



City of Greenfield

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June 6, 2022

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

Re: City of Greenfield Comments on Draft 6th Cycle (2023-2031) RHNA Plan

Dear Ms. Adamson:

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

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

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

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

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

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

Sincerely,



Paul C. Mugan
Community Development Director

Paul Wood, CPA
City Manager

cc: Maura Twomey, AMBAG Executive Director
Greenfield City Council

Attachment

1. Greenfield 2022 Annual Progress Report Summary

Attachment 1

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

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

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

Table B													
Regional Housing Needs Allocation Progress													
Permitted Units Issued by Affordability													
		1	2								3	4	
Income Level		RHNA Allocation by Income Level	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total Units to Date (all years)	Total Remaining RHNA by Income Level
Very Low	Deed Restricted	87	4	-	49	-	-	-	-	-	-	84	3
	Non-Deed Restricted	-	-	-	-	-	-	31	-	-	-	-	-
Low	Deed Restricted	57	27	12	14	-	-	-	-	-	-	97	-
	Non-Deed Restricted	-	-	-	-	-	-	-	44	-	-	-	-
Moderate	Deed Restricted	66	-	-	-	-	-	-	-	-	-	66	-
	Non-Deed Restricted	-	22	-	2	-	-	6	36	-	-	-	-
Above Moderate		153	3	2	7	2	5	52	-	-	-	71	82
Total RHNA		363											
Total Units			56	14	72	2	5	89	80	-	-	318	85

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

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

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