



CITY OF LEMON GROVE

"Best Climate On Earth"

Office of the City Manager

February 20, 2020

Hand Delivered and Emailed to
Tessa.Lero@sandag.org

San Diego Association of Governments
Board of Directors
c/o Tessa Lero
Clerk of the Board
401 B Street, Suite 800
San Diego, CA 92101

RE: City of Lemon Grove Comments on the City of Coronado's Appeal of the Draft Housing Unit Allocation for 2021-2029 Housing Cycle

Dear Chairperson and Members of the Board:

On January 6, 2020, in accordance with Government Code section 65584.05(c) SANDAG provided local governments with notice of all Draft Housing Allocation Appeals filed in the region by sending an email to the jurisdictions containing the notification and links to the appeals. Pursuant to that Section, local governments and SANDAG have 45-days – until February 20, 2020 – to comment on those appeals. The City of Lemon Grove ("City") submits these comments on the appeal letter of the City of Coronado. The City supports the arguments of the City of Coronado as outlined below.

The RHNA Methodology does not take into consideration the unique jurisdictional boundary issues of member agencies. The City of Coronado states in its letter:

"the proposed allocation erroneously assigns all military jobs provided by Naval Air Station North Island (NASNI) to the City of Coronado. As previously documented in the City's letters to SANDAG..., NASNI falls partially within City of San Diego city limits. However, the proposed allocation does not allocate any NASNI jobs to the City of San Diego. The City is unaware of any statutory basis that would allow SANDAG to ignore municipal boundaries when apportioning job numbers to member agencies. Because SANDAG's proposal inaccurately accounts for jobs within each member's jurisdiction, the proposed methodology fails to comply with Government Code Section 65584.04(e)(1)."

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Lemon Grove supports this statement as SANDAG has ignored municipal boundaries when apportioning job numbers to member agencies and, in Lemon Grove's case, SANDAG has ignored municipal boundaries when allocating housing units based on transit stations. SANDAG's general disregard for those boundaries results in an inequitable allocation of the housing units at issue.

In conclusion, the City of Lemon Grove agrees with the City of Coronado that SANDAG has not taken into account the municipal boundaries of its member agencies in drafting the methodology that produced the Draft Allocation. The City respectfully submits these comments on the appeal letter of the City of Coronado.

Respectfully,



Lydia Romero
City Manager