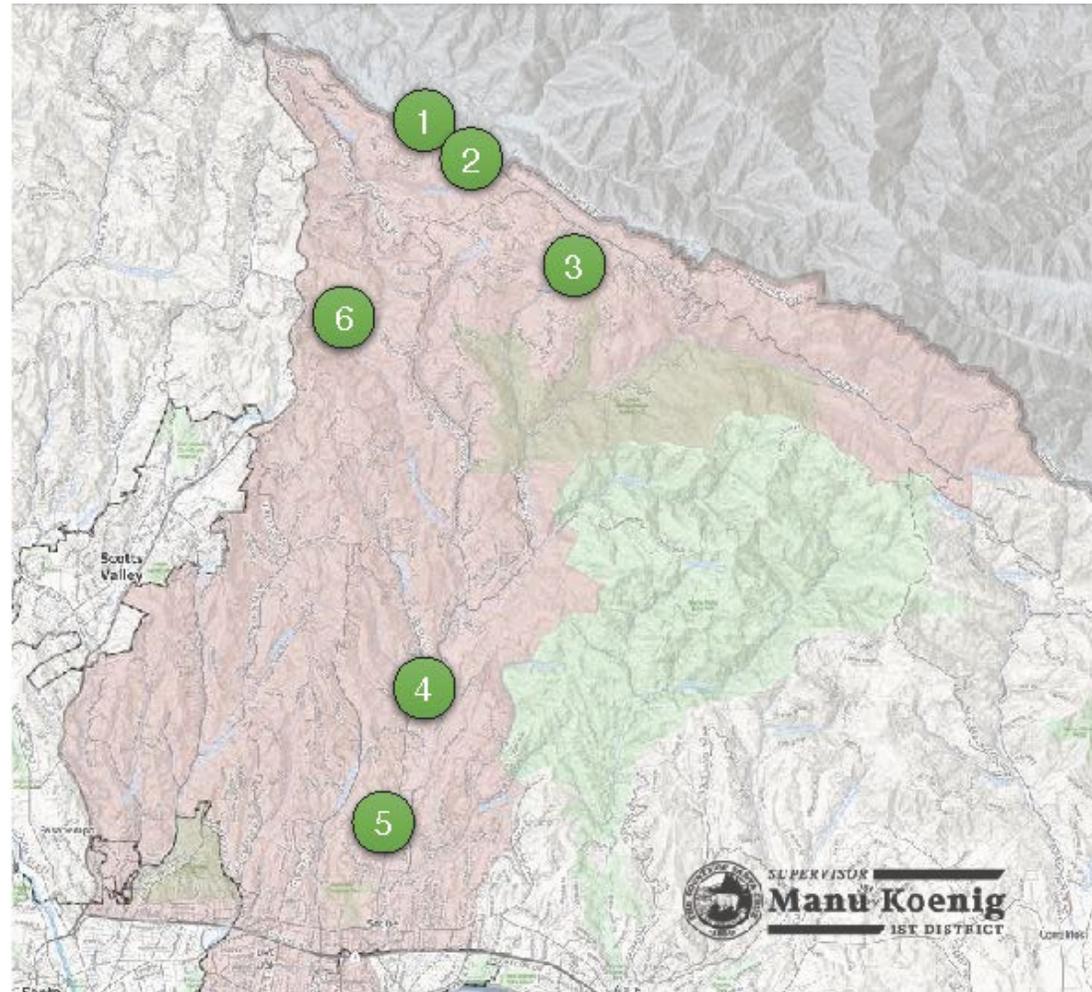
Regional Housing Needs Allocation Plan: 2023 - 2031

Alameda	\$193,743,077,525	\$16,865,600,751	9%		\$1,937,430,775	\$308,966,582	16%	-7%
Madera	\$11,498,382,317	\$7,968,265,087	69%		\$114,983,823	\$17,090,950	15%	54%
Nevada	\$15,973,938,406	\$9,003,068,398	56%		\$159,739,384	\$23,201,834	15%	41%
San Benito	\$6,743,893,879	\$3,307,793,345	49%		\$67,438,939	\$10,197,871	15%	34%
Imperial	\$10,233,444,219	\$4,441,356,439	43%		\$102,334,442	\$15,573,556	15%	28%
San Mateo	\$132,938,103,700	\$15,062,996,389	11%		\$1,329,381,037	\$194,580,936	15%	-4%
Shasta	\$15,627,392,486	\$6,652,606,928	43%		\$156,273,925	\$21,775,328	14%	29%
Fresno	\$61,749,354,583	\$18,500,755,329	30%		\$617,493,546	\$87,862,914	14%	16%
San Diego	\$386,925,410,225	\$66,418,897,263	17%		\$3,869,254,102	\$538,210,653	14%	3%
<b>Santa Cruz</b>	<b>\$33,343,349,993</b>	<b>\$19,298,384,687</b>	<b>58%</b>		<b>\$333,433,500</b>	<b>\$43,479,178</b>	<b>13%</b>	<b>45%</b>
Contra Costa	\$157,920,334,029	\$33,653,810,090	21%		\$1,579,203,340	\$205,375,072	13%	8%
Butte	\$18,044,023,347	\$7,924,677,565	44%		\$180,440,233	\$22,403,675	12%	32%
Riverside	\$237,388,487,198	\$64,320,178,778	27%		\$2,373,884,872	\$295,114,987	12%	15%
Stanislaus	\$42,782,371,241	\$11,889,211,491	28%		\$427,823,712	\$47,776,722	11%	17%
San Bernardino	\$176,135,269,285	\$32,054,356,100	18%		\$1,761,352,693	\$199,566,283	11%	7%
Yolo	\$20,115,181,068	\$3,605,069,489	18%		\$201,151,811	\$19,407,148	10%	8%
Orange	\$410,016,640,580	\$26,694,742,645	7%		\$4,100,166,406	\$264,470,010	6%	1%
State Total	\$4,312,842,756,792	\$859,557,085,367	20%		\$43,128,427,568	\$8,113,229,989	19%	1%



## Agenda

1. Summit Shaded Fuel Break
2. Sheriff Substation Project
3. Fire Camera Update
4. Cell Tower/ Wireless Update
5. Soquel San Jose Resurfacing
6. Code Compliance - Laurel Rd
7. Generator Ordinance Revised
8. FireWise



# 1. Summit Shaded Fuel Break

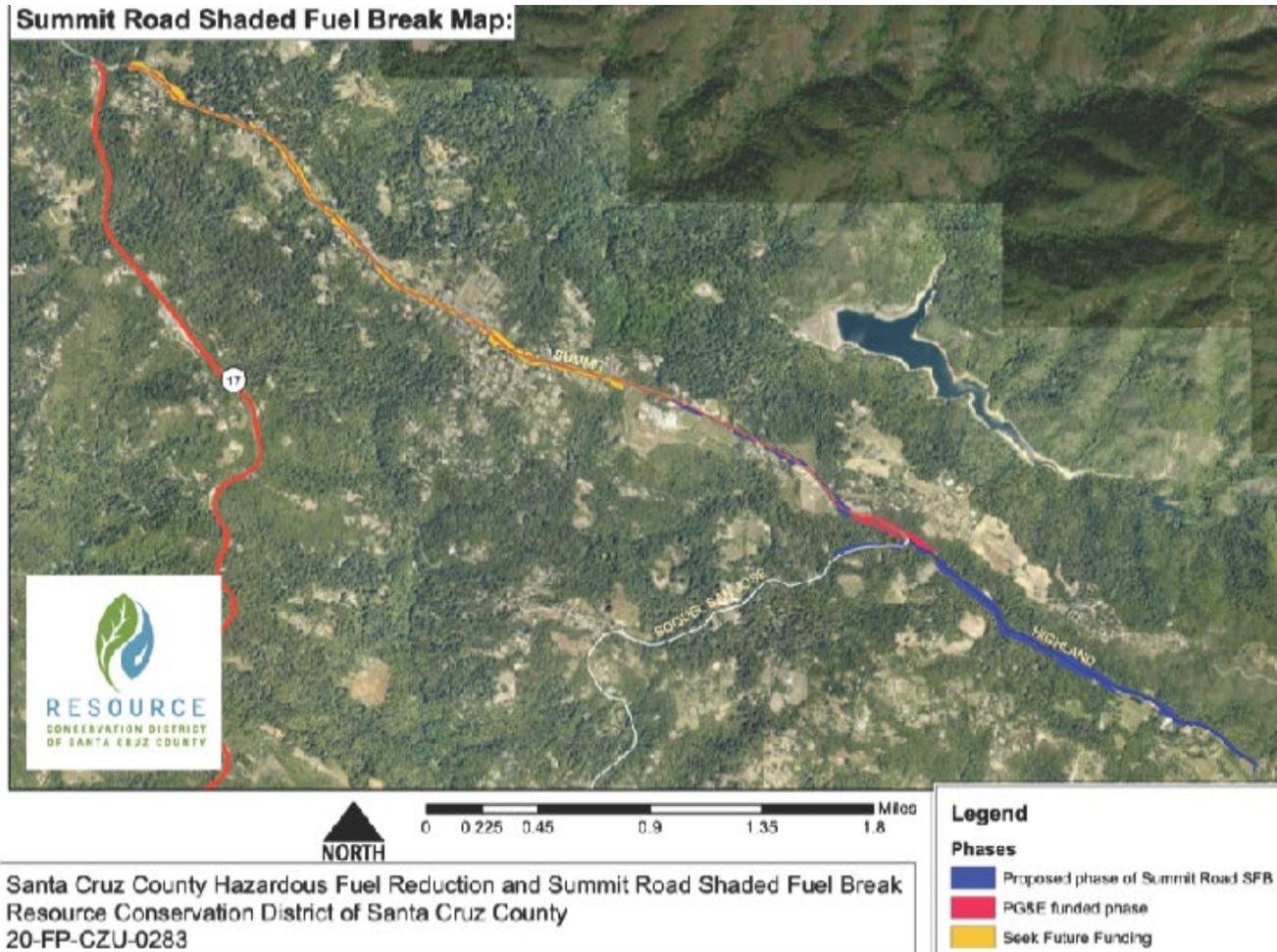


**Phase 1:** Pilot project completed Fall 2021, 2 acres at the intersection of Summit Road and Soquel-San Jose Road. Funded by a PG&E grant.

**Phase 2:** RCD awarded \$585K from CALFIRE. Applying for permits for entire 5.7 mile project (HWY 17 to Mt Bache Rd). Anticipate completing 2.6 miles (60 acres) with the current grant in 2022 (Mt Bache Rd to Loma Prieta School). Additional \$300K grant applied for.

Matt Abernathy, RCD Forest Health Specialist  
Cell: 408-355-3137  
[mabernathy@rcdsantacruz.org](mailto:mabernathy@rcdsantacruz.org)





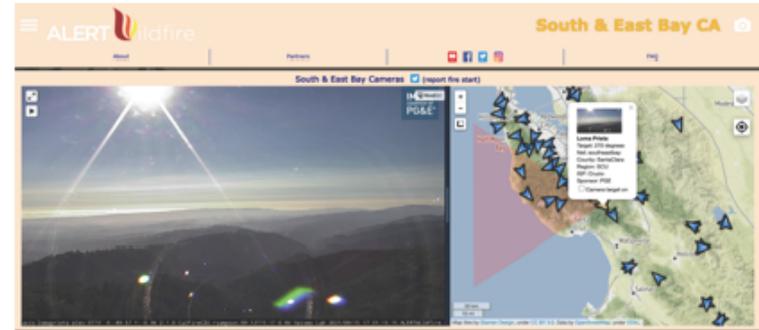
## 2. Sheriff Substation

- Working with Superintendent Grier (Loma Prieta School District), Supervisor Simitian, and Sheriff Smith (Santa Clara County) on joint staffing and renovation funding plan.
- One time costs ~ \$15K
- Timing can be before or after the rest of the building.
- Substation will be at the front of the building for ready ingress and egress.



### 3. Fire Camera Update

- Three (3) new fire cameras scheduled to be installed before 2022 fire season. Locations:
  - ▶ Silver Mountain Winery (thanks Jerold!)
  - ▶ Watsonville Airport (PG&E)
  - ▶ Dream Inn, Santa Cruz (PG&E)
- <https://www.alertwildfire.org/region/centralcoast/>



## 4. Soquel San Jose Resurfacing and Multi-Modal Improvements

- \$1,455,000 awarded by the Regional Transportation Commission on 12/2/21 from state gas tax revenues.
- Will improve bike lanes, pedestrian crossings and resurface the bottom 3.15 miles of Soquel San Jose Rd (from Soquel Dr. To Laurel Glen Rd).
- Exact project date is dependent on the State making funds available.



## 5. Wireless Update

- **1931 Soquel San Jose Rd Cell Service Improvement Project.** Verizon anticipates beginning construction of this site by late February 2022.
  - Contact information and to request improved service in your area:  
Maureen Cruzen, Verizon Municipal Engagement Partner  
E: [maureen.cruzen@verizonwireless.com](mailto:maureen.cruzen@verizonwireless.com)  
T: (925) 279-6638
- **Cruzio \$500K Broadband Award for Wireless Access Points.** Line of sight required.
- **Wireless Ordinance Update - March 9th Planning Commission**
  - Current ordinance is from 2003 and in "desperate need of an update."
  - Biggest change: **transition from discretionary to ministerial process**, unless in a sensitive area: scenic, historic, coastal zone, etc.
  - **More uniform approach to timelines, adoption of the FCC shot clocks (60 days).** Application deemed approved if shot clock expires
  - Denial of an application must be based on "substantial written evidence"
  - Denial cannot be based on environmental or health impacts
  - CPUC July 16, 2020, 72-hour backup power requirement effective July 2021. County ordinance will reiterate this requirement.



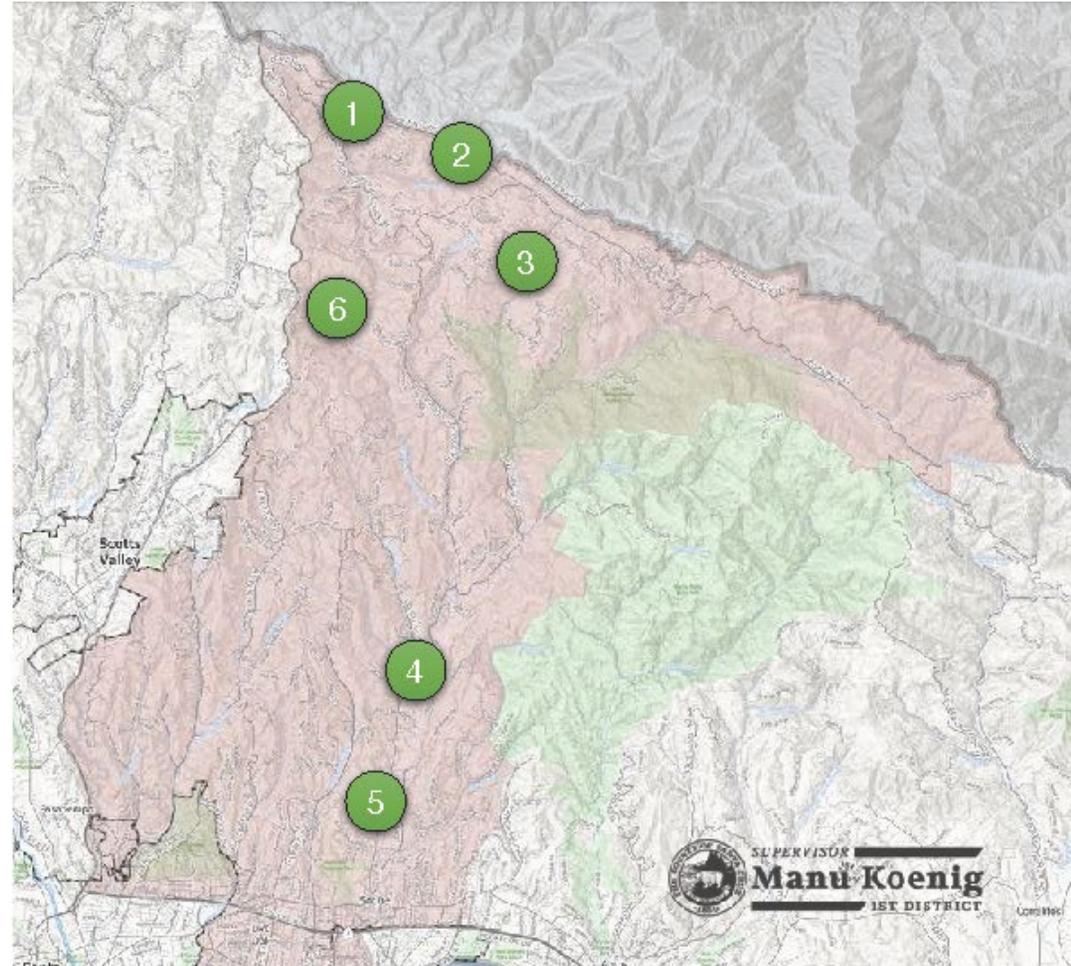
## 6. Code case update: 17195 Laurel Road/APN 09506226

- Code Compliance site visit 11/3, posted Notice of Violation and recorded it on 12/1 that includes:
  - 13.10.556 neglected property - outdoor storage of property and materials
  - 13.10.663(i) Parking or use of mobile homes, trailers, or RVs without a permit
  - 13.10.663(h) Parking or use of mobile homes, trailers, or RVs without a permit
- No contact has been confirmed with owner.
- The Notice of Violation begins a 90 day compliance window for the property owner. Next step is an Administrative Hearing, however service on Steve Rognas is near impossible. If he cannot be located to serve the notice, most likely a default judgement will be made. Once that judgement is handed down (possibly in March but more likely in April) Code Compliance will reassess the case to determine how to proceed.
- If anyone has information as to the whereabouts (or contact info) of Mr. Rognas please let our office know:  
[first.district@santacruzcounty.us](mailto:first.district@santacruzcounty.us)  
(831) 454-2200



## Agenda

- 1. Summit Shaded Fuel Break
- 2. Sheriff Substation Project
- 3. Fire Camera Update
- 4. Cell Tower/ Wireless Update
- 5. Soquel San Jose Resurfacing
- 6. Code Compliance - Laurel Rd
- 7. Generator Ordinance Revised
- 8. FireWise



## 7. New Rules for Generators Approved

- Basics of proposal, allow 65dBA, but **limit operation from 7am to 10pm**. Exceptions for medical need. 5 decibel increase is considered noticeable but it's infrequent.
- Effectively **reduces setback standards from 45-75 feet to 25-45 feet**.
- Approved 12/7/21, will go into effect February 2022.



## 8. FireWise

- June 2021 - \$50,000 of funding allocated in 2021-2022 County Budget
- November 2021 - \$175,000 from the California Fire Safe Council awarded to fund an 18-month County-wide coordinator to organize hazardous fuel reduction, forest health, fire safety and Fire Wise community efforts. Grant was a collaboration between OR3, the Resource Conservation District, and dedicated Fire Safe Council of Santa Cruz County.
- 14 new Fire Wise communities created in 2021, 24 total.
- <https://www.firesafesantacruz.org/>



**FIREWISE USA®**  
RESIDENTS REDUCING WILDFIRE RISKS



SUPERVISOR  
**Manu Koenig**  
1ST DISTRICT

## 8. FireWise Cont.

### Firewise USA Recognized Communities in Santa Cruz County

#### Santa Cruz Mountains (including Bonny Doon)

Las Cumbres (2019)  
Old Ranch Road (2021)  
Pineridge Plus (2021)  
Riva Ridge (2019)  
Sunset Ridge Road (2019)  
Marty Road (2020)  
Terrace Grove (2020)  
Bird Streets (2021) - Bonny Doon  
Ellen Roads (2021)  
Hutchinson Road (2021)  
Westdale Firewise (2021) - Bonny Doon  
Bonny Wood (2021) - Bonny Doon

#### San Lorenzo Valley

TangleWood Neighborhood (2020) - Felton  
Forest Lakes (2021) – Felton  
Lost Acre-Valhalla (2021) – Felton

#### Santa Cruz Environs

Prospect Heights (2019)  
Paradise Park (2019)  
Happy Valley (2021)  
Highland/Hillcrest Terrace (2020)  
B40FirewiseCharlie (2021)  
Santa Cruz Gardens (2021)

#### Aptos and Soquel Area

Redwood Drive/Cathedral (2020)  
Viewpoint Road (2021)  
North Rodeo Gulch (2021)

### What is the process?

Six steps to becoming Firewise USA recognized for the first year:

1. Form a steering committee with a few proactive neighbors
2. Collect neighborhood data for a Community Risk Assessment, and complete the assessment with input from a local Fire Professional.
3. Prepare a Multi-Year Plan, using observations from the Community Risk Assessment and neighborhood priorities
4. Complete one community education event related to wildfire risk reduction
5. Meet the minimum community investment criteria (1 hour or \$25 per household for the year)
6. Create a Firewise USA portal account, complete and submit your application.





# Contact



First.District@SantaCruzCounty.us

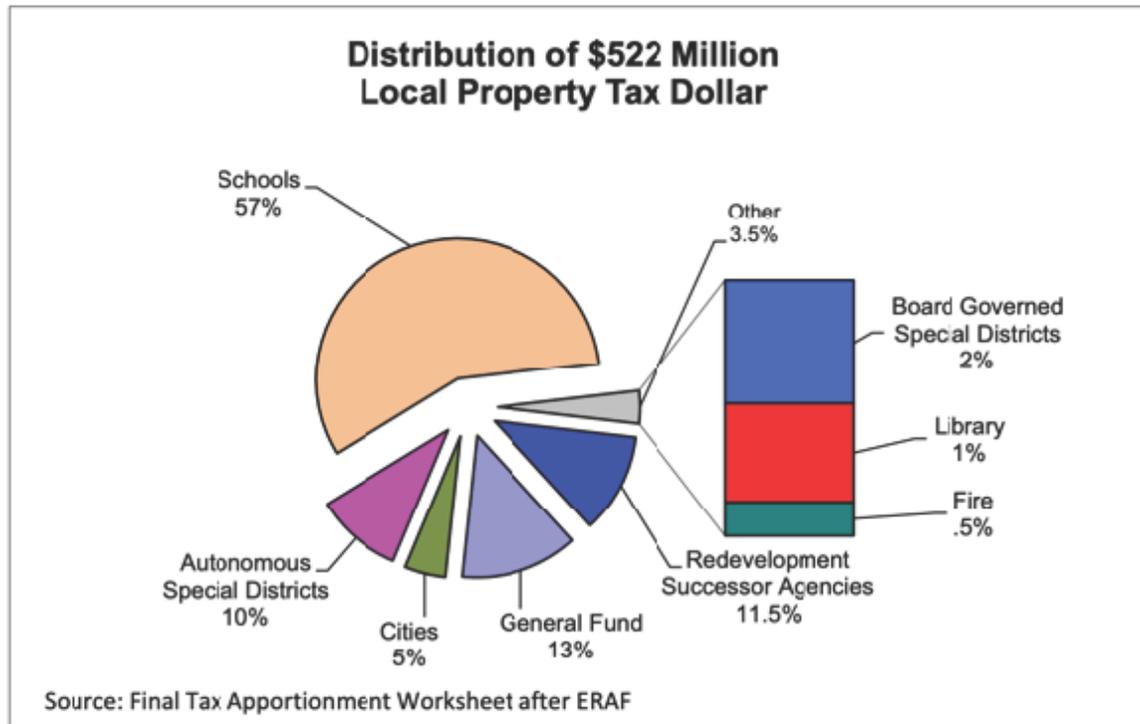


@1stSuperSCC

***Thank You!***



# Where Do Your Property Taxes Go?



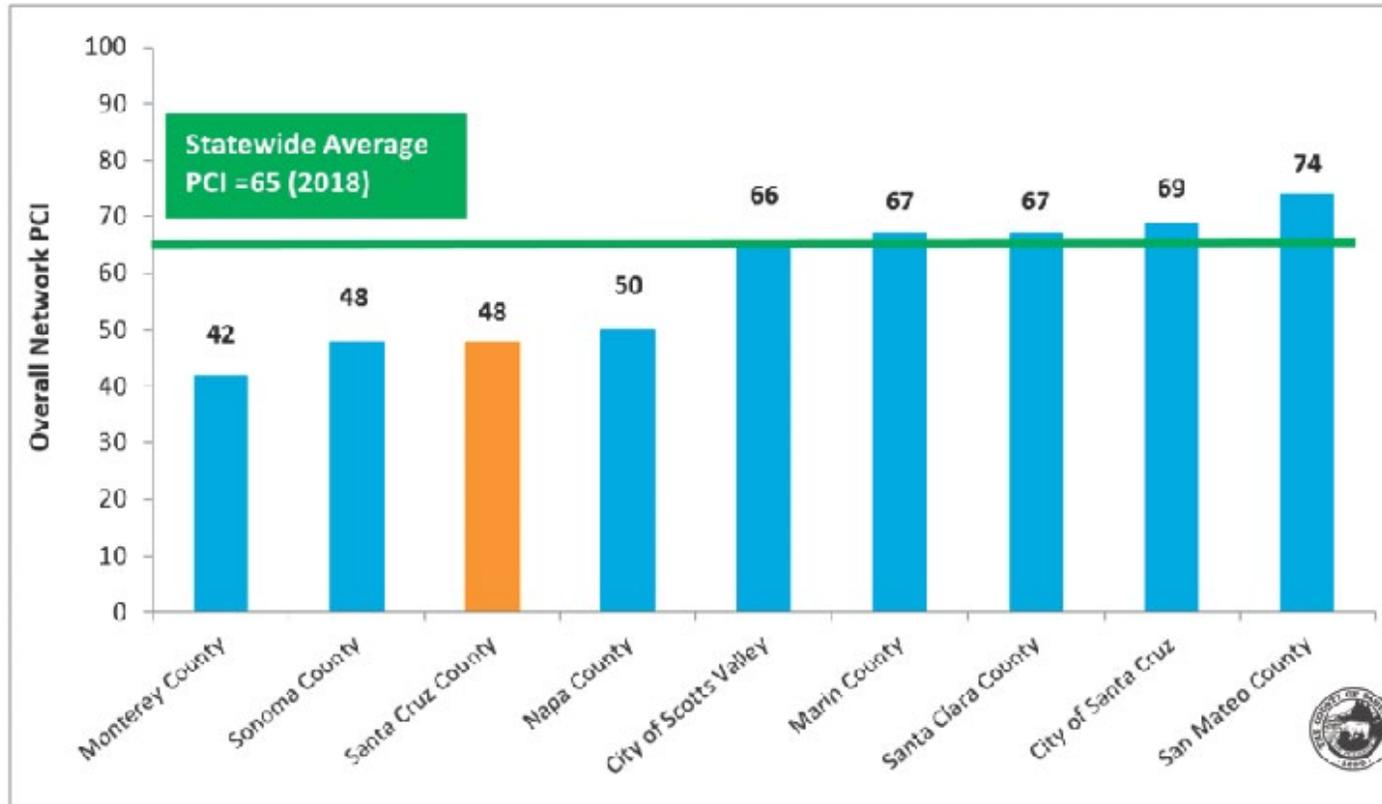
## Prop 13 Set Rates

- Our county gets one of the lowest shares of property taxes, despite having one of the highest shares of population in the unincorporated county.

County	% of Value in Unincorporated Area	% of Property Taxes to County
San Francisco	0%	70%
San Luis Obispo	50%	25%
Santa Barbara	46%	20%
Napa	47%	20%
Marin	28%	19%
Monterey	48%	16%
<b>Santa Cruz</b>	<b>58%</b>	<b>13%</b>



# PCIs of Neighboring Jurisdictions



# Funding Sources



## Forecasted Revenue Sources for the Pavement Management Program

Anticipated Revenue Sources Available for Pavement Maintenance										
Fiscal Year	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
Measure D	\$2,648,932	\$2,714,602	\$2,782,467	\$2,852,029	\$2,923,329	\$2,996,412	\$2,996,412	\$2,996,412	\$2,996,412	\$2,996,412
SB-1	\$0	\$0	\$1,171,750	\$2,318,000	\$2,490,000	\$3,698,000	\$3,938,000	\$4,206,000	\$4,206,000	\$4,206,000
Refuse Vehicle Impact Fee	\$709,000	\$1,400,000	\$1,443,000	\$1,479,000	\$1,516,000	\$1,516,000	\$1,516,000	\$1,516,000	\$1,516,000	\$1,516,000
Assumed Grant Funding (RSTP, STBG, & STIP)	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000	\$1,100,000
HUTA Funds	\$150,000	\$150,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total:</b>	<b>\$4,607,932</b>	<b>\$5,364,602</b>	<b>\$6,497,217</b>	<b>\$7,749,029</b>	<b>\$8,029,329</b>	<b>\$9,310,412</b>	<b>\$9,550,412</b>	<b>\$9,818,412</b>	<b>\$9,818,412</b>	<b>\$9,818,412</b>

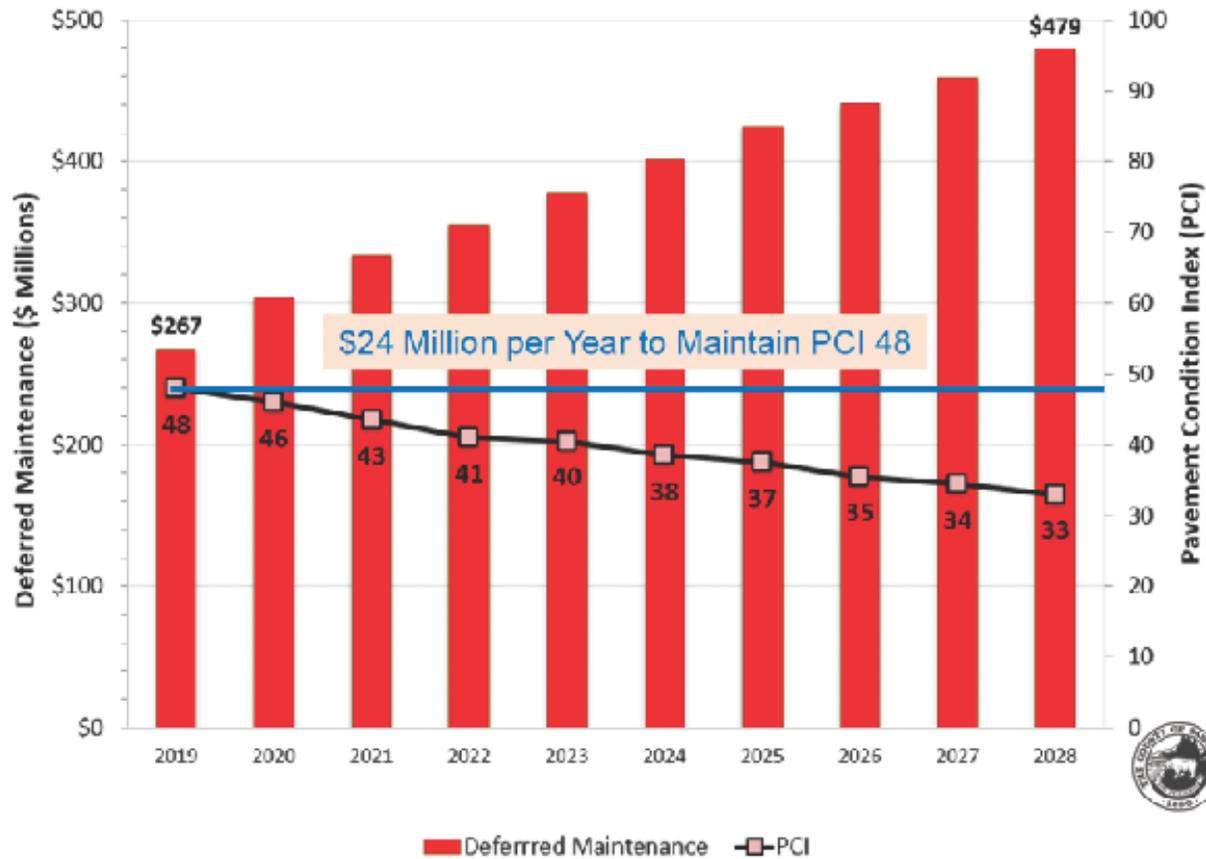


Average Yearly Funding = \$8.06 Million

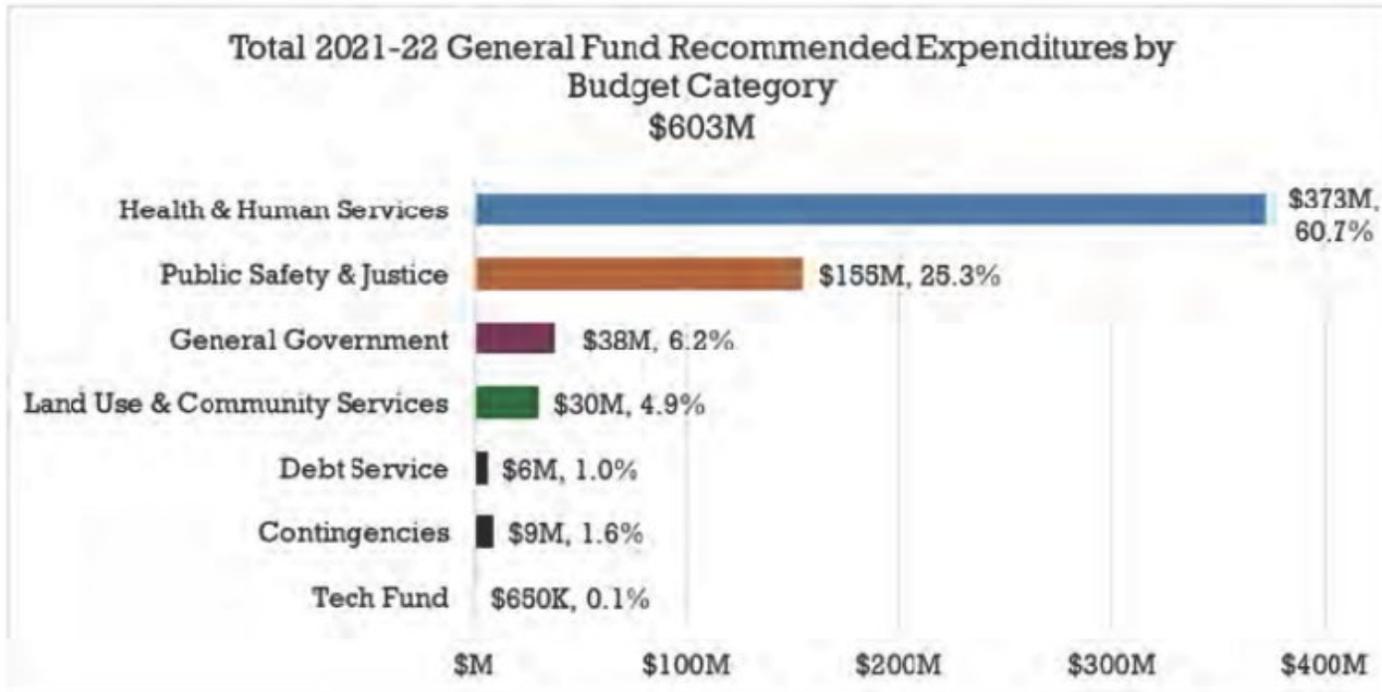
# Forecasted Funding Level of \$8M per Year



Overall PCI drops to 33 over 10 years  
Unfunded Backlog increases from \$266M to \$479M



# County General Fund



## Back of the Envelope: Filling the Road Funding Gap

Increase County Property Tax Share to 20% - \$23M<sup>\*</sup>

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1/2 Cent Sales Tax (50% towards roads) - \$4M

Other Taxes & Fees

- TOT - \$2M
- Cannabis Cultivation (2x) - \$5M
- Event Permits - \$2M

Fair Share of Gas Tax Revenues (RTIP) - \$2M

Cuts to General Government - \$1 M

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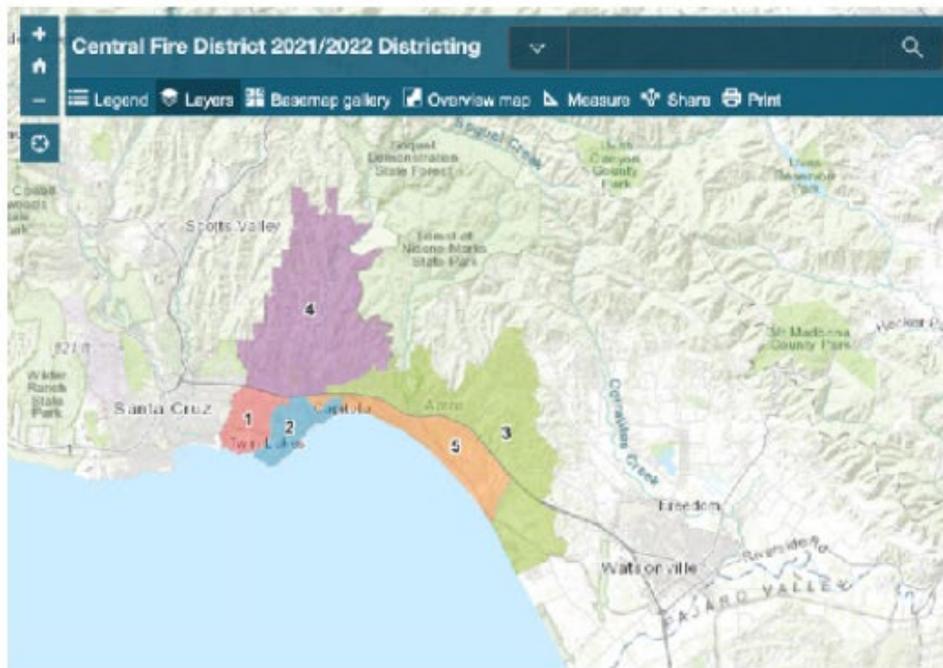
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**Additional Road Funding Needed to Maintain PCI - \$16M**

<sup>\*</sup>2008 dollars



# Central Fire District Elections



- More info: [centralfiresc.org](http://centralfiresc.org)
- Comment: [publiccomments@centralfiresc.org](mailto:publiccomments@centralfiresc.org).



## Minimum Fire Safe Regulations - “Substandard” Roads Board of Forestry and Fire Protection

- The Board of Forestry and Fire (BOF) held a Public Hearing regarding this item on June 22<sup>nd</sup>.
- The BOF Board did not take any action on this item on June 22<sup>nd</sup>.
- They received letters of opposition from several residents, government officials and even fire personnel regarding the proposed changes.
- Biggest take away was intention was to make communities safer, but one size does not fit all.
- BOF is revising their proposed draft based on public comments.



## SERFR/Jet Noise Update

- Met with FAA, Supervisory Senior Advisor
- Met with Roundtable Chair Mary-Lynn Bernald
- SCSC Roundtable was disbanded **11/11** as a result of Santa Clara Cities Association removing themselves as fiscal sponsor
- SFO RT will not expand beyond inviting E Palo Alto and Colma
- Send comments to our congressional leaders requesting a change to the flight path studied by the FAA at:

Rep Anna Eshoo

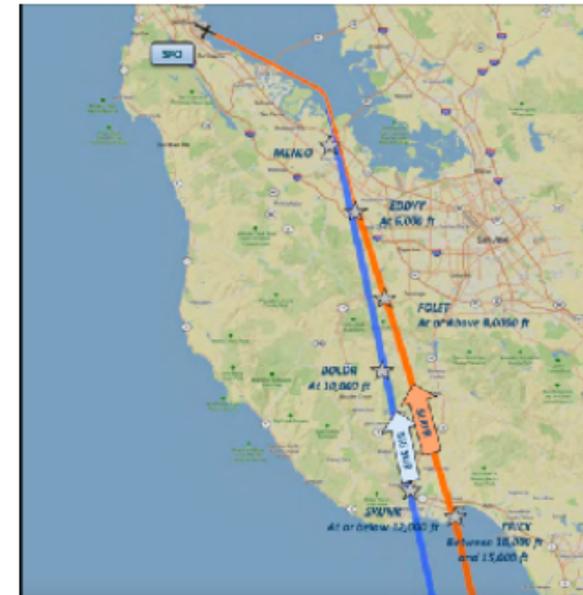
<https://eshoo.house.gov/contact/email-me>

(650) 323-2984

Rep Jimmy Panetta

<https://panetta.house.gov/contact/email>

(831) 429-1976



## County Fire Equipment Update

Equipment replacement due to cost savings on CAL FIRE contract and increased revenues from the 2019 ballot measure. 6 vehicles ordered 2 put into service:

- 1994 Water Tender 3251 in Bonny Doon. Replacement *ordered*, expected to arrive in 2022.
- 1993 Rescue 4161 in Corralitos replacement *ordered* and should be arriving soon.
- 1995 Rescue 3761 in Davenport replacement *ordered* and should be arriving soon.
- 2008 Engine 4111 in Corralitos replacement has been *ordered* and will arrive in 2022. It will then be downgraded to reserve status and replace our current reserve engine there which is a 1991.
- 1998 Engine 3721 in Davenport replacement has been *ordered* and will arrive in 2022.
- 2011 Fire Marshal replacement vehicle *ordered* and should be arriving soon as well as vehicle for second Fire Marshal position that was added in 2020 and hasn't had a vehicle.
- **Two new Type 3 engines were put into service in 2019 and were the first Type 3 engines in the County fire fleet. They are currently stationed in Loma Prieta and Las Cumbres.**

In 2022 we will likely order one more Type 3 engine for Corralitos so that all 5 companies have a Type 3 engine.

Speaking specifically about Loma Prieta in District 1 our current fleet is as follows:

- 2017 Water Tender (purchased with community funds and donated to County Fire)
- 2015 Type 1 engine
- 2018 Type 3 engine
- 1999 Rescue 3661 was replaced in the last 5 years



*“The plan is for each company to have a Water Tender, Type 1 engine, Type 3 engine and a rescue/utility vehicle.”*

- Chief Nate Armstrong



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## Appendix I: AMBAG Final Written Determination on Appeals



ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

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### 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 (RHNA)  
Appeals Final Determinations

**MEETING DATE:** September 14, 2022

**RECOMMENDATION:**

The AMBAG Board of Directors is asked to:

- (1) hold a public hearing;
- (2) approve the final determinations rejecting the appeals on the 6th Cycle Regional Housing Needs Allocation (RHNA), confirming the actions by the AMBAG Board of Directors at a public hearing on August 10, 2022; and
- (3) authorize staff to issue the proposed Final 2023-2031 6th Cycle RHNA Plan prior to Board consideration and adoption in October 2022.

### 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.

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 the California Housing and Community Development Department (HCD)

Planning Excellence!

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P.O. Box 2453 Seaside, CA 93955-2453 [ph] 831.883.3750 [fax] 831.883.3755 <http://www.ambag.org> [info@ambag.org](mailto:info@ambag.org)

## Regional Housing Needs Allocation Plan: 2023 - 2031

in late August 2021 for the planning period beginning June 30, 2023 and ending December 15, 2031.

### ***RHNA Schedule***

Key milestones are for development RHNA are shown in Figure 1.

**Figure 1: 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, HCD and the public may comment on appeals within 45 days of the close of the appeal period
<b>June 15, 2022</b>	Adoption of Final 2045 MTP/SCS AMBAG Board
<b>August 10, 2022</b>	AMBAG held public hearing on appeals received
<b>September 14, 2022</b>	AMBAG makes final written determination that accepts, rejects, modifies appeals and issues final proposed allocation plan
<b>September 23, 2022</b>	Release of Final RHNA Plan with RHNA allocations
<b>October 12, 2022</b>	Adoption of Final 2023-31 RHNA Plan with RHNA allocations by AMBAG Board
<b>December 15, 2023</b>	Jurisdiction’s 6th Cycle Housing Elements are due to HCD

### ***RHNA Development Process***

The AMBAG Board of Directors approved the final RHNA methodology on April 13, 2022 and directed staff to prepare and release the Draft 2023-2031 6<sup>th</sup> Cycle RHNA Plan. The Draft 2023-2031 6<sup>th</sup> Cycle Plan was released on April 22, 2022. The release of the Draft RHNA Plan

initiated a 45-day appeal period allowing a member jurisdiction or HCD to appeal for a revision of the share of the regional housing need proposed to be allocated. (Gov. Code, § 65584.05(b).) The close of the appeal period was June 6, 2002.

***RHNA Appeals and Final Written Determination***

AMBAG received two appeals on the Draft 2023-2031 6<sup>th</sup> Cycle RHNA Plan from the cities of Sand City and Greenfield. State law requires a 45-day comment period on any appeals received on the draft Plan. AMBAG received two comments on the appeals.

AMBAG conducted a public hearing on August 10, 2022 to consider all appeals filed and comments received on the appeals. (Gov. Code, §65584.05(d).) Each appeal was heard individually before the AMBAG Board of Directors. The AMBAG Board of Directors considered all appeals and all comments received on the appeals, discussed and rejected each appeal.

The AMBAG Board of Directors is statutorily constrained to make a final written determination on the appeals “[n]o later than 45 days after the public hearing”. (Gov. Code, §65584.05(e).) The AMBAG Board of Directors is now requested to adopt the final written determination confirming the August 10<sup>th</sup> Board action to reject each appeal and issue a proposed final allocation plan. (Gov. Code, §65584.05(e).) Final determinations “shall be based upon the information and methodology described in Government Code Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584.” The 6<sup>th</sup> Cycle RHNA appeals written final determination for Sand City and Greenfield are included as Attachments 1 and 2, respectively.

The Final 2023-2031 6<sup>th</sup> Cycle RHNA Plan is scheduled to be released by September 23, 2022 pursuant to Gov. Code, §65584.05(e).) The AMBAG Board of Directors will hold a public hearing in October to adopt the final RHNA Plan. (Gov. Code, §65584.05(g).) For more information on the RHNA appeals, please visit: <https://ambag.org/plans/regional-housing-planning>.

***Next Steps***

The AMBAG Board is requested to comply with statutory time limitations and confirm the August 10<sup>th</sup> Board action rejecting the two RHNA appeals by approving the final written determinations.

## Regional Housing Needs Allocation Plan: 2023 - 2031

Following the approval of the final written determination on the RHNA appeals and issuance of the final allocation plan, AMBAG staff will release the Final 2023-2031 6th Cycle RHNA Plan by September 23, 2022 pursuant to Gov. Code, § 65584.05(e.) for Board consideration in October 2022.

### **ALTERNATIVES:**

The AMBAG Board of Directors could choose to not approve the RHNA appeals final written determination rejecting both RHNA appeals. Staff does not recommend this as it would cause staff to determine the number of RHNA units and methodology that would be required to be redistributed to all of the local jurisdictions. This would cause AMBAG not to meet our required RHNA statutory deadlines for finalizing the RHNA Plan. Delay to the adoption of the Final RHNA Plan would cause delay to the development of each of the local jurisdiction's Housing Elements, which would subject each local jurisdictions to penalties from the State.

### **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 2022-23 Overall Work Program and Budget.

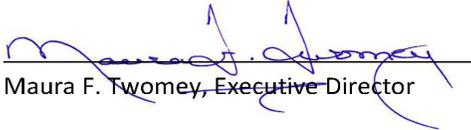
### **COORDINATION:**

All RHNA planning activities are coordinated with the HCD, Council of San Benito County Governments (SBtCOG), and the Planning Directors Forum, which includes all the local jurisdictions within the AMBAG region.

### **ATTACHMENTS:**

1. RHNA Appeals Final Determination – Sand City
2. RHNA Appeals Final Determination – Greenfield

### **APPROVED BY:**



Maura F. Twomey, Executive Director

## **City of Sand City RHNA Appeal Final Determination**

### ***AMBAG's Public Hearing and Review***

The City of Sand City requests the reduction of its Draft RHNA allocation. The City of Sand City's appeal was heard by the AMBAG Board of Directors on August 10, 2022 at a noticed public hearing. The City of Sand City, the California Housing and Community Development Department (HCD), other local jurisdictions, and the public had the opportunity to submit comments related to the appeal. The materials related to the City of Sand City's appeal, including appeal documents submitted by the jurisdiction, the AMBAG staff response, and public comments received about this appeal during the RHNA appeals comment period, are available on the AMBAG website at: <https://ambag.org/plans/regional-housing-planning>.

Per AMBAG's 2023-2031 RHNA Appeals Procedures<sup>1</sup>, the City of Sand City had an opportunity to present the basis for its appeal and information to support its arguments to the AMBAG Board of Directors. The City of Sand City's presentation was followed by a response from AMBAG staff, consistent with the information provided in its [written staff report](#) from August 10, 2022, which is incorporated herein by reference. Then, the applicant could respond to the arguments or evidence that AMBAG staff presented.

After these presentations, members of the public had an opportunity to provide oral comments prior to discussion by members of the AMBAG Board of Directors. Following their deliberations, the AMBAG Board of Directors took a preliminary vote on the City of Sand City's appeal. The AMBAG Board of Directors considered the documents submitted by the City of Sand City, the AMBAG staff report, testimony of those providing public comments prior to the close of the hearing and comments made by City of Sand City and AMBAG staff prior to the close of the hearing, and written public comments, which are incorporated herein by reference.

The recording of the public hearing is available at:  
<https://www.gotostage.com/channel/7465e0fc843843119081c1cdcb31c269/recording/d7ad5951c81243d98c9818171dc87a41/watch>

### ***AMBAG Board of Directors Decision***

Pursuant to Government Code Section 65584.05, subd. (e)(1), AMBAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings. The findings must describe how the final determination is based upon the adopted RHNA allocation methodology and why any revisions made are necessary to further the statutory objectives of RHNA described in Government Code Section 65584, subd. (d).

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<sup>1</sup> Please see AMBAG's 2023-2031 RHNA Cycle Appeals Procedures, available here:  
[https://www.ambag.org/sites/default/files/2022-06/AMBAG\\_2023-2031\\_RHNA\\_Appeals\\_Procedures\\_PDF\\_A\\_0.pdf](https://www.ambag.org/sites/default/files/2022-06/AMBAG_2023-2031_RHNA_Appeals_Procedures_PDF_A_0.pdf).

Based upon AMBAG's adoption of the final RHNA methodology and the 2023-2031 RHNA Appeals Procedures and the process that led thereto; all testimony and all documents and comments submitted by the City of Sand City, HCD, other local jurisdictions, and the public prior to the close of the hearing; and the AMBAG staff report, the AMBAG Board of Directors denies the appeal on the bases set forth in the staff report. The key arguments are summarized as follows:

- Regarding Issue #1: The City of Sand City argues that the RHNA Methodology "fails to meet the requirement of Cal. Gov. Code Section 65584(d)(1)" to further RHNA Objective 1, which relates to "[i]ncreasing 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." (Gov. Code, §65584, subd. (d)(1).) This objective is related to increasing the housing supply in all jurisdictions in the region in an equitable manner, noting the City's small size and its landlocked location between other jurisdictions, the Monterey Bay, and protected habitat. The City of Sand City asserts, based on the jurisdictions' population of residents, its RHNA allocation of 260 units is not equitable in comparison with other jurisdictions' allocations.

This argument regarding the RHNA methodology is not a valid basis for appeal for a reduction in RHNA.

AMBAG's determination of the share of regional housing need considered additional factors beyond each jurisdictions' resident population to address other statutory objectives that the City of Sand City's appeal overlooks. Units per capita cannot be assessed as a stand-alone measure because it does not address jobs/housing balance or historical patterns of concentration in employment oriented land uses such as commercial, industrial, office, or hotel. Under a per capita framework, a hypothetical jurisdiction that was entirely commercial and had no housing would perpetually get a low RHNA allocation because it had zero existing population, which would be contrary to several RHNA objectives, including Government Code section 65584(d)(1), which requires "each jurisdiction" receive an allocation for low- and very low income households. Thus per capita allocation runs counter to RHNA objective 1, which requires that each jurisdiction receive an allocation of units for low- and very-low-income households in an equitable manner (Gov. Code, §65584.04(e)(1)). For example, if AMBAG were to allocate RHNA requirements per square mile of each of AMBAG's jurisdictions, of the AMBAG region's sixteen (16) incorporated cities, thirteen (13) would have RHNA allocations of more than 150 units per square mile. The equivalent value for Sand City is 89 units per square mile, which is considerably lower than most other jurisdictions. Distribution solely based on per capita data would be inequitable because it would not consider other data necessary for an equitable distribution, such as job rates. Lowering Sand City's allocation based on per capita data would therefore also inhibit RHNA objective 3, which requires an improved intraregional relationship between jobs and housing. This objective intends to create an improved balance

between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction. (Gov. Code, §65584.04(d)(3).) This consideration of the number of low-wage workers in comparison to the number of low and very low income households within a jurisdiction would result in a more equitable distribution of units.

- Regarding Issue #2: The City of Sand City alleges the RHNA allocation ignores additional factors the methodology was required to consider. The City argues the City's development potential is constrained due to the City's size of land area, its location between other jurisdictions, the Monterey Bay, and environmentally sensitive species and habitat, and Coastal Zone overlay. The City argues that a majority of the City has been rezoned to High Density Residential or Planned Mixed Use and that there are "almost no other practical opportunities for rezoning to accommodate additional residences" without economic impacts. Specifically, the City of Sand City alleges the RHNA allocation ignores additional factors the methodology was required to consider, such as the availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, opportunities for infill development and increased residential densities, and land preserved or protected from urban development under federal or state programs designed to protect open space. (Gov. Code, §65584.04, subd. (e)(2)(B)-(C).)

This argument by the City of Sand City challenges the final RHNA methodology that was adopted by AMBAG Board of Directors and approved by HCD. This falls outside the scope of the appeals process. A valid appeal must show AMBAG made an error in the application of the methodology in determining the jurisdiction's allocation. HCD has urged AMBAG "to only consider appeals that meet the statutory criteria." HCD reviewed AMBAG's draft RHNA allocation methodology and found that it furthered the statutory objectives described in Government Code Section 65584.

AMBAG finds this argument regarding the RHNA methodology is not a valid basis for appeal for a reduction in RHNA, which is consistent with statutory direction: Government Code section 65584.04, subd. (e)(2)(B) states AMBAG may not limit its consideration of suitable housing sites to existing zoning and land use restrictions. AMBAG must consider the potential for increased development under alternative zoning and land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities.

Jurisdictions had multiple opportunities to comment as the methodology was developed and adopted between June 2021 and April 2022. Sand City did not provide public comments on the Draft RHNA methodology. Housing Element Law gives HCD the authority to determine whether the RHNA methodology furthers the statutory

objectives described in Government Code Section 65584(d), and HCD made this determination.

Furthermore, the City of Sand City did not adhere to statutory requirements to provide a statement explaining why its requested revision is necessary to further the intent of this objective, as required by Government Code Section 65584.05, subd. (b).

***Conclusion***

For the foregoing reasons and based on the full record before the AMBAG Board of Directors at the close of the public hearing (which the Board has taken into consideration in rendering its decision and conclusion), the AMBAG Board of Directors hereby denies the City of Sand City's RHNA appeal and finds that the City of Sand City's RHNA allocation is consistent with the RHNA statute pursuant to Government Code Section 65584.05, subd. (e)(1).

**City of Greenfield RHNA Appeal Final Determination**

***AMBAG's Public Hearing and Review***

The City of Greenfield requests the reduction of its Draft RHNA allocation. The City of Greenfield's appeal was heard by the AMBAG Board of Directors on August 10, 2022 at a noticed public hearing. The City of Greenfield, the California Housing and Community Development Department (HCD), other local jurisdictions, and the public had the opportunity to submit comments related to the appeal. The materials related to the Greenfield's appeal, including appeal documents submitted by the jurisdiction, the AMBAG staff response, and public comments received about this appeal during the RHNA appeals comment period, are available on the AMBAG website at: <https://ambag.org/plans/regional-housing-planning>.

Per AMBAG's 2023-2031 RHNA Appeals Procedures<sup>1</sup>, the City of Greenfield had an opportunity to present the basis for its appeal and information to support its arguments to the AMBAG Board of Directors. The City of Greenfield presentation was followed by a response from AMBAG staff, consistent with the information provided in its [written staff report](#) from August 10, 2022, which is incorporated herein by reference. Then, the applicant could respond to the arguments or evidence that AMBAG staff presented.

After these presentations, members of the public had an opportunity to provide oral comments prior to discussion by members of the AMBAG Board of Directors. Following their deliberations, the AMBAG Board of Directors took a preliminary vote on the City of Greenfield's appeal. The AMBAG Board of Directors considered the documents submitted by the City of Greenfield, the AMBAG staff report, testimony of those providing public comments prior to the close of the hearing and comments made by City of Greenfield and AMBAG staff prior to the close of the hearing, and written public comments, which are incorporated herein by reference.

The recording of the public hearing is available at:  
<https://www.gotostage.com/channel/7465e0fc843843119081c1cdcb31c269/recording/d7ad5951c81243d98c9818171dc87a41/watch>

***AMBAG Board of Directors Decision***

Per Government Code Section 65584.05, subd. (e)(1), AMBAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings. The findings must describe how the final determination is based upon the adopted RHNA allocation methodology and why any revisions made are necessary to further the statutory objectives of RHNA described in Government Code Section 65584, subd. (d).

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<sup>1</sup> Please see AMBAG's 2023-2031 RHNA Cycle Appeals Procedures, available here: [https://www.ambag.org/sites/default/files/2022-06/AMBAG\\_2023-2031\\_RHNA\\_Appeals\\_Procedures\\_PDF\\_A\\_0.pdf](https://www.ambag.org/sites/default/files/2022-06/AMBAG_2023-2031_RHNA_Appeals_Procedures_PDF_A_0.pdf).

## Regional Housing Needs Allocation Plan: 2023 - 2031

Based upon AMBAG’s adoption of the final RHNA methodology and the 2023-2031 RHNA Appeals Procedures and the process that led thereto; all testimony and all documents and comments submitted by the City of Greenfield, HCD, other local jurisdictions, and the public prior to the close of the hearing; and the AMBAG staff report, the AMBAG Board of Directors denies the appeal on the bases set forth in the staff report. The key arguments are summarized as follows:

- Regarding Issue #1: The City of Greenfield requests an adjustment to its RHNA allocation because the City states it has made significant progress in achieving the RHNA goals stated in AMBAG’s previous, 5th Cycle RHNA Plan. Specifically, the City requests a “carry-over credit” because the exceedance of RHNA goals impacts the City’s available lands for production of new units in this 6th Cycle. The City recommends the “carry-over credit” be applied twice: (1) using the latest HCD-accepted Annual Progress Report on housing production in the current RHNA cycle, with overage in housing production by income category credited against the unadjusted Cycle 6 RHNA objectives; and (2) factored into the adjusted Cycle 6 RHNA goals upon each remaining APR filing. The City of Greenfield states the jurisdiction’s exceedance of housing production impacts its available lands for production of new units in Cycle 6 and alleges there are infrastructure improvements needed to keep pace with its housing production related to waste-water facilities, water supply, electrical and natural gas services.

The City of Greenfield does not meet the statutory criteria for submitting an appeal. First, the City did not identify which of the three statutorily defined circumstances to which its appeal must relate. (See Gov. Code, §65584.05, subd. (b)(1-3).) Second, the City of Greenfield did not meet statutory requirements as described in Government Code Section 65584.05, subd. (b) because the City did not include a statement as to why the adjustment or credit is necessary to further the intent of the objectives in Government Code Section 65584.

Also, HCD reviewed AMBAG’s draft allocation methodology and found that it furthered the statutory objectives described in Government Code Section 65584.

While the City of Greenfield’s housing progress is commendable, it continues to have a high level of unmet housing need, which undermines the RHNA Plan’s requirement to further statutory objectives listed in Government Code Section 85504(d). When assessing the RHNA methodology, HCD also considered a statutory factor for “rate of overcrowding”—the percentage of existing households with more than one person per room. (Gov. Code, §65584.04(e)(7).) Greenfield has a very high level of overcrowding. According to 2015-2019 data from the American Community Survey, 29% of households in Greenfield were overcrowded— the highest rate in the AMBAG region.

***Conclusion***

For the foregoing reasons and based on the full record before the AMBAG Board of Directors at the close of the public hearing (which the Board has taken into consideration in rendering its decision and conclusion), the AMBAG Board of Directors hereby denies the City of Greenfield's RHNA appeal and finds that the City of Greenfield's RHNA allocation is consistent with the RHNA statute pursuant to Government Code Section 65584.05, subd. (e)(1).

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**Appendix J: Government Code Section 65584 – 65584.07**

**TITLE 7. PLANNING AND LAND USE [65000 - 66499.58]**

*( Heading of Title 7 amended by Stats. 1974, Ch. 1536. )*

**DIVISION 1. PLANNING AND ZONING [65000 - 66301]**

*( Heading of Division 1 added by Stats. 1974, Ch. 1536. )*

**CHAPTER 3. Local Planning [65100 - 65763]**

*( Chapter 3 repealed and added by Stats. 1965, Ch. 1880. )*

**ARTICLE 10.6. Housing Elements [65580 - 65589.11]**

*( Article 10.6 added by Stats. 1980, Ch. 1143. )*

**65584.**

(a) (1) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.

(2) It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.

(3) The Legislature finds and declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.

(b) The department, in consultation with each council of governments, shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05.

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(c) Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding housing element revision deadline pursuant to Section 65588 by not more than 60 days.

(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.

(e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

(f) For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:

(1) Very low incomes as defined by Section 50105 of the Health and Safety Code.

(2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.

(3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.

(4) Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.

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(g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or 65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

*(Amended by Stats. 2018, Ch. 989, Sec. 1.5. (AB 1771) Effective January 1, 2019.)*

### **65584.01.**

For the fourth and subsequent revision of the housing element pursuant to Section 65588, the department, in consultation with each council of governments, where applicable, shall determine the existing and projected need for housing for each region in the following manner:

(a) The department's determination shall be based upon population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments. If the total regional population forecast for the projection year, developed by the council of governments and used for the preparation of the regional transportation plan, is within a range of 1.5 percent of the total regional population forecast for the projection year by the Department of Finance, then the population forecast developed by the council of governments shall be the basis from which the department determines the existing and projected need for housing in the region. If the difference between the total population projected by the council of governments and the total population projected for the region by the Department of Finance is greater than 1.5 percent, then the department and the council of governments shall meet to discuss variances in methodology used for population projections and seek agreement on a population projection for the region to be used as a basis for determining the existing and projected housing need for the region. If agreement is not reached, then the population projection for the region shall be the population projection for the region prepared by the Department of Finance as may be modified by the department as a result of discussions with the council of governments.

(b) (1) At least 26 months prior to the scheduled revision pursuant to Section 65588 and prior to developing the existing and projected housing need for a region, the department shall meet and consult with the council of governments regarding the assumptions and methodology to be used by the department to determine the region's housing needs. The council of governments shall provide data assumptions from the council's projections, including, if available, the following data for the region:

(A) Anticipated household growth associated with projected population increases.

(B) Household size data and trends in household size.

(C) The percentage of households that are overcrowded and the overcrowding rate for a comparable housing market. For purposes of this subparagraph:

(i) The term "overcrowded" means more than one resident per room in each room in a dwelling.

(ii) The term "overcrowded rate for a comparable housing market" means that the overcrowding rate is no more than the average overcrowding rate in comparable regions throughout the nation, as determined by the council of governments.

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(D) The rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures.

(E) The vacancy rates in existing housing stock, and the vacancy rates for healthy housing market functioning and regional mobility, as well as housing replacement needs. For purposes of this subparagraph, the vacancy rate for a healthy rental housing market shall be considered no less than 5 percent.

(F) Other characteristics of the composition of the projected population.

(G) The relationship between jobs and housing, including any imbalance between jobs and housing.

(H) The percentage of households that are cost burdened and the rate of housing cost burden for a healthy housing market. For the purposes of this subparagraph:

(i) The term “cost burdened” means the share of very low, low-, moderate-, and above moderate-income households that are paying more than 30 percent of household income on housing costs.

(ii) The term “rate of housing cost burden for a healthy housing market” means that the rate of households that are cost burdened is no more than the average rate of households that are cost burdened in comparable regions throughout the nation, as determined by the council of governments.

(I) 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 data request.

(2) The department may accept or reject the information provided by the council of governments or modify its own assumptions or methodology based on this information. After consultation with the council of governments, the department shall make determinations in writing on the assumptions for each of the factors listed in subparagraphs (A) to (I), inclusive, of paragraph (1) and the methodology it shall use and shall provide these determinations to the council of governments. The methodology submitted by the department may make adjustments based on the region’s total projected households, which includes existing households as well as projected households.

(c) (1) After consultation with the council of governments, the department shall make a determination of the region’s existing and projected housing need based upon the assumptions and methodology determined pursuant to subdivision (b). The region’s existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing within the region using the regional employment projections in the applicable regional transportation plan. Within 30 days following notice of the determination from the department, the council of governments may file an objection to the department’s determination of the region’s existing and projected housing need with the department.

(2) The objection shall be based on and substantiate either of the following:

(A) The department failed to base its determination on the population projection for the region established pursuant to subdivision (a), and shall identify the population projection which the council of governments believes should instead be used for the determination and explain the basis for its rationale.

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(B) The regional housing need determined by the department is not a reasonable application of the methodology and assumptions determined pursuant to subdivision (b). The objection shall include a proposed alternative determination of its regional housing need based upon the determinations made in subdivision (b), including analysis of why the proposed alternative would be a more reasonable application of the methodology and assumptions determined pursuant to subdivision (b).

(3) If a council of governments files an objection pursuant to this subdivision and includes with the objection a proposed alternative determination of its regional housing need, it shall also include documentation of its basis for the alternative determination. Within 45 days of receiving an objection filed pursuant to this section, the department shall consider the objection and make a final written determination of the region's existing and projected housing need that includes an explanation of the information upon which the determination was made.

(d) Statutory changes enacted after the date the department issued a final determination pursuant to this section shall not be a basis for a revision of the final determination.

*(Amended by Stats. 2019, Ch. 497, Sec. 146. (AB 991) Effective January 1, 2020.)*

### **65584.02.**

(a) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the existing and projected need for housing may be determined for each region by the department as follows, as an alternative to the process pursuant to Section 65584.01:

(1) In a region in which at least one subregion has accepted delegated authority pursuant to Section 65584.03, the region's housing need shall be determined at least 26 months prior to the housing element update deadline pursuant to Section 65588. In a region in which no subregion has accepted delegation pursuant to Section 65584.03, the region's housing need shall be determined at least 24 months prior to the housing element deadline.

(2) At least six months prior to the department's determination of regional housing need pursuant to paragraph (1), a council of governments may request the use of population and household forecast assumptions used in the regional transportation plan. This request shall include all of the following:

(A) Proposed data and assumptions for factors contributing to housing need beyond household growth identified in the forecast. These factors shall include allowance for vacant or replacement units, and may include other adjustment factors.

(B) A proposed planning period that is not longer than the period of time covered by the regional transportation improvement plan or plans of the region pursuant to Section 14527, but a period not less than five years, and not longer than six years.

(C) A comparison between the population and household assumptions used for the Regional Transportation Plan with population and household estimates and projections of the Department of Finance.

(b) The department shall consult with the council of governments regarding requests submitted pursuant to paragraph (2) of subdivision (a). The department may seek advice and consult with the Demographic

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Research Unit of the Department of Finance, the State Department of Transportation, a representative of a contiguous council of governments, and any other party as deemed necessary. The department may request that the council of governments revise data, assumptions, or methodology to be used for the determination of regional housing need, or may reject the request submitted pursuant to paragraph (2) of subdivision (a). Subsequent to consultation with the council of governments, the department will respond in writing to requests submitted pursuant to paragraph (1) of subdivision (a).

(c) If the council of governments does not submit a request pursuant to subdivision (a), or if the department rejects the request of the council of governments, the determination for the region shall be made pursuant to Sections 65584 and 65584.01.

*(Amended by Stats. 2008, Ch. 728, Sec. 9. Effective January 1, 2009.)*

### **65584.03.**

(a) At least 28 months prior to the scheduled housing element update required by Section 65588, at least two or more cities and a county, or counties, may form a subregional entity for the purpose of allocation of the subregion's existing and projected need for housing among its members in accordance with the allocation methodology established pursuant to Section 65584.04. The purpose of establishing a subregion shall be to recognize the community of interest and mutual challenges and opportunities for providing housing within a subregion. A subregion formed pursuant to this section may include a single county and each of the cities in that county or any other combination of geographically contiguous local governments and shall be approved by the adoption of a resolution by each of the local governments in the subregion as well as by the council of governments. All decisions of the subregion shall be approved by vote as provided for in rules adopted by the local governments comprising the subregion or shall be approved by vote of the county or counties, if any, and the majority of the cities with the majority of population within a county or counties.

(b) Upon formation of the subregional entity, the entity shall notify the council of governments of this formation. If the council of governments has not received notification from an eligible subregional entity at least 28 months prior to the scheduled housing element update required by Section 65588, the council of governments shall implement the provisions of Sections 65584 and 65584.04. The delegate subregion and the council of governments shall enter into an agreement that sets forth the process, timing, and other terms and conditions of the delegation of responsibility by the council of governments to the subregion.

(c) At least 25 months prior to the scheduled revision, the council of governments shall determine the share of regional housing need assigned to each delegate subregion. The share or shares allocated to the delegate subregion or subregions by a council of governments shall be in a proportion consistent with the distribution of households assumed for the comparable time period of the applicable regional transportation plan. Prior to allocating the regional housing needs to any delegate subregion or subregions, the council of governments shall hold at least one public hearing, and may consider requests for revision of the proposed allocation to a subregion. If a proposed revision is rejected, the council of governments shall respond with a written explanation of why the proposed revised share has not been accepted.

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(d) Each delegate subregion shall fully allocate its share of the regional housing need to local governments within its subregion. If a delegate subregion fails to complete the regional housing need allocation process among its member jurisdictions in a manner consistent with this article and with the delegation agreement between the subregion and the council of governments, the allocations to member jurisdictions shall be made by the council of governments.

*(Added by Stats. 2004, Ch. 696, Sec. 6. Effective January 1, 2005.)*

### **65584.04.**

(a) At least two years before a scheduled revision required by Section 65588, each council of governments, or delegate subregion as applicable, shall develop, in consultation with the department, a proposed methodology for distributing the existing and projected regional housing need to cities, counties, and cities and counties within the region or within the subregion, where applicable pursuant to this section. The methodology shall further the objectives listed in subdivision (d) of Section 65584.

(b) (1) No more than six months before the development of a proposed methodology for distributing the existing and projected housing need, each council of governments shall survey each of its member jurisdictions to request, at a minimum, information regarding the factors listed in subdivision (e) that will allow the development of a methodology based upon the factors established in subdivision (e).

(2) With respect to the objective in paragraph (5) of subdivision (d) of Section 65584, the survey shall review and compile information that will allow the development of a methodology based upon the issues, strategies, and actions that are included, as available, in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the department that covers communities within the area served by the council of governments, and in housing elements adopted pursuant to this article by cities and counties within the area served by the council of governments.

(3) The council of governments shall seek to obtain the information in a manner and format that is comparable throughout the region and utilize readily available data to the extent possible.

(4) The information provided by a local government pursuant to this section shall be used, to the extent possible, by the council of governments, or delegate subregion as applicable, as source information for the methodology developed pursuant to this section. The survey shall state that none of the information received may be used as a basis for reducing the total housing need established for the region pursuant to Section 65584.01.

(5) If the council of governments fails to conduct a survey pursuant to this subdivision, a city, county, or city and county may submit information related to the items listed in subdivision (e) before the public comment period provided for in subdivision (d).

(c) The council of governments shall electronically report the results of the survey of fair housing issues, strategies, and actions compiled pursuant to paragraph (2) of subdivision (b). The report shall describe common themes and effective strategies employed by cities and counties within the area served by the council of governments, including common themes and effective strategies around avoiding the displacement of lower income households. The council of governments shall also identify significant barriers to affirmatively furthering fair housing at the regional level and may recommend strategies or

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actions to overcome those barriers. A council of governments or metropolitan planning organization, as appropriate, may use this information for any other purpose, including publication within a regional transportation plan adopted pursuant to Section 65080 or to inform the land use assumptions that are applied in the development of a regional transportation plan.

(d) Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs. Participation by organizations other than local jurisdictions and councils of governments shall be solicited in a diligent effort to achieve public participation of all economic segments of the community as well as members of protected classes under Section 12955. The proposed methodology, along with any relevant underlying data and assumptions, an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, how each of the factors listed in subdivision (e) is incorporated into the methodology, and how the proposed methodology furthers the objectives listed in subdivision (e) of Section 65584, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written or electronic request for the proposed methodology and published on the council of governments', or delegate subregion's, internet website. The council of governments, or delegate subregion, as applicable, shall conduct at least one public hearing to receive oral and written comments on the proposed methodology.

(e) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

(1) 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.

(2) The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

(A) 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.

(B) 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

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Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.

(C) 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 nonagricultural uses.

(D) 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 nonagricultural uses.

(3) 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.

(4) 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 nonagricultural uses.

(5) 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.

(6) 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) The rate of overcrowding.

(8) The housing needs of farmworkers.

(9) 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.

(10) The housing needs of individuals and families experiencing homelessness. If a council of governments has surveyed each of its member jurisdictions pursuant to subdivision (b) on or before January 1, 2020, this paragraph shall apply only to the development of methodologies for the seventh and subsequent revisions of the housing element.

(11) 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.

(12) The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.

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(13) 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.

(f) The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (e) was incorporated into the methodology and how the methodology furthers the objectives listed in subdivision (d) of Section 65584. The methodology may include numerical weighting. This information, and any other supporting materials used in determining the methodology, shall be posted on the council of governments', or delegate subregion's, internet website.

(g) The following criteria shall not be a justification for a determination or a reduction in a jurisdiction's share of the regional housing need:

(1) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.

(2) Prior underproduction of housing in a city or county from the previous regional housing need allocation, as determined by each jurisdiction's annual production report submitted pursuant to subparagraph (H) of paragraph (2) of subdivision (a) of Section 65400.

(3) Stable population numbers in a city or county from the previous regional housing needs cycle.

(h) Following the conclusion of the public comment period described in subdivision (d) on the proposed allocation methodology, and after making any revisions deemed appropriate by the council of governments, or delegate subregion, as applicable, as a result of comments received during the public comment period, and as a result of consultation with the department, each council of governments, or delegate subregion, as applicable, shall publish a draft allocation methodology on its internet website and submit the draft allocation methodology, along with the information required pursuant to subdivision (e), to the department.

(i) Within 60 days, the department shall review the draft allocation methodology and report its written findings to the council of governments, or delegate subregion, as applicable. In its written findings the department shall determine whether the methodology furthers the objectives listed in subdivision (d) of Section 65584. If the department determines that the methodology is not consistent with subdivision (d) of Section 65584, the council of governments, or delegate subregion, as applicable, shall take one of the following actions:

(1) Revise the methodology to further the objectives listed in subdivision (d) of Section 65584 and adopt a final regional, or subregional, housing need allocation methodology.

(2) Adopt the regional, or subregional, housing need allocation methodology without revisions and include within its resolution of adoption findings, supported by substantial evidence, as to why the council

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of governments, or delegate subregion, believes that the methodology furthers the objectives listed in subdivision (d) of Section 65584 despite the findings of the department.

(j) If the department's findings are not available within the time limits set by subdivision (i), the council of governments, or delegate subregion, may act without them.

(k) Upon either action pursuant to subdivision (i), the council of governments, or delegate subregion, shall provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion, as applicable, and to the department, and shall publish the adopted allocation methodology, along with its resolution and any adopted written findings, on its internet website.

(l) The department may, within 90 days, review the adopted methodology and report its findings to the council of governments, or delegate subregion.

(m) (1) It is the intent of the Legislature that housing planning be coordinated and integrated with the regional transportation plan. To achieve this goal, the allocation plan shall allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.

(2) The final allocation plan shall ensure that the total regional housing need, by income category, as determined under Section 65584, is maintained, and that each jurisdiction in the region receive an allocation of units for low- and very low income households.

(3) The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the sustainable communities strategy in the regional transportation plan and furthers the objectives listed in subdivision (d) of Section 65584.

*(Amended (as amended by Stats. 2018, Ch. 990, Sec. 3.7) by Stats. 2019, Ch. 335, Sec. 4. (AB 139) Effective January 1, 2020.)*

### **65584.05.**

(a) At least one and one-half years before the scheduled revision required by Section 65588, each council of governments and delegate subregion, as applicable, shall distribute a draft allocation of regional housing needs to each local government in the region or subregion, where applicable, and the department, based on the methodology adopted pursuant to Section 65584.04 and shall publish the draft allocation on its internet website. The draft allocation shall include the underlying data and methodology on which the allocation is based, and a statement as to how it furthers the objectives listed in subdivision (d) of Section 65584. It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan. The draft allocation shall distribute to localities and subregions, if any, within the region the entire regional housing need determined pursuant to Section 65584.01 or within subregions, as applicable, the subregion's entire share of the regional housing need determined pursuant to Section 65584.03.

(b) Within 45 days following receipt of the draft allocation, a local government within the region or the delegate subregion, as applicable, or the department may appeal to the council of governments or the delegate subregion for a revision of the share of the regional housing need proposed to be allocated to

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one or more local governments. Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584. An appeal pursuant to this subdivision shall be consistent with, and not to the detriment of, the development pattern in an applicable sustainable communities strategy developed pursuant to paragraph (2) of subdivision (b) of Section 65080. Appeals shall be limited to any of the following circumstances:

- (1) The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.
  - (2) The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.
  - (3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.
- (c) At the close of the period for filing appeals pursuant to subdivision (b), the council of governments or delegate subregion, as applicable, shall notify all other local governments within the region or delegate subregion and the department of all appeals and shall make all materials submitted in support of each appeal available on a publicly available internet website. Local governments and the department may, within 45 days, comment on one or more appeals. If no appeals are filed, the draft allocation shall be issued as the proposed final allocation plan pursuant to paragraph (2) of subdivision (e).
- (d) No later than 30 days after the close of the comment period, and after providing all local governments within the region or delegate subregion, as applicable, at least 21 days prior notice, the council of governments or delegate subregion shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c).
- (e) No later than 45 days after the public hearing pursuant to subdivision (d), the council of governments or delegate subregion, as applicable, shall do both of the following:
- (1) Make a final determination that either accepts, rejects, or modifies each appeal for a revised share filed pursuant to subdivision (b). Final determinations shall be based upon the information and methodology described in Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584. The final determination shall be in writing and shall include written findings as to how the determination is consistent with this article. The final determination on an appeal may require the council of governments or delegate subregion, as applicable, to adjust the share of the regional housing need allocated to one or more local governments that are not the subject of an appeal.
  - (2) Issue a proposed final allocation plan.

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(f) In the proposed final allocation plan, the council of governments or delegate subregion, as applicable, shall adjust allocations to local governments based upon the results of the appeals process. If the adjustments total 7 percent or less of the regional housing need determined pursuant to Section 65584.01, or, as applicable, total 7 percent or less of the subregion's share of the regional housing need as determined pursuant to Section 65584.03, then the council of governments or delegate subregion, as applicable, shall distribute the adjustments proportionally to all local governments. If the adjustments total more than 7 percent of the regional housing need, then the council of governments or delegate subregion, as applicable, shall develop a methodology to distribute the amount greater than the 7 percent to local governments. The total distribution of housing need shall not equal less than the regional housing need, as determined pursuant to Section 65584.01, nor shall the subregional distribution of housing need equal less than its share of the regional housing need as determined pursuant to Section 65584.03.

(g) Within 45 days after the issuance of the proposed final allocation plan by the council of governments and each delegate subregion, as applicable, the council of governments shall hold a public hearing to adopt a final allocation plan. To the extent that the final allocation plan fully allocates the regional share of statewide housing need, as determined pursuant to Section 65584.01 and has taken into account all appeals, the council of governments shall have final authority to determine the distribution of the region's existing and projected housing need as determined pursuant to Section 65584.01. The council of governments shall submit its final allocation plan to the department within three days of adoption. Within 30 days after the department's receipt of the final allocation plan adopted by the council of governments, the department shall determine if the final allocation plan is consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department may revise the determination of the council of governments if necessary to obtain this consistency.

(h) Any authority of the council of governments to review and revise the share of a city or county of the regional housing need under this section shall not constitute authority to revise, approve, or disapprove the manner in which the share of the city or county of the regional housing need is implemented through its housing program.

(i) Any time period in subdivision (d) or (e) may be extended by a council of governments or delegate subregion, as applicable, for up to 30 days.

(j) The San Diego Association of Governments may follow the process in this section for the draft and final allocation plan for the sixth revision of the housing element notwithstanding such actions being carried out before the adoption of an updated regional transportation plan and sustainable communities strategy.

*(Amended by Stats. 2019, Ch. 634, Sec. 4. (AB 1730) Effective January 1, 2020.)*

### **65584.06.**

(a) For cities and counties without a council of governments, the department shall determine and distribute the existing and projected housing need, in accordance with Section 65584 and this section. If the department determines that a county or counties, supported by a resolution adopted by the board or boards of supervisors, and a majority of cities within the county or counties representing a majority of the population of the county or counties, possess the capability and resources and has agreed to accept the

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responsibility, with respect to its jurisdiction, for the distribution of the regional housing need, the department shall delegate this responsibility to the cities and county or counties.

(b) The distribution of regional housing need shall, based upon available data and in consultation with the cities and counties, take into consideration market demand for housing, the distribution of household growth within the county assumed in the regional transportation plan where applicable, employment opportunities and commuting patterns, the availability of suitable sites and public facilities, the needs of individuals and families experiencing homelessness, agreements between a county and cities in a county to direct growth toward incorporated areas of the county, or other considerations as may be requested by the affected cities or counties and agreed to by the department. As part of the allocation of the regional housing need, the department shall provide each city and county with data describing the assumptions and methodology used in calculating its share of the regional housing need. Consideration of suitable housing sites or land suitable for urban development is not limited to existing zoning ordinances and land use restrictions of a locality, but shall include consideration of 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.

(c) Within 90 days following the department's determination of a draft distribution of the regional housing need to the cities and the county, a city or county may propose to revise the determination of its share of the regional housing need in accordance with criteria set forth in the draft distribution. The proposed revised share shall be based upon comparable data available for all affected jurisdictions, and accepted planning methodology, and shall be supported by adequate documentation.

(d) (1) Within 60 days after the end of the 90-day time period for the revision by the cities or county, the department shall accept the proposed revision, modify its earlier determination, or indicate why the proposed revision is inconsistent with the regional housing need.

(2) If the department does not accept the proposed revision, then, within 30 days, the city or county may request a public hearing to review the determination.

(3) The city or county shall be notified within 30 days by certified mail, return receipt requested, of at least one public hearing regarding the determination.

(4) The date of the hearing shall be at least 10 but not more than 15 days from the date of the notification.

(5) Before making its final determination, the department shall consider all comments received and shall include a written response to each request for revision received from a city or county.

(e) If the department accepts the proposed revision or modifies its earlier determination, the city or county shall use that share. If the department grants a revised allocation pursuant to subdivision (d), the department shall ensure that the total regional housing need is maintained. The department's final determination shall be in writing and shall include information explaining how its action is consistent with this section. If the department indicates that the proposed revision is inconsistent with the regional

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housing need, the city or county shall use the share that was originally determined by the department. The department, within its final determination, may adjust the allocation of a city or county that was not the subject of a request for revision of the draft distribution.

(f) The department shall issue a final regional housing need allocation for all cities and counties within 45 days of the completion of the local review period.

(g) Statutory changes enacted after the date the department issued a final determination pursuant to this section shall not be a basis for a revision of the final determination.

*(Amended (as amended by Stats. 2018, Ch. 989, Sec. 5) by Stats. 2019, Ch. 335, Sec. 5. (AB 139) Effective January 1, 2020.)*

### **65584.07.**

(a) During the period between adoption of a final regional housing needs allocation and the due date of the housing element update under Section 65588, the council of governments, subregional entity, or the department, whichever assigned the county's share, shall reduce the share of regional housing needs of a county if all of the following conditions are met:

(1) One or more cities within the county agree to increase its share or their shares in an amount equivalent to the reduction.

(2) The transfer of shares shall only occur between a county and cities within that county.

(3) The county's share of low-income and very low income housing shall be reduced only in proportion to the amount by which the county's share of moderate- and above moderate-income housing is reduced.

(4) The council of governments, subregional entity, or the department, whichever assigned the county's share, shall approve the proposed reduction, if it determines that the conditions set forth in paragraphs (1), (2), and (3) have been satisfied. The county and city or cities proposing the transfer shall submit an analysis of the factors and circumstances, with all supporting data, justifying the revision to the council of governments, subregional entity, or the department. The council of governments or subregional entity shall submit a copy of its decision regarding the proposed reduction to the department.

(b) (1) The county and cities that have executed transfers of regional housing needs pursuant to subdivision (a) shall use the revised regional housing need allocation in their housing elements and shall adopt their housing elements by the deadlines set forth in Section 65588.

(2) A city that has received a transfer of a regional housing need pursuant to subdivision (c) shall adopt or amend its housing element within 30 months of the effective date of incorporation.

(3) A county or city that has received a transfer of regional housing need pursuant to subdivision (d) shall amend its housing element within 180 days of the effective date of the transfer.

(4) A county or city is responsible for identifying sites to accommodate its revised regional housing need by the deadlines set forth in paragraphs (1), (2), and (3).

(5) All materials and data used to justify any revision shall be made available upon request to any interested party within seven days upon payment of reasonable costs of reproduction unless the costs are

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waived due to economic hardship. A fee may be charged to interested parties for any additional costs caused by the amendments made to former subdivision (c) of Section 65584 that reduced from 45 to 7 days the time within which materials and data were required to be made available to interested parties.

(c) (1) If an incorporation of a new city occurs after the council of governments, subregional entity, or the department for areas with no council of governments, has made its final allocation under Section 65584.03, 65584.04, or 65584.06, a portion of the county's allocation shall be transferred to the new city. The city and county may reach a mutually acceptable agreement for transfer of a portion of the county's allocation to the city, which shall be accepted by the council of governments, subregional entity, or the department, whichever allocated the county's share. If the affected parties cannot reach a mutually acceptable agreement, then either party may submit a written request to the council of governments, subregional entity, or to the department for areas with no council of governments, to consider the facts, data, and methodology presented by both parties and determine the number of units, by income category, that should be transferred from the county's allocation to the new city.

(2) Within 90 days after the date of incorporation, either the transfer, by income category, agreed upon by the city and county, or a written request for a transfer, shall be submitted to the council of governments, subregional entity, or to the department, whichever allocated the county's share. A mutually acceptable transfer agreement shall be effective immediately upon receipt by the council of governments, the subregional entity, or the department. A copy of a written transfer request submitted to the council of governments shall be submitted to the department. The council of governments, subregional entity, or the department, whichever allocated the county's share, shall make the transfer effective within 180 days after receipt of the written request. If the council of governments allocated the county's share, the transfer shall be based on the methodology adopted pursuant to Section 65584.04. If the subregional entity allocated the subregion's share, the transfer shall be based on the methodology adopted pursuant to Section 65584.03. If the department allocated the county's share, the transfer shall be based on the considerations specified in Section 65584.06. The transfer shall neither reduce the total regional housing needs nor change the regional housing needs allocated to other cities by the council of governments, subregional entity, or the department. A copy of the transfer finalized by the council of governments or subregional entity shall be submitted to the department. The council of governments, the subregional entity, or the department, as appropriate, may extend the 90-day deadline if it determines an extension is consistent with the objectives of this article.

(d) (1) If an annexation of unincorporated land to a city occurs after the council of governments, subregional entity, or the department for areas with no council of governments, has made its final allocation under Section 65584.03, 65584.04, or 65584.06, a portion of the county's allocation may be transferred to the city. The city and county may reach a mutually acceptable agreement for transfer of a portion of the county's allocation to the city, which shall be accepted by the council of governments, subregional entity, or the department, whichever allocated the county's share. If the affected parties cannot reach a mutually acceptable agreement, then either party may submit a written request to the council of governments, subregional entity, or to the department for areas with no council of governments, to consider the facts, data, and methodology presented by both parties and determine the number of units, by income category, that should be transferred from the county's allocation to the city.

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(2) (A) Except as provided under subparagraph (B), within 90 days after the date of annexation, either the transfer, by income category, agreed upon by the city and county, or a written request for a transfer, shall be submitted to the council of governments, subregional entity, and to the department. A mutually acceptable transfer agreement shall be effective immediately upon receipt by the council of governments, the subregional entity, or the department. The council of governments, subregional entity, or the department for areas with no council of governments, shall make the transfer effective within 180 days after receipt of the written request. If the council of governments allocated the county's share, the transfer shall be based on the methodology adopted pursuant to Section 65584.04. If the subregional entity allocated the subregion's share, the transfer shall be based on the methodology adopted pursuant to Section 65584.03. If the department allocated the county's share, the transfer shall be based on the considerations specified in Section 65584.06. The transfer shall neither reduce the total regional housing needs nor change the regional housing needs allocated to other cities by the council of governments, subregional entity, or the department for areas with no council of governments. A copy of the transfer finalized by the council of governments or subregional entity shall be submitted to the department. The council of governments, the subregional entity, or the department, as appropriate, may extend the 90-day deadline if it determines an extension is consistent with the objectives of this article.

(B) If the annexed land is subject to a development agreement authorized under subdivision (b) of Section 65865 that was entered into by a city and a landowner prior to January 1, 2008, the revised determination shall be based upon the number of units allowed by the development agreement.

(3) A transfer shall not be made when the council of governments or the department, as applicable, confirms that the annexed land was fully incorporated into the methodology used to allocate the city's share of the regional housing needs.

*(Amended by Stats. 2019, Ch. 844, Sec. 2. (SB 235) Effective January 1, 2020.)*

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**Appendix K: Jurisdiction Surveys**

Date Submitted	8/16/21
Jurisdiction	Capitola
Name	Katie Herlihy
Email	kherlihy@ci.capitola.ca.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	
b. 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.)	Yes
c. 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.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	
If you checked any of the constraints above, please describe the constraint(s)	Capitola is built out. There are less than 10 vacant lots in the City.

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Factor 3: 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. T. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	N/A
Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?	No
Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?	No
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No
8b. Where do you think additional farmworker housing is most needed?	Near the farms or along transportation corridors that connect to the farms.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	We partner with the county on supporting the housing needs of our residents. We also have rental assistance programs to prevent homelessness.
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be	No

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rebuilt/replaced.	
Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented. The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	Yes
Implementing a Climate Action Plan	Yes
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	Capitola resident's commute patterns.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	Capitola
1. When did your jurisdiction last update the General Plan? (Please list the year)	2013

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2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Increase in older age groups. Decrease in younger age groups. Low percentage of racial and ethnic diversity compared to state. Racial and ethnic diversity is similar to rates within the county. The City of Capitola also has a smaller average household and family household size compared to Santa Cruz County. According to the 2009-2013 American Community Survey 5-Year Estimates, the incidence of overcrowding in Capitola was minimal, with approximately 3.8 percent or 166 of the City's households defined as overcrowded, compared with 6.1 percent County-wide. Estimates indicate that 156 renter households were overcrowded, which means that 94 percent of all overcrowded households were renters, and 6.6 percent of all renter households were overcrowded.
4b. Do any demographic groups experience disproportionate housing needs?	The special housing needs of the elderly are an important concern in Capitola. Many of the elderly residents in the City are retired and living on a fixed low-income, which puts them at greater risk for housing overpayment.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Somewhat/Occasionally
Occupancy restrictions	Not at All
Residential real estate steerings	Very Much/Often
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Very Much/Often
Municipal or State services and amenities	Not at All
Foreclosure Patterns	Not at All
Other (please specify)	vacation rentals
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Somewhat/Occasionally

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Support or opposition from public officials	Not at All
Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	Not at All
Lack of resources for fair housing agencies and organizations	Very Much/Often
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	Yes
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	Incentivized redevelopment and increased density to allow additional housing opportunities.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	Capitola funds a rental assistance program, an emergency rental assistance program, participate in CDBG grants and HOME grants opportunities. We have protected the majority of our mobile home parks over the years through partnerships with non-profits and providing financial assistance to create cooperatives.

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Date Submitted	8/16/21
Jurisdiction	Carmel-By-The-Sea
Name	Brandon Swanson
Email	bswanson@ci.carmel.ca.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	
If you checked any of the constraints above, please describe the constraint(s)	a. Limited water credits pose a barrier to intensifying use in the downtown area to provide new apartment housing above commercial uses b. Carmel-by-the-Sea is a very small town (1 sq. mi.) and little or no underutilized land or areas for infill.

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Factor 3: 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 . Tinfrasturcture. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	N/A
Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?	No
Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?	No
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No
8b. Where do you think additional farmworker housing is most needed?	Closer to where the employees work. It shouldn't be directly adjacent to the fields, but in urban centers that are close to ag operations (Salinas, Marina Castrovillo, etc.). This will provide these crucial employees proximity to their work, but also access to services.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	No

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Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	
Investment in pedestrian, bicycle, and active transportation infrastructure	
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	
Land use changes to allow greater density near transit,	
Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	Yes
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Jurisdiction	Carmel-By-The-Sea
1. When did your jurisdiction last update the General Plan? (Please list the year)	Updates completed in 2003 (Land Use, Coastal Access, and Coastal Resources), 2009 (All other elements), 2015 (Housing Element )
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No

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3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	The population continues to age. We have seen some younger families move into town, but generally we are an older population (60+) with a high percentage of second homes that sit empty for portions of the year
4b. Do any demographic groups experience disproportionate housing needs?	No
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Not at All
Occupancy restrictions	Not at All
Residential real estate steerings	Very Much/Often
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents or land and development costs	N/A or Unknown
Major private investments	Not at All
Municipal or State services and amenities	Not at All
Foreclosure Patterns	Not at All
Other (please specify)	Lack of affordable land for developers to make affordable housing viable.
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	Somewhat/Occasionally
Discrimination in the housing market	Not at All
Lack of fair housing education	Somewhat/Occasionally
Lack of resources for fair housing agencies and organizations	Not at All
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	Yes
Partnership with advocacy/non-profit organizations	
Partnership with schools	
Partnership with health institutions	
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	
Other (please specify)	

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<p>8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?</p>	<p>We have applied for and received State grants to undertake a housing study to determine what can be done.</p>
<p>9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</p>	<p>Our low income housing is managed by the local Carmel Foundation to ensure that it is kept as affordable housing for seniors</p>

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Date Submitted	8/16/21
Jurisdiction	Del Rey Oaks
Name	Denise Duffy
Email	dduffy@ddaplanning.com
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. A. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Del Rey Oaks is a small city of both population and land area, and is primarily built out. It has limited areas for new jobs and additional housing. Population has been static for almost a decade. Future job/housing current projections are dependent upon the successful development of an area within the former Fort Ord; this area requires infrastructure to be brought to the site, as well as a general plan amendment and a willing developer. The timing of this is unknown.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: W: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	

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<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>See response above. The City does not have adequate water supplies. California American (Cal-Am) water services are restricted by order of the State Water Quality Control Board Cease &amp; Desist Order (CDO). No new service connections are allowed within the Cal-Am service area with the City CalAm service area. There is no allocation of water for Del Rey Oaks from the City's allocation within the Monterey Peninsula Water Management District (MPWMD) and thus, no additional fixtures or units that increase water use can be built. Marina Coast Water District (MCWD) oversees water service in the former Fort Ord. No water or sewer infrastructure is located on the former Fort Ord area within the City but can be extended; significant investment is required to provide service extension to this area. Land area is also limited by unexploded ordnance (UXO) and related covenants and restrictions under State Regulations. Within the City and the former Fort Ord, areas lie within the restricted area for housing as well as within the Monterey Peninsula's Airport's Approach Protection Zone and Traffic Pattern Zone. The City has a number of protected properties or open space that would prohibit their development including within areas of flooding, natural protected habitat, drainages near Del Rey Creek and dedicated open space.</p>
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>n/a</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. D. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. D. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. A. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>The high cost of housing is a significant burden to a large portion of the area/City population. Land prices and construction costs are high.</p>

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Factor 7: The Rate of Overcrowding. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. A. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No
8b. Where do you think additional farmworker housing is most needed?	
Factor 9: 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. D. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	Local area schools include CSUMB, Monterey Institute of International Studies, Monterey Peninsula College, Defense Language Institute and Naval Post Graduate School.
Factor 10: The housing needs of individuals and families experiencing homelessness. D. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	The City Housing Element (Dec 2019) indicated that the City did not have a homeless population, according to the most recent survey of homeless persons conducted. The City is updating its Housing Element in 2021. Homeless policies/programs will also be updated at that time to address needs.
Factor 11: 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. D. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented. T? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	
Land use changes to allow greater density near transit,	
Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	

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Other (please specify)	Policies in Dec 2019 Housing Element.
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. A. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). P. Please provide as much detail as possible.	
Jurisdiction	Del Rey Oaks
1. When did you jurisdiction last update the General Plan? (Please list the year)	2019 Housing Element Update; 1998 for Former Fort Ord Area Update
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	Housing Element 2021 Update underway
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	Yes
Throughout the General Plan in each chapter	
Other (please specify)	in future General Plan Update and EIR
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	stable population and housing over the last ten years
4b. Do any demographic groups experience disproportionate housing needs?	Stable Population and housing over last ten years
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	N/A or Unknown
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	N/A or Unknown
Economic pressures, such as increased rents or land and development costs	N/A or Unknown
Major private investments	N/A or Unknown
Municipal or State services and amenities	N/A or Unknown
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	N/A or Unknown
Patterns of community opposition	N/A or Unknown
Support or opposition from public officials	Not at All

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Discrimination in the housing market	Not at All
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	Somewhat/Occasionally
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	
Variety of venues to hold community meetings	Yes
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	focused outreach during 2019 Housing Element and 2021 current update
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	n/a
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	n/a

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Date Submitted	7/8/21
Jurisdiction	Gonzales
Name	Matthew Sundt
Email	msundt@ci.gonzales.ca.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. A. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: W: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	
b. 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.)	
c. 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.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	Yes
If you checked any of the constraints above, please describe the constraint(s)	The most significant obstacle to providing more housing in MoCo is LAFCO. This agency's persistence related to requiring jurisdictions return to LAFCO multiple times for annexation approvals is a disaster. Each trip to LAFCO results in unnecessary risk and uncertainty about outcomes.

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Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	N/A
Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. D. Does your jurisdiction have any agreements in place?	2014 MOA with MoCo
Factor 5: 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. D. Does your jurisdiction have any unit loss that needs to be considered?	No
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. A. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	The Gonzales Development Impact Fees are very high - \$50K for SFD and \$47K per MFD unit
Factor 7: The Rate of Overcrowding. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. A. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No
8b. Where do you think additional farmworker housing is most needed?	In the Salinas Valley
Factor 9: 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. D. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No

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<p>Factor 10: The housing needs of individuals and families experiencing homelessness. D. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:</p>	<p>Yes. The City does have a homeless issue. However, unlike many or most jurisdictions, our homeless are not seen. Our homeless are couch surfing, crammed in houses or apartments with four adults to a bedroom, or a family of 3 or 4 in one bedroom. Our homeless issue is also related in large part associated to the seasonal farm workers. The City gets a massive influx of seasonal farm workers and as a result the City often gets calls from neighbors who complain of a neighbor using a garage for housing without that garage having any of the basic amenities for human habitation. In this regard I recently saw a photo of the interior of a garage here in Gonzales with four bunk beds that is used by farm workers (that would accommodate 8 workers). We also know there are full time residents of Gonzales who are living under similar circumstances throughout the year and we know that there are families couch surfing - this we know from the GUSD.</p>
<p>Factor 11: 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. D. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.</p>	<p>No</p>
<p>Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented. T? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)</p>	
<p>None of the above</p>	
<p>Energy efficiency standards in new construction or retrofits</p>	<p>Yes</p>
<p>Investment in pedestrian, bicycle, and active transportation infrastructure</p>	<p>Yes</p>
<p>Investment in maintaining or improving existing public transportation infrastructure</p>	<p>Yes</p>
<p>Land use changes that encourage a diversity of housing types and/or mixed-use development</p>	<p>Yes</p>
<p>Land use changes to allow greater density near transit,</p>	<p>Yes</p>
<p>Incentives or policies to encourage housing development on vacant or underutilized land near transit</p>	
<p>Changes to parking requirements for new residential and/or commercial construction</p>	
<p>Implementing a Climate Action Plan</p>	<p>Yes</p>
<p>Other (please specify)</p>	

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Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. A. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). P. Please provide as much detail as possible.	
Jurisdiction	Gonzales
1. When did you jurisdiction last update the General Plan? (Please list the year)	2018
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	no Housing construction = minimal to zero population increase.
4b. Do any demographic groups experience disproportionate housing needs?	people of limited means always experience disproportionate housing needs (whatever that means)
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Very Much/Often
Occupancy restrictions	Not at All
Residential real estate steerings	Not at All
Patterns of community opposition	Not at All
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Not at All
Municipal or State services and amenities	Not at All
Foreclosure Patterns	Not at All
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Very Much/Often
Support or opposition from public officials	Very Much/Often
Discrimination in the housing market	Not at All

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Lack of fair housing education	Not at All
Lack of resources for fair housing agencies and organizations	Very Much/Often
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes
Door-to-door interaction	Yes
Increased mobile phone app engagement	Yes
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	NA
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	NA

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/27/21
Jurisdiction	Greenfield
Name	Rob Mullane, City of Greenfield Planning Consultant
Email	rmullane@hrandassociates.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	The region needs to achieve a better balance of housing and jobs. More housing should be directed to areas that are employment centers or are served by well-developed transit options.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	Yes

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<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>Greenfield is currently working with staff from the Regional Water Quality Control Board regarding the adequacy of the City's sewer treatment facilities. RWQCB staff have noted that unless substantial improvements in treatment levels are made, the agency may institute a moratorium on new sewer connections in Greenfield. The City has approved and/or has had new housing and other development in areas noted as vacant land at the start of the current (2014-2023) RHNA cycle. Substantially less vacant land is available at this time. Areas outside of the City limits area areas with prime agriculture and soils. These areas are protected from urban development through agricultural conservation easements and policies that discourage conversion of prime agricultural lands outside the City such as the 2013 Greater Greenfield Area Memorandum of Agreement.</p>
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>Greenfield lacks robust transit services for residents commuting to jobs outside of the City. MST is the only transit option, and the routes that serve Greenfield are infrequent with very long headways.</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>Yes</p>
<p>8b. Where do you think additional farmworker housing is most needed?</p>	<p>In unincorporated areas closest to agricultural production, and in cities that have not made substantial progress in meeting current RHNA cycle low-income housing goals.</p>
<p>Factor 9: The housing needs generated by the presence of a private university or a campus of the California State University or the</p>	<p>No</p>

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University of California within any member jurisdiction. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	No
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	
Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	AMBAG should consider Greenfield's exceptional performance with developing low-income housing as indicated by progress on housing development goals in the current (2014-2023) RHNA cycle. Because of Greenfield's success in exceeding its 2014-2023 very low- and low-income housing allocations, much less land is currently available to support a similarly-large RHNA allocation for this next RHNA cycle.

Regional Housing Needs Allocation Plan: 2023 - 2031

Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	Greenfield
1. When did your jurisdiction last update the General Plan? (Please list the year)	2016
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Greenfield has approved and developed substantial new housing at both lower-income levels and market-rate. The new housing has provided additional housing opportunities to keep pace with the City's population trends.
4b. Do any demographic groups experience disproportionate housing needs?	No
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Somewhat/Occasionally
Occupancy restrictions	Not at All
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Not at All
Economic pressures, such as increased rents or land and development costs	Not at All
Major private investments	N/A or Unknown
Municipal or State services and amenities	Not at All
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Not at All
Support or opposition from public officials	N/A or Unknown

Regional Housing Needs Allocation Plan: 2023 - 2031

Discrimination in the housing market	Not at All
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	N/A or Unknown
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	
Partnership with health institutions	
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	Greenfield's demographics have not led to patterns of segregation.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	Greenfield has approved and/or had built several new low-income residential projects to provide additional housing opportunities for the community.

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/11/21
Jurisdiction	King City
Name	Erik Berg-Johansen
Email	planning@kingcity.com
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Cannabis industry is offering more employment opportunities which is creating need for more market rate housing.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	Yes
If you checked any of the constraints above, please describe the constraint(s)	
Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	Multi-modal transit center is planned and the City has funding to design the platform. And the Land Use Element update is also considering land use changes around this site as an opportunity area.

Regional Housing Needs Allocation Plan: 2023 - 2031

Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?	No
Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?	No
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regional transportation impact fee imposed on new developments (TMAC).
Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	Yes
8b. Where do you think additional farmworker housing is most needed?	Along Lonoak (southeastern part of City).
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	Hartnell College has a satellite campus in the City; however, the classes are primarily for part-time students who live in the area.
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	The City has homeless living along the Salinas River. The City is looking at options to convert motels to housing for homeless individuals.
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No

Regional Housing Needs Allocation Plan: 2023 - 2031

Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	There is not a lot of vacant infill property to be developed, and the City has constraints such as flood zones and protected AG land surrounding the City.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	King City
1. When did you jurisdiction last update the General Plan? (Please list the year)	Housing Element (2015). In process now updating Land Use and Housing Elements
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	These chapters will be added to GP update in process.
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	Yes
Other (please specify)	

Regional Housing Needs Allocation Plan: 2023 - 2031

4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Farmworkers continue to be a prominent special housing needs group in the City, but there is a newer need for market housing as well due to the cannabis industry.
4b. Do any demographic groups experience disproportionate housing needs?	Farmworkers
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Not at All
Occupancy restrictions	Not at All
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Not at All
Economic pressures, such as increased rents or land and development costs	Somewhat/Occasionally
Major private investments	N/A or Unknown
Municipal or State services and amenities	N/A or Unknown
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Not at All
Support or opposition from public officials	Not at All
Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	N/A or Unknown
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	
Partnership with health institutions	
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	Direct mailing surveys to all households.
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	King City is working to provide employee housing for farmworkers and other low-income housing.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	King City is working to provide employee housing for farmworkers and other low-income housing.

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/13/21
Jurisdiction	Marina
Name	Christy Hopper
Email	chopper@cityofmarina.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	In addition to the inclusionary housing requirement, other key housing provisions of Marina's 2006 General Plan provided the direction and framework for the Marina Housing Element update. One of the principal goals and prevailing theme of Marina's General Plan is the attainment of a jobs-housing balance through economic development that generates substantial high quality jobs and through establishment of a jobs-housing phasing program. Other key General Plan provisions call for construction of a diverse mix of housing types to accommodate a broad range of life-styles and income levels, especially with respect to matching the needs of the City's current and projected future workforce (General Plan Policies 2.17 and 2.28).
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	Yes
a. The availability of sewer and water service given 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.	
b. 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.)	
c. 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-term basis.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	
If you checked any of the constraints above, please describe the constraint(s)	

Regional Housing Needs Allocation Plan: 2023 - 2031

<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>N/A</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>The City of Marina has adopted an Urban Growth Boundary to direct development within the incorporated City of Marina with policies to encourage the protection of the agricultural</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens: The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?: Housing cost burden is generally defined as households paying more than 30 percent of their gross income on housing related expenses, including rent or mortgage payments and utilities. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. High housing costs can cause households to spend a disproportionate percentage of their income on housing. This may result in payment problems, deferred maintenance or overcrowding. This section uses data from the 2008-2012 Comprehensive Housing Affordability Strategy (CHAS) published by HUD. The CHAS provides information related to households with housing problems, including cost burden, overcrowding and/or without complete kitchen facilities and plumbing systems. The most recent estimates were posted by HUD in June 2015 and were derived from the 2008-2012 ACS. As shown in Table 26, a significant portion of households were experiencing cost burden greater than 30 percent. Among renters, almost 47 percent of households paid more than 30 percent of income towards housing costs. About 22 percent of renters paid more than 50 percent of their income towards housing costs. Cost burden rates were also high among Marina homeowners. Almost 42 percent of owner-households paid more than 30 percent of income towards housing costs, and 21 percent paid more than 50 percent of household income towards housing costs. Table 27 provides further details of housing cost burden by income and household type. Table 26: Housing Cost Burden by Tenure – City of Marina Household Cost Burden (30%+) Severe Cost Burden (50%+) Lower Income Households (80% AMI) Owner-Occupied 66.2% 53.8% Renter-Occupied 78.3% 41.7% All Households 75.2% 44.7% All City Households Owner-Occupied 41.8% 20.9% Renter-Occupied 46.7% 22.3% All Households 44.7% 21.7% Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2008-2012</p>	

Regional Housing Needs Allocation Plan: 2023 - 2031

<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data? : The definition of overcrowding used in the Housing Element is more than one person per room. Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families are doubling up to afford housing. However, cultural differences also contribute to the overcrowded conditions. Some cultures tend to have larger household size than others due to the preference of sharing living quarters with extended family members as a way of preventing homelessness among family members. Overcrowding can strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes. Table 28 indicates that in 1990, overcrowding was 12 percent (944 units) of the total households. By 2000, overcrowding rate increased to 15.4 percent of all households. However, as previously discussed, household size in the City has been trending down and overcrowding decreased significantly according to the 2010-2014 ACS. Approximately five percent of all households in Marina were overcrowded and another two percent were severely overcrowded in 2010-2014. Overcrowding was more prevalent among renter-households than owner-households (Table 28). Countywide, a larger proportion of the households were considered overcrowded. Table 28: Overcrowding by Tenure (1990-2014) Jurisdiction Overcrowded (1.01-1.5 occupants per room) Severely Overcrowded (1.5+ occupants per room)</p> <table border="1"> <thead> <tr> <th>Renter</th> <th>Owner</th> <th>Total</th> <th>Renter</th> <th>Owner</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1990</td> <td>Marina</td> <td>8.5%</td> <td>4.0%</td> <td>7.0%</td> <td>6.1%</td> </tr> <tr> <td>2.9%</td> <td>5.0%</td> <td>Monterey County</td> <td>8.4%</td> <td>4.0%</td> <td>6.2%</td> </tr> <tr> <td>13.5%</td> <td>4.6%</td> <td>9.0%</td> <td>2000</td> <td>Marina</td> <td>10.2%</td> </tr> <tr> <td>4.6%</td> <td>7.6%</td> <td>19.6%</td> <td>1.8%</td> <td>7.8%</td> <td>Monterey County</td> </tr> <tr> <td>9.4%</td> <td>5.3%</td> <td>7.2%</td> <td>12.9%</td> <td>8.3%</td> <td>13.4%</td> </tr> <tr> <td>2014</td> <td>Marina</td> <td>6.2%</td> <td>2.5%</td> <td>4.6%</td> <td>3.8%</td> </tr> <tr> <td>0.2%</td> <td>2.3%</td> <td>Monterey County</td> <td>12.3%</td> <td>4.4%</td> <td>8.3%</td> </tr> <tr> <td>6.6%</td> <td>1.6%</td> <td>4.1%</td> <td colspan="3">Sources: U.S. Census Bureau, Census 1990 and 2000; ACS, 2010-2014</td> </tr> </tbody> </table>		Renter	Owner	Total	Renter	Owner	Total	1990	Marina	8.5%	4.0%	7.0%	6.1%	2.9%	5.0%	Monterey County	8.4%	4.0%	6.2%	13.5%	4.6%	9.0%	2000	Marina	10.2%	4.6%	7.6%	19.6%	1.8%	7.8%	Monterey County	9.4%	5.3%	7.2%	12.9%	8.3%	13.4%	2014	Marina	6.2%	2.5%	4.6%	3.8%	0.2%	2.3%	Monterey County	12.3%	4.4%	8.3%	6.6%	1.6%	4.1%	Sources: U.S. Census Bureau, Census 1990 and 2000; ACS, 2010-2014		
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Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No																																																						
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<p>Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans: California State University Monterey Bay - A significant presence of college students in a community usually places additional pressure on the local rental housing market. Typically, students need affordable rental housing near the college and their length of stay tends to be transient, revolving around the semesters. In June 1994 a plan was approved to convert part of former Fort Ord into a university. Founded in 1995, California State University Monterey Bay (CSUMB) grew to 2,264 students during the 1999-2000 school year and 6,731 students by 2015. It's most available 2007 master plan projects full-time equivalent student enrollment of 12,000 by 2025. The 2007 master plan assumes 60 percent of traditional full-time equivalent students will be housed on campus. As of 2016 CSUMB has initiated a process to update its campus master plan, and continues to move forward with an established growth target of more than 12,000 students over the coming decade. Resources Available CSUMB offers a variety of housing options for their students, including residence halls, suites, and apartment-style housing, including housing for students with families in their East Campus Apartments. Additionally, recently opened in the Fall of 2015, CSUMB's Promontory apartments offer upper-division students 176 two- to four-bedroom units of single occupancy and double occupancy rooms. While student housing is currently provided by CSUMB, at least some students will reside in housing "in town" as part of the resident population of surrounding jurisdictions, sharing costs in single- and multi-family rental units. According to CSUMB, as of 2016, 45 percent of CSUMB students live on campus. Considering college students may have limited budgets due to the cost of education and limited time available for professional employment, the university population affects the need for affordable housing in Marina. Students may choose to live off campus to reduce living costs and may accept substandard housing or overcrowded conditions.</p>																																																							
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	No																																																						

Regional Housing Needs Allocation Plan: 2023 - 2031

Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	Yes
Implementing a Climate Action Plan	Yes
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	Marina
1. When did your jurisdiction last update the General Plan? (Please list the year)	2000
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No

Regional Housing Needs Allocation Plan: 2023 - 2031

3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years: The City of Marina is one of 12 cities within Monterey County. According to the U.S. Census, Monterey County's population was 415,057 in 2010. Population growth in Monterey County between 2000 and 2010 increased by slightly over three percent, and has slowed considerably since the 1990s (a 13-percent increase between 1990 and 2000). Jobs and housing available at U.S. Army Fort Ord caused Marina's population to swell 28 percent from 1980 to 1990, and then drop nearly 29 percent from 1990 to 2000 when the base closed in 1994. Growth since 2000 has been minimal, as confirmed by building permit statistics and the DOF annual updates. 2015 Due to the redevelopment of former Fort Ord properties, the population is projected to increase steadily in the future. The Association of Monterey Bay Area Governments (AMBAG) prepared the following projections when developing the Regional Housing Needs Allocation (RHNA) goals. AMBAG forecasts a further leveling off of the population growth over the next 25 years with an estimated Marina population of approximately 24,225 in 2035 The age profile of Marina residents in the 1990 Census reflects the presence of Fort Ord, with nearly 46 percent of the population between 20 and 39, and only 7 percent aged 60 years or over. The 2000 Census reflects the impacts of the base closure. Specifically, young families populated the base housing, so the number of children under age 10 declined from 19 percent to 12 percent between 1990 and 2000. Similar to national trends, Marina's population is aging, which will lead to demand for senior housing. Adding in the "Boomers" who represented 8.7 percent of the population between 50 and 59 in 2000, by 2010 over 16 percent of the population was 60 and over. The City's demographics have remained fairly stable since 2000. As of 2010, 36 percent of Marina's residents were "Non-Hispanic White" the largest proportion among all racial/ethnic groups in the City. Another 27 percent of residents were Hispanic/Latino. By comparison, the proportion of Hispanic residents countywide (55 percent) is approximately double that of the City's (27 percent).	
4b. Do any demographic groups experience disproportionate housing needs?	No
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Somewhat/Occasionally
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents or land and development costs	Somewhat/Occasionally
Major private investments	N/A or Unknown
Municipal or State services and amenities	Somewhat/Occasionally
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	N/A or Unknown
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	Not at All

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Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	N/A or Unknown
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	Yes
Partnership with advocacy/non-profit organizations	
Partnership with schools	
Partnership with health institutions	
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	<p>The City of Marina is not an entitlement jurisdiction that receives Community Planning and Development grants from HUD, such as Community Development Block Grant (CDBG) or HOME Investment Partnership Act (HOME) funds. Therefore, the City is not required to prepare an Analysis of Impediments to Fair Housing Choice or Assessment of Fair Housing.</p> <p>Nevertheless, the City recognizes the State and Federal Fair laws and administers housing programs and implement housing-related policies in a manner that fosters equal housing opportunities. Furthermore, the City will be making the following Zoning Code amendments to expand housing choices and access to housing: <input type="checkbox"/>Transitional and supportive housing in commercial, mixed use, and mobile home park zones <input type="checkbox"/>Reasonable accommodation procedures <input type="checkbox"/>Employee housing In addition, the City refers residents to various housing agencies for fair housing complaints.</p>
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	<p>When a Notice of Intent to convert from low income housing to market-rate housing is received (typically one year in advance of conversion), the City will work with property owners to ensure that the tenants are properly noticed and provided information on potential resources for assistance, and any application displacement and relocation requirements are complied with.</p>

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/13/21
Jurisdiction	Monterey
Name	Grant Leonard
Email	leonard@monterey.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. A. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: W: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	
c. 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.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	
If you checked any of the constraints above, please describe the constraint(s)	The City of Monterey has adequate sewer capacity. The City does not have adequate water supplies. All development must stay-within the current site's water allocation. The City is experiencing some housing growth as long there are adequate water credits onsite. A recent example is 595 Munras Ave, an infill redevelopment in Downtown that includes a mix of commercial and ten residential units. Overall, growth is dramatically impacted by the lack of a long-term, viable water supply.

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Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	N/A
Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?	No
Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?	The city's current housing element lists 24 units at risk of conversion due to affordability restrictions expiring.
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No
8b. Where do you think additional farmworker housing is most needed?	Monterey does not have farm land. In order to reduce transportation costs for farmworkers, farmworker housing should be placed in agricultural communities.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	The housing need for students in Monterey schools is substantial. Local schools include: Monterey Institute of International Studies, Monterey Peninsula College, Defense Language Institute and Naval Post Graduate School.
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	Like every jurisdiction in Monterey County, the City of Monterey continues to have unhoused and unsheltered homeless individuals. The creation of Casa De Noche Buena shelter in Seaside and the regional SHARE center in Salinas have increased available resources for the homeless, but the number of unsheltered homeless continues to outnumber the shelter spaces available. Additional emergency shelter and transitional housing for youth, adults, and families are needed as well as on-going operating funding.

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Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	Yes
Implementing a Climate Action Plan	Yes
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	The single most significant issue for housing in Monterey is the lack of a sustainable water supply. Without resolution to the State Water Resources Control Board's cease and desist order, construction of additional housing, including affordable housing, will be extremely limited if permitted at all.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	Monterey
1. When did your jurisdiction last update the General Plan? (Please list the year)	2004
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes

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3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	The EJ will be completed with the Housing Element update.
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	Yes
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	The 2020 Census will better inform what demographic trends there have been over the last ten years. The Regional AI, completed in 2019, showed a modest 1.8% population growth for Monterey between 2010 and 2018.
4b. Do any demographic groups experience disproportionate housing needs?	The City completed a Vulnerable Communities Analysis in 2019 that showed that Youth, families with children, veterans, people with disabilities, people struggling with substance abuse and victims of domestic violence were also identified as vulnerable populations.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	N/A or Unknown
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	N/A or Unknown
Economic pressures, such as increased rents or land and development costs	N/A or Unknown
Major private investments	N/A or Unknown
Municipal or State services and amenities	N/A or Unknown
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	N/A or Unknown
Patterns of community opposition	N/A or Unknown
Support or opposition from public officials	N/A or Unknown
Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	N/A or Unknown
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes

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Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	As part of this Regional AI, a detailed assessment of lending patterns in Monterey County was conducted. Findings are presented in Chapter 4 of the AI. The City also offers supportive resources to mortgage lender groups in the form of an annual workshop or event that provides a venue to review HMDA data, address potential problems regarding lending discrimination, and discuss fair housing law and how to best implement fair housing practices. The City is in the process of reviewing their Inclusionary Ordinance. The City will provide an update which will include new incentives to encourage the development of larger units. The City offers streamlined review and incentives for developments within specific plan areas, including allowing up to 30 units per acre by right.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	In 2020, the City began operating an emergency rental assistance program to prevent at risk households from being evicted and facing homelessness. Annually the City allocates funds to CDBG Public Services non-profit organizations serving at-risk populations to help prevent displacement. The City also operates a home repair program for low income homeowners to conduct home rehabilitation/repairs that allow them to age in place and remain in the community. The City also maintains an inventory of over 550 affordable housing units through the City's inclusionary housing ordinance.

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Date Submitted	8/2/21
Jurisdiction	Monterey County
Name	John M Dugan
Email	duganj@co.monterey.ca.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. A. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. A. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Disconnect between location of “affordable” housing and jobs, especially in relation to hospitality centered on the Greater Monterey Peninsula but “affordable” housing primarily in the Salinas Valley. Limited resources for new housing: water, planning unit caps in Carmel Valley, cost of land. Agricultural lands restrict new housing development and public infrastructure not available in rural/agricultural areas.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: W: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	

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<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>2a. Fire Risk – There are 11 unincorporated communities on the Office of the State Fire Marshal’s Communities at Risk. These communities, next to federally owned land, cover more than 54,000-acres. The Very High-Risk designation in these communities triggers additional building code requirements and real estate disclosures that may impede future development. Water Supply –California Coastal Commission requirement that projects document a sustainable water supply; this applies primarily to the North County Local Coastal Zone. The community of San Lucas does not have access to potable water, which has meant that a 33-lot subdivision has remained undeveloped for almost 20-years. Wastewater Systems - Wastewater system capacity of County Service Areas and Sanitation Districts is a limiting factor in communities such as Chualar. 2c. The Agricultural Land Trust controls more than 46,000-acres throughout Monterey County. The Big Sur Land Trust controls more than 40,000-acres throughout Monterey County. Efforts to use land trusts to control development is not limited to proactively purchasing conservation easements. Carmel Valley beyond Mid-Valley is all on septic and cannot support intensive development. After the 2014 approval of the 185-lot Ferrini Ranch subdivision, the Ag. Land Trust was able purchase a conservation easement in 2019.</p>
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>Many county communities outside Salinas and Monterey do not have transit service any more often than every 30 minutes or one hour.</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>MOA with City of Salinas, Soledad, Greenfield and Gonzalez</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>Approximately 15 units.</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<ul style="list-style-type: none"> <li>•High cost of land in coastal areas makes affordable housing more expensive to build.</li> <li>•Lack of infrastructure in Salinas Valley outside of cities increases costs of all housing in any meaningful density.</li> </ul>

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Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	The 2018 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 address farmworker household overcrowding. The Study also found an immediate need for 5,372 units of permanent, subsidized, affordable housing for farmworkers. The Study is available at: <a href="https://www.cityofsalinas.org/sites/default/files/departments_files/community_development_files/farmworker_housing_study.saslinas-pajaro.june_15-2018.complete.pdf">https://www.cityofsalinas.org/sites/default/files/departments_files/community_development_files/farmworker_housing_study.saslinas-pajaro.june_15-2018.complete.pdf</a>
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	Yes
8b. Where do you think additional farmworker housing is most needed?	Big Sur for hospitality workers. Greater Monterey Peninsula. Cities in the Salinas Valley for farmworkers and those employed in occupations that support agriculture. Cities in the Salinas Valley for farmworkers and those employed in occupations that support agriculture. for hospitality workers. Cities in the Salinas Valley for farmworkers and those employed in occupations that support agriculture.
Factor 9: 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 Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	– Yes, but housing needs to be provided in urban jurisdictions where supportive services are available.
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	Wildfire unit losses in 2020 estimated at approximately 230 units.
Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	

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Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes

Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	The 2010 General Plan policies regarding a Development Evaluation System has been disputed and caused housing projects to be delayed or discouraged.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). P. Please provide as much detail as possible.	Infill development opportunities outside cities and towns is very limited due to lack of water, sewer, community services and areas meeting the definition of urban infill outside farmland.
Jurisdiction	Monterey County
1. When did your jurisdiction last update the General Plan? (Please list the year)	Adopted 2010
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	Initial studies underway
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	Yes
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Limited growth in all demographics
4b. Do any demographic groups experience disproportionate housing needs?	Hispanic demographic. Agricultural and visitor serving groups. Baby-boomer white males, veterans.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Somewhat/Occasionally
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	Somewhat/Occasionally
Patterns of community opposition	Very Much/Often

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Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Very Much/Often
Municipal or State services and amenities	Very Much/Often
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Somewhat/Occasionally
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	N/A or Unknown
Discrimination in the housing market	Somewhat/Occasionally
Lack of fair housing education	Somewhat/Occasionally
Lack of resources for fair housing agencies and organizations	Not at All
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	Inclusionary housing ordinance
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	None, to avoid gentrification if that is the gist of the question.

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/6/21
Jurisdiction	Pacific Grove
Name	Anastacia Wyatt
Email	awyatt@cityofpacificgrove.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	The number of low-paying service jobs outnumbers the number of lower market rate/affordable housing opportunities. Since October 2009, California American Water, the water purveyor to the City of Pacific Grove, has been under a Cease and Desist Order (CDO) from the State Water Resources Control Board, reducing the available water supply for the Monterey Peninsula, placing a moratorium on all new water connections, and further restricting pumping on the Carmel River from its previous 1990 order. While the City is actively participating in the regional effort to develop an alternative water source, the lack of water continues to prevent housing development. The CDO currently prohibits the establishment of new water meters for additional housing units other than ADU's. The CDO also limits/prohibits a change of use and converting a property, e.g. from a hotel to permanent housing or building housing on a vacant lot zoned for residential. Based on the City's recent study, "Welcome Home: Creating an Affordable Future (May 2021), two-thirds of the 7,500+ people who work in PG earn less than \$40,000/year and most cannot afford to pay more than \$1,000 a month for housing without being rent-burdened. Most of the rents in PG are well over \$1,600-\$1,700/month and the monthly cost to own a median-priced home is over \$4,500/month.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes

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<p>c. 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.</p>	<p>Yes</p>
<p>d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.</p>	
<p>If you checked any of the constraints above, please describe the constraint(s): The City's Water Distribution Regulations (Chapter 11.68 of the Municipal Code) detail water entitlements and distribution limited per the CDO. The CDO constrains the City from building on vacant single family lots, creating new housing and increasing the size of units or splitting residential parcels to increase density on a parcel. Each unit must have an existing water meter for a new development. Currently, the City cannot accept architectural permits for vacant parcels. The City recently had a first read of a ordinance enacting a temporary moratorium on the submittal of planning permits on vacant parcels that do not have an existing meter. There are 10 units on the waitlist, six have expired and four are close to expiring. The City has few vacant lots that could be developed; however, due to the CDO, these lots remain empty while there is a severe housing shortage. Historically, the City relies on citizen initiatives that affect planning and zoning. The City's total area is 1,830 acres or approximately 2.8 square miles. The City is mostly built out. As of 1993, less than 2 percent (31.8 acres) of Pacific Grove's land area was vacant and available for additional development. There is not a lot of land suitable for development and conversion to residential use that faces challenges. However, the City's predominant land use is residential and most of that is single-family. Commercial uses are mostly related to goods and services, with almost no land available for industrial uses. A generous amount of land is devoted to parks and natural areas that are free and open to the public. Several provisions have become part of the City's Zoning Ordinance through the initiative process. Provisions approved by initiative restrict certain types of multiple-unit developments, the development of motels and the use of George Washington Park, and the rezoning of land zoned either "U" (Unclassified) or "O" (Open Space). The initiative that regulates multiple-unit developments involving condominiums and planned unit developments (PUDs) was passed in 1982. Its intent was to assure that condominium and PUD developments conform with land use and zoning standards applicable to single-family uses. It restricts condominium and PUD densities to no more than 125 percent of the density of the nearest sing-family residential district. A 1986 initiative prohibits the development of hotels and motels in all but existing R-3-M districts. It also prohibits the establishment of any new R-3-M districts, and sets the density of R- 3-M uses at a minimum of 2,500 square feet of land for each family unit and hotel or motel unit. Another initiative measure passed in 1986 requires that all property within the City zoned "O" or "U" as of July 14, 1986 must retain such zoning until an ordinance to change the zoning is approved by the voters. The parcels affected include parks and recreation areas, Pacific Grove Unified School District properties, and municipal properties. In 1994, the City council passed a measure to allow condominiums and hotel use in the Holman's block of the Downtown and the Holman building was converted to mixed use residential with multi-million dollar condominiums. The City has a Fire Hazard Severity Zone that needs to be taken into account for development. The City's fire zone is located in the Del Monte Park portion of the City, toward the southern and eastern most boundary of the City. The City is prone to hazards during rain storm events and rising water from high surf, flooding in low lying areas near the coast and downed power lines and trees. Based on Flood Factor, flood risk is increasing for Pacific Grove as sea levels rise and weather patterns change. Approximately 71 (or 1%) properties are already at risk in Pacific Grove and within about 30 years, it is estimated that 72 will be at risk. One opportunity the City is taking advantage of is the State Density Bonus Law. The City ensures that zoning regulations are in conformance with state Density Bonus Law (California Government Code §65915). The City encourages developers to utilize the density bonus provisions to increase the number of units in the underlying zone in return for construction of lower-income housing (extremely-low, very-low, and low-income units) by providing workable incentives that improve the financial feasibility of a project. The City is pursuing State and federal grant opportunities to fund a Downtown Master Plan to evaluate the feasibility of high-density residential development and incentives for upper floor residential units in the downtown area and support the existing compact urban core with convenient services and transit, and financing strategies for development. The City encourages residential and mixed use development in commercial zones. Potential residential and mixed-use opportunities and available incentives encourage, where feasible, converting and/or upgrading buildings for permanent special needs housing that could serve disabled, seniors, extremely-low-and/or very-low-income persons. Where the General Plan and zoning allow, development on existing residential parcels could be intensified by replacing existing residences on commercially-zoned sites. The City has a cemetery, Asilomar Dunes, George Washington Park and other parks protected under Zone O, voter initiatives.</p>	

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<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>N/A</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Take into account the City’s recent study, “Welcome Home” and the background and Summary Data. Pacific Grove has many seniors or low-moderate income homeowners who are house rich and cash-poor. Maintaining the existing housing stock is critical to ensuring homes do not turn over as second homes. The high cost of housing and low wages limit the ability of a younger workforce to purchase homes in the community or rent. Based on the Countywide, 2021 Comprehensive Economic Development (CEDS) document, the population on the Peninsula is aging compared to other areas in Monterey County. The Welcome Home study found that more than a quarter of residents in Pacific Grove (26.4%) are over the age of 64 compared to only 14.8% statewide. Over half of all residents (53%) have lived in their home since 2009 or earlier (compared to about 28% in Monterey County and CA).</p>
<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>No</p>
<p>8b. Where do you think additional farmworker housing is most needed?</p>	<p>Farmworker Housing is needed near where jobs are located for farmworkers in addition to being close to services, such as health care, fresh produce, community centers, and schools.</p>

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<p>Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:</p>	<p>Although the City does not have a college or university directly in the jurisdiction, it is close to MPC, DLI, MIIS, and CSUMB. The Coalition of Homeless Services Providers and other advocacy organizations have noted that there are a substantial number of homeless students from CSUMB. Many live in their cars in surrounding communities. The lack of student housing at CSUMB and other local institutions on the Peninsula, stresses an already overburdened housing market and housing conditions. There are limited housing options at local institutions and even less affordable housing options. Further information is needed to determine the true impact of local educational systems and their impact on the peninsula housing market and homelessness.</p>
<p>Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:</p>	<p>The City is dedicating LEAP funding toward regional homeless shelter operations in Seaside. Safe parking and other overnight shelters operate within the City of Pacific Grove nightly.</p>
<p>Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.</p>	<p>No</p>
<p>Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)</p>	
<p>None of the above</p>	
<p>Energy efficiency standards in new construction or retrofits</p>	
<p>Investment in pedestrian, bicycle, and active transportation infrastructure</p>	
<p>Investment in maintaining or improving existing public transportation infrastructure</p>	
<p>Land use changes that encourage a diversity of housing types and/or mixed-use development</p>	
<p>Land use changes to allow greater density near transit,</p>	
<p>Incentives or policies to encourage housing development on vacant or underutilized land near transit</p>	
<p>Changes to parking requirements for new residential and/or commercial construction</p>	<p>Yes</p>
<p>Implementing a Climate Action Plan</p>	
<p>Other (please specify)</p>	

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Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	As noted in the Welcome Home Study, the majority of service workers cannot afford to live in the City of PG and due to poor public transit services. Many workers commute into the City of PG, which increases GHG emissions. The City would like to build additional affordable units for those who work in the community, but many constraints, especially water, prevent additional units from being built, primarily the CDO.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	The City needs to examine restrictive voter initiatives and zoning standards that prevent development of additional housing.
Jurisdiction	Pacific Grove
1. When did you jurisdiction last update the General Plan? (Please list the year)	1994
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	

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<p>4a. Describe demographic trends and patterns in your jurisdiction over the past ten years: According to the California Department of Finance, the population in Pacific Grove in 2015 was estimated to be 15,388. In 2019, the U.S. Census estimated that 15,413 people lived in the City, a slight increase of 0.2% from 2015. However, there was a slight decrease since 2010, with a population of 15,638. There was a 22% population increase in the early 1970's, but since then, Pacific Grove saw slight fluctuations in the overall population from 1975 to 2010. In 1975, there were 16,500 people in Pacific Grove. Based on 2018 ACS data, children under 18 years old make up a smaller proportion of the Pacific Grove population (18.6%) than compared to California (22.5%). Twenty-six percent (26%) of renter-occupied households include children under 18 compared to 18.5% of owner-occupied households. Overall, the population is aging. In 2010, the median age of Pacific Grove residents was 48.1 years, well above the Monterey County median of 32.9 years. More than a quarter of residents (26.4%) are over the age of 64 compared to only 14.8% statewide. While some residents moved to PG to retire, many have been here for decades. Over half of all residents (53%) have lived in their homes since 2009 or earlier (compared to about 28% in Monterey County and CA). According to the 2010 Census, Pacific Grove's racial and ethnic composition differed significantly from Monterey County as a whole; over half of county residents reported Hispanic ancestry and only 11% of City residents. Based on 2018 ACS estimates, over 70% of residents are non-Hispanic white, 10% are Hispanic or Latino of any race, 5% are Asian, 1.3% are Black or African American, and 0.3% are American Indian or Alaska Native. Almost 4% of residents are multi-racial. In 2010, non-Hispanic white was 78.2, 10.7 were Hispanic or Latino of any race, 5.7% were Asian, 1.3% were Black or African American, 0.3% were American Indian or Alaska Native, and 3.4% identified as other. Pacific Grove is a highly educated community. Over 96% of residents aged 25 and older graduated from high school and 52.7% of residents have a bachelor's degree or higher. The City has a lot of low-paying service jobs and people come to the City to work, but cannot find housing to live and work in the community. In 2010, the largest occupational category for Pacific Grove residents was "management, business, science, and arts," with about 46% of all employed residents. Service and sales/office occupations represented about 21% and 25% of workers, respectively. The unemployment rate for City residents was about 4%. In 2020 jobs by sector based on highest to lowest were: Financial and Professional services, retail, health care and social assistance, education, public, self-employed, site-based skilled trade, wholesale, manufacturing and agriculture (field work). About 15.6% of all workers in Pacific Grove are also residents of the City. Another 30% of workers commute in from the Monterey Peninsula communities. The remainder of workers are commuting in from Salinas, San Jose, Watsonville, Fresno, LA and other locations. About 56% (or approximately 8,693) of Pacific Grove residents 16 and older are in the civilian workforce, most commute out of the City. According to 2009-2013 U.S. Census ACS data, the median household income in Pacific Grove was approximately \$72,000 per year. The current median household income of all residents is \$81,623 per year. However, owner households have a median annual income of \$103,603 compared to renter households who have a median annual income of \$70,920.</p>	
<p>4b. Do any demographic groups experience disproportionate housing needs?</p>	<p>Children under 18 years old make up a smaller proportion of the Pacific Grove population (18.6%) than compared to California (22.5%). Twenty-six percent (26%) of renter-occupied households include children under 18 compared to 18.5% of owner-occupied households. Children who grow up in a rental have less stability and may be more likely to move homes and schools throughout their childhood. Increasingly, many people in the community find it difficult or impossible to find housing that meets their needs. Limited housing choice has forced many people in PG to leave and live elsewhere, and the vast majority of people who work in PG help run the City, or work in restaurants stores, golf courses and hotels, commute to the City. The housing shortage creates a high cost for the community in economic, environmental, and social terms.</p>
<p>5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?</p>	
<p>Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements</p>	<p>Very Much/Often</p>
<p>Occupancy restrictions</p>	<p>N/A or Unknown</p>

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Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Very Much/Often
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Very Much/Often
Municipal or State services and amenities	N/A or Unknown
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	N/A or Unknown
Patterns of community opposition	Very Much/Often
Support or opposition from public officials	Very Much/Often
Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	Somewhat/Occasionally
Lack of resources for fair housing agencies and organizations	Somewhat/Occasionally
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	
Variety of venues to hold community meetings	Yes
Door-to-door interaction	Yes
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	The City will continue to work on Fair Housing issues within the community and work with local non-profit organizations for tenant-landlord disputes. The City publicizes information about the enforcement activities of the California Fair Employment and Housing Commission. Fair housing information is made available on the City's website and through flyers and brochures at the Planning Division and Finance Department Counters at City Hall and at the Pacific Grove Public Library and Senior Center. In recent years, the City promotes April as "Fair Housing Month" and has passes Fair Housing Resolutions. The City conducted the May 2021, Welcome Home Strategy: Creating an Affordable Future. This document created action priorities to address housing concerns and was completed with extensive community outreach shaped by input from hundreds of community members, the guidance of Pacific Grove's elected and appointed officials, volunteers, and staff.

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<p>9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</p>	<p>The City has passed Fair Housing Resolutions and conducted the May 2021, Welcome Home Strategy: Creating an Affordable Future. This document created action priorities to address housing concerns and was completed with extensive community outreach shaped by input from hundreds of community members, the guidance of Pacific Grove’s elected and appointed officials, volunteers and staff. This document created action steps which the City will continue to work on as it moves forward with its Housing Element update. The City works with property owners of housing in need of rehabilitation to make repairs to reduce the potential of continuing deterioration. The City has run the Housing Rehabilitation program since the 1980’s that funds households earning up to 80% Area Median Income with low-interest, deferred loans to rehabilitate their properties to ensure they can age in place or afford upgrades to ensure they can live in safe, sanitary, and decent housing. In addition, the City runs a sewer-lateral loan program to assist households within the City have access to a low-interest loan to ensure decent sanitation on their property. The City also runs an Emergency Home Repair Loan Program to assist lower-income homeowners with urgent home repairs. The City has maintained the existing R-1- M-H zoning for the Monarch Pines Mobile Home Park. The preservation of the 103 mobile home units protects existing residential neighborhoods and considers the quality of life in higher density neighborhoods. This park provides lower cost housing to seniors in PG.</p>
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Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/16/21
Jurisdiction	Salinas
Name	Jonathan Moore
Email	jonathanm@ci.salinas.ca.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Please consider the Farmworker Housing Study and Action Plan ( <a href="https://www.cityofsalinas.org/our-city-services/community-development/regional-farmworker-housing-study">https://www.cityofsalinas.org/our-city-services/community-development/regional-farmworker-housing-study</a> ), and the jurisdiction's Housing Element Annual Progress Reports.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	Yes
If you checked any of the constraints above, please describe the constraint(s)	In virtually all parts of the City, sewer and water service is readily available, pending extension of local lines and infrastructure. There are opportunities, but limited, for infill development. The city also recently adopted two specific plans for approximately of its Future Growth Area north of Boronda Road, however this requires significant infrastructure development. City and County MOUs direct growth north and east to protect prime farmland

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<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>Due to technical issues with the place types mapping tool we have not completed our land use updates for the MTP/SCS in development. Need to reconnect with AMBAG on completing this task.</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>The Greater Salinas Area MOU, approved in 2006.</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>Since the last survey period the City has only lost one affordable unit.</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>Yes</p>
<p>8b. Where do you think additional farmworker housing is most needed?</p>	<p>Permanent farmworker housing is needed throughout the County, specifically within or close proximity to the cities. The Farmworker Housing Study also recommends increasing housing for temporary farmworkers on farm sites.</p>
<p>Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:</p>	<p>Hartnell College and CSUMB satellite campus drive students to the City and increase the need for market-rate and affordable housing.</p>
<p>Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:</p>	<p>Salinas has significant housing needs for those experiencing homelessness. Recent efforts to address this include development of Moon Gate Plaza in Chinatown (90 units for low/extremely low income including those unhoused), the SHARE Navigation Center, and Project Homekey conversion of the Good Nite Inn to permanent supportive housing.</p>

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Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	Yes
Implementing a Climate Action Plan	
Other (please specify)	The City is updating its General Plan and starting its first Climate Action Plan. Both will include additional policies and strategies to minimize GHG emissions.
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	Consider adding a statement regarding item 4 and the need for the cities in the Peninsula to provide their fair share of affordable housing (for their workforce).
Jurisdiction	Salinas
1. When did your jurisdiction last update the General Plan? (Please list the year)	The last comprehensive update was in 2002. The Housing Element was last updated in 2015. An Economic Development Element was adopted in 2017. The city is currently undertaking a comprehensive General Plan Update.

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2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	Environmental justice/social equity will be included in the General Plan update.
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	Most likely through an EJ Element, but still to be determined.
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Salinas continues to grow in population and has a larger youth population than the overall County. Over 75% of Salinas residents are of Hispanic origin.
4b. Do any demographic groups experience disproportionate housing needs?	Salinas has a lower proportion of moderate/above moderate income households than the County. Many of its residents are farmworkers or in other industries with wages insufficient to afford current housing prices.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Somewhat/Occasionally
Occupancy restrictions	Not at All
Residential real estate steerings	Somewhat/Occasionally
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Somewhat/Occasionally
Municipal or State services and amenities	Not at All
Foreclosure Patterns	N/A or Unknown
Other (please specify)	Cost of living and low wages drive residents to a particular area of the City. East Salinas is the most populated area of the City and "most affordable".
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Very Much/Often
Patterns of community opposition	Very Much/Often
Support or opposition from public officials	Not at All
Discrimination in the housing market	Somewhat/Occasionally
Lack of fair housing education	Somewhat/Occasionally
Lack of resources for fair housing agencies and organizations	Very Much/Often
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	

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Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes
Door-to-door interaction	Yes
Increased mobile phone app engagement	Yes
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	Affirmative Fair Housing Plan from HUD - <a href="https://www.cityofsalinas.org/sites/default/files/departments_files/community_development_files/housing_division_files/final_monterey_county_ai_-_report_0_0.pdf">https://www.cityofsalinas.org/sites/default/files/departments_files/community_development_files/housing_division_files/final_monterey_county_ai_-_report_0_0.pdf</a>
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	Recent community planning documents have included anti-displacement goals, especially the Alisal Vibrancy Plan. Following AVP adoption in late 2019 the city formed a housing policy technical advisory committee to discuss programs and strategies to protect tenants and minimize/mitigate displacement.

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/6/21
Jurisdiction	Sand City
Name	Charles F Pooler
Email	chuck@sandcityca.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	The City historically had a job/housing imbalance as the City had been the industrial hub for the Monterey Peninsula for many decades. However, this has slowly changed over the past 20 years as mixed-use zoning was implemented in the early 2000s and as the market demand and economic benefit of residential development has replaced the economic benefit of commercial storage yards. Development of the multi-family/mixed-use project known as "The Independent" provided high density residential on a once industrial site, which exemplifies the movement to address the job-housing imbalance for the City. In 2018, the City approved entitlements for the South of Tioga (a.k.a. "The West End") development project, which includes a maximum of 356 residential dwelling units, of which 52 will be affordable units (level of afford ability TBD). The project site was cleared of most the old blighted commercial structures in early 2021, and is awaiting final clearance from CSFWS prior to moving forward. This will substantially increase both market rate and affordable housing unit inventory in Sand City.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	

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<p>If you checked any of the constraints above, please describe the constraint(s): A. Regional sewer and local water capacity are available to accommodate increased residential density within the City; however, upgrades may be needed upon certain local sewer infrastructure address increased sewer flow impacts and extensions of local sewer and water infrastructure throughout vacant areas. B. Most of the urban landscape in Sand City would be considered “urban in-fill”, where the City’s zoning allows mixed use that includes housing; however, development is dependent upon market conditions and available investment funds. Other lands available within the coastal zone are problematic due to resistance/opposition to development on coastal lands by the general public and various governmental agencies (i.e. U.S. Fish &amp; Wildlife, California Fish &amp; Wildlife, California Coastal Commission). The “East Dunes” area of the City, east of Highway 1/Southeast of Tioga Avenue, is currently vacant land with a High Density Residential zoning intended for future residential development, but this area continues to be constrained by environmentally sensitive habitat crossing over multiple parcels and ownerships. Without proper habitat mitigation, development of that area continues to be inhibited. C. More than 60-acres west of Highway 1 will remain as open space. There are also two officially designated habitat preserves east of Highway 1 adjacent to the City’s two regional shopping centers that cannot be developed or used. The new South of Tioga development project will also provide a 0.9-acre habitat preserve as mitigation for impacting environmentally sensitive lands as mandated by that project’s incidental take permit issued by CSFWS.</p>	
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>N/A</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>The cost of developing new housing in Sand City is impacted by three primary factors. First, the cost of land on the Peninsula is high; even during the 2008 economic downfall, land values took less hit on the Peninsula than in other areas. Second, the cost to demolish old structures in making way for new development adds expense atop high land values as compared to the costs of developing vacant land elsewhere. Third, the impact and cost of habitat mitigation adds to the overall expense of developing the City’s vacant lands. Both issues increase the overall costs to developers, making it less economically enticing to develop when vacant land elsewhere, with lower land values and no habitat issues, exist.</p>
<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>No</p>

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8b. Where do you think additional farmworker housing is most needed?	In close proximity to agricultural lands/fields to minimize traffic and commuter impacts and reduce GHG emissions. Preferably on the actual agricultural farmland.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	What jurisdiction isn't impacted by homelessness. Encampments are everywhere! Sand City tends to attract homeless individuals due to the Salvation Army Good Samaritan Center located in Sand City that provides assistance to those individuals. Sand City's older housing inventory provides low income housing opportunities, but the demand far outpaces the supply (which is everywhere). Sand City amended its Zoning Ordinance years back to allow homeless shelters capable of meeting the City's fair share of housing for homeless individuals as determined by the City's Housing Element. Housing Element Programs 4.4.1.E and 4.4.1.F. The Public Facilities (PF) zoning district is the zoning district in which homeless shelters will be allowed without discretionary action, but subject to standard design permit approval. There are approximately 7 acres of PF zoned land within Sand City.
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	
Investment in pedestrian, bicycle, and active transportation infrastructure	
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes

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Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	The City is currently working on a Sustainable Transportation Plan through a Cal-Trans grant. This plan is identifying and recommending solution to pedestrian, bicycle, and ADA deficiencies to, from, and within Sand City. Also..."Land Use Changes to Allow Greater Density Near Transit" (see above). The City amended its mixed use zoning to allow for greater residential density in exponential proportion to accumulated smaller parcels into a single larger parcel. The mixed use zoning districts of Sand City are within walking distance (less than 1/2 mile) of the MST bus transit center on Playa Avenue and other bus stops in Seaside along Del Monte Blvd and the TAMC owned railroad right-of-way that will someday facilitate rail or other commuter transit. The City is also working on a Parking Plan to, among other issues, evaluate current parking standards and recommend changes that would promote land uses and development encouraged by General Plan.
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	Regional rent control that equally applies restrictions on excessive (market driven, not cost driven) rent increases.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	Sand City is land and water locked between neighboring jurisdictions and the Monterey Bay. Except for land impacted by environmentally sensitive habitats, the City is essentially built out and can only redevelop that land already with development. The City's mixed-use zoning [SCMC 18.13.060(H)(1).] allows for exponentially greater residential density allowance in relation to the amount of merged land into a single development site, which can exceed the residential density allowed under the City's High Density Residential zoning.
Jurisdiction	Sand City
1. When did you jurisdiction last update the General Plan? (Please list the year)	2002
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	

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Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Influx of more wealthy individuals/households into the newly developed housing; some of which are ending up as short-term vacation rentals and not owner occupied or long-term rentals. There has been an ongoing waiting list for the 10 affordable housing units at 'The Independent' mixed-use multi-family development as those units are 100% occupied. Lower incomes tend to occupy the older, in need of maintenance, housing structures that are low density residential.
4b. Do any demographic groups experience disproportionate housing needs?	No
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Not at All
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	N/A or Unknown
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	N/A or Unknown
Municipal or State services and amenities	Not at All
Foreclosure Patterns	Not at All
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	N/A or Unknown
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	Not at All
Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	N/A or Unknown
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	
Partnership with schools	
Partnership with health institutions	
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	No known historical issues of segregation or barriers; beyond the typical economic limitations generally attributed to specific demographic groups.

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<p>9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</p>	<p>In the early 2000s, the City re-zoned a substantial segment of the City from "Manufacturing" and "Heavy Commercial" to "Mixed Use" that allows the integration of commercial and residential land uses. Promotes "live-work" opportunities through renovation of existing commercial buildings or development of new mixed-use and/or residential properties/units.</p>
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Date Submitted	8/17/21
Jurisdiction	Santa Cruz
Name	Matt VanHua
Email	mvanhua@cityofsantacruz.com
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low- wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	<p>Santa Cruz is a regional destination for its beaches, open space, a theme park, and proximity to many other world-class natural resources. Many of the city's low-wage jobs are seasonal with lower staffing levels in the fall, winter, and spring, such as the theme park, hotel, restaurant, and retail staff. It is likely that many seasonal low-wage earners live outside of the city and work elsewhere three seasons out of the year but commute into the city in the summer months for this work. The 2021 City of Santa Cruz Economic Development Strategy report states: "High housing costs are a top concern for workforce attraction and retention. As housing costs and rents increase, Santa Cruz businesses are having difficulty recruiting and retaining workers at all skill levels and occupations. This is particularly challenging for industries that employ large numbers of workers in lower-wage occupations, such as tourist-driven service industries (hotels, restaurants, and retail)." The city is also directly adjacent to other urbanized areas of the County, so there is a close commute shed where many people have a workplace in the city but live just outside of the city limits. Of the 28,097 jobs in the city, 20,670 (74%) of those working in the city lived elsewhere (Census Bureau 2017). Likewise, the city is part of a larger commute shed given its connectedness to the Bay Area and Silicon Valley. Of the number of working Santa Cruz residents (22,528), 15,101 (67%) work elsewhere and 16% of that number (3,717) work in Santa Clara County (Census Bureau 2017). There are also more people living in Santa Cruz and commuting up Highway 17 to Silicon Valley than those living in Silicon Valley and commuting to Santa Cruz. This places a unique strain on the city's housing demand and affordability. While Santa Cruz has a high jobs to employed resident ratio, some of those jobs are seasonal (as noted above), and housing prices are such that many people who live in Santa Cruz must commute to Silicon Valley to afford their housing. More high-paying jobs are needed in Santa Cruz in order to reduce the need for commuting to Silicon Valley. This has many potential benefits, including but not limited to reduction of vehicle miles traveled, improved health outcomes (with less commute time and potential for walking/biking to work), and improved social outcomes (increased time for volunteering, arts/culture, etc.).</p>
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes

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<p>b. 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.)</p>	<p>Yes</p>
<p>c. 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.</p>	<p>Yes</p>
<p>d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.</p>	
<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>a. New development is extremely water-efficient. Sometimes new, higher density residential projects have equal or less water demand than the lower density projects they are replacing, so increased development sometimes means no change in overall water demand. Water supply for the city changes year to year. In wet years, the City’s water supply is sufficient to keep up with existing and projected demand. In multiple dry years, the City runs into water challenges regardless of new development or not. Water is not a constraint to development. Rather, future infrastructure solutions are needed, especially in updating the storage of water. The City’s Water Department continues to work towards this goal and Planning is closely coordinating new development efforts with them. The City is prepared to allow new development and infrastructure as planned in the General Plan, and the City will continue to work towards solutions for water supply to serve existing and future development.</p> <p>b. The City of Santa Cruz has many reuse, infill, and redevelopment policies, since the City is now relatively built out. Plans are also underway to expand the Downtown Plan boundary south and increase the intensity of the South of Laurel Street area to allow for additional housing opportunities. The vast majority of housing opportunities within the City involve redevelopment and intensification of existing, developed sites.</p> <p>c. The City has an urban growth boundary to protect open space, parkland, environmental habitats, and natural resources. These open spaces areas, as well as various open space areas within the City, are home to a wide range of federally protected flora and fauna that limit development opportunities. Development is also limited in other areas that are not designated as parks or open space by the presence of riparian resources or other protected species. Furthermore, for areas closer to the coast, the California Coastal Commission retains oversight, and in some instances even jurisdictional approval authority, for the approval of new</p>

	development, which can limit development potential.
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<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>N/A</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>Since the beginning of this current RHNA cycle in 2015, there has been loss of units contained in assisted housing developments. They include: Affordability use restrictions: 36 units @ 80% AMI 84 units @ 50% AMI ADUs through Mortgage Prepayment: 2 units</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Santa Cruz is closely connected to Silicon Valley by way of Highway 17. This connection has likely contributed to higher housing costs in Santa Cruz due to extended market demand from high earners. Temporary (and possibly permanent) increases in teleworking brought on by the COVID-19 pandemic have also placed increased pressure on housing markets like Santa Cruz, which have access to world class outdoor recreation activities. Additionally, over 1,000 houses close to the city were lost in the 2020 Santa Cruz Mountain CZU fires. While the additional housing demand created by this catastrophe might be softened as units are replaced in fire-ravaged areas, there is still likely higher housing demand and high cost burden in the city due to this large displacement of people near the city. It is difficult to determine what exactly the impact of teleworking and the fire displacement have had on rental and for-sale housing, but data has shown that a 1- bedroom monthly rent in Santa Cruz has increased about 11% in the past year and that the average home in Santa Cruz has increased in value by 28.5% in the past year (Sources: Zumper and Zillow). Based on data from the National Low Income Housing Coalition for Fiscal Year 2021, Santa Cruz County has the highest cost burden for a two bedroom rental in California and third highest in the whole country. It is also worth considering that the city's substantial student population may also affect cost burden. It cannot be determined the number of students that receive additional financial support by family, and that may change the practical implications of some cost burden data.</p>

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<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>The city has significant student and young adult populations that often favor shared housing. This is often for financial reasons but also social reasons too.</p>
<p>Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>No</p>
<p>8b. Where do you think additional farmworker housing is most needed?</p>	<p>There is minimal farmland in the city. Substantially higher farmworker housing demand is located in larger agricultural hubs like areas in and around Watsonville and Salinas. There may also be a greater need for farmworker housing in unincorporated areas of the counties where grape growing and wine production is present.</p>
<p>Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:</p>	<p>The University of California Santa Cruz (UCSC) abuts the City of Santa Cruz and as such, the University’s approximately 19,000 students play a significant role in the housing market in Santa Cruz. As of 2020, UCSC provided 9,401 beds for students to live on campus so more than half of its students (nearly 10,000) live off-campus and a high portion of that would live in the City of Santa Cruz. Students are likely to skew some of the income data as many are supported by parents to some degree. This could lead to the potential for some areas to be mapped more lower-income than they might otherwise be if parental support was taken into account.</p> <p>UCSC has drafted a 2021 Long Range Development Plan (LRDP) that proposes adding 8,500 students beyond the 19,500 planned for in the 2005 LRDP. An additional 2,200 full-time equivalent (FTE) faculty and staff are anticipated as well. UCSC has a goal to house all of the additional students on campus while only providing on- campus housing for 25 percent of the additional faculty and staff (550 FTE). This will increase housing demand in the City of Santa Cruz but it is unknown by how much and when because this build-out will happen gradually over the next ten to twenty years.</p> <p>Based on the competitive rental market driven by increased teleworking, it is not known how students will be impacted coming back to the area for the 2021-2022 school year. Some students may have left the city for the year due to the pandemic shutdowns and the shift to remote instruction. Rental housing may now be in shorter supply than usual because increased numbers of non-student teleworkers, as well as those who lost homes due to the recent fires, may have filled rental vacancies over the past year while students were away.</p>

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<p>Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:</p>	<p>The City is disproportionately impacted by homelessness. Approximately 24% of the County’s population resides in the City of Santa Cruz, whereas approximately 55% of the County’s homeless population resides in the City, both according to the latest 2019 Point in Time Count. The City has one of the highest per-capita homeless ratios in the state. Many factors contribute to this situation, not the least of which is that, as the County seat, the County’s jails, the County’s courts, and many of the County’s services, like their health services, are located in the City limits. Similar to our homeless population, the City bears a disproportionate share of the number of the County’s homeless shelter beds and affordable housing units. Despite limited areas to grow, the City has continued to approve and facilitate the development of hundreds of newly authorized affordable and permanent supportive housing units, including in a number of City-sponsored projects.</p> <p>Pursuant to a new ordinance, the City is also establishing a minimum of 150 nighttime- only safe sleeping beds for the unsheltered in our community, and the City is exploring further expansions of the safe parking programs and allowances in the City.</p> <p>The County recently prepared a Homelessness Strategic Plan that acknowledges the need for more homelessness resources, including temporary shelters and permanent supportive housing. The City Council accepted and endorsed that plan. Given the disproportionate impacts already experienced by the City and given the disproportionate level of housing and services provided in the City, the greater area/region needs to increase their investments in addressing this perpetually challenging issue by providing more housing and support services for the homeless in areas outside the City limits.</p>
<p>Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.</p>	<p>No</p>
<p>Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)</p>	

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None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	Yes
Implementing a Climate Action Plan	Yes
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	Santa Cruz
1. When did you jurisdiction last update the General Plan? (Please list the year)	2012
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	Yes
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	This language is not directly in the General Plan but SB 1000 states that an environmental justice/social equity chapter or integration throughout the General Plan be adopted as part of the next revision of two or more elements concurrently on or after January 1, 2018. The City adopted General Plan 2030 in 2012 and the City will undertake the adoption of this new chapter as part of the next

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	General Plan update. The City does have a Health in All Policies (HiAP) ordinance requiring, among other things, that all staff reports on planning projects going before City Council have a section stating how the given project meets the social equity and sustainability goals of HiAP. Recent long range planning efforts involving the environment and development (the Climate Action Plan, the Local Hazard Mitigation Plan, Resilient Coast planning, and Objective Development Standards) include these goals as well as directed outreach to disadvantaged or historically under-represented communities to better address environmental justice and social equity in this work.
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Per Department of Finance data, the city's population increased 7% from 2010 to 2015 (59,946 to 64,223) but leveled from 2015 to 2020 (64,424). Mild population growth is projected due to an aging population, low number of people per household, and a high cost of living. The vacancy rate decreased over those ten years from 7.1% to 5.6% but this number is likely to effectively be even lower given the number of vacation homes in the city that can be counted as vacant but are not seeking tenants. HUD data from 2019 shows a 1.9% vacancy rate and the current American Community Survey estimates a rental vacancy rate of 2% and a homeowner vacancy rate of 0.4%.
4b. Do any demographic groups experience disproportionate housing needs?	There is high number of students and young adults in the city due to the presence of the University of California Santa Cruz. This population is more interested in co-housing and congregate living both from a social and economic perspective.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Very Much/Often
Occupancy restrictions	Somewhat/Occasionally
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	N/A or Unknown
Municipal or State services and amenities	Somewhat/Occasionally
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights	Not at All
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	Not at All
Discrimination in the housing market	N/A or Unknown
Lack of fair housing education	N/A or Unknown
Lack of resources for fair housing agencies and organizations	Somewhat/Occasionally
Other (please specify)	

Regional Housing Needs Allocation Plan: 2023 - 2031

7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	
Variety of venues to hold community meetings	Yes
Door-to-door interaction	
Increased mobile phone app engagement	Yes
Social media or other online engagement	Yes
Other (please specify)	The city has increased use of written and spoken Spanish translation and is reaching out to latinx and black community leaders earlier in planning processes for more direct outreach and to understand the best way to work with underrepresented communities for a given project.
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	<p>The City of Santa Cruz has produced numerous plans and ordinances seeking to provide more dwelling units of all types and at all affordability levels. The City supports the construction of ADUs and SROs to create more naturally affordable and deed-restricted affordable housing. The City has a 20% inclusionary requirement so all market rate projects include a significant number of affordable units. The inclusionary ordinance requires affordable units for low income households while SRO development requires affordable units for very low income households. The City also passed supportive housing policies to allow specified projects over 50 units to be deemed uses by right, exceeding the State supportive housing development requirement, pursuant to AB 2162. The 2030 General Plan proposes to intensify transportation corridors throughout the city.</p> <p>Downtown land uses were also intensified in 2017, which spurred a number of market rate and affordable residential projects. These intensifications better connect land use to transportation and provide better access to resources. Additionally, higher density housing (which is relatively more affordable) is not proposed in low-income areas of the city such as Beach Flats.</p>

Regional Housing Needs Allocation Plan: 2023 - 2031

<p>9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</p>	<p>Nearly all new development in the city is infill development. At the area planning and citywide scale, special care is taken at the beginning of projects to determine potential displacement impacts to help inform later decisions. This is a key part of the existing conditions analysis in any planning process to help minimize any potential displacement that might occur and work with the community to find ways to mitigate any possible impacts. Focusing growth outside of Beach Flats and other low-income areas is an important goal of these planning processes as well, so as to minimize displacement of low- income households. When infill development is replacing existing housing, the City has its own residential replacement and relocation benefit requirements in addition to following the State’s SB330 requirements. These relocation benefits include one to three months of rent depending on the type of displacement. The City of Santa Cruz has a large rent increase ordinance to minimize large rent increases. For instance, if a landlord increases rent beyond the City’s limit and the tenant is forced to move out due to the increase, the tenant is owed two months of rent in relocation compensation. While the State’s SB 330 legislation protects displacement related to the construction of new housing, the City also has replacement and relocation protections for when housing is displaced by any type of development.</p>
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Date Submitted 8/12/21

Regional Housing Needs Allocation Plan: 2023 - 2031

Jurisdiction	Santa Cruz County
Name	Anais Schenk
Email	anais.schenk@santacruzcounty.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	Yes

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<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>a) The County has a partial moratorium limiting new development in the Rodeo Gulch Basin to 4 sanitary sewer connections per vacant lot or 1,000 gallons discharge per day for commercial projects due to inadequate sanitation facilities. The availability of water has also been a limitation with overdrafted aquifers. County urbanized areas are served by Soquel Creek Water District and the City of Santa Cruz Water Department. The latter has not yet adopted an Urban Water Management Plan so it is unknown how adequate water supplies for the Live Oak portion of our County will be met.</p> <p>c) Federal and state laws protecting individual species, plants and animals constrain development in some of our urban areas. Biotic impacts are common in CEQA documents. For example, the westernmost part of the urban area, Aptos/Seascape has strict requirements for protection of the Santa Cruz Long Toed Salamander including restrictions on lot coverage. Additionally, there are large portions of the unincorporated County that are conservation lands, state parks, land trust preserves, or are protected farmland under the Williamson Act. d) The County General Plan contains a section on Agricultural Lands that includes comprehensive policies designed to protect our natural resources and prime agricultural land. Zoning designations and County Code also preserve County agricultural lands from development.</p>
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>N/A</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>

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Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	Yes
8b. Where do you think additional farmworker housing is most needed?	The County recently adopted an amendment to the county code to allow for agricultural employee housing as an agricultural use on land zoned for agriculture. The County Code identifies an area in the Pajaro Valley as a development reserve to allow for up to 200 units within that area.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	Housing and services for people who are homeless are coordinated through the HUD mandated continuum of care process, locally called the Housing Action Partnership (HAP). The County's affordable housing programs assist are described in the Housing Element. The County is attempting to address long term housing need through various policy levers such as the zoning amendments that allow for low-income housing on public facility land and for farmworker housing on agricultural lands, as well as well as amendments to the County's regulations regarding Accessory Dwelling Units. The County is also responsible for a number of social services that provide health and temporary housing.
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	The CZU Fire left a large area of the unincorporated County devastated and there was significant loss of structures and dwelling units. Based on best estimates, approximately 900 dwelling units were lost; it is estimated that approximately 730 units lost were legally permitted on lands that are suitable for development and will be rebuilt. Approximately 30 permits have been issued to date.
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	

Regional Housing Needs Allocation Plan: 2023 - 2031

Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	
Land use changes to allow greater density near transit,	
Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	Yes
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	The County has strict growth boundaries and limits its infill development to lands within the urban and rural services lines. A large portion of unincorporated lands are designated as State Responsibility Areas, and Wildland-Urban Interface (WUI) ordinances and upcoming new regulations from the Board of Forestry will continue to limit development potential in rural County areas, particularly in the Santa Cruz Mountains. We are concerned that some of the HCD mapping factors includes high fire hazard areas where the state will not support development and that conflicts with the county's policies for infill development and resource conservation.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	As stated above we are concerned that the HCD AFFH maps for high resource areas in the County include high fire hazard areas where development will be and already is restricted by the state and are also areas that include lands held as state parks, land trusts and resource conservation areas. While infill development is addressed in bullet 1 the concerns around developing in high fire hazard areas has not been addressed.
Jurisdiction	Santa Cruz County
1. When did you jurisdiction last update the General Plan? (Please list the year)	Amendments were made 2020, however we have not updated two or more elements since SB 1000 went into effect
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	We are in process of updating our General Plan and will be incorporating environmental justice policies throughout the document to meet the requirements of SB 1000.
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	

Regional Housing Needs Allocation Plan: 2023 - 2031

Throughout the General Plan in each chapter	Yes
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Trends and patterns have demonstrated slow growth in both population and employment.
4b. Do any demographic groups experience disproportionate housing needs?	Workers in lower-income sectors, such as retail, service, teachers, and farmworkers, are experiencing housing supply issues. The County is attempting to address this through various policy levers such as the aforementioned zoning amendments that allow for low-income housing on public facility land and for farmworker housing on agricultural lands, as well as well as amendments to the County's regulations regarding Accessory Dwelling Units.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	N/A or Unknown
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Very Much/Often
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Very Much/Often
Municipal or State services and amenities	Somewhat/Occasionally
Foreclosure Patterns	Somewhat/Occasionally
Other (please specify)	Cost of construction
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Very Much/Often
Support or opposition from public officials	Very Much/Often
Discrimination in the housing market	Very Much/Often
Lack of fair housing education	Somewhat/Occasionally
Lack of resources for fair housing agencies and organizations	Very Much/Often
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	The County has used the outreach strategies noted above, translation services, housing support and funding programs, as well as dedication of public funds to housing projects.

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<p>9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</p>	<p>To address these concerns, the County funds various security deposit, eviction prevention, and rental assistance programs for lower-income households, and administers the County's Continuum of Care which offers similar programs. In addition, for many years the County has implemented local codes (e.g., SCCC 12.06, 8.45, and 17.12) and state law (the Mello Act, density bonus law) to minimize displacement due to demolition, code violations, and/or redevelopment. These policies require replacement housing units and/or relocation assistance with right of first refusal for affected tenants. In addition, prior to 2011, when the County had a redevelopment agency, it funded various projects and programs to stabilize lower-income tenants in mobile home parks and rental properties. The County also has a mobile home rent stabilization program (SCCC Chapter 13.32) and an inclusionary zoning (SCCC 17.10) which has created many affordable rental and/or ownership units since 1979, to provide affordable housing options for lower-income households.</p>
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Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/16/21
Jurisdiction	Scotts Valley
Name	Taylor Bateman
Email	tbateman@scottsvalley.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Scotts Valley has experienced a significant loss of employment opportunities. Seagate Technology closed its Scotts Valley operations in 2016. Other major employers, including Fox Shox and Vista Outdoors have relocated corporate headquarters from Scotts Valley.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	Yes
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	

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<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>a. Water is only sourced from a limited aquifer and service is provided by a special district that is not under City jurisdiction.  b. The City provides a residential overlay and planned district rezoning process that provides for alternative zoning to accommodate urban infill development and residential uses.  c. Approximately one quarter of the City is located in the Sandhills region which is the habitat for the federally listed endangered Mount Hermon June Beetle and the Zayante Band Winged Grasshopper. A majority of Scotts Valley is within areas of moderate sensitivity for historic and prehistoric cultural resources, with pockets of high sensitivity, due to the regions woodland mountain alluvial setting.  d. N/A</p>
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>a. Water is only sourced from a limited aquifer and service is provided by a special district that is not under City jurisdiction. b. The City provides a residential overlay and planned district rezoning process that provides for alternative zoning to accommodate urban infill development and residential uses.  c. Approximately one quarter of the City is located in the Sandhills region which is the habitat for the federally listed endangered Mount Hermon June Beetle and the Zayante Band Winged Grasshopper. A majority of Scotts Valley is within areas of moderate sensitivity for historic and prehistoric cultural resources, with pockets of high sensitivity, due to the regions woodland mountain alluvial setting.  d. N/A</p>
<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>No</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>Regionally consistent data is sufficient</p>
<p>Factor 8: The housing needs of farmworkers. 8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>No</p>

Regional Housing Needs Allocation Plan: 2023 - 2031

8b. Where do you think additional farmworker housing is most needed?	N/A
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	No
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	No
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	City has adopted Green Building Code, recently completed an Active Transportation Plan in conjunction with Ecology Action and Bike Santa Cruz County; and approved a number of Planned District Rezoning to accommodate mixed use developments.

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Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	
Jurisdiction	Scotts Valley
1. When did you jurisdiction last update the General Plan? (Please list the year)	Update of 1994 General Plan is nearing completion.
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	Yes
An environmental justice chapter	
Throughout the General Plan in each chapter	
Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Population relatively stable over past ten-year period with approximately 1.5% growth. 86% white, 10% Hispanic. 18% of population over 65.
4b. Do any demographic groups experience disproportionate housing needs?	No
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Not at All
Occupancy restrictions	Not at All
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Not at All
Economic pressures, such as increased rents or land and development costs	Not at All
Major private investments	Not at All
Municipal or State services and amenities	Not at All
Foreclosure Patterns	Not at All
Other (please specify)	

Regional Housing Needs Allocation Plan: 2023 - 2031

6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Not at All
Support or opposition from public officials	Not at All
Discrimination in the housing market	Not at All
Lack of fair housing education	Not at All
Lack of resources for fair housing agencies and organizations	Not at All
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	City has approved a variety of housing types including multi-family apartments, mixed-use, single-family, and accessory dwelling units.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	City has an inclusionary housing ordinance and operates and maintains affordable housing program.

Regional Housing Needs Allocation Plan: 2023 - 2031

Date Submitted	8/12/21
Jurisdiction	Seaside
Name	Ben Nurse
Email	bnurse@ci.seaside.ca.us
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Seaside has historically hosted more than its fair share of regional low-income housing; thus, the baseline is artificially high and misrepresents the goals and needs of the community.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	Yes
b. 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.)	
c. 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.	
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	
If you checked any of the constraints above, please describe the constraint(s)	The availability of water is a major constraint, particularly the lack of a sustainable and adequate water supply to support proposed housing developments and allow for development of vacant land.

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Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	N/A
Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?	No
Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?	No
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	No
8b. Where do you think additional farmworker housing is most needed?	We have individuals working in the agriculture section, but no specific farmworker housing. Farmworker housing may be most needed in the northern areas of Seaside bordering Marina, in Marina, Salinas, and Castroville.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	We recommend considering dorms and university apartments in the housing counts.
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	There is a need for a regional continuation of care investment needed for temporary facilities for homeless. Seaside’s Homeless Commission has expressed interest in having ADU’s, Tiny Homes, portable showers, and portable toilets as part of the resources for the homeless.

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Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	Yes
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	Yes
Changes to parking requirements for new residential and/or commercial construction	Yes
Implementing a Climate Action Plan	Yes
Other (please specify)	The City is in the process of completing its Climate Action Plan.
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	Noted in Factor 1
Jurisdiction	Seaside
1. When did your jurisdiction last update the General Plan? (Please list the year)	2014

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2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	No
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	No
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	
An environmental justice chapter	
Throughout the General Plan in each chapter	Yes
Other (please specify)	Seaside is in the process of revising its General Plan.
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	Increased young adults (18-24) due to increased enrollment at the CSUMB. Decreased adults in the family-forming age (25-44) due to the rising housing costs and limited employment opportunities. Increased senior population (65+). Increased single households, including seniors living alone.
4b. Do any demographic groups experience disproportionate housing needs?	Low-income African-American and Latinx community members.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Very Much/Often
Occupancy restrictions	N/A or Unknown
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	Not at All
Municipal or State services and amenities	N/A or Unknown
Foreclosure Patterns	Somewhat/Occasionally
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	Very Much/Often
Discrimination in the housing market	Somewhat/Occasionally
Lack of fair housing education	Not at All
Lack of resources for fair housing agencies and organizations	Very Much/Often
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes

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Partnership with schools	Yes
Partnership with health institutions	
Variety of venues to hold community meetings	Yes
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	City of Seaside has provided downpayment assistance to increase home ownership by low-income individuals. The City requires 20% of all new housing units anywhere in the City to be affordable.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	The City has provided rental assistance to keep citizens housed; it has provided mortgage assistant grants to help homeowners avoid foreclosure.

Date Submitted	8/11/21
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Jurisdiction	Soledad
Name	Bryan Swanson
Email	bswanson@cityofsoledad.com
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low-wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Meeting the housing needs may be difficult to accomplish due to the amount of time it may take for certain projects to receive regulatory approval such as LAFCO.
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	
b. 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.)	Yes
c. 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.	Yes
d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.	Yes
If you checked any of the constraints above, please describe the constraint(s)	While the preservation of agricultural lands are important, it provides an impediment for the production of homes.
Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.	N/A

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Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?	The City and Monterey County have an existing MOU, approved in 2016 that dictates growth but such document needs to be revisited and revised.
Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?	No
Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	Regionally consistent data is sufficient
Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?	Yes
8b. Where do you think additional farmworker housing is most needed?	Farmworker housing is needed in every community within Monterey County.
Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:	Hartnell College Soledad Center is located in the community. While student housing is on the horizon due to a voter initiated measure, more housing could be used for employees of the Hartnell College Center.
Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:	No
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No

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Factor 12: Greenhouse gas emissions targets. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	
Investment in pedestrian, bicycle, and active transportation infrastructure	Yes
Investment in maintaining or improving existing public transportation infrastructure	Yes
Land use changes that encourage a diversity of housing types and/or mixed-use development	Yes
Land use changes to allow greater density near transit,	Yes
Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	The amount of time it takes for projects to meet the needs and requirements of the different agencies in Monterey County, such as, LAFCO, AG Trust etc.
Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.	As stated before, reducing some of the stringent requirements needed for housing production need to be included in the analysis of determining regional housing needs.
Jurisdiction	Soledad
1. When did you jurisdiction last update the General Plan? (Please list the year)	2005. We will be starting the update to the General Plan and Housing Element in late 2021/early 2022.
2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?	Yes
3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?	We will be selecting a new consultant to update our General Plan later this month (August 2021).
3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)	
None of the above	Yes
An environmental justice chapter	
Throughout the General Plan in each chapter	

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Other (please specify)	
4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.	The community is growing but without the adequate amount of housing needed.
4b. Do any demographic groups experience disproportionate housing needs?	Groups in the 20-40 range are having a difficult time finding housing in Soledad.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Very Much/Often
Occupancy restrictions	Not at All
Residential real estate steerings	N/A or Unknown
Patterns of community opposition	Not at All
Economic pressures, such as increased rents or land and development costs	Very Much/Often
Major private investments	N/A or Unknown
Municipal or State services and amenities	Not at All
Foreclosure Patterns	N/A or Unknown
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights laws	Not at All
Patterns of community opposition	Not at All
Support or opposition from public officials	Not at All
Discrimination in the housing market	Not at All
Lack of fair housing education	Not at All
Lack of resources for fair housing agencies and organizations	Not at All
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes
Door-to-door interaction	Yes
Increased mobile phone app engagement	Yes
Social media or other online engagement	Yes
Other (please specify)	
8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?	The City of Soledad works closely with all affordable housing non-profits, Monterey County and other regional housing partners.
9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?	The City of Soledad has provided various forms of housing over the past 10 years, such as, H2A, low income and senior housing.

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Date Submitted	8/16/21
Jurisdiction	Watsonville
Name	Suzi Merriam
Email	suzi.merriam@cityofwatsonville.org
Factor 1. Your jurisdiction's existing and projected jobs and housing relationship, particularly low- wage jobs and affordable housing. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau, California Employment Development Department, and others. Are there any jobs/housing issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?	<p>Since the 2015-2023 Housing Element was adopted, the City's 2030 General Plan has been the subject of litigation and set aside, the Atkinson Lane Specific Plan was challenged and set aside, and the Manabe-Ow Business Park (MOBP) Specific Plan has not been developed with the number of jobs anticipated in the MOBP Specific Plan or Measure U, which set the Watsonville urban limit line and future development timing. The City is concerned with the increasing imbalance of jobs and housing in the City. The 2019 American Community Survey reports that 37.7% of Watsonville residents commute 30 or more minutes to work each way, up from 32% in 2015. This is a concerning trend, indicating that affordable housing is not being constructed near jobs. In addition, the MOBP Specific Plan Area, which was anticipated to accommodate up to 2,100 jobs, is trending to be developed as warehouse/distribution space, with up to 400 potential jobs. Because of this, the City is at risk of succumbing to a further imbalance of jobs to housing. In 2016, the jobs/housing balance for the City was 1.6. In 2019, the latest year that housing data was available, the ratio decreased to 1.55. We are concerned that this trend will continue downward if we are not able to focus on the creation of quality jobs in addition to providing more housing units. Furthermore, as shown on HCD's map entitled "AFFH Analysis: Jobs Proximity Index," the City of Watsonville exhibits a relatively greater distance between jobs and housing compared with other portions of Santa Cruz County. (This map also exhibits an unexpected result that areas in the rural county land southwest and northeast of city limits are classified as having "closest proximity" (a Jobs Proximity Index &gt; 80), which may reflect a high proportion of farmworkers living within those census tracts.) Compounding this issue is the lack of opportunities in the area. As shown in the HCD maps entitled "AFFH Analysis: TCAC Opportunity Areas," the City of Watsonville and surrounding area is considered a "low resource" area and exhibits less positive economic outcomes as compared with other portions of Santa Cruz County.</p>
Factor 2. The opportunities and constraints to development of additional housing in your jurisdiction, including all of the following: Which of the following opportunities and constraints to development of additional housing are relevant for your jurisdiction? (Check all that apply.)	
None of the above	
a. The availability of sewer and water service given 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.	

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<p>b. 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.)</p>	
<p>c. 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.</p>	<p>Yes</p>
<p>d. County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.</p>	<p>Yes</p>
<p>If you checked any of the constraints above, please describe the constraint(s)</p>	<p>The City is constrained by two main legislative acts: Santa Cruz County Measure J and City of Watsonville Measure U. Measure J, adopted by voters in 1978, serves to protect prime agricultural land within the unincorporated county, adjacent to the limits of the City of Watsonville, focusing development toward urban centers. There are no urban centers between Watsonville and Aptos, the nearest unincorporated town. Measure U, adopted by Watsonville voters in 2002, set the 25-year urban limit line for the City. This Measure, parts of which are set to expire in 2022, identifies specific areas in which the City can pursue annexation. There is a group working to extend Measure U through another voter initiative in 2022. The largest annexation area identified in Measure U, Buena Vista, anticipated up to 2,250 housing units, is located directly west of the Watsonville Municipal Airport, and due to airport land use restrictions, cannot be developed as originally intended. This leaves the Atkinson Lane Specific Plan area as the only expansion area left to the City for housing, with up to 400 units. All other development must be accommodated within City boundaries.</p>
<p>Factor 3: 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. The MTP/SCS land use pattern will form the basis for the total RHNA calculation. The land use pattern is developed in tandem with a series of transportation investments in an effort to ensure past and future transportation investments are maximized. Since the MTP/SCS considers this factor, additional jurisdiction input is not necessary.</p>	<p>N/A</p>

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<p>Factor 4: Agreements between a county and cities in a county to direct growth toward incorporated areas of the county. Does your jurisdiction have any agreements in place?</p>	<p>As stated in Factor 2, Measure J and Measure U both serve to direct growth to the existing city limits and within agreed-upon annexation areas outside the City.</p>
<p>Factor 5: 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. Does your jurisdiction have any unit loss that needs to be considered?</p>	<p>No</p>
<p>Factor 6: High-housing costs burdens. The percentages of existing households at each of the income levels listed in subdivision (f) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any housing cost issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>The City recently estimated the number of cost-burdened households as part of the new Environmental Justice Element currently under development. A database of Fair Market Rent estimates prepared by the U.S. Department of Housing and Urban Development (HUD) was used for the Santa Cruz-Watsonville Metropolitan Statistical Area. Table 1 lists the fair market estimates for this area in 2018. TABLE 1. Fair Market Rent Estimates, Santa Cruz/Watsonville Rental Type Fair Market Rent Estimate (2018) % Median Household Income (2018) 0 bedrooms (studio) \$1,253 34.8% 1 bedroom \$1,477 40.9% 2 bedrooms \$1,965 54.2% 3 bedrooms \$2,615 72.0% 4 bedrooms \$2,961 82.24% Source: HUD 2018. HUD defines moderate cost-burdened households as those “spending more than 30 percent of their income for housing” and severe cost-burdened households as those “spending more than 50 percent of their income on housing” (HUD 2017). Households that have an income of \$4,500 per month (\$54,000 per year) in Watsonville would be paying over 30 percent of their income on rent for an efficiency apartment and over 50 percent of their income on a two-bedroom home. The average household income in the City is \$86,304 (City of Watsonville 2020). As shown on Figure 1, nearly 25 percent of households have incomes over \$100,000, while approximately 41 percent of households have incomes of \$50,000 or less. The average per capita income from 2014 to 2018 was \$19,930 (in 2018 dollars), corresponding to a poverty rate of approximately 16 percent. The high housing costs result in a relatively high percentage of household incomes going to rent and mortgage payments, indicating that the average household is moderately or severely cost-burdened. FIGURE 1. Average Household Income Distribution Source: City of Watsonville 2020. The new AFFH Data Viewer released by HCD provides a range of data to assist in the assessment of fair housing, including data on income and overpayment by renters and homeowners. As shown in the attached map entitled “AFFH Analysis: Low to Moderate Income Population,” a larger proportion of low to moderate income households live in Watsonville as compared to other parts of Santa Cruz County. In addition, the attached maps showing overpayment by renters and homeowners indicate that a greater proportion of households in Watsonville are cost-burdened compared to other jurisdictions. References: City of Watsonville. 2020. “Demographics.” Economic Development Department. Data from Applied Geographic Solutions.</p>

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	<p>Accessed July 2021.  <a href="https://www.cityofwatsonville.org/1441/Demographics">https://www.cityofwatsonville.org/1441/Demographics</a>.</p>
<p>Factor 7: The Rate of Overcrowding. AMBAG/SBtCOG will compile data for all jurisdictions from sources including the U.S. Census Bureau. Are there any overcrowding issues that AMBAG/SBtCOG should consider for your jurisdiction in addition to that data?</p>	<p>The new AFFH Data Viewer released by HCD also provides the ability to map overcrowded households. As shown in the attached map entitled "AFFH Analysis: Overcrowded Households," the vast majority of census tracts exhibiting overcrowding above the statewide average of 8.2 percent are concentrated in and near the City of Watsonville.</p>
<p>Factor 8: The housing needs of farmworkers.8a. Is there existing farmworker housing in your jurisdiction?</p>	<p>Yes</p>
<p>8b. Where do you think additional farmworker housing is most needed?</p>	<p>Farmworker housing should be located both within City limits and on farms when farm owners wish to provide permanent or temporary housing for farmworkers.</p>
<p>Factor 9: 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. Do you have a college or university in your jurisdiction that needs to be considered? If yes, please describe housing need/plans:</p>	<p>Cabrillo College south-county campus is located in downtown Watsonville, however most students are from the local area. It is our understanding that Cabrillo has a need for both student and teacher housing.</p>
<p>Factor 10: The housing needs of individuals and families experiencing homelessness. Does your jurisdiction have housing needs for those experiencing homelessness? If yes, please describe housing need/plans:</p>	<p>The City has several transitional housing and housing of last resort units including the Salvation Army, Teen Challenge of Monterey Bay, the Stag Hotel, Wall Street Inn, Plaza Hotel, and Resetar Hotel, all located in the downtown area. In addition, the City participates in the Countywide</p>

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	homeless action partnership
Factor 11: 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. Does your jurisdiction have any unit loss that needs to be considered? If yes, please provide the number of units that have yet to be rebuilt/replaced.	No
Factor 12: Greenhouse gas emissions targets. The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? Are AB32 standards implemented? The location and type of housing can play a key role in meeting State and regional targets to reduce greenhouse gas (GHG) emissions. What land use policies or strategies has your jurisdiction implemented to minimize GHG emissions? (Check all that apply.)	
None of the above	
Energy efficiency standards in new construction or retrofits	
Investment in pedestrian, bicycle, and active transportation infrastructure	
Investment in maintaining or improving existing public transportation infrastructure	
Land use changes that encourage a diversity of housing types and/or mixed-use development	
Land use changes to allow greater density near transit,	
Incentives or policies to encourage housing development on vacant or underutilized land near transit	
Changes to parking requirements for new residential and/or commercial construction	
Implementing a Climate Action Plan	
Other (please specify)	The City is developing a Downtown Watsonville Specific plan to address many of the items listed above. The purpose of the plan is to improve the walkability and safety of the downtown, provide higher residential density with a variety of housing types including mixed use, located near the bus depot and rail trail, reduce parking requirements and invest in public parking lots. The Plan should be complete by Spring 2022.
Factor 13: Other factors adopted by AMBAG/SBtCOG that further or at minimum do not conflict with statutory objectives. Are there any additional factors that you would recommend considering? Use the space below to describe. (If no suggestions, you may leave this space blank.)	

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<p>Please provide any additional feedback (issues not already covered in the 12 factors above) that AMBAG/SBtCOG should consider for your jurisdiction pursuant to the five RHNA objectives defined in Government Code Section 65584(a). Please provide as much detail as possible.</p>	
<p>Jurisdiction</p>	<p>Watsonville</p>
<p>1. When did you jurisdiction last update the General Plan? (Please list the year)</p>	<p>The City is using the 2005 General Plan, which was adopted by City Council in 1994. In 2003, the City began a comprehensive general plan update, known as the 2030 General Plan. This Plan was first adopted by the City in 2006. The General Plan was subject to legal challenge, which resulted in modifications required. The General Plan was subsequently rescinded, modified, and readopted in 2012. The readopted General Plan and General Plan EIR were again challenged in court, with the courts finding for the appellants. The City will be working on a General Plan update in the next 1-2 years.</p>
<p>2. Does your jurisdiction have an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing due to U.S. Department of Housing and Urban Development (HUD) requirements?</p>	<p>Yes</p>
<p>3a. Does your General Plan have an environmental justice/social equity chapter or integrate environmental justice/social equity, per SB 1000?</p>	<p>2.The City is currently undertaking an Environmental Justice Element that will be added to the 2005 General Plan as a stand-alone chapter. We anticipate that the EJ Element will be completed in 2022.</p>
<p>3b. If you answered yes or in process to question 3a, how does your General Plan integrate or plan to integrate environmental justice? (Check all that apply.)</p>	
<p>None of the above</p>	
<p>An environmental justice chapter</p>	<p>Yes</p>
<p>Throughout the General Plan in each chapter</p>	
<p>Other (please specify)</p>	
<p>4a. Describe demographic trends and patterns in your jurisdiction over the past ten years.</p>	<p>The City is primarily a community of families. Small related families comprise the majority of households, with an average household size of 3.8, most of which contain at least one elderly person (age 62 or older) and one or more children 6 years old or younger. The American Community Survey reports that the number of persons 62 years and over grew from 11.1% in 2010 to 13.3% in 2019. This is a big concern as almost half of the single person households in the City consist of an elderly person, many of whom typically face special housing needs due to fixed incomes, high health care costs and physical disabilities. More than half of the total households in the City are considered low income contributing 30% or more of their income towards housing costs. The high cost of housing coupled with the lower incomes of Watsonville residents not only contributes to instability of households to obtain or maintain housing but also to overcrowding.</p>

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4b. Do any demographic groups experience disproportionate housing needs?	Because of the City geographic constraints and the policy decisions that have been made at the County and State level, the City is limited in its ability to grow, provide and/or preserve affordable housing. New housing has consisted mainly of infill projects within existing neighborhoods, none of which are affordable to extremely low income households and only a few to low-moderate income households. The City's Affordable Housing Ordinance requires that 5% of affordable units in for-sale projects be available to low income households and 10% of affordable units in rental projects be available to very low income households.
5. To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?	
Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or minimum parking requirements	Not at All
Occupancy restrictions	Not at All
Residential real estate steerings	Somewhat/Occasionally
Patterns of community opposition	Somewhat/Occasionally
Economic pressures, such as increased rents and development costs	Very Much/Often
Major private investments	Very Much/Often
Municipal or State services and amenities	Very Much/Often
Foreclosure Patterns	Very Much/Often
Other (please specify)	
6. To what extent do the following act as determinants for fair housing and compliance issues in your jurisdiction?	
Unresolved violations of fair housing or civil rights	Not at All
Patterns of community opposition	Somewhat/Occasionally
Support or opposition from public officials	Somewhat/Occasionally
Discrimination in the housing market	Somewhat/Occasionally
Lack of fair housing education	Somewhat/Occasionally
Lack of resources for fair housing agencies and organizations	Very Much/Often
Other (please specify)	
7. Which of the following are your public outreach strategies to reach disadvantaged communities? (Check all that apply.)	
None of the above	
Partnership with advocacy/non-profit organizations	Yes
Partnership with schools	Yes
Partnership with health institutions	Yes
Variety of venues to hold community meetings	Yes
Door-to-door interaction	
Increased mobile phone app engagement	
Social media or other online engagement	Yes
Other (please specify)	

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<p>8. What steps have your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?</p>	<p>The City of Watsonville has been working diligently for decades to provide quality housing for all income levels. This work includes the adoption of an affordable housing ordinance in the late, 1980's, requiring that up to 20% of new residential units constructed be deed restricted affordable, maintenance of a compliant housing element, and partnering with non-profits to build housing for farmworkers and special populations. Our Housing Division provides a variety of grant and loan programs to assist residents in purchasing and maintaining their homes. These include:</p> <ul style="list-style-type: none"> <li>•First time homebuyer loans</li> <li>•Downpayment assistance</li> <li>•Owner-occupied housing rehabilitation loans</li> <li>•Renter-occupied housing rehabilitation loans</li> <li>•Rental assistance</li> </ul> <p>The City of Watsonville has also provided a wide range of housing types for all income levels, particularly for lower income households. As shown in Table 2, while single-family homes represent the largest housing type (61%), nearly a third of all dwelling units are a form of multifamily housing (31%). Duplexes, triplexes and fourplexes, often referred to as "missing middle housing," represents over one in nine units. And a significant number of mobile homes exist throughout the community. These provide more affordable units than single-family homes, and at greater proportions than other jurisdictions in the County of Santa Cruz.</p>
<p>9. What steps have your jurisdiction undertaken to avoid, minimize, or mitigate the displacement of low income households?</p>	<p>The Urban Displacement Project is a research and action initiative of UC Berkeley. As shown in the attached map entitled "AFFH Analysis: Vulnerable to Displacement," the Urban Displacement Project's Housing Precarity Risk Model, which measures the risk of displacement and eviction across 53 metropolitan areas, the City of Watsonville was found to be a community "vulnerable" to displacement. The City has adopted mobile home park protection ordinances such as a separate mobile home park overlay zone in order to protect our existing mobile home parks from sale or conversion. The City has adopted a relocation assistance ordinance to provide temporary shelter to residents who must be removed from unsafe and/or dangerous living conditions. The city collaborates with non-profits such as CRLA, Watsonville Law center, CAB, FIT, and Community Bridges to assist residents who are at risk of displacement.</p>