

Public Comments Received on the AMBAG 6th Cycle RHNA Methodology

Number	Agency/ Organization	Last Name	First Name	Comment	Response	Comment Format	Date
1	Public	Lee	Ruckus	<p>In Consideration of 5th Cycle Results and</p> <ul style="list-style-type: none"> Historical exclusion of Extremely-Low Income (ELI) category from RHNA goals despite statutory objectives [Equal representation does not necessitate an asterisk] AMBAG 6th Cycle RHNA goals for the lowest-incomes: ratios of Very-Low Income (VLI) over "Above 120% AMI" (56%) and Low Income (LI) over "Above 120% AMI" (37%), per Agenda, p8 Available land historically prioritized for luxury/market-rate housing while "kicking can down the road" on "truly affordable" housing (ELI, VLI, LI) via in-lieu fees and/or land donations without developer under contract Silicon Valley boundary encroachment into AMBAG counties AMI increase due to that encroachment, e.g., rental rates @100% AMI <p>1-person (only, regardless of square footage) household unit, monthly rental rate, per 2021 AMI Santa Cruz County: \$1958.75 (= \$78,350/12 x 0.3); "Above 120% AMI" = above \$2350.50 San Benito County: \$1587.50 (= \$63,500/12 x 0.3); "Above 120% AMI" = above \$1905 Monterey County: \$1427.50 (= \$57,100/12 x 0.3); "Above 120% AMI" = above \$1713</p> <p>1-person (only, regardless of square footage) household unit, monthly rental rate, per 2018 AMI Santa Cruz County: \$1522.50 (= \$60,900/12 x 0.3) San Benito County: \$1418.75 (= \$56,750/12 x 0.3) Monterey County: \$1208.75 (= \$48,350/12 x 0.3)</p>	HCD provides the units by income categories as part of its Regional Housing Need Determination.	Email	9/7/2021
2	Public	Lee	Ruckus	<p>Either</p> <ul style="list-style-type: none"> Establish an overriding timeline in each of the AMBAG designated areas for the lowest-income RHNA goals FOR EVERY TWO YEARS of the 8.5-year 6th Cycle (6/30/23 – 12/15/31), similar to AMBAG 6th Cycle RHNA goal ratios of Very-Low Income (VLI) over "Above 120% AMI" (56%) and Low Income (LI) over "Above 120% AMI" (37%), per Agenda, p8. Suspend permit approvals for "Above 120% AMI" housing units should that timeline goal for the lowest-income-level housing units not be accomplished at the end of each two-year period. Or Require the State to provide the funds up front (not via grant lotteries, tax credits, etc.) to fulfill the lowest-income RHNA goals. How about taxing Tech and luxury-rate real estate developers—those purveyors of rooftop pools and bars—to contribute to that purpose? 	AMBAG does not have land use authority. Each local jurisdiction is responsible for preparing a housing element and permitting housing units.	Email	9/7/2021
3	Public	Lee	Ruckus	<p>The Hubris of Density Up in a Seismic Zone</p> <p>No engineer or architect can design an "earthquake-proof" structure. That concept does not exist in reality, despite its common usage. They design toward the goal of "earthquake-resistance" to minimize lateral movement, but they cannot guarantee that any structure they design will be habitable... or standing... after every earthquake.</p> <p>They can cite a low probability of failure based on statistical analyses, but earthquakes are unique and unpredictable.</p> <p>And there are other variables, including the inherent faulty construction practices and materials that may not be discovered until after successive ground movement has occurred to expose them.</p> <p>"Earthquake design is a fuzzy proposition. You can't ask an engineer to guarantee that a building will never collapse in an earthquake. That is not fair, and it is not the deal that society has made with the construction world. You can ask that it will behave as well as possible, meeting at least the code requirements. Even that's a heavy responsibility." —Leonard Joseph, Principal, Seismic Performance-Based Design, Thornton Tomasetti</p>	Comment noted.	Email	9/7/2021
4	Santa Cruz YIMBY	Sonnenfeld	Rafa	<p>Santa Cruz YIMBY advocates for more affordable housing to meet the needs of our growing population in response to the ever-increasing cost of living and the housing crisis in our region. We have been closely following the RHNA methodology discussion that has been occurring this year, and recommend the following changes to the staff-proposed RHNA allocation methodologies in order to improve the housing-construction feasibility and social equity that come out of the RHNA allocation:</p> <p>Use AFFH as a significant factor in allocation housing totals, not just adjusting the share of allocation for Low/Very Low Income. This will ensure that high opportunity areas receive higher numbers of both low income units as well as market rate units, instead of the proposed income shift methodology that assigns more market rate units to low opportunity communities, which could exacerbate gentrification.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	9/20/2021
5	Santa Cruz YIMBY	Sonnenfeld	Rafa	<p>Use jobs access as the other major factor, and base that on jobs proximity instead of within jurisdiction jobs-housing balance.</p>	<p>By putting more housing where the largest number of jobs are, that meets the statutory RHNA objective of improving jobs/housing balance. Objective 2 of RHNA states "Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction." ABAG's assessment of Objective 2, recommended by HCD, was to assess RHNA's performance based on jurisdiction-level jobs data, not job proximity.</p>	Letter	9/20/2021

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

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10	MBEP	Madrigal	Elizabeth	<p>Overview: Historically, the Monterey Bay Region has fallen short of permitting the units needed in order to fulfill the RHNA numbers stipulated for each jurisdiction. As of the latest state reporting period ending July 2021, AMBAG has only met 58.8% of its 5th Housing Element Cycle RHNA allocation, which spans 2014-2023. Further analysis determined that jurisdictions defined as high opportunity areas by the California Department of Housing and Community Development were least likely to be on track to meet their very low and low income RHNA targets. Of the six jurisdictions in AMBAG that have a minimum of three high opportunity areas within them, they were cumulatively found to have only produced 11.94% of AMBAG's overall RHNA allocation. Of note is that between all six jurisdictions in AMBAG that have a minimum of three high opportunity areas tracts within them, they have collectively only permitted 294 very low income and low income units - 7% of AMBAG's allocation for very low income and low income units (4,155 total very low and low income goal). We must continue to track and evaluate the specific practices that have led to high opportunity areas within our region underperforming, especially when it comes to very low income and low income units. As a result of HCD now taking both existing and project housing needs into account when determining the Regional Housing Determination for each COG, the determinations under the 6th Housing Element cycle have turned out to be significantly higher than past determinations. The final regional housing need determination for AMBAG is 33,274 units across four income categories - very-low (extremely-low units are included within this category), low, moderate, and above-moderate. This is a 219% increase from AMBAG's total 5th Housing Element cycle RHNA allocation of 10,430. As for SBCOG, their final regional housing need determination for the 6th Housing Element cycle is 5,005 units across the four income categories of very-low (extremely-low units are included within this category), low, moderate, and above-moderate. This amounts to a 128% increase from SBCOG's total 5th Housing Element cycle RHNA allocation of 2,194.</p> <p>Now that AMBAG has received its RHND from HCD, it is tasked with determining the methodology that will be utilized to allocate the Monterey Bay Region's housing need across jurisdictions. The priority factors AMBAG has identified in developing its methodology are: regional growth forecast, employment, transit, resiliency, and affirmatively furthering fair housing (AFFH). Of note is that the AFFH allocation approach does not affect the number of units a jurisdiction is assigned - it only adjusts the share of allocation for very low & low income units.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	10/8/2021
11	MBEP	Madrigal	Elizabeth	<p>Methodology Approach Case Study: In order to offer a view into a comparable region in the state, the methodology the Santa Barbara County Association of Governments (SBCAG) adopted will be broken down. Similar to AMBAG in that SBCAG is comprised of subregions that are distinct from one another, SBCAG chose to divide their allocation between the North County and South Coast subregions in order to focus on the region's sub-regional jobs-housing imbalance. Afterwards, a jobs-balance allocation method was applied, which includes a 60% weighing on current jobs, and a 40% weighing on forecasted 2020-2030 jobs from SBCAG's Regional Growth Forecast. The result of this first step allocated 60% of the region's RHNA determination to South Coast jurisdictions as this subregion is host to 60% of the region's current jobs. The remaining 40% of the RHNA determination was allocated to North County jurisdictions. Subsequently, SBCAG elected to distribute the subregional allocations to jurisdictions based on equal weighting (50%) for both overcrowding and cost burden. Lastly, SBCAG elected to have the methodology adjusted per RHNA's four income categories. This adjustment made it so that any jurisdiction with a high share of housing from a specific income category would receive a lower proportion of units of that very income category. As a result of this strong equity adjustment, 75% of the lower income RHNA figure was allocated towards high opportunity areas with access to jobs. The methodology approach SBCAG opted to move forward with ought to be further explored by AMBAG as our respective regions are both distinct subregions in which one approach would not adequately take into account the intricacies underlying each subregion. A strong equity adjustment similar to the one SBCAG implemented should also be highly considered by AMBAG in order for high resource areas within AMBAG's jurisdiction to build their fair share of very low and low income units.</p>	<p>Objective 1 of RHNA states: Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households. Housing law does not allow any jurisdiction to get 0 low- and very low income units. By allocating units to jurisdictions based on their number of jobs and their access to high-quality transit, and then shifting across income categories, the proposed methodology does funnel more very low and low income RHNA units to higher-income areas with access to key resources. In assessing the results of the draft methodology, we have also noted that jurisdictions with higher per capita unit allocations have current housing shortages, as illustrated by high rates of overcrowding and high need for farmworker housing. The proposed methodology balances existing housing needs by locating housing where it is needed, and balances equity by shifting across income categories.</p>	Letter	10/8/2021
12	MBEP	Madrigal	Elizabeth	<p>Recommendations to Consider: Farmworker Housing - The Monterey Bay Area region is distinct from various regions in the state in that it is comprised of a multi billion dollar agricultural industry primarily concentrated in the Salinas Valley, as well as a booming tourism industry in the coastal regions of the Monterey Peninsula and Santa Cruz. On the point of economic drivers within the Monterey Bay Region, it is imperative that AMBAG specifically account for the housing needs of farmworkers, especially when factoring in the significant rates of overcrowding in our region when it comes to this special needs population. According to the Farmworker Housing Study and Action Plan for Salinas Valley and Pajaro Valley, farmworker households were found to be occupied at 7 People Per Dwelling (PPD) to the average PPD of 3.23 in Monterey County, and 2.60 PPD in Santa Cruz County. It is recommended that AMBAG staff explore incorporation of a factor allocating very low & low income farmworker housing units throughout the Salinas Valley jurisdictions, Watsonville, and unincorporated Monterey & Santa Cruz counties. AMBAG staff also ought to consider measures that can be taken to address the jobs-housing imbalance prevalent within coastal areas of our region with large hospitality and service sector employees.</p>	<p>While farmworker needs must be taken into account through the RHNA process, AMBAG is mandated to allocate units based on income, not on occupant type. While the farmworker and hospitality/service sectors are located in different places, on balance the distribution jobs across lower-wage industries (ag, retail, services) very closely mirrors that of total jobs across the region. Thus, while it might seem counter-intuitive, the total jobs factor results in an allocation that also distributes units to places with lower-wage industries. Finally, AMBAG explored such an such as allocating RHNA based on type of job based on discussions with the Planning Directors Forum. Ultimately, the consensus was that total jobs made more sense. We also double checked the numbers and found if we did use such a factor as suggested, more units would be allocated to lower income areas and less units allocated to higher opportunity areas. Staff does not feel that this meets the equitable distribution factor as compared to option staff presented.</p>	Letter	10/8/2021

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13	MBEP	Madrigal	Elizabeth	Affirmatively Furthering Fair Housing - Another large question to consider is whether AMBAG's methodology is effectively incorporating the Affirmatively Furthering Fair Housing factor. As it currently stands, the Affirmatively Furthering Fair Housing metric AMBAG is utilizing does not affect the total number of housing units a jurisdiction is allocated - it is simply used as a shifting mechanism to adjust the share of very low & low income units a jurisdiction receives. Santa Cruz YIMBY has flagged this usage of the Affirmatively Furthering Fair Housing metric as a concern as it would in effect assign more market rate units to low opportunity communities, which has the potential to lead to gentrification. AMBAG staff ought to review and take into consideration Affirmatively Furthering Fair Housing factors other COGs in the state have utilized that have been shown to produce larger lower income RHNA allocations within high opportunity areas, such as the strong AFFH factors SBGAG and SCAG developed into their methodologies. As stated on the previous page of this brief, SBGAG was able to have 75% of the lower income RHNA numbers allocated towards high opportunity areas. As for SCAG, this COG was able to allocate 95% of their lower income RHNA figures to high and highest resource areas (with the exception of the cities of Industry and Vernon) due to their strong AFFH factor in their methodology.	There is no guidance under state law that suggests total units should be reduced in lower-income jurisdictions. Instead the law states that the RHNA plan must "(1) increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households." [Emphasis added.] In many cases reducing the total number of units could be counter-productive for equity as lower-opportunity jurisdictions tend to have high overcrowding rates and are in need of additional housing. Moreover the research on market rate housing and gentrification is mixed at best.	Letter	10/8/2021
14	MBEP	Madrigal	Elizabeth	Water for Housing - Lastly, a distinct issue that AMBAG must take into consideration when developing the RHNA methodology is that of the water supply problem the Monterey Peninsula is faced with. While AMBAG chose to adjust the RHNA allocation of cities within the Monterey Peninsula downwards during the 5th Housing Element cycle, we urge AMBAG to explore options that would not decrease the RHNA allocations of jurisdictions in the Monterey Peninsula, especially as most high opportunity areas within Monterey County are located within the Monterey Peninsula. Detailed in length in MBEP's Study on the Impact of Water on Housing Development in the Monterey Peninsula, a possible solution would be for AMBAG to develop an alternative distribution of the RHNA numbers in order to assign additional units to Peninsula jurisdictions once the Carmel River Cease and Desist order is lifted by the deadline the California State Water Resources Control Board has imposed of December 31st, 2021.9 It is equally important to acknowledge that while water is often cited as a barrier to the production of new housing in the Monterey Peninsula, it is not the main, nor the only barrier to housing development in these communities. Such barriers include community opposition to high density housing, high costs of construction on new housing development, and there not existing a guaranteed source of local affordable housing financing - to name a few. Establishing solutions to combat these challenges will before a new supply of water is available must be accomplished in order for jurisdictions to be well positioned to take advantage, and partner with developers to build housing without any delays.	Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including: 1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Letter	10/8/2021
15	MBEP	Madrigal	Elizabeth	Conclusion: The RHNA methodology established by AMBAG must address the housing demands of Monterey Bay residents, both existing and projected, as well as the unique issues we face. Incorporating the considerations above including a strong Affirmatively Furthering Fair Housing factor, adequately accounting for farmworker & hospitality service housing needs, and making production oriented adjustments regarding the Monterey Peninsula's water challenges are vital when equitably planning for the future of our region. Once AMBAG and SBGAG have established their respective methodologies, they will be used to allocate a share of the Regional Housing Needs Determination to each locality that resides within AMBAG and SBGAG. After this step has been completed, each jurisdiction will have to create a Housing Element, which is required to detail how the allocated number of units will be accommodated, and any zoning changes that will need to be made to account for the units stipulated under RHNA. MBEP will be involved throughout the duration of the RHNA process, and urges advocacy groups and community members to become involved in this undertaking that directly shapes the future of our region.	Thank you for your comments.	Letter	10/8/2021
16	Public	Porter	Ed	This Ambag meeting is upon us with its planned big numbers of market rate homes and above. I'm hoping AMBAG Board members will realize that the proposed numbers are upside down. The low and very low numbers are absurdly small! (not to mention that State density bonus law RETARDS and BLOCKS application of our legally required 20% inclusionary mandate!) Guess who dreamed THAT up as a dishonest pretext to get more affordable housing! It seems like the people who proposed the published schedule (below) have not read newspapers for a few years. (haven't noticed the homeless camps?) I would challenge their methodology because it clearly delivered a ridiculous set of numbers that do not address our true and clear needs especially for very low income units. Very Low (0-50% AMI) = 817 units Low (50-80% AMI) = 534 units Moderate (80-120% AMI) = 427 units Above Moderate (120% or more of AMI) = 1,092 units	HCD provides the units by income categories as part of its Regional Housing Need Determination.	Email	10/10/2021

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17	Public	Porter	Ed	<p>As far as I am concerned, the need for moderate and especially above moderate is negligible and that's clearly demonstrated by lack of residents (vacancies) at 555 Pacific Ave. and probably at other Downtown locations like 2030 N. Pacific. Way back when I was on the SC City Council, AMBAG was setting absolutely absurd, ridiculous numbers for the City of Santa Cruz. Fact is, we had to take AMBAG to court to get reasonable numbers! I hope our elected friends who understand these things will put ideas something like this on the AMBAG record for the Wednesday meeting. Is this reasonable? *The state's requirements for the number of homes built in Santa Cruz and Monterey counties will more than triple starting in June 2023. NO! Not reasonable. It's bizarre! And how on Earth can they say with a straight face that the quota for above Moderate (120% or more of AMI) = 1,092 units? THAT's what I am calling gentrification insurance. (or Gentrification guarantees!) Regarding AMGAG methodology, I think the decline in the California 2020 US census population should send them back to their "drawing boards"! If there was an emergency in previous years, with a population decline since, and increased housing production on record, the emergency has ended by definition. Let's address the true deficiency especially of very low income units! THAT is a true emergency!</p>	HCD provides the units by income categories as part of its Regional Housing Need Determination.	Email	10/10/2021
18	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse Sonnenfeld	Aaron Rafa	<p>California YIMBY, Santa Cruz YIMBY, and YIMBY Law are submitting this letter to the Association of Monterey Bay Area Governments to provide recommendations for adopting a Regional Housing Needs Allocation methodology, based on best practices developed through rigorous academic analysis by experts in the field of planning and housing development, of various methodologies that have already been adopted by Councils of Governments in other regions during the 6th Housing Element Cycle. We also offer our own analysis of the ability of the currently proposed RHNA methodology to meet the statutory requirements for the RHNA process, and make specific recommendations for modifications to the methodology that would further the required statutory objectives, beyond what has been proposed, which we believe to be inadequate.</p> <p>Accompanying this letter we have included a copy of the RHNA Methodologies Best Practices report from the UC Berkeley Turner Center for Housing Innovation. This report highlights some important policy considerations which we believe AMBAG have, to date, not incorporated sufficiently into its proposed allocation methodology. There are a number of best practices COGs can use to increase the likelihood that their allocation promotes the statutory objectives of RHNA. These are highlighted in this letter with bullet points.</p>	Thank you for your comments.	Letter	10/15/2021
19	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse Sonnenfeld	Aaron Rafa	<p>Put more emphasis on strategies that promote both RHNA's equity and environmental goals simultaneously. Allocating RHNA near existing job centers promotes both equity and environmental goals because workers are often forced to commute long distances when adequate housing isn't available near jobs. COGs should put more emphasis on factors such as proximity to jobs that can simultaneously promote both the state's equity and environmental goals.</p> <p>In an equitable distribution, we would expect to see, at the very least, no pattern of lower-income jurisdictions consistently taking on a larger share of the RHNA allocation relative to their share of the region's population or jobs. Ideally, given that wealthier jurisdictions have historically used exclusionary policies to limit growth within their jurisdictional boundaries, we would see higher-income jurisdictions taking on a larger share of the regional RHNA allocation relative to their share of the region's population and jobs. On the following page is a chart of AMBAG's RHNA distribution as currently proposed in the staff's recommended methodology compared to existing housing stock. This chart shows the total number of housing units in each jurisdiction according to the 2020 US Census, as well as the Attachment 5 percentage growth that the proposed allocation has, based on their 2020 total number of housing units.</p> <p>As currently proposed, AMBAG's regional methodology does an extremely poor job at promoting equity. According to the 2020 US Census, the AMBAG region has a total of 249,976 housing units. With a determination of 33,274 units for the region, the total regional growth is 13.3%. As currently proposed, some of the wealthiest, most exclusive jurisdictions in our region, such as Carmel and Pacific Grove, are being allocated much smaller growth rates, less than 6%, compared to the region as a whole; while less affluent, more rural communities such as Greenfield and King City are being allocated over 25% growth rates, and two jurisdictions, Sand City and Gonzales, are each being allocated over 100% growth rates. We strongly encourage AMBAG to adopt a more equitable allocation strategy to ensure areas of highest opportunity and access to employment are allocated higher than average growth rates, not lower than average growth rates, as is currently the case.</p>	A substantial share of the proposed RHNA allocation is based on jobs. The proposed methodology balances existing housing needs by locating housing where it is needed, and balances equity by shifting across income categories.	Letter	10/15/2021
20	California YIMBY, Santa Cruz YIMBY, and YIMBY Law	Eckhouse Sonnenfeld	Aaron Rafa	<p>Consider equity directly when determining how many total RHNA units a jurisdiction will receive. Using explicit equity-focused factors—such as measures of segregation or opportunity—when determining each jurisdiction's total RHNA allocation can help ensure lower-income and racially segregated areas are not taking on more than their fair share of RHNA, while also funneling more RHNA to higher income areas with access to key resources that promote economic mobility. We note that AMBAG's current methodology does not consider equity directly when determining total RHNA allocations. Instead, staff have proposed an "income-shift" approach that swaps low-income units from lower-opportunity jurisdictions with the higher-income units from higher opportunity areas. The intended outcome of the staff approach is to affirmatively further fair housing by increasing the percentage of low-income units planned for in higher opportunity areas, however, we believe a better approach would be to instead allocate additional total numbers of low income units to areas of high opportunity, instead of just shifting the percentages.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	10/15/2021

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

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

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

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

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

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35	SC YIMBY	Sonnenfeld	Rafa	We still feel a more equitable approach to the overall methodology is to use the "bottom up" approach as outlined in our letter, that creates a separate allocation methodology for each bucket of affordability, rather than the income-shift methodology that is on the fast track to adoption. There will still need to be adjustments for statutory requirements, especially concerning the situation in unincorporated Monterey County. To account for farmworker housing, which was a concern several jurisdictions, such as Soledad, feel is being overlooked, the original idea we had was to create a farmworker housing threshold/adjustment so that we could be sure that each jurisdiction with a farmworker housing need would be sure to get at that minimum number of units for low/very low. One way that could be done is by re-allocating the huge number of VLI units in unincorporated Monterey County to the other farmworker jurisdictions. Monterey County will almost certainly need to be adjusted down to fulfil the statutory requirement of directing housing to infill and AFFH.	Areas with the most agricultural jobs, and thus highest need for farmworker housing are Unincorporated Monterey and Salinas, followed by Greenfield, Watsonville, Unincorporated Santa Cruz, Gonzales, Soledad, and King City. Creating a separate farmworker housing factor would add units to those jurisdictions. Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including: 1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments	Email	11/5/2021
36	SC YIMBY	Sonnenfeld	Rafa	I wanted to make sure you and your staff are aware of some of the problems with AMBAG's proposed RHNA methodology, which is being voted on next week. I'm forwarding you an email thread raising some of our concerns. In addition to those comments, I have some additional technical details about the problematic proposal as it relates to unincorporated Monterey County. It may be helpful to start from the beginning of this thread (at the bottom). Based on the allocation recommended by staff at the Monday meeting, Monterey County would have to have to find somewhere to zone for 1,370 very low and 896 low income units. Since Monterey County's 2010 General Plan bars sprawl development (GP Policy LU-1.19), the affordable units would have to be located in • the "Community Areas" of Castroville, Chualar, Boronda, East Garrison, and Pajaro, of which Pajaro and Chualar are the highest priority (LU-2.23) • the "Rural Centers" of Bradley, Lockwood, Pine Canyon, Playto, River Road, San Ardo, and San Lucas, or • the 3 Affordable Housing Overlay districts (see Policy LU-2.11) o AHO1 - 13-acre Mid-Carmel Valley - see map at https://www.co.monterey.ca.us/home/showpublisheddocument/45880/636389941503600000 [co.monterey.ca.us] o AHO2 - 85-acre Airport Area AHO - see map at https://www.co.monterey.ca.us/home/showpublisheddocument/45940/636389942172030000 [co.monterey.ca.us] o AHO3 - 31-acre Highway 68/Reservation Road AHO - see map at https://www.co.monterey.ca.us/home/showpublisheddocument/45942/636389942179370000 [co.monterey.ca.us]	Comment noted.	Email	11/5/2021

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37	SC YIMBY	Sonnenfeld	Rafa	<p>These are the only areas in which the General Plan permits Monterey County to focus future growth. (GP Policy LU-1.19.) And at this point, no additional development would be allowed in the Mid-Carmel Valley AHO in light of the 190-unit cap in the Carmel Valley Master Plan. (GP Policy CV-1.6.) Ironically, only the Mid-Carmel Valley site actually has the resources and opportunities that are supposed to be the rationale for allocating so many lower income units to the County.</p> <p>There are various prerequisites to non-affordable project development in the Community Areas and Rural Centers, including the adoption of a Community Plan for Community Areas (Policy LU-2.23) and adoption of a Capital Improvement and Financing Plan for Rural Centers (Policy LU-2.29). The purpose of a Community Plan is to create a livable community by implementing General Plan Policy LU-2.22, which requires the following elements:</p> <p>LU-2.22 Community Areas shall be designed to achieve a sustainable, balanced, and integrated community offering:</p> <p>a) A vision for that community</p> <p>b) Various types and nature of land use designations including:</p> <ul style="list-style-type: none"> o A diverse range of residential densities and housing types. o A mix of retail commercial businesses and offices. o Industrial development where appropriate. o A variety of recreational opportunities and public amenities integrating enhancement of existing natural resources into the community where possible. <p>c) Adequate public facilities and services including public water and sewer, an extensive road network, public transit, safety and emergency response services, adequate flood control, parks, and schools.</p> <p>d) Opportunities for workers to live near jobs.</p>	Comment noted.	Email	11/5/2021
38	SC YIMBY	Sonnenfeld	Rafa	<p>To our knowledge, Monterey County has not yet adopted any community plans for Community Areas or Capital Improvement and Financing Plans for Rural Centers. However, Community Plans and Capital Improvement and Financing Plans are not required for 100% affordable projects in Rural Centers and Community Areas. (GP Policy LU-2.11 b, f, g.) The only requirement for a 100% affordable development in these areas is that it take care of its own infrastructure needs. (Policy LU -2.11, f, g.)</p> <p>If the current allocation is adopted, Monterey County's revised Housing Element will have to upzone at least 113 acres of land in the Community Areas, Rural Centers, or AHOs to high density, i.e., at least the 20 units per acre required to meet HCD's density mandate for low income units (1370+896=2266 units, divided by 20 units per acre=113 acres). In effect, this means that the only way that Monterey County could develop its Low and Very Low Income affordable housing at this point would be to locate it in</p> <ul style="list-style-type: none"> • Community Areas, but without the Community Plans that are supposed to make the areas livable, • Rural Centers, but without Capital Improvement and Infrastructure Plans and far from jobs and other opportunities, • in the 116 acres of AHOs at Reservation Road and Highway 68 or around the Airport, where there would be no space to develop any other uses since essentially all of the space would be needed for the VL and L income units <p>This would result in isolated low income affordable units without community plans or comprehensive infrastructure plans. This segregation without resources or opportunities is contrary to the intent to affirmatively further fair housing, and will likely make it impossible to obtain necessary subsidies.</p>	<p>Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:</p> <ol style="list-style-type: none"> 1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments 	Email	11/5/2021

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39	SC YIMBY	Sonnenfeld	Rafa	<p>Again, this problem is a result of the over-allocation of units to the unincorporated Monterey County on the basis of its percentage of regional employment despite the fact that there is no jobs/housing imbalance in the unincorporated County. This base allocation to the unincorporated area is contrary to the statutory objective to promote "infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080." (Gov. Code, § 65584(d)(2).)</p> <p>The over-allocation of units to the unincorporated area of Monterey County is also contrary to the Government Code Section 65584.04(e)(4) mandate that the RHNA methodology shall include as one of its factors any "agreements between a county and cities in a county to direct growth toward incorporated areas of the county. The County has in fact entered into agreements with cities to direct growth into incorporated areas. These agreements are consistent with the County policies calling for City Centered Growth. (See GP Policies LU-2.14 through LU-2.17.) For example, Policy LU-2.14 requires the County to "[w]ork with AMBAG and cities to direct the majority of urban growth including higher density housing development into cities and their spheres of influence with an emphasis on redevelopment and infill."</p> <p>Finally, it should be noted that in speaking with affordable housing developers whose job it is to try to build affordable housing in rural communities, it's just not feasible to develop the above-listed areas, no matter the zoning: they don't have the necessary infrastructure to be developable. If AMBAG and HCD allow the proposed methodology to proceed and give hundreds of units of our region's low income RHNA allocation to unincorporated Monterey county, it is a plan doomed to fail, and our RHNA process will have been a wasted exercise for the thousands of low income families who depend on this process to work to build the affordable housing we need.</p>	<p>Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:</p> <ol style="list-style-type: none"> 1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) <ol style="list-style-type: none"> 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments 	Email	11/5/2021
40	SC YIMBY	Sonnenfeld	Rafa	<p>1) We generally like the approach of using Racial Concentrated Areas of Affluence (RCAA) as the way of AFFH'ing jurisdiction's allocations, but the all-or-nothing approach that lets the city of Santa Cruz reduce its low and very low allocation by 50% because it is only 66% affluent instead of 68% affluent is not acceptable. AMBAG should change its methodology for determining RCAs-based allocations for jurisdictions that are more than 50% white by reducing the percentage of low and very low units by the relative amount of affluence compared to the region. So for Santa Cruz, instead of a full 50% reduction to low income units, it should be a reduction of ~1%.</p>	<p>The Board of Directors could direct staff to modify the definition of RCAA and include those jurisdictions that qualify as a partial RCAA.</p>	Email	11/5/2021
41	SC YIMBY	Sonnenfeld	Rafa	<p>2) Ensure that the statutory adjustments mentioned to reduce sprawl and directing units to infill are given enormous weight for unincorporated Monterey County, due to their legal barriers to AFFH.</p>	<p>Statutory adjustments will be considered after a methodology is selected as included in Government Code Section 65584.04(e). . Statutory adjustment(s) will be made and documented as part of the draft RHNA Plan. Statutory adjustments can be made according to the 13 RHNA plan factors including:</p> <ol style="list-style-type: none"> 1. Jobs and housing relationship 2. Opportunities and constraints to development of additional housing (see below) <ol style="list-style-type: none"> 2a. Capacity for sewer and water service 2b. Availability of land suitable for urban development 2c. Lands preserved or protected from urban development 2d. County policies to preserve prime agricultural land 3. Opportunities to maximize transit and existing transportation infrastructure 4. Policies directing growth toward incorporated areas 5. Loss of units contained in assisted housing developments 6. High housing cost burdens 7. Rate of Overcrowding 8. Housing needs of farmworkers 9. Housing needs of UC and Cal State students 10. Individuals and families experiencing homelessness 11. Loss of units during an emergency 12. SB 375 Greenhouse Gas Reduction Targets 13. Other factors adopted by Council of Governments 	Email	11/5/2021
42	SC YIMBY	Sonnenfeld	Rafa	<p>3) Recommend that AMBAG implement a bottom-up approach for the allocation like ABAG did that integrates equity into the total allocation (or at the very least, include it as an option with draft allocation numbers for the Directors to consider) rather than the income shift approach, which is the only methodology which the directors have seen draft numbers for, and which has never been presented to them as a real possibility.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p>	Email	11/5/2021

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43	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	<p>Monterey Bay Economic Partnership's Housing Initiative is aimed at promoting the increase of housing at all income levels in the Monterey Bay region via data driven policies, funding solutions, and advocacy. In coordination with other housing advocates in Santa Cruz and Monterey counties, we have been closely tracking the AMBAG RHNA methodology process, and have some recommendations for a more equitable distribution of housing units throughout our region:</p> <p>1. Adopt a bottom-up methodology approach to result in more housing units allocated to jurisdictions with the most access to opportunity instead of incorporating Affirmatively Furthering Fair Housing (AFFH) via an income-shifting mechanism that does not affect the absolute number of units a jurisdiction receives. As it currently stands, jurisdictions in the Salinas Valley are seeing the largest growth rates, although none of these communities are designated as Racially Concentrated Areas of Affluence (RCAA). While we understand that it is difficult to balance the range of housing needs in a region as diverse as ours, we do not believe that low growth rates in Racially Concentrated Areas of Affluence fulfill the statutory objective of AFFH that AMBAG is required to meet per Government Code Section 65584(d). The bottom-up approach results in a more equitable outcome since it not only allocates more RHNA to jurisdictions with higher access to resources on a per capita basis, but also higher-resourced jurisdictions receive a larger amount of lower income RHNA on a per capita basis. We recommend the bottom-up approach so that access to Racially Concentrated Areas of Affluence is directly factored into the methodology, followed by the existing priority factors that the Board of Directors choose to incorporate for each income category, which includes employment, transit, and resiliency factors.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	11/9/2021
44	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	<p>2. Establish a jobs-proximity factor in order to counter the jobs-housing imbalance that the proposed methodology exacerbates. The purpose of the jobs-proximity factor is to consider the relationship between jobs and transportation with the intent of encouraging more housing in jurisdictions either within, or with easier access to a relevant job center. One example of the methodology exacerbating the jobs-housing imbalance are draft allocations for Watsonville and Santa Cruz. As demonstrated in the change to the existing housing stock chart that Santa Cruz YIMBY prepared in its letter dated October 15th, the City of Watsonville is projected to have a growth rate of 18%, and the City of Santa Cruz a growth rate of 12%.¹ While this is not problematic at face value, when we take into account 28,514 existing jobs in 2020 for the City of Watsonville versus 43,865 for the City of Santa Cruz, that's a 54% difference in existing jobs. More housing units must be directed towards jurisdictions in which existing job centers are located until more job centers and much needed infrastructure are developed in jurisdictions where it is deficient. Allocating more housing units towards existing job centers will also promote RHNA's environmental goals by way of reducing Vehicle Miles Traveled and Greenhouse Gas Emissions.</p>	<p>Looking at any factor—including jobs—without considering jurisdiction size could lead to unreasonable results (such as thousands of units allocated to a city that is just a few square miles in area). Objective 2 of RHNA states "Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction." Statute, and thus the methodology, centers on jobs "in each jurisdiction." As a legacy of Prop 13, job-heavy jurisdictions have fiscal incentives to avoid planning for housing within their jurisdiction. Diluting their imbalance by looking at neighboring areas could undermine this RHNA objective.</p>	Letter	11/9/2021
45	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	<p>3. Explicitly account for farmworker housing units. This can be achieved by ensuring that jurisdictions with a high number of farmworker jobs have a floor number of lower income units that are available to low income farmworkers, even if other factors, such as RCAA, reduce that total. The Farmworker Housing Study and Action Plan for Salinas Valley and Pajaro Valley found that an additional 45,560 units of farmworker housing are needed to alleviate critical overcrowding in farmworker households that are occupied at 7.00 PPD to the average PPD of 3.23 in Monterey County and the average PPD 2.60 in Santa Cruz County.² The Plan includes the goal of producing 5,300 permanent affordable farmworker housing units over the next five years across the Salinas and Pajaro Valleys. We know that this data matters greatly to the Board of Directors given that AMBAG, along with MBEP, the Counties, and others, were funding partners of the Study and committed to the implementation of the Action Plan. The past 20 months have reminded us that farmworkers are essential workers in our regional economy and a safe and secure food supply requires a healthy stable trained workforce living in safe and secure affordable housing. It is important to note that H2A farmworkers are not a part of this unit count, given that they do not live in the region year round and are provided housing by their employer.</p>	<p>Ag jobs are included in our jobs data. We are not using "Census" jobs data—we're using address-level data from the California Employment Development Department, InfoUSA, and nearly a year of extensive ground-truthing the data by AMBAG staff. These data sources do include agricultural jobs as well as agricultural support jobs. If the number of ag jobs in the 2022 RGF appears low, it is not because we missed ag jobs, it's because of industry classifications. Within NAICS classifications, support activities for agricultural or animal production (e.g., harvesting contractors, farm labor contractors, crop packaging, warehousing) appear in manufacturing, transportation and warehousing, or wholesale. In addition, a comprehensive review of AMBAG region firms listed in the agriculture NAICS sector showed many support activities. AMBAG staff re-classified these to manufacturing, wholesale, or retail. For these reasons, allocating by total jobs does help to ensure that housing will be planned where farmworkers live. Perhaps more importantly: The listed jurisdictions (Gonzales, Greenfield, King City, Salinas, Soledad, Unincorporated Monterey, Watsonville, and Unincorporated Santa Cruz) account for nearly 2/3rds of the Very Low and Low income allocation (more than 8,000 units) under the proposed framework. Allocating an additional 1,000 units to those jurisdictions (many of which are already lower-income) would necessitate taking lower-income units away from high-resource jurisdictions, and thus perpetuating existing inequalities—a principle RHNA is designed to protect against. Areas with the most agricultural jobs, and thus highest need for farmworker housing are Unincorporated Monterey and Salinas, followed by Greenfield, Watsonville, Unincorporated Santa Cruz, Gonzales, Soledad, and King City. Creating a separate farmworker housing factor would add units to those jurisdictions. In addition, AMBAG had extensive conversations with HCD about H2A, and H2A units are included in the base data that HCD used to determine the region's existing need. An additional 11,410 was added to our RHNA number due to overcrowding, of which is due in large part to lack of farmworker housing.</p>	Letter	11/9/2021

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46	Monterey Bay Economic Partnership (MBEP)	Roberts	Kate	<p>4. Push out approval of the draft methodology until equity concerns are wholly addressed, and a presentation on the sources of employment data is presented to jurisdictions that request them. At the Planning Directors Forum held on November 1st, several jurisdictions expressed concerns around the lack of transparency regarding the data sources used for employment figures. All data sources utilized for purposes of the methodology should be fully transparent and easily accessible in order for all involved decision makers to be as informed as possible going forward.</p> <p>We commend the Association of Monterey Bay Area Governments for their work on the 6th Cycle Housing Element and look forward to having a methodology in place that we can fully stand behind as our region seeks approval from the State. Thank you for your leadership. For questions, please contact Elizabeth Madrigal at emadrigal@mbep.biz.</p>	<p>Given the feedback we've heard from local jurisdictions and stakeholders and the preliminary review of a draft methodology by HCD, AMBAG staff is not recommending approval from the Board tonight.</p> <p>All data used in RHNA is publicly available. The 2022 RGF was approved by the AMBAG Board of Directors through public meetings and is available on the AMBAG website. https://www.ambag.org/sites/default/files/2020-12/Final%20Draft%202022%20Regional%20Growth%20Forecast_PDF_A.pdf</p> <p>The majority of the RHND is proposed to be allocated based on:</p> <ul style="list-style-type: none"> - Jobs (Employment), published as part of the RGF (see link above) and was based on data from the California Employment Development Department and InfoUSA. - Wildfire—CPUC and the Office of the State Fire Marshal - Sea Level Rise—NOAA - AFFH: TCAC/HCD Opportunity Area Maps or RCAAs (U.S. Census Bureau, American Community Survey (2015-2019), and 2020 Census) <p>AMBAG staff has submitted a request to EDD to allow us to share the confidential jurisdictional level EDD employment data. The county level data is already available. In addition, AMBAG has shared the InfoUSA data with any local jurisdiction who has requested it. Finally, the AMBAG Board could choose to direct staff to use a different data source for jobs data.</p>	Letter	11/9/2021
47	City of Salinas	Carrigan	Steve	<p>The City of Salinas (City) requests that the AMBAG Board delay adoption of the Regional Housing Needs Allocation (RHNA) Methodology until it directly considers equity in its total unit allocation. The City of Salinas always has recognized that it would receive the largest share of units. With the planned Future Growth Area and recent developments such as Moon Gate Plaza and Project Homekey conversion of the Good Nite Inn, Salinas is demonstrating its commitment to increasing housing opportunities across all income levels. Throughout the process, we have asked that the allocation be equitable and that jurisdictions with high resources have a larger role in providing future housing. AMBAG staff have done a commendable job of meeting deadlines while breaking down a very complicated process in the creation of a fair base methodology. We thank them and the Board of Directors for their hard work and diligence in this project. Unfortunately, because something is fair, does not necessarily mean that it is equitable. The City feels the results of this methodology places an inequitable emphasis on Salinas and Salinas Valley jurisdictions to shoulder future housing production, failing to further RHNA Plan Objectives (Government Code 65584(d)) of affirmatively furthering fair housing (AFFH) and promoting an intraregional jobs-housing balance. The City of Salinas has the following specific concerns:</p>	<p>Given the feedback we've heard from local jurisdictions and stakeholders and the preliminary review of a draft methodology by HCD, AMBAG staff is not recommending approval from the Board tonight.</p>	Letter	11/10/2021
48	City of Salinas	Carrigan	Steve	<p>a) While Salinas is the largest community in the region, according to AMBAG's 2022 Subregional Growth Forecast, as of 2020 it has 22.7% of the region's (Monterey and Santa Cruz counties) population but is being given 28% (9,353 units) of the region's housing allocation. For comparison, the next highest allocation goes to unincorporated Monterey County, which receives just over nine percent (3,083 units), but has almost 15% of the region's population.</p> <p>b) According to 2020 US Census data compiled by California YIMBY (see letter in AMBAG Memorandum to Planning Directors Forum November 1, 2021, pages 18-25), this allocation would represent a 21 % growth in housing stock. Salinas Valley communities are being asked to accommodate growth of 22% (Soledad), 26% (Greenfield), 29% (King City), and 108%(Gonzales). The only Monterey Peninsula communities being allocated growth over 20% are Del Rey Oaks and Sand City, which amounts to just over 500 units. Carmel and Pacific Grove would each only have to accommodate about a five percent change to existing housing stock.</p> <p>c) The City appreciates the inclusion of Racially-Concentrated Areas of Affluence (RCAAs) as a step toward a more equitable allocation. However, by just shifting allocation among income groups within a jurisdiction, rather than re-allocating any total units based on affluence, there is a missed opportunity to require jurisdictions with significant resources, including those in unincorporated areas, to contribute more to solving the housing crisis and address regional patterns in inequity.</p>	<p>RHNA must consider a variety of factors, including current housing need. Of the region's 33,274 unit allocation, 11,410 were allocated based on overcrowding. The highest rates of overcrowding in the region are in the Salinas Valley jurisdictions. Based on the 2015-2019 American Community Survey data, Salina's overcrowding rate is just over 19% compared with just under 10% in unincorporated Monterey County.</p>	Letter	11/10/2021

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49	City of Salinas	Carrigan	Steve	<p>d) AMBAG states that it did not shift total units based on equity because it "would have resulted in lower unit total allocations to areas with high overcrowding and high need for farmworker housing" (AMBAG Memorandum to Planning Directors Forum November 1, 2021, page 6). There is room to consider equity directly in total allocation numbers while holding such communities accountable for addressing these needs. For example, even a methodology shift that simply brings the City's RHNA share in line with its population share would still allocate over 7,500 units to Salinas, which is still more than double the next highest allocation.</p> <p>e) By allocating so much growth inland, this methodology also risks exacerbating regional traffic and commute struggles. Morning commutes to the Monterey Peninsula on US 101 and Route 68 are already grueling because people cannot afford housing where they work.</p> <p>f) Under SB 35 (Wiener, 2017) in communities that fail to meet RHNA production targets, developers may elect to use a ministerial process to get project approval for certain residential projects. Building 9,353 units over the course of eight years means building over 1,000 per year. From 2015-2020 there were 708 total units developed in Salinas. The City is not a housing developer, and while it can plan to accommodate many units, it has much less control over the actual pace of development. Such a high unit allocation could result in loss of local control and poor-quality housing development as the City currently allows housing in certain areas via conditional use to mitigate adverse environmental factors. The current allocation risks punishing one of the region's most pro-housing communities.</p>	<p>The Board of Directors could direct AMBAG staff to consider a population-based factor as part of the allocation methodology.</p> <p>Many of the region's jurisdictions already fall, or may in the future fall, under the purview of SB 35 and may have to rezone.</p>	Letter	11/10/2021
50	City of Salinas	Carrigan	Steve	<p>Salinas is pursuing every opportunity possible to develop new housing. In addition to the aforementioned projects, it is in the process of upzoning parking lots and underutilized commercial properties through SB 2, updating its general plan to facilitate more kinds of housing throughout the city, and is constantly pursuing funding to close financing gaps. To make a true difference in the housing crisis, and to affirmatively further fair housing, however, requires efforts from every community in the region, including those with significant resources. The City of Salinas asks that the Board delay approval of the draft methodology until written concerns have been addressed and has the following recommendations:</p> <p>1. Directly consider equity when determining total RHNA units a jurisdiction receives and use RCAs and AFFH as a significant factor in allocating housing totals as well as shifting income level determinations.</p>	<p>AMBAG staff presented an option to the Planning Directors Forum to do something similar to this at our June 30, 2021 meeting. Consensus was that by allocating RHNA by two AFFH-based factors was redundant. Instead, they chose to allocate by AFFH income category only, but increased it to a high weight.</p> <p>The AMBAG Board of Directors can direct staff to modify the draft methodology to consider an AFFH factor as an allocation factor and bring back to the Planning Directors for discussion.</p>	Letter	11/10/2021
51	City of Salinas	Carrigan	Steve	<p>2. Consider a jurisdiction's connectedness to the regional job market and commute times to jobs, in addition to job locations.</p>	<p>Objective 2 of RHNA states "Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction." Statute, and thus the methodology, centers on jobs "in each jurisdiction." As a legacy of Prop 13, job-heavy jurisdictions have fiscal incentives to avoid planning for housing within their jurisdiction. Diluting their imbalance by looking at neighboring areas could undermine this RHNA objective.</p>	Letter	11/10/2021
52	City of Salinas	Carrigan	Steve	<p>3. If the Board feels strongly about making a final decision on 11/10/21, the City of Salinas urges the selection of Option B as the more equitable of the two.</p>	<p>Thank you for your comments.</p>	Letter	11/10/2021