



12/6/2021

Dear AMBAG Board of Directors and Planning Directors Forum Participants,

Santa Cruz YIMBY, and YIMBY Law are submitting this letter to the Association of Monterey Bay Area Governments to provide a final recommendation for adopting a Regional Housing Needs Allocation methodology.

Our primary recommendation which differs from what is included in the AMBAG staff report/recommendations is to increase the income shift percentage for affirmatively furthering fair housing (AFFH) from 30% to 40% for each jurisdiction. Regardless of which allocation methodology is selected, it is important to ensure that units which are allocated to jurisdictions on the basis of affirmatively furthering fair housing, (ie the RCAA+ allocation methodology), are certain to be low or very-low income units. Under the staff-proposed 30% income shift approach, there are jurisdictions that have been allocated units for AFFH purposes, but even with a 30% or 35% income shift, those jurisdiction's total number of low income units are fewer than the number of units allocated via AFFH/RCAA+; a result which is antithetical to the goal of affirmatively furthering fair housing.

Increasing the income-shift to 40% ensures that wealthy, exclusionary communities in our region who are assigned units on the basis of their future residents' access to higher opportunities are required to have an adequate number of those new units be for persons of low or very low income.

Concerning the choices of an allocation methodology before you, we believe both Options A and Option B, as well as LandWatch's proposal to use only the Jobs/Housing imbalance for the jobs portion of the allocation are solid choices worthy of consideration. Each option represents trade-offs: Option A maximizes assigning housing to our most exclusionary communities, while Option B and LandWatch's recommendation both help get folks living closer to where they work. We would support any selection of one of these choices as long as the income shift is increased to 40%.

For your convenience, we have also prepared an allocation chart which approximates the distribution of units at a 40% income shift for each jurisdiction.

Sincerely,

Rafa Sonnenfeld
Co-lead, Santa Cruz YIMBY
Director of Legal Advocacy, YIMBY Law

RHNA Methodology Allocation Comparison Table

Region	RHNA Total - Option A	RHNA Total - Option B	Difference from Option A	RHNA total - Landwatch	Difference from Option A
Region	33274	33274	0	33274	0
Carmel	139	110	(29)	42	(97)
Del Rey Oaks	396	331	(65)	376	(20)
Gonzales	1869	1941	72	2,228	359
Greenfield	868	958	90	937	69
King City	803	896	93	1,052	249
Marina	1189	1154	(35)	1,012	(177)
Monterey	2897	3004	107	5,011	2114
Pacific Grove	638	507	(131)	420	(218)
Salinas	7466	8358	892	7,250	(216)
Sand City	440	416	(24)	676	236
Seaside	1116	1059	(57)	832	(284)
Soledad	804	906	102	986	182
Uninc. Monterey	3827	3050	(777)	2,194	(1633)
Capitola	1090	1070	(20)	1355	265
Santa Cruz	3400	3547	147	3327	(73)
Scotts Valley	600	663	63	779	179
Watsonville	2067	2390	323	2358	291
Uninc. Santa Cruz	3665	2915	(750)	2439	(1226)

RHNA Methodology Option A - 40% income shift

Region	Baseline Income Allocation				Rebalance to Income Group Totals				RHNA Total - 33,274
	VL	Low	Mod	AM	Very Low	Low	Mod	Above Mod.	RHNA Total - Option A
Region	7868	5146	6167	14093	7868	5146	6167	14093	33274
Carmel	33	21	26	59	48	31	17	43	139
Del Rey Oaks	94	61	73	168	136	89	47	123	396
Gonzales	442	289	346	792	276	181	446	966	1869
Greenfield	205	134	161	368	128	84	207	448	868
King City	190	124	149	340	138	78	192	395	803
Marina	281	184	220	504	176	115	284	614	1189
Monterey	685	448	537	1227	998	655	346	898	2897
Pacific Grove	151	99	118	270	220	144	76	198	638
Salinas	1765	1155	1384	3162	1103	723	1783	3857	7466
Sand City	104	68	82	186	108	71	79	182	440
Seaside	264	173	207	473	165	108	267	577	1116
Soledad	190	124	149	341	119	78	192	415	804
Uninc. Monterey	905	592	709	1621	1319	865	457	1187	3827
Capitola	258	169	202	462	376	246	130	338	1090
Santa Cruz	804	526	630	1440	837	549	609	1405	3400
Scotts Valley	142	93	111	254	192	126	81	202	600

Watsonville	489	320	383	875	356	234	463	1014	2067
Uninc. Santa Cruz	867	567	679	1552	1173	769	492	1231	3665
Total					7868	5146	6167	14093	33274

RHNA Methodology Option B 40% income shift

Region	Baseline Income Allocation				Rebalance to Income Group Totals				RHNA Total - Option B
	VL	Low	Mod	AM	Very Low	Low	Mod	Above Mod.	
Region	7868	5146	6167	14093	7868	5146	6167	14093	33274
Carmel	26	17	20	47	39	26	10	35	110
Del Rey Oaks	78	51	61	140	118	77	31	105	331
Gonzales	459	300	360	822	297	194	483	967	1941
Greenfield	227	148	178	406	147	96	239	477	958
King City	212	139	166	379	137	90	223	446	896
Marina	273	178	214	489	176	115	287	575	1154
Monterey	710	465	557	1272	1072	701	281	950	3004
Pacific Grove	120	78	94	215	181	118	47	160	507
Salinas	1976	1293	1549	3540	1278	836	2081	4163	8358
Sand City	98	64	77	176	106	69	71	169	416
Seaside	250	164	196	449	162	106	264	527	1059
Soledad	214	140	168	384	139	91	226	451	906
Uninc. Monterey	721	472	565	1292	1088	712	285	964	3050
Capitola	253	165	198	453	382	250	100	338	1070

Santa Cruz	839	549	657	1502	904	591	608	1444	3547
Scotts Valley	157	103	123	281	237	155	62	210	663
Watsonville	565	370	443	1012	366	239	595	1190	2390
Uninc. Santa Cruz	689	451	540	1234	1040	680	273	922	2915

RHNA Methodology - LandWatch - 40% income shift

Region	Baseline Income Allocation				Rebalance to Income Group Totals				RHNA total - Landwatch
	VL	Low	Mod	AM	Very Low	Low	Mod	Above Mod.	
Region	7868	5146	6167	14093	7868	5146	6167	14093	33274
Carmel	10	6	8	18	15	10	5	13	42
Del Rey Oaks	89	58	70	159	131	86	45	115	376
Gonzales	527	345	413	944	332	218	528	1150	2,228
Greenfield	222	145	174	397	140	92	222	484	937
King City	249	163	195	446	183	103	249	517	1,052
Marina	239	157	188	429	151	99	240	522	1,012
Monterey	1185	775	929	2122	1742	1143	593	1532	5,011
Pacific Grove	99	65	78	178	146	96	50	128	420
Salinas	1714	1121	1344	3071	1080	709	1719	3742	7,250
Sand City	160	105	125	286	168	110	120	278	676
Seaside	197	129	154	352	124	81	197	429	832
Soledad	233	152	183	418	147	96	234	509	986

Uninc. Monterey	519	339	407	929	763	501	260	671	2,194
Capitola	320	210	251	574	471	309	160	414	1355
Santa Cruz	787	515	617	1409	826	542	591	1367	3327
Scotts Valley	184	120	144	330	252	165	104	259	779
Watsonville	558	365	437	999	410	269	524	1155	2358
Uninc. Santa Cruz	577	377	452	1033	788	517	325	810	2439

Santa Cruz YIMBY is a chapter of YIMBY Action, a network of pro-housing activists fighting for more inclusive housing policies and a future of abundant housing. **YIMBY Law** is a project of the 501(c)(3) nonprofit Yes In My Back Yard. We are dedicated to making housing in California more accessible and affordable.