



September 1, 2021

Mayor Bruce Delgado  
City of Marina  
211 Hillcrest Avenue  
Marina, CA 93933  
Email: Marina@ci.marina.ca.us

Subject: Marina Station development agreement

Dear Mayor Delgado and Members of the Marina City Council,

In 2008 LandWatch supported the proposed Marina Station project on 320 acres of the Armstrong Ranch. Marina Station is an excellent example of Traditional Neighborhood Design. In addition to the 1,360 homes, the project includes three “neighborhood retail centers”, 50 acres dedicated to a light-industrial business park with 12 acres for office and 38 acres for light industrial. This kind of planning encourages a real jobs/housing balance that gives people the opportunity of living close to their work.

The project applicant is now asking to extend buildout to 2036. During the 13 years since project approval, infrastructure and water issues have change dramatically. In addition, the demand for market rate housing and additional retail and office space has not materialized, but the need for affordable housing has increased.

AMBAG’s current Regional Housing Need Assessment (RHNA) calls for 40% affordable units countywide.<sup>1</sup> However, there is a glut of approved, unbuilt entitlements, mostly for unaffordable single family units. [LandWatch data](#) show that countywide over 20,000 dwelling units and 2,148,948 square feet of a commercial/industrial/office space have been approved and are unbuilt, including 4,186 dwelling units and 1,054,380 square feet of commercial/industrial/office space in Marina.

Given the number of single family dwelling units proposed for Marina Station, and the need for affordable housing, is it worth considering a different mix of more affordable housing types, e.g., apartments, condominiums, townhouses, and higher density unit? Should the City negotiate a phasing plan that balances market rate and affordable housing construction with retail and office space construction?

For example, the California Department of Housing and Community Development has determined that a density of 20/units per acre is required for affordable units.<sup>2</sup> We understand that the current Marina Station project is subject to the City's inclusionary housing ordinance requiring 20% be affordable units. To reach the 40% RHNA target for affordable units, the

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<sup>1</sup> AMBAG, Regional Housing Needs Allocation Plan: 2014-2023, pdf page 21, available at [https://ambag.org/sites/default/files/2019-12/RHNP%202014-2023\\_Final\\_revised\\_PDF\\_A\\_2.pdf](https://ambag.org/sites/default/files/2019-12/RHNP%202014-2023_Final_revised_PDF_A_2.pdf).

<sup>2</sup> HCD, Default Density Standard Option – 2010 Census Update, June 20, 2012, available at [https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/default\\_2010census\\_update.pdf](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/default_2010census_update.pdf).

additional 20% could be provided through “affordability by design” – but only if a sufficient number of units are zoned in areas with 20 or more units per acre. Currently, only 35% of the units are located in areas zoned for a density over 20 units per acre. The City may want to consider requiring 40% of units to be in an area zoned for at least 20 units per acre.

Prior to approving an extension, the City may also want to determine if additional impact fees are necessary to cover the costs of providing water, sewer, schools, and other public services. Finally, given the over-pumping of the Deep Aquifer, which is the major source of drinking water for city residents, the City and Marina Coast Water District should determine if there is a sustainable yield for future water demand and, if not, how that will affect the project.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is stylized with a large, looped initial "M" and a long, sweeping underline.

Michael D. DeLapa  
Executive Director