



CITY OF MARINA
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December 7, 2021

Board of Directors
Association of Monterey Bay Area Governments
24580 Silver Cloud Court Monterey, CA 93940

Re: RHNA Methodology

Dear Board Members:

I'm writing this letter on behalf of the Mayor and Marina City Council. The City of Marina, like other AMBAG cities, is committed to providing more affordable housing in our region. We appreciate the work and the public outreach efforts the AMBAG Board and staff have put into developing the Regional Housing Needs Allocation (RHNA) methodology.

At the AMBAG Planning Directors Forum on November 29, 2021, feedback on the final draft RHNA methodology was provided. We support HCD's recommendations to consider affirmatively furthering fair housing (AFFH) as an allocation factor and to consider a partial scale for identifying racially concentrated areas of affluence (RCAAs). We support the 5% transit and 10% resiliency factors.

However, we disagree with the allocation of housing based on a percentage of jobs in the area. The jobs allocation should be based on the jobs/housing balance rather than a jurisdiction's share of regional jobs. The methodology as proposed pays no attention to existing housing units, which is critical in determining where future housing should be located. As a region we should be adopting policy that incentivizes or corrects areas where we have housing imbalances. Additionally, adopting a job/housings balance further supports the five RHNA objectives particularly "ensuring jobs-housing balance/fit".

According to Robert Cervero, some of the benefits of adopting a jobs/housing balance approach include commute distances would be shortened and the share of nonmotorized trips, including walking and cycling would increase. The number of miles driven on areawide roads each day would decrease, as would energy consumption and emission of vehicle pollutants. Perhaps equally important, jobs/housing balance would produce well-defined commute sheds wherein local neighborhood traffic is segregated from regional through-traffic. A jobs/housing balance can help address some of our most pressing and persistent concerns – congestion, energy depletion, air pollution, sprawl, and class segregation.

The location of housing away from jobs increases commute times which has both social and economic implications. Longer commutes mean less time with family and lower real earnings for workers. If the wage is constant but the commute time increases, the net wage is lower. Increased commute time also impacts the ability of business firms to attract workers. Longer commutes mean that workers are more tired and distracted on the job. In short, and as has been pointed out by the Healthy Cities, Compassionate Cities, Smart Cities, Mindful Cities, Sustainable Cities, and other wholistic city movements, this translates to a lower quality of life.

To achieve jobs/housing balance, the available housing choices should match earning potential of available jobs in an area. RHNA policy adopted by AMBAG should be encouraging more housing to be built where the jobs are located. It should be encouraging less reliance on automobiles and the climate and regional impacts associated with increased automobile usage.

We encourage using a jobs/housing balance methodology that allocates housing units to the jurisdictions that actually need to improve their jobs/housing balances and allocates units in proportion to the severity of their jobs/housing imbalance. This methodology would not allocate units to jurisdictions that already have a better than average jobs/housing balance in our region.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Layne Long', with a stylized flourish extending to the right.

Layne Long
City Manager
City of Marina

Cc: Mayor, City Council